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Our Ref: AVT/JT
Your Ref:

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Dounreay Radioactive Waste Substitution Consultation
Scottish Government
The Rural and Environment Directorate
Environmental Quality Division
Area 1-H North
Victoria Quay
LEITH
Edinburgh
EH6 6QQ

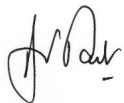
Dear Sirs

Dounreay Radioactive Waste Substitution Consultation 2010

Orkney Islands Council welcomes the opportunity to respond to the above mentioned consultation document.

Should you require any further clarification on the comments made by Orkney Islands Council please do not hesitate to contact me.

Yours faithfully



Albert V Tait
Chief Executive

CONSULTATION QUESTIONS

Question 1 *Do you agree that a waste substitution policy should be adopted for radioactive waste arising from overseas research reactor fuel reprocessing contracts at Dounreay?*

IN PART

Favour return of cemented MTR and PFR wastes to country of origin, or radiological activity equivalent of substituted MTR wastes, resulting in a net decrease of the waste inventory at Dounreay, as would have been expected when the agreements were entered into.

Question 2 *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?*

YES

Question 3 *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?*

IN PART

See responses to 4 and 5 for qualification.

Question 4 *Do you agree with the proposals to ensure broad environmental neutrality for the United Kingdom?*

IN PART

The constitutional status of UK suggests that the specific measures described in this consultation are finite, and in accordance with the principles of minimum transport of waste. However broad environmental neutrality for the UK is a principle that goes way beyond this, and one which we cannot accept. Consideration should be given to national responsibilities and return of waste within the UK, and environmental neutrality of constituent countries, in conjunction with principles of minimum transport and storing waste 'near' where it was produced. Accepting broad environmental neutrality for the UK could in the future permit Dounreay to be used as the national waste store.

Question 5 *Do you agree that all of the relevant implications of the proposed policy have been identified?*

NO

It is not known how receiving countries will react to the returning of their, or substituted waste. Other factors may have to be taken into account. Based on the principle of minimising the transport of radioactive waste, and this waste being a small proportion of the total waste held at Dounreay, is it best to leave waste where it is? The cost of treatment and storage to be borne by the originating country.

Cross border issues are not addressed such as long term responsibility for waste substituted, and 'internal' environmental neutrality.