# Why West Cumbria is unsuitable for a deep geological nuclear waste facility: Allerdale

International aspects
Guidelines
What other countries do

Geology of Allerdale
Political/scientific manipulation
Hubris of nuclear engineers

Some progress made during/since MRWS consultation:

Geology put centre-stage of agenda

**Arguments reduced to two rock types:** 

- Eskdale / Ennerdale granites (Copeland)
- Mercia Mudstone Group (Allerdale)

Sellafield now implicitly ruled out

Decisions by the 3 councils postponed

## Evolution of international search criteria

The following organisations agree or have agreed on the same set of broad principles:

- •IAEA (pre Nirex 1995 Inquiry guidelines)
- British Nuclear Fuels Ltd
- •IAEA new guidelines 2011
- European Union
- British Geological Survey
- Finnish Geological Survey

None of them put voluntarism ahead of a systematic geological search.



# Search practice abroad

## Geological search for a waste repository

#### **Abroad:**

Geology sorted before community involvement:

- Belgium
- Canada
- Finland
- France
- Sweden
- Switzerland
- USA

The 2008 White Paper misleads on:

**Sweden and Finland** 



## Summary of fundamental criteria

Drawn from research, experience and recommendations here and abroad since the early 1990s:

- •The host rock is NOT so important at the first stage.
- •The regional setting of the site IS most important.
- Long geological stability.
- Low hydraulic gradients.
- Simple geology.
- Suitable geology precedes community assent / veto.

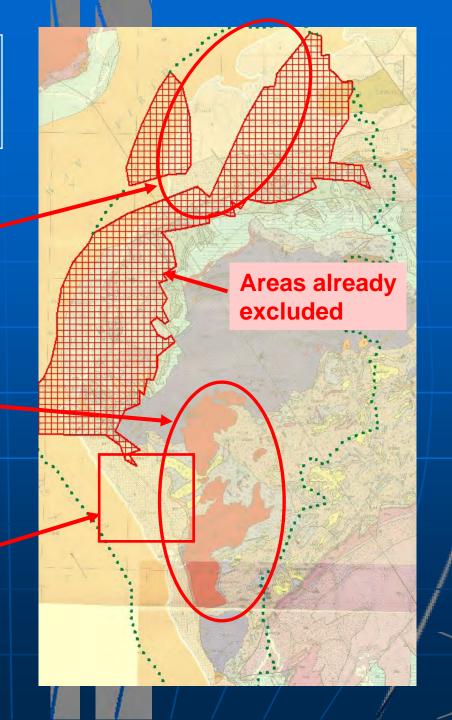
Every locality in West Cumbria has a problem with several of these.

## **Geology of the areas left in play**

Northern Allerdale – the Mercia Mudstone Group

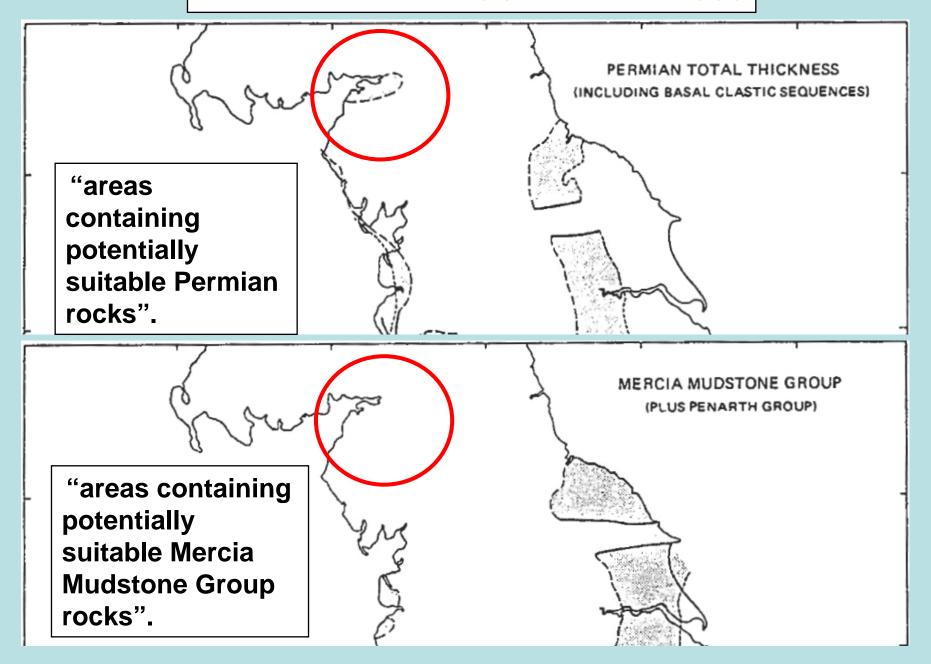
Eskdale and Ennerdale granites (red areas)

Sellafield / Longlands Farm



The MMG in Cumbria was excluded by the BGS as a potential host rock during the 1980s national search

