

**RESUMED**

**[4.15 pm]**

25 COMMISSIONER: We will reconvene at 1615 on the subject on low and intermediate level waste. We welcome Mr Neri from the Spanish National Agency for Radioactive Waste Management and Decommissioning. Thank you, Mr Neri, for joining us.

30 MR NERI: Thank you very much. Please let me say that ENRESA feels honoured by being invited by the Commission. We are very happy to contribute to your discussions.

COMMISSIONER: Thank you. Counsel.

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MR JACOBI: ENRESA is the Spanish National Agency for Radioactive Waste Management and Decommissioning. Having been created by the Spanish Parliament in 1984, it is a public company which deals with the management and storage of radioactive waste produced in Spain, the decommissioning of nuclear power plants and the environmental restoration of uranium mines and related facilities. Mr Emilio Garcia Neri joined ERESA in 40 1993. Throughout his career, Mr Neri has worked in the coordination and monitoring of ENRESA's activities in low and intermediate level radioactive waste management and decommissioning.

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Mr Neri is the national representative on a number of European commission and IAEA bodies, including the IAEA's Waste Technology Advisory Committee, and the Commission calls Mr Emilio Garcia Neri.

5 COMMISSIONER: Mr Neri, might I just start by just a very broad question on the extent of nuclear activities in Spain?

MR NERI: Yes. Well, I hope we can find some information about the Australian (indistinct) my slides.

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MR JACOBI: I think on slide number 3.

MR NERI: It's number 3, you can identify the number of nuclear reactive installations that we have in our country. As you may know, in Spain we have a minimum size nuclear programme. What this means is that we have a number of nuclear power plants in operation. The first nuclear reactor started operation in 1969, and this unit has been (indistinct) the power plant has been under decommissioning today. This is one of the main points that ENRESA carries nowadays. In addition to this reactor, in total we have 10 reactors in operation. Nowdays, we have only eight. Identifying the map where are they located.

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They produce about 20 per cent of the electricity that is being generated in our country, so they play a key role in our electric system. In relation to these nuclear power plants that are private owned in our country, we have a number of nuclear installations, the main ones, I think they are the nuclear fuel manufacturing plant that is located in (indistinct) close to the Portuguese border in the northern part and also of course El Cabril repository. I believe we will have time for further details in relation to that, as in Australia, we have a number, a large number of waste producers that they are operators of radioactive installations related to the usage of the medicine, nuclear medicine, all industry purposes and also research. Up to now, there should be around 1,200. This is the main sources for waste generation for waste generation in our country.

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35 COMMISSIONER: That's a good into, thank you very much. Can we move, now, to the extent of the El Cabril centralised low and intermediate waste disposal facilities. Can you give us a broad outline of the types of waste that this facility manages, and also perhaps at the end of that to talk us through why Spain decided on a centralised waste repository approach?

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MR NERI: Do you mind if I start from the end?

COMMISSIONER: I don't mind.

45 MR NERI: Thank you very much. For us, having a national repository

(indistinct) has been a key point in our program. What we understand under the word national is that we collect, ENRESA collects and manages, all the waste for this waste category - low and intermediate level waste, short-lived, but it is generated in Spain without explaining who is the producer, where it comes from, and the reason for why it has been generated, operations or decommissioning. This is a quite broad scope, but we believe that the facility is very much the operation of all assisting nuclear installations in our country, so this has been the main reason why the government decides to set up such a kind of centralised facility. As ENRESA is also a centralised body that assumes these responsibilities for the true state of Spain.

Regarding the type of waste that we are managing and disposing of at El Cabril site is related to the safety case. At the time when we start planning about design and construction of the new repository for Spain, we firstly carry out - established about the waste inventory - present and forecast. Having the conclusion that the most part of the waste to be generated will be related to this waste class, so we try that El Cabril facility has been the final outcome, to design and construct a facility that would be able to receive the wastes that we are producing, or most part of the wastes that were are producing in our programme.

