DOUNREAY STAKEHOLDER GROUP ENVIRONMENT SUB GROUP

DSG/ESG(2010)M001

MINUTES OF THE DSG ENVIRONMENT SUB GROUP MEETING HELD ON WEDNESDAY $10^{\rm TH}$ MARCH 2010 AT 1330 HOURS IN THE PENTLAND HOTEL, THURSO.

Present: Cllr George Farlow Highland Council (Chair)

Hamish Pottinger Caithness Against Nuclear Dumping

Ian WebsterBuldoo Residents GroupCllr Steven HeddleOrkney Islands CouncilRick NickersonShetland Islands Council

June Love DSG Secretariat, DSRL
Alan Scullion Director of Assurance, DSRL

Phil Cartwright Project Manager, DSRL (for item 5)
James Gunn Heritage Officer, DSRL (for item 8)

Roy Blackburn NDA

MINUTES

1. WELCOME AND INTRODUCTIONS

George Farlow welcomed everyone to the meeting. He noted that, due to recent management changes at Dounreay, Alan Scullion would replace Tony Wratten as Director of Assurance for DSRL. Alan was welcomed to the meeting and was introduced to all members.

2. APOLOGIES

Apologies were received from:

William Calder Scrabster Seafoods Ltd
 Gordon Jenkins North Highland College
 Pauline Craw Highland Health Service

Roger Wilson SEPA

3. MINUTES OF LAST MEETING

The minutes were taken as read. These were proposed by Ian Webster and seconded by Steven Heddle.

4. PROGRESS ON ACTIONS

See appendix 1 for an update on progress. Of note:

George Farlow noted that outstanding actions were long term ones and would be progressed as appropriate.

Rick Nickerson noted an action on COMARE to provide a presentation to the group on their findings of their extended study on cancer excesses in the vicinity of Seascale and Dounreay. Mr Nickerson requested that COMARE was also asked if they have considered the KIKK report (from Germany) which provided additional information in leukaemia clusters in young people which raised a lot of concerns

among people. It was agreed to ask COMARE whether this study would be considered.

ACTION: DSG/ESG(2010)M001/A001: Secretary to contact COMARE to ask if they were considering KIKK (German) study on leukaemia clusters in young people while carrying out their own extended study.

It was also noted that there had been no response the DSG(2010)M001/A018 (licensing of the low level waste facility), hence this was still outstanding. The secretary noted that this would be raised at the DSG meeting and the question would be asked to the Scottish Government and NII representatives.

In respect to Action DSG(2009)M004/A006 re Highland Council's planning framework, George Farlow noted that there would now be an overarching framework document and then a separate one which would cover Sutherland, Caithness and a part of Ross-shire.

5. PARTICLES UPDATE

DSG(2010)C017 (particles progress report, Nov 2009 to March 2010) was tabled for information. Phil Cartwright provided an update. Of note:

A contract for the off-shore clean-up has now been awarded to Land and Marine.
The detection system for the new ROV (remotely operated vehicle) would be very
similar to that used with the on-shore monitoring. It was expected that the cleanup operations would commence in July (weather permitting), following testing of
the new unit.

Rick Nickerson asked whether this was a new piece of kit. Phil Cartwright responded when the work was originally tendered Land and Marine had adapted a ROV that already existed but recognised it was not the finished article. They learned from that system and have decided to build a new ROV specifically for the work. Phil noted that the decision to award the contract to Land and Marine had been a difficult commercial decision for both DSRL and the NDA. He recognised that Fathoms had done a good job over the last few years, which had allowed DSRL to specify the equipment required..

lan Webster noted that the equipment was much larger than the last one. Phil agreed and said that when the ROV was deployed there would be a 60m working platform/barge which will be anchored off the Dounreay site along with a tug to move the barge (in inclement weather) and a small support vessel.

Steven Heddle asked whether this equipment would provide the opportunity to go into deeper water. Phil said there would be an opportunity to follow the particle plume into deeper waters, if that was what the information gained indicated. They would still continue to target the main particle plume but if that plume looks like it is going further out the equipment has the capability of doing this.

