

P-05-1003 Demand an EIA now on the dumping of radioactively contaminated mud in Welsh waters, Correspondence – Natural Resources Wales to Committee, 10.05.21

Further to our previous discussion on responding to the letter from Janet Finch-Saunders MS (dated 23 March), please see our response below to the matters raised.

CR-39 Testing

We have consulted with our technical experts, and they have provided the following advice;

- a. If plutonium were present in the environment around Hinkley Point A, it would be accompanied by a range of other radionuclides such as fission products like caesium-137. These other radionuclides would be readily detectable by gamma spectrometry and could be used to indicate samples on which to undertake radionuclide specific analysis for alpha emitters such as plutonium. This tiered approach was used for the analysis of sediment samples from the Bristol Channel and has been supported by the findings of the independent Hinkley Point C Stakeholder Reference Group.
- b. Regulators require that any analytical measurements made as part of environmental monitoring apply the best available techniques and expect-recognised standards to be followed. Radiological analysis should be accredited to ISO17025 or an equivalence demonstrated. We are only aware of UKAS ISO17025 accreditation being given to laboratories using CR39 for radon measurement in the UK i.e. the accreditation does not apply to the radiological analysis in question.

Marine Licence Applications

All applications for a marine licence are thoroughly and robustly assessed, to ensure the proposed works do not harm people or the marine environment. The collection and analysis of the samples must be in accordance with the sample plan we publicly consulted upon and subsequently approved on 15 September 2020 (SP1914). We will base our decision of whether the sediment is safe to dispose at sea on robust scientific evidence, in line with the following accepted international standards:

- OSPAR guidance for the management of dredged material at sea (in line with London Convention) of 2014 covering physical, chemical, and biological characterisation of sediment; and
- International Atomic Energy Agency (IAEA) standards (in line with London Convention) of 2003, 2004, 2015 used for radiological assessments.

The application will be processed in accordance with the Marine Works (Environmental Impact Assessment) Regulations (2017). All documents submitted in support of such an application will form part of a minimum 42 day consultation with our technical advisors and with the public. All relevant representations to the consultation will be considered as part of our determination process.

We have a dedicated position statement on this matter: [Natural Resources Wales / Disposal of dredged material from Hinkley Point C off the coast of Cardiff, South Wales^{\[1\]}](#)

Kind regards,