MR JACOBI: We're very interested to understand the overall approvals process and planning process associated with the establishment of the El Cabril facility. I think you picked up the fact that there was a characterisation of the existing inventory and projection about its growth, but were there other things that were done at that preliminary stage in terms of formulating the concept for El Cabril?

MR NERI: For our case, the site doesn't play a key role, but we rely very much, 100 per cent, in the engineer barrier system. The engineer barrier system has been design to be robust enough to be located it almost in any site, but this has been our concept. In ENRESA (indistinct) for El Cabril site we take benefit of the site geology it is good, but it's hard to characterise. It's hard to characterise because hydrogeology is quite complex here, and this is why we decided to design the facility in such a way that we don't pay safety credit to the site even though we know that the site is okay.

MR JACOBI: Putting the site to one side, I'm also interested in the extent to which you are able at the time you were planning El Cabril to look to what other communities had done around the world in terms of the facilities that they developed. Did that form part of the process?

MR NERI: We took benefit of international experience, so our community is not the first of this kind of facilities, and we try to learn from others. In terms of participation of the communities, well at El Cabril case the government

didn't carry out any consultation. We didn't carry out a siting process, so this has been much more a decision taken by the government.

5 MR JACOBI: How was it possible to site the facility in the absence of conducting such a process in the circumstances that simply a decision was made?

10 MR NERI: We don't believe that this is the approach that can be carried out today. As you are aware, we are constructing a centralised temporary store for spent fuel in Spain. It's a quite a complex facility that intends to render the same services that El Cabril site for another one waste class, but of course nowadays the social and political circumstances are completely different, completely different in our country, so we have to start it from the very beginning with the volunteer process. It's something very similar to what is  
15 being done in your country in Australia, fairly extensive consultation, information and communication with any potential stakeholder.

20 I will repeat that this is a key point today in any project or programme -that might consider to set up a nuclear facility to be granted a social licence. Without the social licence, such kind of approach it becomes completely impossible.

25 MR JACOBI: How far is ENRESA through the process in terms of seeking volunteer communities and then to begin to engage with those communities associated with the development of that facility?

30 MR NERI: ENRESA is not involved directly as this has been a process that has been launched by the Spanish government. ENRESA will be the end user. We will be the licensees and operator. But the process is conducted, or was conducted because the process is fully finished, was conducted by the national government. The government got about 14 sites, they were volunteer sites, I mean, communities. In our case, the government look for town councils, so trying to get the political issues covered through this way. This full list was assessed by dedicated technical committee and it governed interdepartmental  
35 committee that was proposed by the government, assisted by a technical advisory group.

40 They were responsible to carry out further surveys, not site surveys, but collecting information. This (indistinct) were responsible for providing assessment on the plans to the government while collaborating a random list from this list the government took the decision, so the site was approved in December 2011. The name of the villages (indistinct) in the Province of Cuenca already working here now mainly with the licensing, while we have already started carrying out some conventional building, but our main  
45 (indistinct) today is licensing and technical design.

MR JACOBI: Is the ultimate aim on that site to develop a geological disposal facility for direct disposal of spent fuel?

5 MR NERI: Yes. The final objective is set up by the general priority waste plant. This is the document, this is the governmental document drafted by ENRESA, endorsed by the Department of Industry then becomes national policy of waste management and decommissioning. It states very clearly that the final objective for spent fuel and long lived radioactive waste should be or  
10 will be deep geological repository. However, the time scales that we are managing are quite general, so let's say, so we are thinking about 2068 for the entering operation for this particular repository so it's a number of decades.

MR JACOBI: Can I come back to that. When was the volunteer process  
15 commenced by the government? I'm interested in the time scale before a decision was ultimately made by the government to select that particular site, how long did that process go for?

MR NERI: The process wasn't a rose path so the government face a number  
20 of difficulties, also one of them was that they can't - we had a government that changed in the middle. So the government that launched the process was led by the socialist party, while the government who took the decision has been for the popular party, they are two different parties. So there has been something in between. But to respond directly to your response, it took about three years,  
25 three years and a half from the beginning, from the moment in which the Commission was set up. We were or better said the government relates their first call for call for volunteers, providing information about the characteristics of the facility, some background information for decision-making of potential interested parties, until the end in which they were the decision, December  
30 2011.