Rick Nickerson asked whether additional cost would be incurred using this system. Phil noted that the project had been taken through the DSRL and NDA sanction process and the funding for this project had been agreed. He said that the base costs were higher on a day to day basis but as the Land and Marine system was on station for 24 hrs/day, daily coverage was expected to be much higher and the overall cost of the project was very similar. Rick asked what period of time the costs covered. Phil commented that costs had been based on present knowledge of the plume and risks of both increased area and area reductionwere considered in the

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decision. The funding of the site decommissioning programme was currently being re-assessed and priorities for the site would need to be considered, within the overall budget. As it stands the funding forinitial particle clean-up covers the next 3 years.

Hamish Pottinger asked if the new equipment was effective would the cost of making two machines be prohibitive. Phil responded that he believed that there was an opportunity to clear the rest of the known plume next year.

Steven Heddle asked what would happen after the plume was dealt with. Phil replied that all the information from the 2010 clean up would be provided to PRAG(D) who will consider the information gained and allow them to make recommendations for completion criteria. He said that HPA, Food standards and SEPA, together with the other PRAG(D) members were clear that the criteria would have to include statistical review.

Steven Heddle asked if the plume was found to go into deeper water what was the likelihood of more money being required and would this be made available. Roy Blackburn responded that if there was a change in the scope of the project then the site would submit a change control to the NDA and this would be considered through the sanctioning process.

Rick Nickerson noted that following last years' campaign 115 particles were retrieved with 16 particles (mostly significant) left in situ. He asked if these had been logged and would the equipment be going back to see if there were still there. Phil responded that this was the intention because whatever was found would provide information to PRAG(D) in relation to whether these particles were mobile. This would also provide further information on repopulation issues.

An Environmental Safety case for the remediation of the old liquid effluent discharge system has been provided to SEPA for their consideration. The safety case has determined that, with minimal intervention in the form of targeted grouting, the system will remain passively stable for 100,000 years.

Monitoring of beaches continued as per schedule. The foreshore continues with weekly surveys, weather permitting. Sandside Beach was monitored during November and December but since then access had been withdrawn by the landowner. Dunnet beach had been surveyed in December with a further strandline survey due this week.

George Farlow noted that thanks should be extended to all those landowners who continued to provide consent for access to the beach to allow consistent data to be collected.

Steven Heddle asked whether the depth of the sand varies on beaches. Phil confirmed this and noted that a study had been undertaken on Sandside to develop a baseline map so that changes to the beach can be seen on a month to month basis. One of the things looked at, for improving the detection equipment was the movement of sand on the beach whichdoes change to some degree on a daily basis, but during storm events does alter significantly between tides.. Steven asked about the rocky areas. Phil said that in general particles followed the sediment and therefore rocky areas were not monitored except for where sediment accrued.

Steven Heddle asked whether the off-shore ROV could be deployed on-shore. Phil said that the equipment design required them to be in the water as the hydraulics of the equipment needed the water to keep them cool. The possibility of usin the ROV

from a beach had been considered and remained a possibility if towards the end of the clean-up this was deemed to be necessary.

Rick Nickerson noted that DPAG (Dounreay Particles Advisory Group) no longer existed. Phil commented that DPAG had been set up in 2000 to provide scientific information to SEPA and DSRL to guide the work done and identify the extent of the particle plume. DPAG's remit was completed with the publication of their Fourth Report. However, when the off-shore retrieval work started it was felt that an independent body was still required to review the ongoing work and PRAG(D) (Particles Retrieval Advisory Group (Dounreay)) was set up. Current PRAG(D) members were all from DPAG but with a differently focussed remit. PRAG(D) provides advice to SEPA and DSRL. It was noted that DSG was represented on PRAG(D) as an observer.

Rick Nickerson asked for the minutes of PRAG(D). The secretary noted that she received all PRAG(D) paperwork and would circulate the minutes and a list of papers – members could then request to see the additional information if they require.

ACTION: DSG/ESG(2010)M001/A002: Secretary to circulate PRAG(D) minutes and list of paperwork to ESG members on a regular basis.

Rick Nickerson noted that there had been several management changes on the site. He asked Phil what his position was and would he continue in the project management role relating to particles. Phil Cartwright confirmed that he continued to be the project sponsor for particles and for a number of other projects. It was the site's intention to keep him involved with this project but he would not have day to day operational responsibility. Rick Nickerson asked who was taking over the daily responsibility. Phil responded that the responsible person for the overall project was now Charlie Fowler, with Bill Thomson taking over the day to day management.

