



Amministratore Delegato

**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**

**SUBJECT: Consultation on a Policy for Substitution Overseas Radioactive Wastes at  
Dounreay (December 2010)**

With reference to the Consultation on a Policy for Substituting Overseas Radioactive Wastes at Dounreay, currently conducted by the Scottish Government, we would like to point out the following.

Sogin, as a party to an old contract with UKAEA (originally entered into by and between UKAEA and ENEA customer), has the contractual obligation to take back the wastes arising from the reprocessing by NDA in Dounreay Site.

Sogin is strongly interested in the substitution of the wastes that should arise from the reprocessing in Dounreay of ENEA nuclear material with the equivalent vitrified wastes at Sellafield NDA Site.

The Italian Ministry of Economic Development (Ministero dello Sviluppo Economico) has already given a positive indication as to the substitution strategy, issuing a Directive dated 10 August 2009. Pursuant to such directive, Sogin shall agree with NDA on the return to Italy of a single form residues, that is the vitrified residues from Sellafield.

Therefore, in Sogin opinion, the adoption by the Scottish Government of a waste substitution policy for radioactive waste arising from overseas research reactor fuel reprocessing contracts at Dounreay would allow Sogin to close its contractual obligations arising from Dounreay contract with NDA.

In particular, as per the directive issued by the Italian Ministry, Sogin is interested in the substitution of cemented radioactive waste in Dounreay with the vitrified radioactive waste from Sellafield.

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UK environmental neutrality may benefit from both the technology on the management of vitrified radioactive waste in Sellafield and the experience achieved by NDA on the return to costumers of the vitrified residues.

These returns are ongoing and the Sogin vitrified residues return is already scheduled with NDA.

The implementation of the substitution policy in Scotland will permit the return to Italy of all the residues arising from all the reprocessing contracts between Sogin and NDA.

It is our overall view that substitution represents a relatively simple, practical and environmentally neutral way to cope with the waste return obligations of overseas customers of NDA and the finalization/implementation of all the NDA overseas contracts.

We also agree with the Scottish Government that all the relevant implications of the proposed substitution policy have been identified in the documentation and the substitution policy may improve the decommissioning project of the Dounreay plants and permit the return of the wastes to the overseas customers.

In light of the above, Sogin hopes that the Scottish Government will allow, as soon as possible, the Dounreay Radioactive Waste Substitution as a method to implement the overseas contracts.

Executive Chief Officer

Giuseppe Mucci



Enc. Consultation response form