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NDA Business Plan Consultation  
Nuclear Decommissioning Authority  
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Dear Sir/Madam

**DOUNREAY STAKEHOLDER GROUP – RESPONSE TO NDA DRAFT BUSINESS PLAN 2010-2013**

The Dounreay Stakeholder Group (DSG) welcomes the opportunity to comment on the draft business plan, agrees with the remit of the NDA to support delivery and firmly believes that safety needs to be the over-riding priority in all activities.

Specifically relating to the Dounreay site:

- It is pleasing to see that the site will be taken to its interim end state, as prescribed by DSG following public consultation. However, to take the site to the end state in a safe, efficient and cost effective manner predictability of funding is essential. While understanding the present financial climate it is essential to secure the funding required for the site to continue the very good progress that has been made over the last few years.
- Funding for future years needs to be communicated to stakeholders as soon as the PVP is complete and a clear engagement programme should be made available to ensure this information is provided in a timely manner.
- While we recognise the drive towards efficiency savings and believe that there are areas where improvements can be made it is important to recognise that saving 3% year on year is going to become more difficult as the programme progresses and sites, such as Dounreay which have been recognised for the work already done in this area, cannot continue without detrimental impact to the continuity of the decommissioning programme and to the retention of the skills required to complete the programme.

- The key activities for 2010/11 for the Dounreay site appear to be fair and reasonable. Again funding may become an issue and sites should not be penalised for being unable to complete the key activities if the level of funding becomes an over-riding issue to delays to the programme.
- We note that, under the critical enablers, there is a key activity to work with other SLCs to achieve early off-site transfer of fuels. This activity will need a clear engagement plan to ensure that the DSG and other interested parties, including Scottish Government, are kept informed of progress. The NDA and DSRL need to work together to ensure a pro-active stakeholder engagement plan on fuel transfers.
- The policies of the Scottish Government need to be taken into account when determining the NDA strategy. While we recognise that there are a small number of Scottish sites it is important to ensure that the difference in policies is understood and that the NDA continue to inform site stakeholder groups of these differences and how they intend to work within the policy frameworks of all the parliaments.
- DSG notes that the clean-up campaign for radioactive particles in the marine environment is not listed as a key activity. The Dounreay site did an excellent job of consulting on the way forward to clean-up the uncontrolled contamination left on the seabed by historical practices. While we recognise that this is not termed as a 'hazard' within the recognised hazard reduction portfolio of the NDA it nevertheless is uncontrolled contamination which is outwith the licensed site. Priority should be given to continue the good work that has already been undertaken and we want to ensure that funding for the clean-up campaign is not compromised over the coming years. While the NDA may not view this as a major hazard reduction the detriment and blight to the area is significant and the continuation of this project is essential for the future regeneration activities required for the area.
- DSG notes that the socio economic spend has been reduced from £10M (in 2009/10) to £5M (2010/11). While we recognise the need to reduce non-site expenditure it is equally important to ensure that the NDA revisits their priority areas. The NDA need to consider the different needs of each of its sites, the different timescales for completion of the decommissioning programme and the opportunities being opened up for some sites with new build and other opportunities. It would be useful to understand the criteria that you considered when identifying the priority sites.
- On page 44 (breakdown of non-site expenditure) it is noted that there is a considerable reduction in a number of these activities. The Pension costs are reduced significantly (39.8 in 2009/10 to 3.8 (2010/11). It would be useful to provide clarity on how this significant reduction has been arrived at.
- It is also of concern that while all other activities within the non-site expenditure have taken a considerable reduction the NDA operating costs remain much higher. NDA need to consider this and make substantial reductions wherever possible and we will continue to monitor this throughout the year as the Chief Executive considers the organisation structure of the NDA.

DSG looks forward to continuing dialogue with both NDA and DSRL as site decommissioning progresses.

Yours sincerely

*Sent electronically without signature*

**Alastair MacDonald**

DSG Chairman

*On behalf of the Dounreay Stakeholder Group*