#### **Details from the BGS review of 1986**

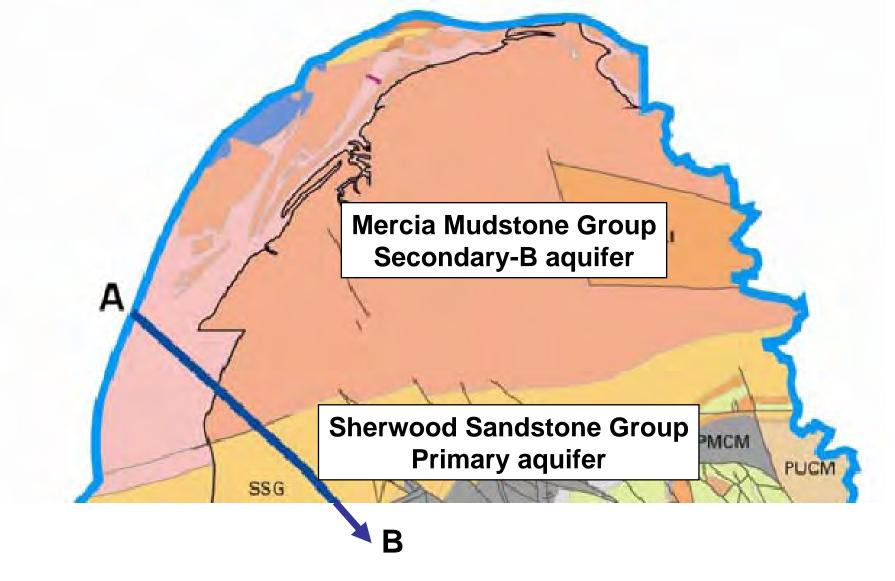


#### **Dr Dearlove:**

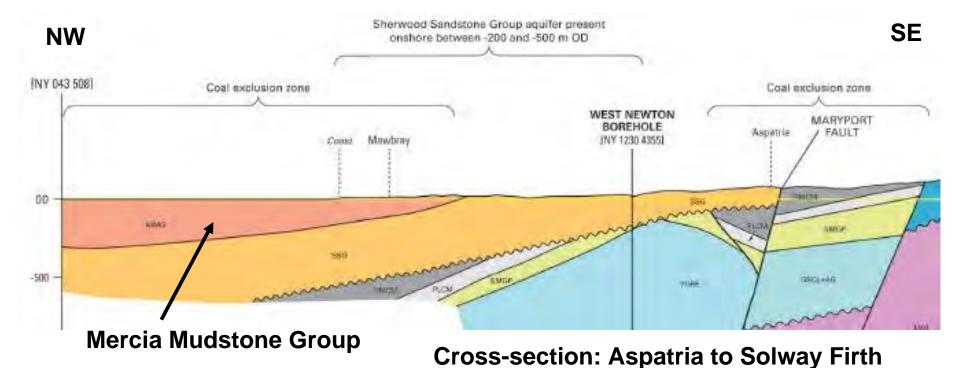
"Figure 2.1.1 (b) in Smythe's submission identifies the area including the MMG as "areas of potentially suitable sedimentary rocks" following Dr Chapman's 1986 review. Whilst an assessment may have been made at the time to remove this area from the search for potentially suitable sites, additional data have since been acquired that may, or may not, change that view. These data need to be assessed."



Detail of map from *The Way Forward* (Nirex, 1987), based on the BGS national search of the mid 1980s



Sediments of northern Allerdale A cross-section along line AB is shown in the next figure.



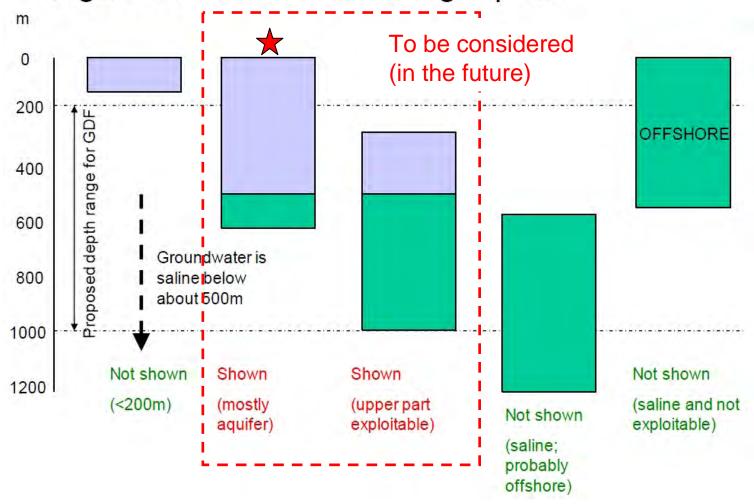
#### **Mercia Mudstone Group**

- Not previously considered as a host rock by the BGS.
- A site at Anthorn airfield was considered and rejected in 1988.
- Dr Dearlove (MRWS) has introduced the MMG: "I understand from brief discussions with the BGS that the Mercia Mudstones within this area would also form part of the BGS's "potentially suitable sedimentary formations"."

So the MMG is in play on the basis of hearsay.

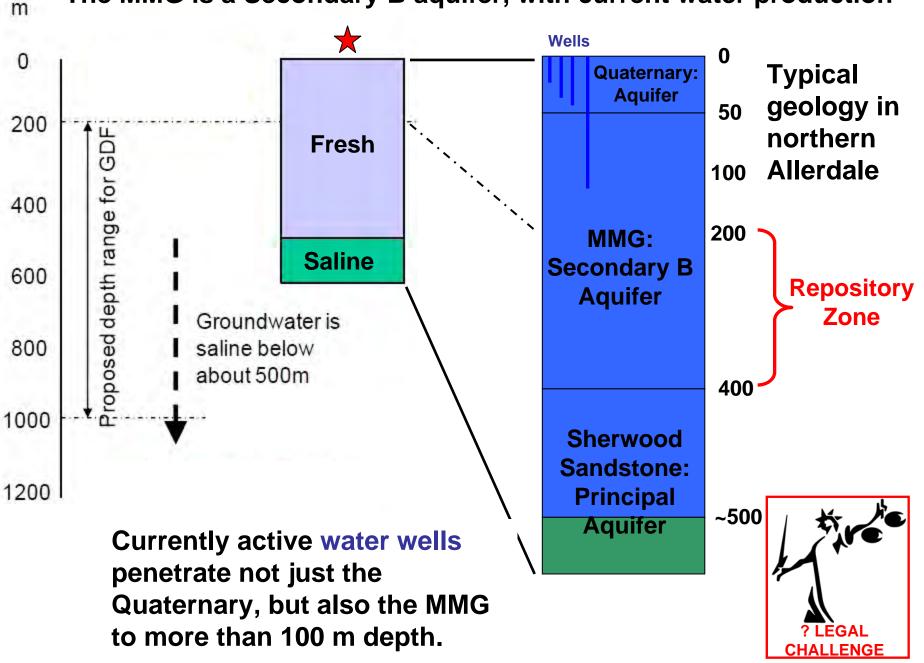
## The MMG is an aquifer

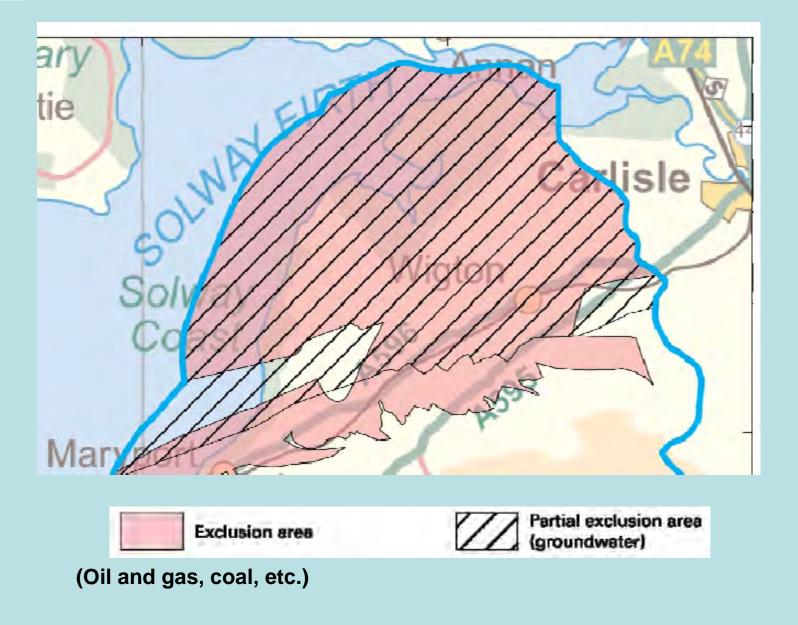
## Illustrations of where 'aquifer' is marked in Figure 13 in BGS screening report