MR JACOBI: Was a technical process undertaken concurrently with the social process to obtain consent, and that is once the community had identified themselves as a volunteer, was there work done to characterise the geology of  
35 the area in order to determine that it might be prospective for such a facility?

MR NERI: Yes. Both processes, social and technical, they run at the same - the same way. I'm not sure the same as speed but the government can see that both elements relevant as equal. So we can get - the government completely  
40 understood that such process couldn't achieve their purposes without design is good enough for the purposes of the managing of the waste but also getting the engagement and acceptance from the community and related institutions.

MR JACOBI: In terms of the community, as I understand it, the community  
45 would be accepting responsibility for spent fuel from other regions. Are there

economic benefits that flow to the community in addition to the construction of the facility? Was there a package of benefits?

5 MR NERI: Yes. We never used the word "benefit" but I think you can find something about it in slide number 20. This is related to El Cabril, but applies also to the city, to the centralised temporary store. This is much more a kind of policy, the so-called good neighbour policy. So this is what we tried to do when we took over a site for any given purpose. I mean, there is waste disposal, there is store or even the commissioning, so we had to be an active  
10 actor in this new environment for us, these are the ways that we tried to do it.

So maybe the main - the most important measure is the so-called assignments order. The so-called assignments order is the national legislation that establishes fees that will be paid by ENRESA to the town councils that are  
15 located in the neighbourhood of the facilities storing or disposing of the waste and this is the national legislation so again we are the body who make the payments but we have nothing to discuss about this.

20 MR JACOBI: So I'm right in understanding that there are direct taxation benefits that flow to the local community by reason of the placement of the facility.

MR NERI: The taxation again is - well, taxation regime, you know, it changes a bit country to country. You know, a country like Spain, we have a tax that  
25 will be paid or is being paid to the town council, it's the building tax. We have another tax, it's the planning tax, that this goes to the regular government, your states. Finally, we have the (indistinct) we have the activity tax, this goes - this is split, this goes a part to the national government, another part to the regular government. In terms of taxes, these are the main ones. There's a number of  
30 other taxes but I think they are minor.

MR JACOBI: I am just interested, you talked about the operation of that facility over a very, very long time scale, and we'll come back to El Cabril in a  
35 minute, but I am just interested, what's envisaged to occur over the period say from now to the possible - or to the intended operation of that facility. Are there going to be further characterisation studies? What are the sorts of works that are going to be undertaken at that site?

MR NERI: Thank you for this question. I think it's very convenient and very  
40 appropriate to think in the future when you are basically in your (indistinct) so at first I would like to mention that the general radioactive waste plan, the states, what it's intended to do, when, how, how much, and also in the long term. So we have identified a number of the stages up to five, that should be covered by ENRESA among the next decades related to the deep geologic  
45 repository. So if you can imagine now there is very much focus on the

centralised temporary store. The centralised temporary store will give us time. Time for maturing our disposal profile for spent fuel and time also to prevent that our nuclear power plants they become in a hurry or become with difficulties to store the spent fuel.

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So our main effort is today concentrated in the centralised temporary store, on all related activities, mainly our licensing, on technical design, while we have allocated very low resources to the deep geological disposal program, but we understand or we know that in the coming years we will need to increase our effort in the working line so our final objective. In fact, it's supposed that ENRESA will disappear at the time when the deep geological repository will finish its ability.

MR JACOBI: Am I right in understanding that in terms of - because we've understood that with respect to, for example, the development of the Swedish and Finnish facilities, there have been very extensive periods of investigation conducted with respect to the particular rock types, they run particular laboratories for periods of time underground to validate conclusions that they have come to. Is that's what envisaged to ultimately occur with the Spanish facility?