PRAG(D) update

Phil Cartwright noted that DSG were represented, as an observer, on PRAG(D) but unfortunately Alastair MacDonald was unable to attend the last meeting. It had been agreed that he would provide the update for the February meeting. Of note:

- PRAG(D)'s annual report has now been drafted and is likely to be published at the end of March. The next meeting of PRAG(D) was planned for 23rd June.
- At the February meeting the off-shore work for 2008/09 was considered and PRAG(D) were content with the revised reports provided by DSRL.
- PRAG(D) continue to re-iterate the necessity for continuous data for on-shore beach monitoring.
- DSRL submitted the outline plan for the coming years' work and PRAG(D) considered this in some detail. The agreement reached was toreduce the lower predicted particle area and increase the area in the higher particle population densities. In terms of predicted numbers DSRL expect to retrieve approximately 200 significant particles this year. However, the proviso is that if higher activity particles continue to be detected monitoring will continue until the population is seen to be less than 5 particles/hectare. PRAG(D) will review DSRL decisions but noted they trusted the project to may the correct operational decisions.

- PRAG(D) reviewed new equipment, in terms of the detector systems, and no
 issues were identified. They also scrutinised the retrieval tool and noted the
 project was heavily dependant on accurate particle location. Testing of the new
 equipment on representative particles was therefore important.
- By working with PRAG(D) it is hoped to get to a stage where criteria are set to determine the clean-up has been acceptable,.

George Farlow noted the particle that was found near to the low level waste facility site. He asked whether further monitoring of the land near to that vicinity would continue. Phil Cartwright confirmed that the initial work was undertaken to look at the detail of the footprint of the proposed site for the low level waste facility. Following the find there had been a detailed investigation. Discussions had taken place with Buldoo Residents Group and in terms of areas covered so far, including other coastal areas DSRL do not plan to do any more at present, although this will be kept under review. The Buldoo Residents Group had agreed with this.

6. UPDATES

DSRL site performance reports

DSG(2010)P005 and P006 were tabled and noted. Alan Scullion provided a verbal update. Of note:

- Reactor decommissioning: At PFR (Prototype Fast Reactor) the 2nd of the three dump tanks has now been decommissioned. Electrical strip-out of the PFR reactor top is now complete with over 22km cabling being removed.
- A remote camera inspected the reactor vessel which identified no significant amounts of sodium remained. This information is important to determine the strategy for dealing with the vessel.
- At DFR the liquid metal destruction plant successfully completed its 75th batch before being shutdown for maintenance. A total of 89 batches has now been destroyed.
- The FCA (fuel cycle area) ventilation project continued with the commissioning of the new ventilation system. Electrical testing was completed and setting to work of the fans has commenced. The system will be thoroughly inactively tested before being connected to the plants.
- The investigation into an elevated neutron dose rate from a waste flask was initially assessed at INES Level 0 this has now been re-assessed at Level 1. The rating has been confirmed by the NII National INES officer. NII continues to investigate. (NB INES Level scales from 0 (low) to 4 (high)).
- DSRL submitted a new discharge proposal to SEPA which forecast levels of discharge until 2025 and reflects the change of focus from operational to decommissioning activities. SEPA has asked DSRL to make some minor revisions and modifications to its application and this is expected to be completed by end of March.

Rick Nickerson asked when it was expected that SEPA would carry out consultation on the new site discharge authorisation. It was agreed that this would be something to ask SEPA.

Action: DSG/ESG(2010)M001/A003: Secretary to ask SEPA when consultation on DSRL's site discharge authorisation was expected.

Rick Nickerson asked how often the discharge authorisation would be reviewed Alan Scullion said he would clarify this and report back to the ESG.

Action: DSG/ESG(2010)M001/A004: Alan Scullion to clarify review periods for the site discharge authorisation.

- In February SEPA completed an audit of Environmental Support files and progress on implementation plans. The outcome of the audit was satisfactory.
- In December the teams in DFR and PFR have now passed a combined total of twelve years without a lost time accident which equates to four million man-hours without an injury that has resulted in someone being off work for more than a few days. On 28th February the site, as a whole, recorded 366 days (3.76 man-hours) without a lost time accident – this exceeds the previous site record of 3.58 million man-hours.