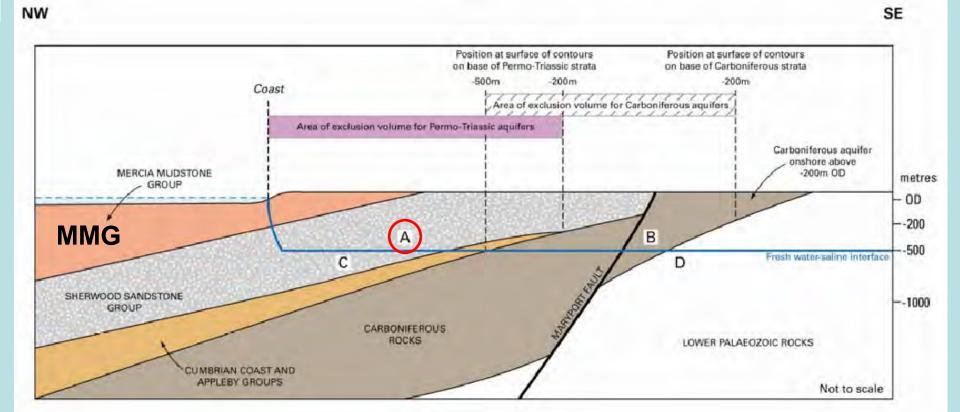
Slide from Adrian Bath: 2011 MRWS geology seminar. In the BGS screening report the MMG is not included in the category of aquifers.

#### The MMG is a Secondary B aquifer, with current water production





BGS draft screening report, July 2010: all of northern Allerdale is completely excluded (minerals), AND partially excluded (groundwater).



### **BGS** screening report:

Volume A of the Sherwood Sandstone is excluded.

But since the MMG is an aquifer it must also be excluded

# The MMG is in an oil and gas exploration province



Criteria	To be applied as exclusion criteria (Y/N)?	Reasons/explanations and qualifying comments (from Table B1, Defra, 2008)	Assessment of the geology of the Partnership area judged against the criteria
Natural resource	s		
Coal	Yes	Intrusion risk to depth, only when resource at >100m depth	Includes areas of the Cumbrian (Workington/Whitehaven) Coalfield and Coal Measures, at depth, in the Solway Basin
Oil and gas	Yes	Intrusion risk to depth	Known oil and gas fields lie to the south of the area [check Solway Basin]; some areas of the Sherwood Sandstone, at depth, might be regarded as prospective

Table B1: Summary table of initial sub-surface screening criteria

	To be applied as exclusion criteria?	Reasons/explanations and qualifying comments
Natural resources		
Coal	Yes	Intrusion risk to depth, only when resource at >100m depth
Oil and gas	Yes	Intrusion risk to depth

Defra White Paper 2008 – the only mention of oil and gas

Refers to JOINT REPORT OF THE CRITERIA PROPOSALS GROUP (CPG) AND THE CRITERIA REVIEW PANEL (CRP)

## JOINT REPORT OF THE CRITERIA PROPOSALS GROUP (CPG) AND THE CRITERIA REVIEW PANEL (CRP)

#### (b) Oil and gas

The UK has been thoroughly explored for gas/oil resources, many oilfields have been developed and their distribution is well known. The extent of future exploration and exploitation is difficult to judge and will be dependent on market prices for oil and development of new theories on oil genesis/traps that might lead to novel areas being explored in future.

It is not feasible to predict possible future exploration areas for exclusion but it is appropriate to exclude areas from consideration based on the extent of known oil and gas fields. It is the risk of intrusion into the repository in conjunction with the loss of future oil and gas resource that is addressed by this exclusion.

## So the BGS draft screening report was correct to exclude northern Allerdale



## Is the MMG well understood?

Dr Dearlove (MRWS) claims that the area still needs to be assessed – and by the BGS

## Hypothetical survey data required to scope out the Mercia Mudstone Group in Allerdale

#### 2D seismic programme:

100 km onshore, mainly following roads

Cost: £800,000

+ 15 km offshore

(? If opportune: £25,000)

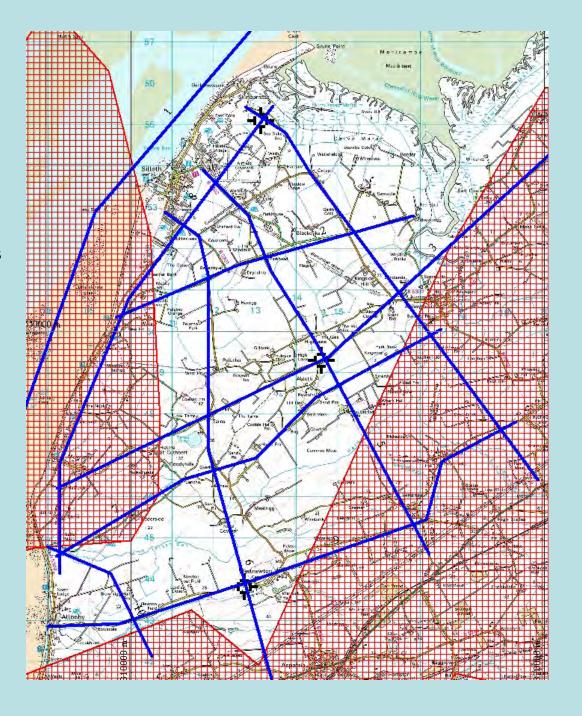
#### Three boreholes to 500 m:

Fully cored and logged

Cost: £1,500,000

Total cost (including interpretation):

£2.5M



## **Existing survey data over Mercia Mudstone Group in Allerdale**

#### 2D seismic data:

More than 150 km onshore + many km offshore

#### **Boreholes:**

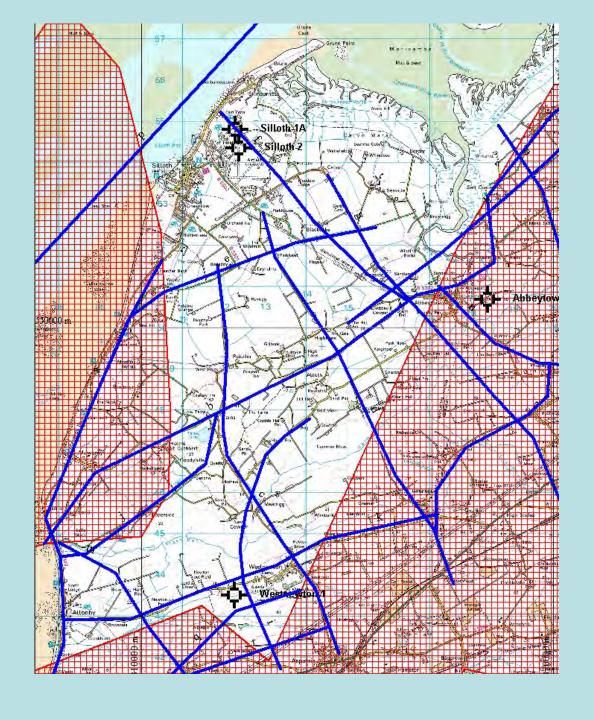
Abbeytown (1876) Geology available to 311 m

Silloth-1A oil well (1973) Fully logged to 1330 m.

