

Dear Sir or Madam,

please find attached our contribution to the Dounreay Radioactive Waste Substitution Consultation 2010.

If you have any additional questions do not hesitate to contact us.

Best regards,

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## Questions for Consultees

<p>Question 1</p>	<p>Do you agree that a waste substitution policy should be adopted for radioactive waste arising from overseas research reactor fuel reprocessing contracts at Dounreay?</p> <p><b><u>YES</u></b> / NO / IN PART / NOT SURE</p> <p>Please provide additional comments, where necessary, to support your answer.</p> <p>We are taking part in this consultation on behalf of all German institutions involved (Forschungszentrum Jülich - FZJ, Helmholtz-Zentrum Geesthacht – HZG, Helmholtz-Zentrum Berlin – HZB, Wiederaufarbeitungsanlage Karlsruhe – WAK, Technische Universität München - TUM, Physikalisch-Technische Bundesanstalt – PTB)</p> <p>We agree to the proposed waste substitution policy, because it is of common interest for Germany and UK. Substitution would allow a single form of waste to be returned from the UK giving advantages in terms of logistics and handling of the material.</p> <p>A substitution policy would allow a reduced amount of waste to be transported in both the UK and Germany providing a reduction in the environmental impact and required public assurance of transports.</p> <p>Furthermore, a substitution policy would allow the Dounreay reprocessing contracts to be closed out earlier and would provide greater certainty for planning in both UK and Germany for the management of the liabilities associated with the contracts.</p>
<p>Question 2</p>	<p>Do you agree that substituting cemented Materials Test Reactor radioactive waste for Prototype Fast Reactor radioactive waste should be an available option to finalise the overseas contracts?</p> <p><b><u>YES</u></b> / NO / IN PART / NOT SURE</p> <p>Please provide additional comments, where necessary, to support your answer.</p>
<p>Question 3</p>	<p>Do you agree that substituting vitrified radioactive waste from Sellafield for cemented Materials Test Reactor radioactive waste and/or Prototype Fast Reactor radioactive waste should be an available option to finalise the overseas contracts?</p> <p><b><u>YES</u></b> / NO / IN PART / NOT SURE</p> <p>Please provide additional comments, where necessary, to support your answer.</p> <p>Vitrified radioactive waste return is a well established practice in Germany as we have received many transports from France. German Utility companies have already made great progress with the UK to allow the returns of vitrified</p>

	<p>product from Sellafield. A substitution policy would potentially allow us to utilise the expertise already obtained in this area.</p>
Question 4	<p>Do you agree with the proposals to ensure broad environmental neutrality for the United Kingdom?</p> <p><b><u>YES</u></b> / NO / IN PART / NOT SURE</p> <p>Please provide additional comments, where necessary, to support your answer.</p>
Question 5	<p>Do you agree that all of the relevant implications of the proposed policy have been identified?</p> <p><b><u>YES</u></b> / NO / IN PART / NOT SURE</p> <p>Please provide additional comments, where necessary, to support your answer.</p>