

**DOUNREAY STAKEHOLDER GROUP  
ENVIRONMENT SUB GROUP**

**DSG/ESG(2009)M002**

**MINUTES OF THE DSG ENVIRONMENT SUB GROUP MEETING HELD ON  
WEDNESDAY 24<sup>TH</sup> JUNE 2009 AT 1330 HOURS IN THE PENTLAND HOTEL,  
THURSO.**

**Present:** George Farlow Highland Council (chair)  
Alastair MacDonald DSG Chair  
Hamish Pottinger CAND  
Ian Webster Buldoo Residents Group  
David Brown Orkney Island Council  
Irina Foss ERI  
Silvia Batchelli ERI

**In addition:** June Love DSRL (Secretary)  
Tony Wratten Director of Assurance, DSRL  
Phil Cartwright DSRL (for item 5)  
Graham Beaven DSRL (for item 7)  
John Disbury DSRL (for item 8)  
Byron Tilly SEPA

**Observing:** Lee Winsor SEPA Communications  
Debbie Storm SEPA Communications

**MINUTES**

**1. WELCOME AND INTRODUCTIONS**

George Farlow (sub group chair) welcomed everyone to the meeting. He introduced Lee Winsor and Debbie Storm (SEPA Communications) who were observing the meeting. He also welcomed David Brown (Orkney Island Council) to his first meeting and asked that a letter of thanks to Nick Blowfield for his contribution was sent on behalf of the group.

**ACTION: DSG/ESG(2009)M002/A001: SECRETARY TO WRITE TO NICK BLOWFIELD (ORKNEY ISLAND COUNCIL) TO THANK HIM FOR HIS CONTRIBUTION TO THE ENVIRONMENT SUB GROUP AND TO DSG OVER THE PAST YEAR.**

**2. APOLOGIES**

Apologies were received from Roy Blackburn (NDA), Roger Wilson (SEPA), Chris Jones (SEERAD), Willie Calder (Scrabster Harbour Trust/Scrabster Seafoods Ltd), Pauline Crow (NHS), Rosemary Thompson (NHC), Rick Nickerson (Shetland Island Council) and Isobel Swanson (Caithness Young Farmers).

**3. MINUTES OF LAST MEETING**

DSG/ESG(2009)M001 refers. Members had received the draft minutes and had responded with comments. It was agreed that the minutes were an accurate reflection of the meeting and this was proposed by Ian Webster and seconded by Hamish Pottinger.

#### **4. PROGRESS ON ACTIONS**

M001/A018: ESG to write to Scottish Government and HSE to stress that a date for a decision on whether the low level waste facility should be licensed was given greater priority to allow a decision to be made. *Action ongoing – Scottish Government have responded as follows (23.06.09): “There are currently actions outstanding arising from the last meeting with HSE and other interested parties which require to be completed but due to other priorities in each of the organisations we have not been able to progress this matter as quickly as we would have wished. The Scottish Government will continue to work closely with HSE and others to progress the issue of licensing facilities such as that planned at Dounreay.”*

All other actions are listed in Appendix 1.

#### **5. PARTICLES UPDATE**

DSG(2009)C045 refers. Phil Cartwright provided a verbal update. Of note:

- In terms of BPEO, the off-shore clean-up commenced on 1<sup>st</sup> June. It is intended to cover 7.5 hectares this season (weather permitting) and is concentrating on the main particle plume which had been identified in DPAG's (Dounreay Particles Advisory Group) Fourth Report. Two hectares had been covered to date and 32 particles had been detected with 23 retrieved.
- Since reporting at the last meeting the old diffuser system has been inspected at both the landward and seaward end. An option study is now underway. This is a requirement of the site's RSA authorisation and SEPA have clarified that the option identified to seal the old diffuser chamber should be looked at in the context of decommissioning the whole system.

George Farlow asked, in terms of the off shore particles retrieval, whether the project was going well. Phil Cartwright responded that in terms of the seabed clean-up it was progressing well although he had set a target for 95% retrieval of all particles detected. The main focus would be on retrieval of detected high activity particles and noted that deeply buried particles were more difficult to retrieve.

- Two significant particles had been detected and removed from the Dounreay foreshore. Monitoring had been suspended on the West Foreshore because of the bird nesting season although monitoring was continuing on the East foreshore, which was tidal.
- A meeting had been held with Highland Council, SEPA, Highland Health Board, NII and DSRL to discuss the DPAG recommendation to close off access to the foreshore. This had been a positive meeting. Under the legal framework it would prove difficult to completely restrict access unless there was a real health and safety issue. It was agreed new signage would be erected at either end of the site perimeter. The previous signs were advisory and the wording would be strengthened. Two short pieces of fencing would be re-instated to manage access.

Byron Tilly noted that this was an area included in the radioactive contaminated land assessment process and that may affect what would be done in that particular area in future.