Silloth-2 geothermal well (1982) Fully cored and logged to 351 m.

Westnewton-1 oil well (1983) Fully cored and logged to 1976 m.

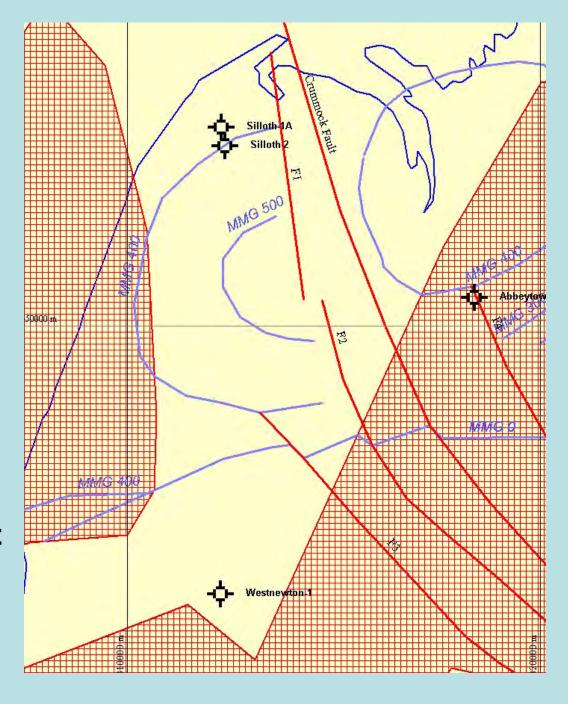
- + several water wells into MMG, plus gravity and aeromagnetic maps etc.
- All interpreted and published by BGS before the 1986 national search



Results known in time for the 1986 assessment and published by BGS:

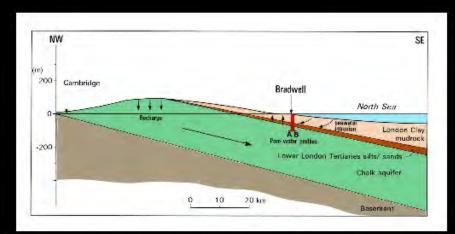
- -Simple shallow basin
- -Cut by large faults

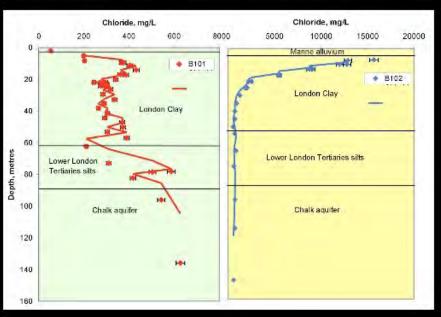
So the geological structure is simple, but fundamentally unsuitable



## Is the MMG a good clay rock?

## The move to clay





- Internationally, there is a developing preference for clay host rocks:
  - diffusion-controlled transport;
  - self-healing fractures,
  - preservation of past evolution;
  - 'explorability'.
- UK researchers developed many of the concepts and methodologies currently being applied at clay sites elsewhere.
- However
  - there is a 20-year gap in our own knowledge base;
  - EBS designs must be tailored accordingly.

Graphics courtesy Adrian Bath (BGS ©NERC)

#### Highways Agency report on UK clays, 2006

"strata considered to behave as 'stiff plastic clays' are generally of Jurassic age or younger. These include, for example, the

- Upper Lias Clay,
- Oxford Clay,
- •Weald Clay,
- •Kimmeridge Clay,
- Gault Clay and
- London Clay.

Older mudrocks of Triassic and Carboniferous age, such as the Mercia Mudstone, are usually too indurated to be considered as clays."

NB local name for Solway MMG is Stanwix Shale

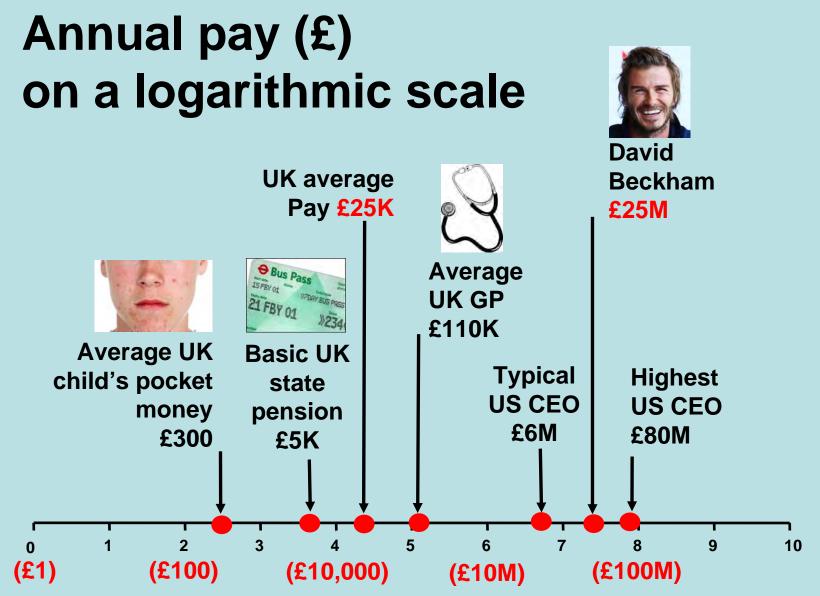
## Mercia Mudstone Group (MMG) Comparison with Europe

Three European countries have each found a good clay host rock.

Is the MMG up to the job?

