

10 March 2011

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

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Our ref:

Dear Sirs

Dounreay Radioactive Waste Substitution Consultation 2010

I am writing on behalf of International Nuclear Services in response to the above Consultation.

The Consultation relates to the proposed policy of radioactive waste substitution for the radioactive waste arising from historic fuel reprocessing contracts with overseas customers at Dounreay. International Nuclear Services (INS), the Nuclear Decommissioning Authority's (NDA) wholly owned commercial agency for spent fuel management services in the UK, is responsible inter alia for the implementation the return of waste obligations in the NDA's contracts with these customers. Therefore INS has a strong interest in the outcome of this Consultation as any decision on related policy will have a direct bearing on such implementation of waste return under these contracts.

INS supports the proposed Substitution Policy for the following reasons:

- It is consistent with similar substitution arrangements which INS, on behalf of the NDA, has concluded with the NDA's reprocessing customers at Sellafield.
- The arrangements proposed ensure that in the event that waste substitution is implemented in relation to the NDA's Dounreay contracts Broad Environmental Neutrality will be ensured for the UK.
- A substitution policy would mean that INS, on behalf of NDA, has greater flexibility to implement the contractual and policy requirement to return waste in a timely manner.
- It would reduce the potential burden on the UK taxpayer by saving the need to construct, operate and decommission a bespoke vitrification facility at the Dounreay site for the overseas reprocessing contracts.



I attach a completed Respondent Information Form as requested in the Consultation document.

Yours faithfully



M C JERVIS

Managing Director

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INS Response to Dounreay Radioactive Waste Substitution Consultation 2010

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? YES
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? YES
Question 4	Do you agree with the proposals to ensure broad environmental neutrality for the United Kingdom? YES
Question 5	Do you agree that all of the relevant implications of the proposed policy have been identified? YES