Hamish Pottinger noted that a minor particle had recently been detected at Murkle beach. He was disappointed that, while DSRL had informed the landowner of the

find, there had been no follow up communication. Phil Cartwright apologised for this noting that a letter had been prepared and posted. When he became aware the letter had not been received it had been resent.

Hamish Pottinger also noted that previously when monitoring Dunnet beach the landowners were given notice before monitoring commenced. The last strandline survey had taken place with no communication to the landowners. Phil Cartwright said he would check the communication plan to give prior warning of the monitoring schedule.

**ACTION: DSG/ESG(2009)M002/A002: PHIL CARTWRIGHT TO ENSURE THAT THE DUNNET LANDOWNERS WERE GIVEN PRIOR NOTICE BEFORE MONITORING WAS UNDERTAKEN AT DUNNET BEACH.**

Phil Cartwright noted that SEPA planned to undertake a habit survey of Dunnet beach and this, together with all other data, would assist SEPA in assessing future monitoring.

- Permission, by the landowner, to carry out a single survey of Sandside beach had been given, in March. This survey was the first one carried out since October 2008. The survey commenced on 23<sup>rd</sup> March and continued until the 8<sup>th</sup> April. Seven particles were detected and retrieved (1 relevant and 6 minor particles). Permission for both a standard survey and an enhanced survey was received from Sandside Estate and commenced on 1<sup>st</sup> June. Three particles were detected on the first day. Over the next seven days a further 8 particles were detected, before the enhanced footprint was monitored (in areas exposed between the tides). During next six days a further 3 particles were detected. At this point access was withdrawn.

The information gathered by this survey has been reported to SEPA and ex-DPAG members to allow consideration in terms of beach height. Of the first 11 particles detected DSRL believes eight of these appear to have arrived, at the point they were retrieved, since the previous survey.

Members expressed disappointment that access had been withdrawn and felt that to allow continued monitoring would allow more particles to be removed and allow more accurate trends of particle arrival to be produced. Phil Cartwright noted that discussions were continuing with the landowner.

- Byron Tilly tabled DSG(2009)C047 which set out the terms of reference of the new expert body which succeeded DPAG. The Particles Retrieval Advisory Group (Dounreay) [PRAG] will provide advice specially relating to the offshore particle retrieval process. This group would be chaired by Professor Keith Body who had been the chairman of DPAG.

ESG members were asked whether they would like to send a representative to observe at these meetings which would take place in Edinburgh. Members felt that this would be useful and agreed to consider the request.

**ACTION: DSG/ESG(2009)M002/A003: ESG MEMBERS TO CONSIDER REPRESENTATION AT THE PARTICLES RETREIVAL ADVISORY GROUP (PRAG).**

## **6. UPDATE REPORTS**

**DSRL:** DSG(2009)P014 was tabled. Tony Wratten provided a verbal update:

- A project to upgrade the ventilation system in the fuel cycle area was progressing well. Two new stacks had been erected, two fans had been installed and there had been good progress on the duct work.
- Low levels of tritium had been detected in one of the inactive outfalls. The Sodium Inventory Destruction Plant at PFR had been voluntarily shutdown pending the outcome of an investigation.
- Commissioning of the DFR NaK Disposal Plant had restarted and 33 batches of liquid metal had been processed which equated a 10% reduction in the highest hazard on the site.
- An emergency exercise had taken place on 13<sup>th</sup> May based on a criticality event. NII were complementary on the site response. DSRL had also provided support to the recent Vulcan emergency exercise which had been deemed as adequate by site inspectors.

Ian Webster noted that the new ventilation project had been reported in the local press saying that the new system would protect workers. He asked that as the site decommissioning work progresses was it likely that the discharge levels would increase. It was noted that it was expected that discharges would reduce and a diagram of predicted discharges would be provided for the next meeting.

**ACTION: DSG/ESG(2009)M002/A004: DSRL (TONY WRATTEN) TO PROVIDE A DIAGRAM TO SHOW PREDICTED FUTURE DISCHARGES.**

**SEPA:** DSG(2009)P015 refers. Byron Tilly provided a verbal update:

- At the last DSG meeting a presentation by SEPA had outlined the proposed consultation for authorising the new low level waste facility. Helpful comments had been received at that meeting and SEPA had now reconsidered their approach to the public consultation.

In addition DSRL had submitted an Environmental Safety Case at the beginning of April and part of the document requires further development and therefore statutory consulting will not take place until the document is finalised which is expected to be September. This means that the public consultation phase will be carried out later than expected. After consideration SEPA, , will explain the logic of their thinking in determining the application, and will consult on this before reaching a decision. It is currently expected that this wider public consultation will take place around the middle of next year but in recognising there are various parties who have an interest in this application, it will be posted on the website before then to allow people to comment.

