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Sent: Friday, 30 July 2021 7:25 PM
To: Committee, Public Works (REPS) <pwc@aph.gov.au>
Subject: Sub 20 Submission: "ANSTO Intermediate Level Solid Waste Storage Facility Lucas Heights, NSW"

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To: Parliamentary Standing Committee on Public Works Inquiry: "ANSTO Intermediate Level Solid Waste Storage Facility Lucas Heights, NSW" Public Submission.

I do not write as someone who is opposed to Australia having a plan for the permanent disposal of the nuclear wastes that are generated at Lucas Heights. Quite the reverse. Australia must face up to the necessity for such a plan. However, ANSTO's proposal for a temporary storage of these long lasting toxic wastes, at Napandee, South Australia, is NOT such a plan. As the licensing body, ARPANSA, has acknowledged, these highly hazardous nuclear fuel wastes can be safely and securely stored at Lucas Heights. Indeed ARPANSA has licensed this storage for at least 40 years to come. There is absolutely no need to trek this highly dangerous stuff for 1700 km to a small rural community, in a richly agricultural area - for so-called "temporary" storage. At Napandee, they may well become "stranded wastes", while the necessity for permanent disposal remains "a can kicked down the road".

ARPANSA is still to consider the licensing application for the Napandee nuclear waste facility plan. ANSTO should not be able to continue with its process for the Napandee plan before this; ARPANSA Approval for proposed indefinite duration above ground nuclear fuel waste and Intermediate Level Waste storage in SA may not be granted.

Therefore, it is up to the Public Works Committee to require and confirm ANSTO public works that will comply with the Contingency to keep Intermediate Level Wastes at Lucas Heights until a final disposal option is available.

It has not been made clear that there are really two separate proposals by the National Radioactive Waste Management for radioactive waste storage in South Australia

- for Low-Level Waste disposal facility in SA for an indefinite period.
- above ground nuclear fuel waste and ILW storage

ARPANSA will expect separate License Applications for these two proposals.

On transparency. ANSTO has been secretive about its plans regarding Intermediate Level Wastes. At least two significant reports to ARPANSA, required as part of ARPANSA Licensing Conditions and due to the regulator by 30 June 2020, and ARPANSA's reply, should be made available to the PWC, and publicly available.

On safety and security. As ARPANSA has noted, the double handling of Intermediate Level Waste in transporting it from one temporary storage to another temporary storage, is not consistent with international best practice. The safety and security problems of course also involve the communities en route, over such a long distance. Yet the NRW taskforce has not engaged with these communities, surely that engagement must be a requirement for such a plan

On the undemocratic process. The National Radioactive Waste Management plan for this facility at Napandee rides roughshod over the rights of South Australians, who have had no say in this decision. It is an affront to South Australia, with its clear law prohibiting nuclear activities. The Eyre Peninsula region's communities have had no say. Importantly, the traditional owners of the area, the Barngarla people, were eluded from the local vote, and are clearly against the dump plan.

On the hypocritical claim of "medical necessity". The publicity from ANSTO and from Minister Pitt has portrayed this facility as a "medical necessity", which it very obviously is not. As this submission primarily concerns the public works at ANSTO, I won't go into that issue now. But it is pretty obvious to all but the somewhat brainwashed Kimba supporters of the plan, that the mostly short-lived medical radioactive wastes are dealt with at the local level, with no need for the elaborate centralised plan for Napandee.

Thank you for the opportunity to contribute. I would like my submission to be published

Sincerely

Noel Wauchope