MR NERI: We envisage to do in our time frame something similar to what has been done or is being done in Finland. In fact, most of the large European countries have started with the deep geological repository programs, almost at the same time, has been the case for Germany, UK, Finland, Sweden, France, ourselves, even Belgium, but it's true that most of us, we have faced strong difficulties mainly from the social point of view, social and political point of view, and this has been the main reason why our disposal programs for the spent fuel, they became delayed. If I try to remember the first date that we included in our previous radioactive waste plans, it was foreseen that the deep geological repository will be in use in 2000. So you see how we are far, far away of our first objective.

Later on, we put off the date, because we were completely unable to make progress due to the position of the - well, social opposition. We fail. I think we failed to explain and convince our society about, well, everything related to these projects. We didn't pay enough attention to this social licence. We were wrong. We focused almost 100% in technical issues. I now understand from the perspective that we have today, we think that we didn't pay enough attention to the social components, and this is something that the Finnish and the Swedish, they learned quickly. Well, I think that is one of the key points why they are succeeding while obviously we are not.

MR JACOBI: Thank you, Mr Neri. Can we turn our minds back to El Cabril at the moment? In terms of the operating cost for the facility, is that funded

from the generation of electricity through nuclear power plants?

MR NERI: Yes, thank you again for the question. Economics are always a delicate issue and, yes, the funding for all the whole implementation of the general radioactive waste plans comes from the fees that the waste producers they pay. As you can imagine, and I agree, mainly the nuclear power plants, in our case in Spain. One point that I would like to mention is that we gave you a number for our operational cost. Please allow me to refer that operational cost is very site specific. It's very site specific. So we have covered some bench marking with other operators - well, for similar facilities, and this number varies very much, because the scope of the - first the scope of the activities that you may include into operational costs can vary, also because the operations that are carried out in a given site can be extremely different to what are carried out in another one.

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So these are, I think, the two key points in this brief discussion that I would like to mention when considering operational costs. It's something very sensitive.

20 MR JACOBI: Can I come to the actual technical aspects of the design of El Cabril facility, and I'm interested in why in particular a decision was made to select near-surface disposal, why that was picked over other concepts.

MR NERI: Yes. Well, at the time when ENRESA start considering the construction of our new disposal facility for low and intermediate level waste, three options were on top of the table: so trenches, underground, and near-surface disposal using an engineered barrier system. Why ENRESA took the decision for this design, I think that at that time the trench concept was considered inadequate, because the trenches that were used during their life late 80s and early 90s were built in the 60s and 70s. So for every safety assessment or environmental impact assessment, they were recognised not to be easy to licence. They can be, but not in our case. In our case it would be very hard.

Underground is - I think that the main reason why we didn't consider underground disposal much longer has been the cost, the capital cost, I mean. We got the impression at that time that the capital cost would be much larger for a facility having the capacity that we expect to have for the Spanish national program. So, yes, the disposal seems to be a good option for us. Why? Well, from a technical point of view, it was recognised to be the, let's say, most advanced, or one of the most advanced designs. It was advanced because the reference, or the main reference, not the only one, but the main reference is simply the Le Manche in France. That was completing in its operations in the late 80s, and so ANDRA, the French agency for radioactive waste, they start developing the centre de l'Aube as an upgraded version, using the same concept.

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At the same time, or one year later, two more institutions, we took the same decision. We have been JNFL Japan for Rokkasho-Mura repository and ourselves for El Cabril. So these three facilities: centre de l'Aube, Rokkasho-Mura and El Cabril they have many points in common, further to the initial approach and initial design. It's true that we have some peculiarities, each one of us, that make the difference between us, but - well, this has been - I think these are the main reasons why ENRESA took the decision for near-surface disposal. We are very happy. We are fully convinced that it has been the right decision. Well, along these years the El Cabril has become a reference for others, so - - -

MR JACOBI: Is there a benefit in terms of retrievability?

MR NERI: Yes. Well, retrievability is recognised to be feasible for any - even surface disposal. However, it would be harder or easier, depending on the measures that you adopt in your design to facilitate, or not, such retrievability. The retrievability concept has been implemented in our disposal facility through the use of the concrete containers. I think that El Cabril has been the first one in the world to include this concept.