SEPA update

DSG(2010)P007 was tabled. Roger Wilson had tenders his apologies for this meeting but would attend DSG this evening. Therefore any questions to SEPA would be transferred to this evening's meeting if appropriate.

NDA update

Roy Blackburn provided a verbal update. Of note:

- The public value programme (PVP) was not yet complete for most sites with the
 exception of Dounreay. The funding for Dounreay has been agreed up to a
 maximum of £150m per year (starting 2011/12). The reason for Dounreay's
 funding position being agreed was because of the competition for the site's PBO
 which had just commenced.
- The NDA competition for the Dounreay site commenced with a day in Wick Assembly Rooms on the 5th February which was hosted by DSG and concentrated on the socio-economic opportunities for the county. The 2nd part of the industry event had been held in Glasgow on 9th March and concentrated more on the competition process and contractual issues with presentations being provided by the regulators as well.
- The formal contract notice for the competition had been issued in OJEU listing on Friday last week and this formally kicked off the competition.
- The NDA Chief Executive and the local NDA team provided congratulations to the site and its sub contractors on achieving 12 months without a lost time accident.
- The NDA continues to make organisational changes and two senior members –
 Jim Morse and Bill Roberts had now moved on. Temporary cover for these posts
 has been put in place and a review of organisational effectiveness continues.
- 7. SCOTTISH GOVERNMENT'S CONSULTATION HIGH ACTIVITY WASTES

Scottish Government had recently published a consultation on high activity wastes. A working group of DSG had been set up and had met and identified a list of questions and issues for clarification (DSG(2010)C018 refers). Elizabeth Gray from the Scottish Government would attend DSG this evening to provide a presentation and clarify some of the issues which were raised. Following this the working group would meet again with a review to drafting a response to the consultation which would be circulated round all members for comment/approval before submission. Deadline for responses is 9th April.

Rick Nickerson noted that Shetland Islands Council could not associate with the DSG response as views from Shetland were different to those living in the local area. He agreed that he would circulate the Shetland response when it was available. Rick indicated that Shetland Islands Council did not agree with the disposal option and favoured the storage and management of waste. Their main concern was that Scottish Government have completely reversed their decision and it appears that first choice is now given to disposal with no intent to retrieve.

Action: DSG/ESG(2010)M001/A005: Rick Nickerson to circulate Shetland Islands Council response to Scottish Government's consultation on high activity waste when available.

Steven Heddle noted that Orkney Islands Council would also submit a response to the consultation. He also agreed to circulate to members Orkney's response.

Action: DSG/ESG(2010)M001/A006: Steven Heddle to circulate Orkney Islands Council response to Scottish Government's consultation on high activity waste when available.

George Farlow noted that Highland Council's response would be put before the committee shortly and he also agreed to circulate Highland Council's response.

Action: DSG/ESG(2010)M001/A007: George Farlow to circulate Highland Council's response to Scottish Government's consultation on high activity waste when available.

8. **DRAFT HERITAGE STRATEGY UPDATE**

James Gunn, DSRL provided a verbal update. Of note:

- The engagement process for the draft heritage strategy commenced on 10th December and closed on 8th March.
- He provided an outline brief of all the activities undertaken in the run-up and during the engagement process to encourage responses.
- Thirty-seven responses were received and there would be a couple of days grace to see if further responses were received through the post.
- The next steps would be to review all the responses a document with all submissions and DSRL's initial response would be made available on the website.
- The submissions would be considered and the heritage strategy would be finalised and agreed with NDA and DSRL before being published. This would then lead to an implementation plan being set down to ensure that the heritage

strategy is delivered.

lan Webster asked if the DFR is scheduled to be painted this year as it was starting to look quite tatty. James Gunn said he would ask and report back.

Action: DSG/ESG(2010)M001/A008: James Gunn to check whether DFR is scheduled to be painted this coming financial year.