Byron Tilly noted that the NDA were currently consulting on the strategy for low level waste. He drew members' attention to section 5.5 when considering the consultation.

- Another consultation recently started is the UK and devolved Governments' consultation on revisions of exemption orders. This could be of interest to DSG because of the low level waste strategy as the exemption orders could potentially change what goes into the low level waste facility. Consultation

closes on 4<sup>th</sup> September.

George Farlow noted that there were a number of consultations in progress at this time and he would find it helpful if these were all pulled together in one document. The secretary stated she was currently pulling together a forward diary and consultations will be included in this listing.

- **NDA:** Roy Blackburn had tendered his apologies but had provided a written update for this meeting.

**New CEO:** On 17 June 2009, NDA announced the appointment of Tony Fountain as the new Chief Executive Officer who will take up his new position in October 2009. Mr Fountain has held several senior executive positions in BP's international businesses.

The NDA Chairman has thanked Richard Waite, the current Acting CEO, for leading the NDA through a year of significant achievements. The Chairman highlighted the competition of Sellafield, land sales and the overall Business Plan results for 2008/09. Richard will have a key role in taking the organisation forward.

- **LLW Strategy:** NDA launched their Low Level Waste Strategy consultation on 5 June 2009. The full title of the document is:

"UK Strategy for the Management of Solid Low Level Radioactive Waste from the Nuclear Industry: UK Nuclear Industry LLW Strategy".

This is in response to the revised Government policy for the management of solid LLW which was published in March 2007.

The strategy has been produced in conjunction with a UK wide consultative group - the Low Level Waste Strategy Group, which represents a cross-section of interested parties. NDA has also consulted with many more organisations throughout its development.

The strategy is being launched along with the Strategic Environmental Assessment (SEA), which underpins the strategy.

The strategy reflects the Government's revised LLW policy and importantly allows for development of solutions on a case-by-case basis and for flexible decisions to be made to ensure safe, environmentally acceptable and cost effective management solutions that reflect the nature of the LLW concerned. Adoption of a more flexible approach will be critical to continued provision of capability and capacity for LLW management in the UK.

The principles of the draft strategy are similar to those applied to domestic and industrial waste management across the country, that is, Prevent, Reduce, Reuse, Recycle, prior to disposal.

More information about the strategy document and the consultation process can be found on the NDA website.

## **7. ALL WASTE OPTION STUDY**

Graham Beaven provided a verbal update:

- This would be the last update to the group on the all waste options study submission. Documentation had now been submitted to SEPA in line with their requirements, covering national and international best practice and also the BPEO with a programme for integrating changes to the strategy.

In response to a question Graham confirmed that the one change to the original study (carried out in 2003) was related to the low level liquid effluent treatment plant. In the 2003 BPEO sludges accumulated was to dissolve the material and discharge to sea. In considering best practice it is now proposed that sludges will be stored at present and will be treated and go into the low level waste facility as solid waste.

## **8. AUTHORISATIONS**

John Disbury attended the meeting to provide a briefing to members of the proposed new authorisations for the site. He noted:

- This project dates back to 2001 when it was recognised that the authorisations required considering because of the change of site's mission from an operational site to a decommissioning one.
- It allows the site to fully scope out a programme up to 2025 and the discharge authorisation application will cover solid, gaseous and liquid discharges.
- Gaseous discharge is quite easy to do and will show a decrease in the discharge limit although the tritium authorisation will increase (for the period covering the clean-up of residual sodium from the reactors). It is expected that 2016 tritium discharges will drop off significantly.
- It is estimated that liquid discharges will be reduced and will impact across all of the nuclides reported.
- After SEPA's determination of the application it is expected that the site will move to one single certificate of authorisation.
- The application will go through internal due process in July/August 2009 and submitted to SEPA by September 2009.
- The application is expected to be complete with a new authorisation provided in 2012.

Byron Tilly noted that SEPA had been in discussions with the site about this application to ensure that the site was aware of SEPA's understanding of what would be reasonable to put into the application.

In general terms, when SEPA is considering an application it follows the three key radiological protection principles laid out by the International Commission on Radiological Protection:

1. justification (benefit v disbenefit) (formally a matter for Government, and of limited relevance when the waste has already been generated)
2. optimisation (use of best practice to keep radiation doses as low as reasonably achievable)

3. limitation (specific targets) based on international standards and best practice.

Alastair MacDonald noted that the document to be submitted to SEPA would be a considerable and technical read. He asked whether it was possible to provide an executive summary and thought it might be worthwhile having a presentation at both ESG and DSG to cover this topic.