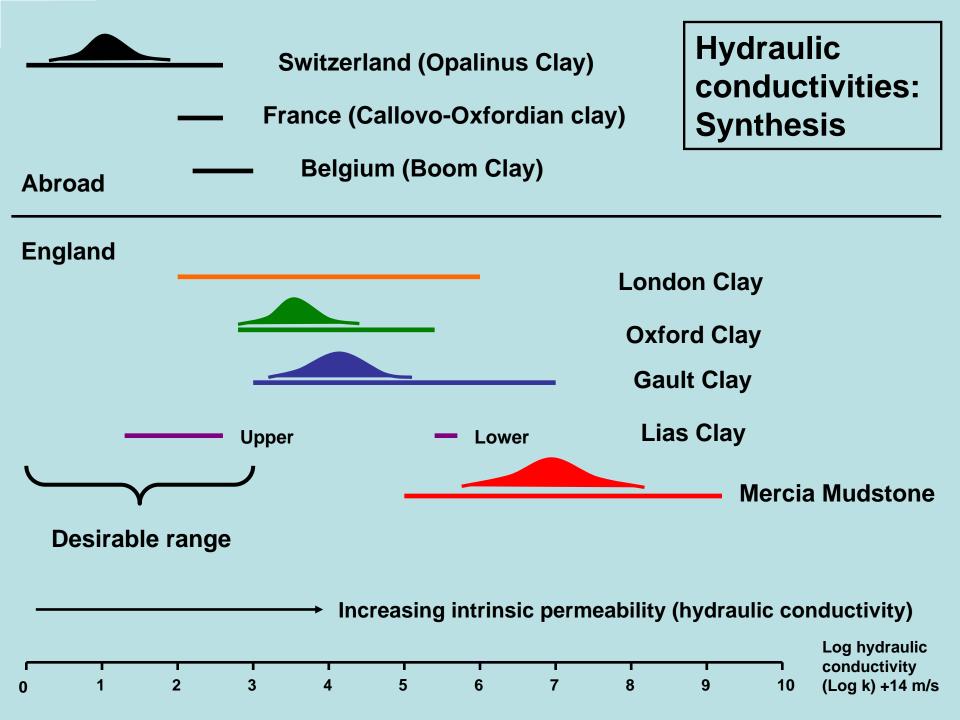
The crucial factor is the hydraulic conductivity

- -How fast the water can flow through the rock
- -First, a word on logarithmic scales ...

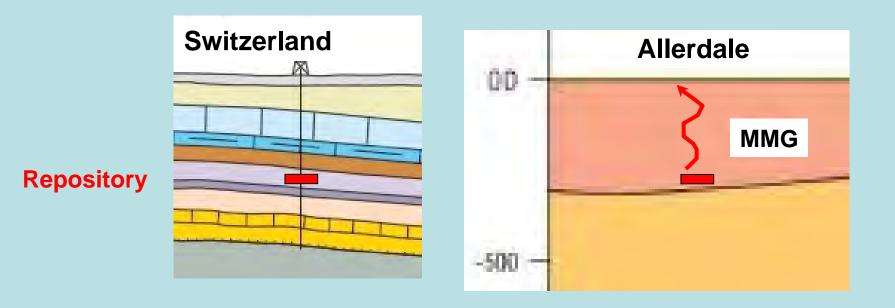


Logarithmic scale:

Each unit of the scale is a factor of 10 increase to the right



### What the relatively high permeability of the MMG means



50 m Opalinus Clay above repository Say 1 million years to travel 50 m

300 m MMG above repository

**Permeability 1 unit** 

Permeability 6 – 8 units

This is a **SAFE** repository

How long to reach surface?

#### **Switzerland**



50 m thick Safe for 1 million years

Uncertainty: 100,000 years 10 million years

## Safety of Swiss and Allerdale sites:

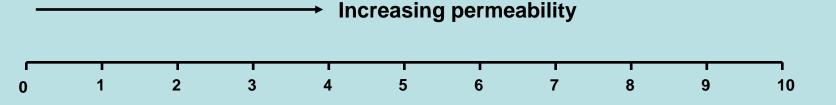
Time for escape of toxic waste to the surface

**Mercia Mudstone** 

300 m thick Safe for 6 years

Uncertainty: 8 months 60 years

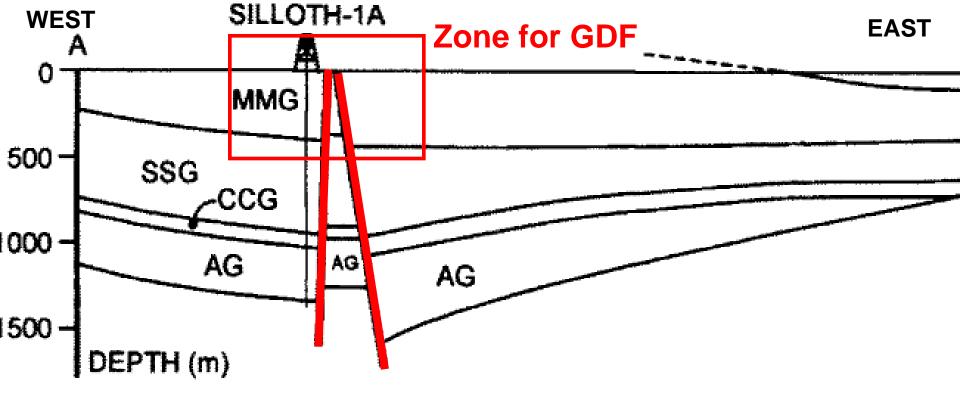




## Mercia Mudstone Group (MMG) Conclusions on permeability

- The MMG is NOT a clay rock
- •The MMG is "poorly permeable and is classified as a Secondary B Aquifer" (BGS screening report)
- Its permeability is far too high
- So the MMG is unacceptable as a host rock

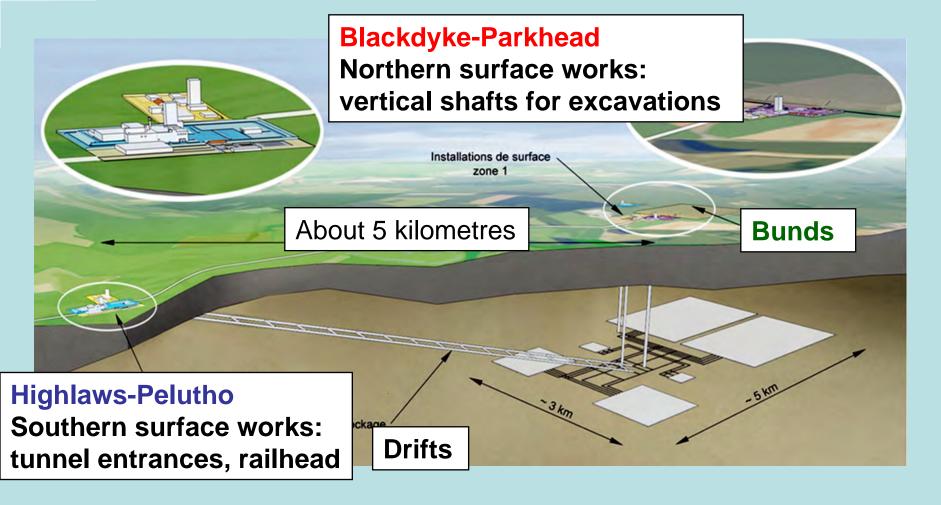




**BGS** cross-section through northern Allerdale

- and that is before the faulting (red) is taken into consideration. Only the two major faults are shown.