9. CORRESPONDENCE FOR NOTING

- At the last DSG meeting it had been agreed that DSG would write to the Scottish Government about legislation on non-radioactive material and landfill.
 (DSG(2010)C012 refers. A response from Richard Lochhead (DSG(2010)C019) has suggested that DSG speak to SEPA to see if there is a non-legislative way of dealing with this. The secretary noted that this would be raised this evening through the chair.
- The secretary noted that a number of questions had been raised in relation to the RIFE report. She had written to Roger Wilson asking for:
 - A copy of the habit survey undertaken in 2008.
 - Clarification on the sampling of rabbits it appears only one rabbit was sampled and does not explain the location of where that rabbit was and how the dose to critical groups are calculated using one sample.
 - o What effect Dounreay has on the environment?

It was agreed that these would be asked at the evening meeting and an action placed on Roger Wilson to provide a response in due course.

Action: DSG/ESG(2010)M001/A009: Roger Wilson to provide response in relation to questions from RIFE report.

There being no further business George Farlow thanked everyone for attending and closed the meeting.

George Farlow DSG Environment sub group chairman 13th March 2010

APPENDIX 1

ACTIONS ARISING FROM THIS MEETING

DSG/ESG(2010)M001/A001: Secretary to contact COMARE to ask if they were considering KIKK (German) study on leukaemia clusters in young people while carrying out their own extended study.

DSG/ESG(2010)M001/A002: Secretary to circulate PRAG(D) minutes and list of paperwork to ESG members on a regular basis.

DSG/ESG(2010)M001/A003: Secretary to ask SEPA when consultation on DSRL's site discharge authorisation was expected.

DSG/ESG(2010)M001/A004: Alan Scullion to clarify review periods for the site discharge authorisation.

DSG/ESG(2010)M001/A005: Rick Nickerson to circulate Shetland Islands Council response to Scottish Government's consultation on high activity waste when available.

DSG/ESG(2010)M001/A006: Steven Heddle to circulate Orkney Islands Council response to Scottish Government's consultation on high activity waste when available.

DSG/ESG(2010)M001/A007: George Farlow to circulate Highland Council's response to Scottish Government's consultation on high activity waste when available.

DSG/ESG(2010)M001/A008: James Gunn to check whether DFR is scheduled to be painted this coming financial year.

DSG/ESG(2010)M001/A009: Roger Wilson to provide response in relation to questions from RIFE report.

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: "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 for Dounreay". [DSG(2009)C098 asks for this action to be closed out as a matter of urgency].

DSG(2009)M004/A003: Tony Wratten, DSRL to provide a presentation to the ESG on environmental monitoring (current regime and into the future). *Action ongoing – on agenda for June ESG.*

DSG(2009)M004/A005: June Love to organise a visit to the Dounreay site for Councillors Steven Heddle and George Farlow (and extend to other DSG members) at a convenient time. Action ongoing – currently out to members to identify all those who wish to visit.

DSG(2009)M004/A006: Tony Wratten to circulate the Highland Council's Planning Framework document to ESG members when complete. Will likely be available in the

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summer 2010.

DSG(2009)M004/A008: Secretary to invite COMARE to present their findings once the extended study on cancer excesses in the vicinity of Seascale and Dounreay was complete. *Invitation has been sent asking COMARE for updates and a presentation when study is complete.*

ACTIONS COMPLETED

M002/A014: DSRL to provide a presentation at next ESG and DSG on the application for new discharge authorisation. *Action complete – presentation taking place at ESG in September and on agenda for DSG meeting on 9th December.*

M003/A008: Tony Wratten to provide secretary with electronic version of summary information in support of the application for authorisation from Dounreay. *Action complete – see DSG(2009)C102.*

DSG(2009)M004/A001: DSG members to write to Scottish Government on the storage of waste and landfill. *Action complete – see DSG(2010)C012.*

DSG(2009)M004/A002: Secretary to circulate list of paperwork for PRAG meetings to ESG members. Action complete – list of PRAG(D) papers for meeting 2 was sent round ESG members on 15th December 2009.

DSG(2009)M004/A004: Phil Cartwright to send Cllr Steven Heddle the DPAG defined map of the main particle plume (and website link to DPAG's 4th report). *Action complete – maps of main particle plume sent to Cllr Heddle on 15th December.*

DSG(2009)M004/A007: All members to discuss with their respective organisations and submit views to the heritage strategy. Action complete – reminder sent out and closing date of 8^{th} March is now passed.