**ACTION: DSG/ESG(2009)M002/A005: DSRL TO PROVIDE A PRESENTATION AT NEXT ESG AND DSG ON THE APPLICATION FOR NEW DISCHARGE AUTHORISATION.**

#### **9. HERITAGE UPDATE**

DSG(2009)C044 refers. DSRL were continuing to work with Historic Scotland to finalise the draft strategy for heritage. A further update will be provided to ESG in due course.

#### **10. NDA LOW LEVEL WASTE STRATEGY CONSULTATION**

This subject was discussed earlier in the meeting (see NDA's update). It was agreed that the DSG should respond to this document and members were asked to provide the secretary with any input/comments on the strategy document. The secretary would collate and provide a draft response to members for final endorsement before submission.

**ACTION: DSG/ESG(2009)M002/A006: ALL DSG MEMBERS TO PROVIDE VIEWS ON NDA'S CONSULTATION ON LOW LEVEL WASTE STRATEGY TO THE SECRETARY.**

**ACTION: DSG/ESG(2009)M002/A007: SECRETARY TO COLLATE ALL RESPONSES TO NDA'S CONSULTATION ON LOW LEVEL WASTE STRATEGY AND DRAFT RESPONSE FOR ENDORSEMENT BY DSG MEMBERS BEFORE SUBMITTING TO NDA.**

#### **11. ANY OTHER BUSINESS**

There being no further business the meeting closed.

**George Farlow**

Environment sub group chairman

29<sup>th</sup> June 2009

## **APPENDIX 1**

### **PROGRESS ON ACTIONS**

#### **ACTIONS ARISING FROM THIS MEETING (JUNE 2009)**

DSG/ESG(2009)M002/A001: Secretary to write to Nick Blowfield (Orkney Island Council) to thank him for his contribution to the environment sub group and to DSG over the past year.

DSG/ESG(2009)M002/A002: Phil Cartwright to ensure that the Dunnet landowners were given prior notice before monitoring was undertaken at Dunnet beach.

DSG/ESG(2009)M002/A003: ESG members to consider representation at the Particles Retrieval Advisory Group (PRAG).

DSG/ESG(2009)M002/A004: DSRL (Tony Wratten) to provide a diagram to show predicted future discharges.

DSG/ESG(2009)M002/A005: DSRL to provide a presentation at next ESG and DSG on the application for new discharge authorisation.

DSG/ESG(2009)M002/A006: All DSG members to provide views on NDA's consultation on low level waste strategy to the secretary.

DSG/ESG(2009)M002/A007: Secretary to collate all responses to NDA's consultation on low level waste strategy and draft response for endorsement by DSG members before submitting to NDA.

#### **ACTIONS ONGOING FROM PREVIOUS MEETINGS**

M001/A018: ESG to write to Scottish Government and HSE to stress that a date for a decision on whether the low level waste facility should be licensed was given greater priority to allow a decision to be made. *Action ongoing – Scottish Government have responded as follows (23.06.09): "There are currently actions outstanding arising from the last meeting with HSE and other interested parties which require to be completed but due to other priorities in each of the organisations we have not been able to progress this matter as quickly as we would have wished. The Scottish Government will continue to work closely with HSE and others to progress the issue of licensing facilities such as that planned at Dounreay."*

M015/A021: Secretary to put heritage strategy presentation on September DSG agenda. *Note this will come forward at a future meeting once project team is ready – likely to be later in 2009.*

M016/A014: Doug Graham to consider how best to present the information on environmental aspects and the frequency of this report. *Action ongoing – work was presently ongoing to provide useful and clear information on environment aspects and will include text on the environmental monitoring reporting.*

#### **ACTIONS COMPLETE SINCE LAST MEETING**

DSG(2009)M001/A016: Secretary to amend minutes (DSG/ESG(2008)M013) to reflect amendments as noted in minutes. *Action complete – minutes amended to reflect changes.*



DSG(2009)M001/A017: Tony Wratten to provide details of the waste streams which have the potential to be sent to Sweden for smelting. *Action complete – The only material being considered at present is lead however this would be dependent only if a business case can be made*

DSG(2009)M001/A019: Tony Wratten to find out why lorries leaving site with rubble and spoil were not covered. *Action complete - Action complete - Projects have been advised to ensure covers are used where appropriate. However it should also be noted that lorries operate from the quarry in Reay/Melvich which is not part of any site activity.*

DSG(2009)M001/A020: DSRL (Doug Graham) to provide an explanation on the new authorisation at the next meeting. *Action complete – on agenda for 24<sup>th</sup> June 2009.*

DSG(2009)M001/A021: Graham Beaven to continue to update ESG on progress with the all waste options study. *Action complete – on agenda for 24<sup>th</sup> June.*

DSG(2009)M001/A022: Nigel Canty to respond to questions listed in DSG(2009)C021 at the DSG meeting to be held in June 2009. *Action complete – on agenda for DSG meeting on 24<sup>th</sup> June 2009.*