# Where would surface installations be sited in northern Allerdale?

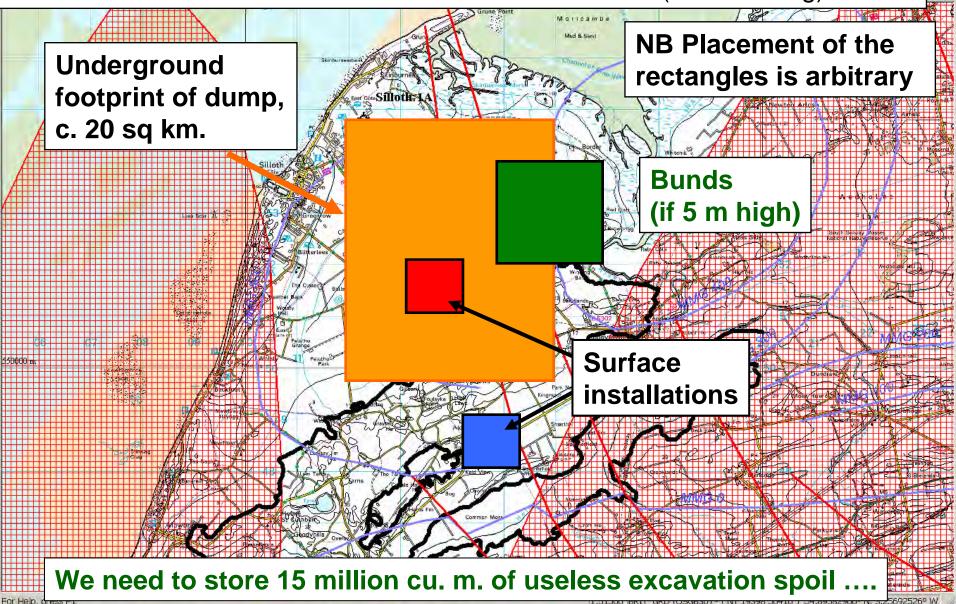


3D view of the proposed French waste repository in clay, applied to Allerdale. NB Allerdale subsurface area 20-23 km<sup>2</sup>.

Southern works on higher ground (greater than 10 m above sea level). Northern works sited on the very low ground (where MMG thickest). Spoil heaps stored in bunds nearby.

#### Mercia Mudstone Group: target rock for waste dump

Confined to area between BGS excluded zones (red hatching).



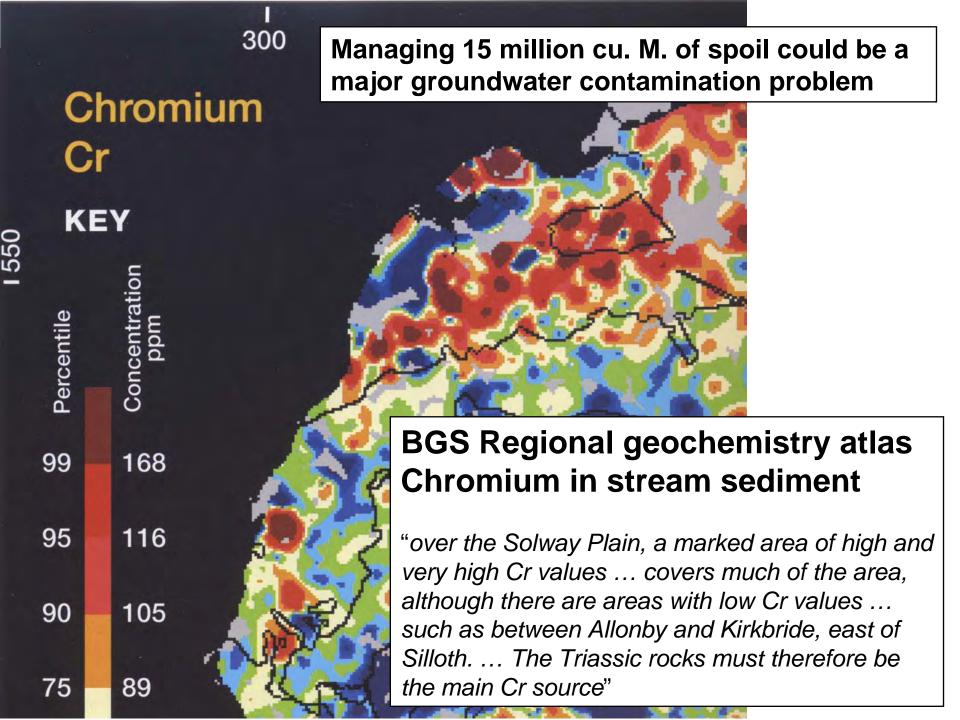


The Great Pyramid of Cheops (or Kheops) at Giza, Egypt volume 2,500,000 cu. m., 140 m high.

London Routemaster bus is shown for scale.

Spoil heaps will not be pyramids but flat-topped mounds called *bunds*. Allerdale dump will produce 6 pyramids of spoil.

If 5 m high some 4 sq km (= 400 Ha = 1000 acres) required.



# Mercia Mudstone Group The MRWS 'review' by Dr Dearlove

Professor Smythe appears to have misunderstood my comments that "a proper evaluation of the available data has not yet been undertaken". In my opinion, and that of Mr Colin Knipe, only the BGS is capable of making this assessment, and until the BGS undertake and publish such a review the area must remain potentially suitable.

It is primarily on this basis that I suggest that the MMG cannot be rejected at this stage of the MRWS Partnership process as a potential GDF host rock. I also agree with Mr Knipe's comments that, whilst not currently ruled out, the prospect of finding sufficient volume of suitable rock in the MMG is not promising, it CANNOT AT THIS STAGE BE ENTIRELY RULED OUT.

# Scientific conclusion Mercia Mudstone Group - unsuitable

- 1. Not previously considered as a host rock by the BGS.
- 2. Introduced by MRWS in 2011 on hearsay.
- 3. Current hydrocarbon exploration should have been excluded.
- 4. Regional hydraulic gradient is high (but perhaps acceptable).
- 5. Undesirably shallow depth of between 200 and 500 m.
- 6. Geology is well understood due to oil industry exploration.
- 7. Haematite-bearing red beds oxidising environment.
- 8. Very high in chromium (→toxic spoil heaps?).
- 9. The groundwater is fresh.
- 10. Exploited as an aquifer.
- 11. Hydraulic conductivity is 100,000-1,000,000 times too high.
- 12. A leaky seal (cap rock) for hydrocarbons.
- 13. Cut by large faults which may act as water conduits.
- 14. Geothermal anomaly potential in Solway area.

