



**Scottish
Water**
Always serving Scotland

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Dear Mr Macdonald

DOUNREAY RADIOACTIVE WASTE SUBSTITUTION

Thank you for giving Scottish Water the opportunity to respond to the above consultation document. Owing to the technical and specialist nature of the consultation we are not equipped to provide a detailed response to the questions posed, however we would like to make the following points.

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?*

Not sure - Scottish Water is the statutory drinking water and sewerage undertaker in Scotland. Our purpose is to protect public health and the environment through the provision of safe drinking water and the treatment and safe return to the environment of society's waste waters. We require that radioactive materials are safely managed in accordance with all regulatory provisions to prevent releases to the water environment or to drainage.

We require to be consulted on any proposed new activities in relation to waste management or operations involving radioactive materials that may present a risk of releases of these materials to the water environment, or may lead to discharge to drainage systems. Within this consultation it would be useful to understand better how risks of release of material (e.g. to the water environment and to drainage systems) are managed during the transport of any of these materials during the substitution process.

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?*

Not sure - no further comments.

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?*

Not sure - but we would refer you to the general statements in Question 1.



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

Yes - it is important that the UK plays its part in managing the global legacy of radioactive processes.

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

Not sure - as stated in our answer to Question 1 it would be to understand better how risks of release of material (e.g. to the water environment and to drainage systems) are managed during the transport of any of these materials during the substitution process. It is imperative that this proposal does not present additional risk to the water environment.

Should you require additional information regarding our response to this paper, or any related matter, please do not hesitate to get in touch.

Yours sincerely

Dr Mark Williams
Environmental Regulation & Climate Change Manager