MR JACOBI: I think we've got a slide that picks this up. Perhaps if we go to slide 11, and you might be able to take the Commission through the conceptual aspects of the design for the facility, and hopefully address, I think, the issue of the containers that we've just picked up.

MR NERI: Okay. So if we go to slide 11, the delivery system is composed of three main elements. The first one is the container, it's the so-called disposal unit. This element is a cube of reinforced concrete having the waste inside. The waste is more commonly placed in drums from (indistinct) programmes with various modifications. Of 20 - sorry, 220 litres, and we are able to place 18 of these drums in each one of the containers. Later on we immobilise the drums inside the container by injecting mortar, grout.

MR JACOBI: Yes. I think perhaps what - sorry to interrupt you, Mr Neri, but I think by reference to slide 17, is that what we can see in slide 17 in the right-hand image. Have they been mortared up?

MR NERI: Yes. On the right what you can see is the vault.

MR JACOBI: Yes.

MR NERI: Is disposal vault. On the containers that are placed inside the vault. So as you can see - well, you can see the vault - the containers, but I really need to explain that they are pinned down. They are not fixed. So they

are (indistinct) if when they will be completed the vault, we will construct the top slab on top. If needed, or if decided, we can remove the top in future and retrieve the packages, these containers, in the same way in which they have been placed. This is how we implemented the regulatory concept in our disposal site.

MR JACOBI: But am I right in understanding that in the right-hand image the concrete has already been poured between the drums within the container?

MR NERI: Say that again.

MR JACOBI: No. I think that might be my misunderstanding. That's okay. Could we come back to slide 11, and there's a reference there to there being a mobile roof. Can you explain the concept of that?

MR NERI: Yes. So the concept covers three elements. The container itself. I think I hope my explanation about the container has been enough. These containers are placed into the vaults, and the vaults have the elements that you can see in the right. So each one of the vaults that have capacity for 320 containers. They are placed in four layers. Eight, 10 and four. Okay? I think we have a limited number of vaults. We have two platforms with the total number of vaults of 28.

One of our points is that if we decide to extend El Cabril need to apply for a new licence. So in our case we have a limitation about the amount of waste that we can manage and dispose of here at El Cabril. The vaults are supported by a strict (indistinct) slab that this place, a certain strict (indistinct) role and mainly for seismic purposes. I hope you can see inspection gallery that we have underground, that this is the first element we have placed to detect (indistinct) which some leakage come from the disposal vaults.

MR JACOBI: Is that what we can otherwise pick up I think in slide number 18?

MR NERI: Say that again, please.

MR JACOBI: Is that what we can pick up in slide number 18, that is the reference to an inspection gallery.

MR NERI: Okay.

MR JACOBI: Is that what we're seeing in slide 18?

MR NERI: Yes. It's a photo. I'm sorry. I missed it. Yes. The inspection gallery plays a key role and a number of purposes. First it's for a technical

purpose because very easily we can verify that there is no leak, or in case there is a leak we can get early notice and do whatever needed. But also is very useful from a social and information point of view because we can - we take our visitors to this place. We show them that we have systems in place to  
5 verify that the disposal system is running in the right way and its appropriate and we (indistinct) has been designed for. So one of the things that is not related to the site, but one of the things that is very important for us is how to maintain such social licence that I refer before. Visits. We promote visits to our facility. They go as deep as we can into the facility to see and to touch  
10 whatever they can touch.

MR JACOBI: In that sense are the visitors also able to go and look at things like the containers and the vaults themselves?

15 MR NERI: Yes.

MR JACOBI: If we could come back to slide number 11, and there's reference there to long-term coverage. Just wondering perhaps whether you can take us through the concept of the barrier system that's associated with the  
20 intended I suggest capping of the vaults.

MR NERI: Well, of course the final - the purpose of this facility, this disposal facility, as any other given disposal facility, is to prevent and not to guarantee isolation of - or the waste has been disposed of from the people and the  
25 environment in the short-term, and also of course in the long-term. For the purpose of the long-term is why we are designing this long-term cover. We are still in the preliminary stage. ENRESA has two not full size, but we have two mock ups that we are - they are monitoring that we are testing their performance, and they are located at El Cabril also.

