



### **Submission to the Parliamentary Standing Committee on Public Works**

**SUBJECT:** Australian Nuclear Science and Technology Organisation (ANSTO) Intermediate Level Solid Waste (ILSW) Storage Facility Lucas Heights, NSW

**INTRODUCTION:** The Flinders Local Action Group (FLAG) welcomes the opportunity to make a submission to this Public Works Standing Committee.

FLAG was formed to challenge the 2015 nomination of Wallerberdina Station in the Flinders Ranges district, and its inclusion on the shortlist of three potential South Australian sites for the proposed National Radioactive Waste Management Facility (NRWMF). The Group is made up of indigenous and non-indigenous members of the community.

We have become very well informed on the NRWMF proposal, seeking out and researching information from independent sources to weigh up against what has been provided to the community by the Department of Industry, Innovation and Science (DIIS - now the Department of Industry, Science, Energy & Resources, DISER). As both the proposer and promoter of the NRWMF, the Department cannot claim any sort of neutral position.

#### **SUMMARY:**

- ANSTO's preferred Option 2 must be considered on the basis that interim storage will be until a permanent disposal site has been established. This would provide the licensing pathway to disposal required by the independent regulator, ARPANSA.
- There is no logic or economic sense in double-handling ILW from temporary storage at Lucas Heights to further temporary storage somewhere else, in preparation for yet another transfer to a third location for final disposal at some time in the future.
- There is no economic sense in establishing a facility for low level waste alone when a disposal site, critical for ILSW and more than suitable for LLW, is still to be established.

#### **SUBMISSION POINTS:**

##### **Temporary Intermediate Level Solid Waste (ILSW) Storage:**

The Department has guaranteed that all waste to be received at the NRWMF will be in a dry, compacted or compactable form. ANSTO defines ILSW as the result of conditioning Intermediate Level Liquid Waste under the Synroc process. In solid or liquid form, it is still Intermediate Level Radioactive Waste (ILRW). We do not accept any difference between what we have been opposing and refer to as ILRW, and ILSW.

Intermediate Level Waste is the key element of greatest concern in the current NRWMF proposal.

- ANSTO has informed to us that Intermediate Level is the most dangerous and long-lived nuclear waste in Australia, with a toxic life in excess of 10,000 years. Our research tells us that in Europe little distinction is made between Intermediate and High Level waste – both remain potentially extremely dangerous over enormous time periods.

- Until now, the only plan for ILSW has been to remove it from temporary storage at Lucas Heights and transport it halfway across the country to a proposed NRWMF - still to be established. There it will remain in further temporary storage, for an undefined period, co-located with Low Level Radioactive Waste.
- Temporary storage does not solve the national problem, which is the permanent, safe disposal for all of Australia's nuclear waste, including the most dangerous and long-lived category, ILSW.
- ANSTO's submission to the Standing Committee outlines five options "to assess the most efficient and effective approach to the design and construction of new storage capacity". We note that Option 2 (4.1.2. – ANSTO submission) "provides a direct continuation of existing operations for storing waste...(with the)...benefits of low capital outlay...minimal organisational change...at low business risk make this the preferred option".
- This would be of great encouragement to our Group if it means that ANSTO intends to continue interim storage of ILSW at Lucas Heights until the promised "single, state-of-the-art, world's best practice radioactive waste management facility" (quotes from DIIS information) for the permanent disposal of both waste categories, ILW and LLW, is established.
- After more than 60 years of producing nuclear waste and 40 years of failed attempts to establish a national nuclear waste facility it is hard to accept that the only plan for the country's most dangerous radioactive material continues to be temporary storage for an indefinite period of time. This would be a classic example of that over-used metaphor "kicking the can down the road".

### **National Radioactive Waste Management Facility:**

If ILSW remains at Lucas Heights until a permanent disposal site is established, there is no necessity for a facility to separately manage Low Level waste.

- The flaw in the NRWMF proposal has always been that, despite the Department's assertion to the contrary, there was never to be a single national facility. Low level waste would be disposed of there, with Intermediate Level co-located alongside on a temporary basis, for an indefinite period, until a disposal facility was established somewhere else.
- The economic benefits promoted to the community from a nearby NRWMF were promised because the decision was announced to co-locate Intermediate Level Waste at the same site. This was the reason given to both communities, Flinders and Kimba, for the Ministerial announcement that the 15 full-time equivalent jobs initially promised were suddenly increased to 45 along with a number of other economic incentives.
- Any site that is suitable for the permanent disposal of ILSW is suitable for the disposal of Low Level waste.

### **CONCLUSION:**

Our Group readily accepts the benefits that result from Australian atomic research and the production of medical isotopes. We accept the need for a NRWMF to consolidate and dispose of all the country's nuclear waste in one location.

What is hard to accept, and still being experienced, are the disruptive and divisive effects this process has had on our communities. Inflated promises of economic benefits have raised overly optimistic expectations in some people. Cold, hard logic shows that these expectations will not be met by the model that is currently being proposed.

Greg Bannon,  
(On behalf of the Flinders Local Action Group)  
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