The MMG might have been introduced as a debating tactic by MRWS- but we cannot be sure.



# Misinformation or Non-information?

#### **British Geological Survey (BGS)**

-Advocacy by subterfuge



-2002: (Hearsay) BGS director supports return to Sellafield.

2006: BGS/Nirex: 'rather more than 30%' of the UK is potentially suitable.

2006: BGS: high hard-rock mountains are a 'favourable' location.

2010: Crucial screening criteria (oil, water) removed.

2011: BGS now allegedly considers MMG to be a potential host rock.

2012: 'Geological Society of London' support for MRWS process actually emanates from one BGS board member + two employees.

2012: Richard Shaw (BGS) states on BBC radio that West Cumbria "offers potential".

If Stage 4 goes ahead: Can we trust the BGS?





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On behalf of FWS Consultants Ltd

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DR F W SMITH

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Review of the geological submissions by Dr Jeremy Dearlove of FWS, commissioned by MRWS, June 2012.

Smythe, Haszeldine, McDonald, Knipe: c. 500 pages of geological evidence

#### NOTES ON LIMITATIONS

- FWS Cossultants Lid (FWSC) has prepared this report solely for the use of the Clin slove it agent on the basis of exchange(s) of proposals and instructions, and MISC. As a responsibility or liability.
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Should any third party wish to use or the property of the CCL A or, written approval from PWSC must be sought. Furthermore it is made in the property independent advice is sought by that the example with respect to cooling operator requirements.

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## Scrutiny of the process?

**Committee on Radioactive Waste Management** (CoRWM)

**Letter to Colin Wales, March 2012** 

Response to question about voluntarism before geology:

"It could be argued that the British process has also screened out unsuitable geology before asking communities to volunteer.

. . .

Your sincerely, Robert Pickard, Chair of CoRWM"

# Committee on Radioactive Waste Management (CoRWM)

" ... no credible scientific case to support the contention that all of West Cumbria is geologically unsuitable."

#### This is NOT TRUE:

- •We DO know it's a highly studied area
- No stone has been left unturned
- NOWHERE is suitable
- •MRWS stage 4 has been done

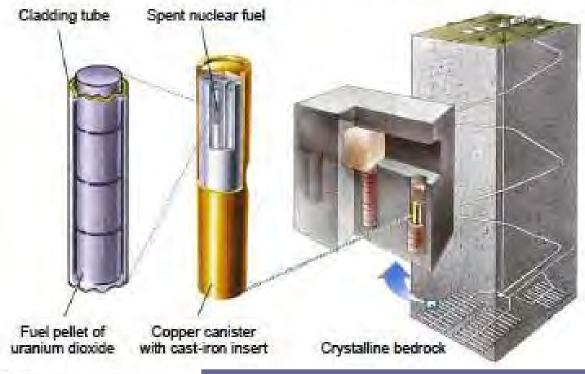
# The Swedish KBS-3 nuclear waste repository concept:

Problems and implications for the UK

This disposal concept has been adopted by the UK for high-level waste and spent fuel.

- •ls it suitable yes / no ?
- Confusion reigns in DECC (as usual)
- Arrogant optimism of nuclear engineers

#### The KBS-concept





#### Swedish KBS-3 repository concept:

- Fuel placed in isolating <u>copper canisters</u>
- With a high-strength cast iron insert.
- Canisters are surrounded by bentonite clay
- In individual deposition holes at 500 m depth
- In granitic bedrock.

# Figure 5. The encapsulated waste. The copper canister is 4.7 metres long and has a

#### Original KBS copper cylinder:

Wall thickness of copper:

•1977 - 20 cm (left)

•1983 - 10 cm

•1999 - 5 cm

Is the progressive reduction in thickness justified, or merely expedient?

Current copper cost per cylinder (5 cm) = \$18K

#### TABLE 7. Calculated canister dissolution times (yr). KBS~I: >10<sup>4</sup> >10<sup>6</sup> Titanium (6 mm) pinhole >500 Lead (100 mm) $3 \times 10^4 - 3 \times 10^6$ Borosilicate glass KBS-II: >10<sup>6</sup> Copper (200 mm) Lead (interstitial) not accounted for Zircaloy (~1 mm) not accounted for ~10<sup>6</sup> (carbonate complex) Uranium dioxide >104 Alumina (corundum)

This table shows that a 20 cm thick Cu canister is supposed to last for more than 1 million years.

Source: Rydberg (1981); KBS-2 is for spent fuel.

**Technical Report** 

TR-99-06

Main Report Summary

Deep repository for spent nuclear fuel

SR 97 - Post-closure safety

November 1999

Svensk Kärnbränslehantering AB Swedish Nuclear Fuel and Waste Management Co Box 5864 SE-102 40 Stockholm Sweden Tel 08-459 84 00

+46 8 459 84 00 Fax 08-661 57 19 +46 8 661 57 19



#### Further confidence in KBS-3

SR 97, published 1999

"Canister corrosion"

"Copper is very stable in the environment in a deep repository. The only known copper corrodant that has been identified in deep Swedish groundwaters is sulphide. Initially, oxygen is also present in the buffer and the tunnel backfill, as is sulphate which can be converted to sulphide. Soon after deposition, small quantities of nitric acid could also conceivably be formed by radiolysis of the buffer's pore water.

Pessimistic rough calculations show that none of these factors threatens canister isolation, even in a millionyear perspective. Nor has any mechanism that could lead to a local corrosion attack been identified."

#### BUT

Sweden has a robust and independent safety authority, SSM (as does France),

#### and

funds an independent NGO office (MKG) to scrutinise work.





### Strål säkerhets myndigheten

Swedish Radiation Safety Authority

[NB The UK has neither of these]



## ... and the SSM has recently shown that this confidence in KBS-3 is unfounded

SSM report on copper (Macdonald and Sharifi-Asl 2011):

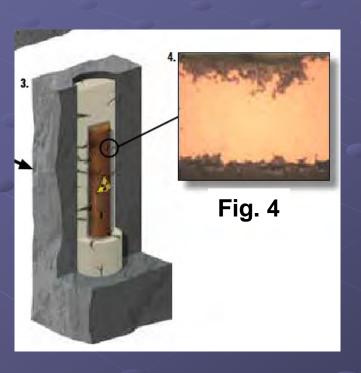
"Accordingly, the assumption that copper will be immune during the anoxic storage period is untenable, despite the fact that native deposits of copper do occur in granitic formations. The success of the KBS-3 program must rely upon the multiple barriers being sufficiently impervious that the corrosion rate be reduced to an acceptable level.