30 What we intend is that they, in a couple of decades, not before we complete the operation of the first - sorry, of the second platform, we also need a proposal to the regulatory body. In this field we are also cooperating with the French agency ANDRA - we have a very good relationship. We were trying to learn  
35 from each other due to the fact that we have similar facilities, while the safety objectives are of course the same.

MR JACOBI: Now, I'm interested in the extent to which there's monitoring of radiation associated with the El Cabril facility, that is both for workers that  
40 work in the facility and also for perhaps the community nearby the facility. Could you offer some insight as to first of all what the relevant limits are, and then perhaps give us an idea about what the relevant measurements would be?

MR NERI: Well, radiation monitoring - or well let's say - one of the  
45 objectives of our operations is to prevent any impact, undue impact into the

people and the environment from our operations today, or an impact today and the impact into the future. So one of the measures that we have is that we have a so-called environmental radiation programme that is composed of a number of test spots and that they measure the impact outside the fence of the facility.

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So not only ENRESA but also the CSM, the Nuclear Safety Council, very similar to ARPANSA, and the regular environmental agency of (indistinct) we free we take samples of our own to verify that the El Cabril operations are not causing any radiological environmental impact into the surroundings. So we have a sampling network that we collect soils, we collect plants, we collect surface water, underground water. I would be happy to elaborate on my response a little bit and to submit to the Commission in writing.

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MR JACOBI: I am just interested just in general terms. Is the information that's collected with respect to radiation made available to the public?

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MR NERI: Can you say that again?

MR JACOBI: Sorry. Is the information that's collected, for example, from your monitoring stations outside the fence, is that made available to the community?

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MR NERI: Yes. Thank you again for this very interesting question. So one of the key elements that the Spanish system, ENRESA at the end of the system as operator, we have to communicate that to inform the communities is that the we should make a number of reports, in a regularly basis to the town closest and also concerned parties. So there are a number of different records. There's one that's for operations, another one is for transport, another one is, as you said, environmental radiological conditions. We have another one about hydrogeology related to the site. So we have a number of reports we prepare and they are distributed for use and understanding of the regulator authorities.

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Related to the town councils, there are up to six town councils that are those that are located in the neighbourhood of the El Cabril site. They receive this information together with the regular governments of Andelusia and the regular government of (indistinct). That these are the two regions to which these town councils they belong. Again, I would be very happy to elaborate a little bit this response and to submit it to the Commission.

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COMMISSIONER: Can I just explore that for one further question. Does the regulator give you a standard of, for instance, millisieverts per hour that you must not exceed, and is that part of what you have to report?

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MR NERI: Of course. But (indistinct) for the operational El Cabril we have what we call limitations and conditions. This is a written document that it

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states very clearly which are the conditions, set up the conditions in which ENRESA is allowed to operate El Cabril. Of course there are limits for personnel, there are limits for visitors, these limits are public. We have to - this is a part of - one of the components of the report that I mentioned before about environmental radiological impact. So you would get it in - let's say a bit more elaborated and I would be pleased to include the numbers. Don't think you will get something very specific because our facilities align with the international practices, so the limits are almost the same for everybody, so we follow the recommendations of the agency and our regulator, they set up their limitations according with this

COMMISSIONER: We have in Australia some concerns about these waste repositories. Outside of the boundary, what would be the likely dose rate that you might expect from your facility in particular in terms of millisieverts? Is that something you have off the top of your head? We're very happy to take detailed information later, I was just wondering whether you would have that to hand.

MR NERI: Yes. Of course you will find this kind of information, hopefully what you will get is zero.

MR JACOBI: Can I just deal with two further issues before we finish. One is the concept of transportation. Am I right in understanding that the main mode of transportation to this facility is by road? Perhaps if I can repeat the question. I am just interested about the mode of transport of waste to the facility. Is this a facility that's connected by rail, or is it only connected by road?

MR NERI: I'm sorry. I can't hear you. I very happily see you.

MR JACOBI: Perhaps if I can speak - can you hear me now, Mr Neri?

MR NERI: Can you see me?

COMMISSIONER: We can, but you can't hear us.

MR NERI: No, very hardly.

COMMISSIONER: Okay. I think if you can't hear us, that rather prevents us from having the sort of discussion we want. We might see if we can reconnect with you in a few days' time because we do have a few more questions we'd like to discuss.

MR NERI: I am hearing you better now.

COMMISSIONER: Okay.

Let me try again then, Mr Neri.

MR NERI: Thank you.

5 MR JACOBI: The question was, in the transportation of waste to the facility, is it mainly conducted by road or rail?

MR NERI: It's only road, only by road, all the cases. Transportation is not an issue for us. It's not an issue for ENRESA nor for the public. People feel - the public feels very confident of our transportation, so we are performing  
10 transportation to El Cabril for more than 25 years without any relevant incident. It's true that our geography in Spain is not as wide as in Australia, the distances here are shorter, but from Asco Nuclear Power Plant to El Cabril is about 800 kilometres, that is not to next corner. So transportation is something  
15 very easy for us. We expect that we will need to work a bit explaining to people at the time when we will start transporting spent fuel, but for low, intermediate waste is nothing.

MR JACOBI: I am just interested to understand, over what sort of time period  
20 has there been the transportation of such wastes within Spain such that that confidence has been built with the community about the transportation?

MR NERI: Well, the transportation - well, first, we have very clear laws and rules about how to do it, how to carry out it. We have to apply and to have in  
25 mind regulations for transportation of dangerous hazardous materials, that they have the dedicated chapter for radioactive waste, for nuclear material, so this is the main reference for us. We are transporting waste to El Cabril for 23 years.

MR JACOBI: I just wanted to finish off - sorry.

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MR NERI: Maybe it's interesting to mention how many transports we have. So we have about three or four transports per week. So El Cabril receives three or four trucks per week. Trucks, they can bring starting from eight to  
35 42 drums, it varies depending on the activity of the packages, but this is the rhythm of our transportation operations.

MR JACOBI: I just want to just finish off and deal with in terms of whether you think there are any particular lessons that you have learned from the establishment and operation of the El Cabril facility that other countries that  
40 are contemplating the establishment of facilities ought take account of.

MR NERI: Well, in terms of lessons learned I think that we have learned, the first one is that international references are very useful, they facilitate understanding and also licensing. Regulators they tend to be - to feel more  
45 comfortable when something has been already implemented in a relevant

country. The second lesson learned, I think, is that never use copy and paste. So something that may work in a given country, maybe it doesn't work in your country because of the environment, the situations, the conditions and the environment are completely different, even the goals. So it's a long way, it's a hard way, it requires a lot of effort. So I think I provide you with some ideas in my outline.

MR JACOBI: Did you have a view about the range of stakeholders you need to engage?

MR NERI: The stakeholders and engagement, public participation and communication activities, in our view should be started as soon as the project intends to be lodged.

MR JACOBI: Do you have a view about the breadth of the stakeholders you need to engage?

MR NERI: In our experience we try to identify any interested party or potentially interested party. So again in our experience the threats for the disposal project mainly come from the second ring, what we call the second ring, so people that they are - they have some interest, but they are not a part of the process. So these are the people or the institutions that they can cause a delay your project or even make (indistinct)

COMMISSIONER: Mr Neri, thank you very much for your written contribution and also for getting up so early this morning to talk to us. It's been very useful. It's always instructive for us to see how other nations have gone about their business and certainly from our view El Cabril is one of those stand-out sites for us to learn with as we conduct our review. So I do appreciate your participation.

MR NERI: Thank you again for inviting ENRESA to participate in your discussions and we will be very happy to provide you with any additional information or any further clarification that you may need. Thank you again.

COMMISSIONER: Thank you. Good morning. We will now adjourn.

MR NERI: Good afternoon.

COMMISSIONER: We will now adjourn until Monday at 1530.

**MATTER ADJOURNED AT 5.15 PM UNTIL  
MONDAY, 23 NOVEMBER 2015**

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