•••

If the proposed corrosion scenario posed by SKB is correct, that the rate of copper corrosion is determined by the rate of mass transport of sulfide ion through the bentonite buffer, the question must then be asked: "Why use copper?" "Would not a less expensive and hence more costeffective alternative, such as steel, suffice?" Answers to these questions possibly lie outside of the realm of corrosion science."



# MKG interprets these results



#### "Why the KBS method will not work"

"After the emplacement of the canisters and clay the oxygen in the repository is quickly consumed by bacteria and chemical processes. The fundamental assumption in the KBS method is that very little corrosion takes place in an oxygen-free environment. The canister walls are 5 centimetres thick and only a millimetre or two of the copper is supposed to corrode in a million years.

#### Pitting can result in penetration

Once copper begins to corrode, the process can proceed quickly through so-called pitting, which gives pox-mark indentations in the surface. The risk of pitting has led critical researchers to fear that the copper canisters may start to leak after only some hundreds of years — instead of after hundreds of thousands of years. (Fig 4)."

# Is the UK adopting the KBS-3 concept, or not? Joint BGS/Nirex statement, March 2006

"The BGS has reviewed the characteristics of existing ILW/LLW disposal concepts and the geological factors relating to packaged HLW/spent fuel (KBS-3 concept) and believes that the geological conditions that would be suitable for the former will also be appropriate for the isolation of the latter."

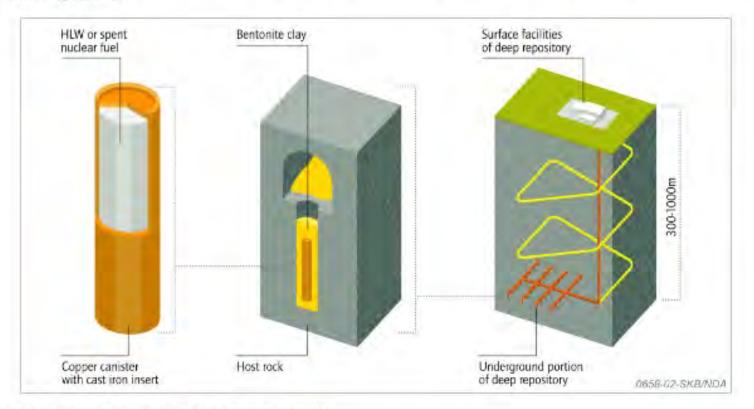
#### CoRWM doc 2456 Sep08

BGS response to CoRWM (Committee on Radioactive Waste Management) questions:

"BGS do not think the KBS-3 concept is applicable to the UK situation due to the combination of the UK's geology and variety of waste forms."

So the British Geological Survey (BGS) has changed its mind about KBS-3 in under three years.

Figure A2 Illustration of the KBS-3V Concept (SKB, Sweden – as adapted by the Nuclear Decommissioning Authority, 2010)



Source: Nuclear Decommissioning Authority (NDA) (2010)

But the NDA still appears to think that the KBS-3 concept is applicable in the UK

#### **Entec for NDA, October 2010**

Table 1.1 Illustrative geological disposal concepts

Host rock	Illustrative Geological Disposal Concept Examples	
	ILW/LLW	HLW/SF
Higher strength rocks <sup>a</sup>	UK ILW/LLW Concept (NDA, UK)	KBS-3V Concept (SKB, Sweden)
Lower strength sedimentary rock <sup>b</sup>	Opalinus Clay Concept (Nagra, Switzerland)	Opalinus Clay Concept (Nagra, Switzerland)
Evaporites <sup>c</sup>	WIPP Bedded Salt Concept (US-DOE, USA)	Salt Dome Concept (DBE-Technology, Germany)

#### Notes:

a Higher strength rocks – the UK ILW/LLW concept and KBS-3V concept for SF were selected due to availability of information on these concepts for the UK context.

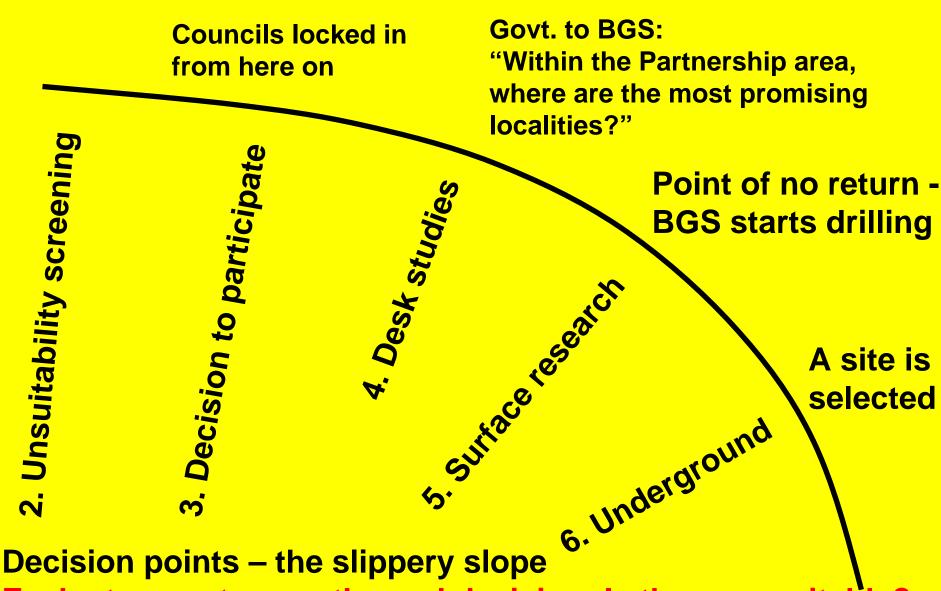
Evidently the NDA is still working with the KBS-3 concept for the UK, despite its intrinsic shortcomings, and despite the declaration by the BGS. The V-suffix means the vertical emplacement option.

#### Conclusions and lessons to be learned

- •The KBS-3 concept is fundamentally flawed
- The UK has not got a viable encapsulation concept
- •The final, and most important, barrier remains the geology

The pronouncements of nuclear engineers about the performance of their 'Engineered Barriers' such as KBS-3 are grossly optimistic.

#### Memo to Councils: once you're in, you're in



Each step postpones the real decision: Is the area suitable?

3. Decision to participate

Councils locked in from here on.

4. Desk studies

BGS has stated West Cumbria "offers potential" – so can hardly now change its view.

5. Surface research

Point of no return - contractors start drilling.

6. Underground An unsuitable site is selected.

All the above open to legal challenge on various grounds

- not just geological unsuitability



#### Conclusions and lessons to be learned

The UK is now 25 years behind Sweden, Finland and France.

#### It should:

- •Stop searching for a repository site in the most unsuitable area in England.
- •Undertake 25 years of proper research into both encapsulation and geological siting.
- •Prioritise building interim (100 years) safe surface storage at Sellafield.

# Fin