



Please respond to:

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Nuclear Decommissioning Authority
Herdus House
Cumbria

Dear Sir/Madam

DOUNREAY STAKEHOLDER GROUP - RESPONSE TO NDA'S DRAFT STRATEGY.

The Dounreay Stakeholder Group represents over 20 community organisations. While the response set out below is a general consensus of the group it is possible that some organisations will not agree with all the comments made in this submission. Shetland Islands Council has intimated that they do not concur with some of the responses to this submission and will therefore be submitting their own response. Other member organisations have been encouraged to submit their own response if these vary widely from the DSG response.

On a general note, DSG welcomes the opportunity to comment on the draft strategy and congratulates the NDA and the Dounreay site for the progress that has been made over the past five years. DSG notes that there have been periods of uncertainty both in the staffing of the NDA and on the issues of funding. DSG is pleased with the announcements from the UK Government's funding review which allows the site to have predictability of £150M funding for the Dounreay site to allow it to continue the exceptional progress made to date.

General comments not related to the questions posed but which are worth noting are as follows:

Page15: *Critical enabler – socio economics:* DSG consider that this should include staff transition and based on the lifetime of the programme and the socio-economic impact in the area, including other employment opportunities in the travel to work area.

Page 19: It is encouraging that the NDA are providing an estate-wide good practice guiding principles. DSG considers that this should be extended to look at good practice across the entire nuclear sector.

Responding to the questions set out in the draft strategy document:

Q1 What are the most important factors for the NDA to consider when developing estate wide, good practice principle from decommissioning and clean up and why?

DSG agrees that risk/hazard reduction is important. However this needs to be considered along with the socio-economic impact. At Dounreay the funding level is reasonable because the site, at present, has the second highest hazard in the NDA estate. If NDA concentrate only on high hazards, by the time Dounreay's hazard is destroyed funding could be dramatically reduced. DSG believes it is important to ensure appropriate funding for the site continues to allow the retention of skills to take the site to the interim end state. Therefore funding levels need to be balanced between the reduction of risk/hazard alongside the economic impact of severely reduced funding.

Q2 What factors should the NDA consider when exploring opportunities for managing contamination in-situ

Factors should include the risk to people and the environment posed by contamination (nuclear and non-nuclear). Consideration should also be given to the decay period of radioactive contamination weighed against the costs of digging out the ground and transportation/disposal into a low level waste facility. DSG believes that future use of land should be a significant factor in the decision to manage contamination in-situ.

Q3 What are your views on the preferred strategy to restore a site condition suitable for its next planned use?

DSG supports this strategy and believes that if land/property is handed over to another responsible nuclear licensee, a clear report must be given to allow the new incumbent information on the condition of the land/property. If there is legacy issues NDA should remain responsible for these.

Q4 What factors should the NDA take into account when determining how much restoration is sufficient?

Factors should include the future land use (and dependent on that use) the environmental factors (such as drainage, potential environmental/climatic changes), risks from contaminant, radioactive toxicity and half lives as well as accessibility. Local Stakeholder views will be important since they assisted in the definition of the site end states on behalf of the NDA. The polluter pays principal should be applied to environmental issues.

Q5 Do you agree with the NDA's expectation that none of our facilities will be preserved for national heritage? If not why not?

DSG was involved with the Dounreay site's heritage strategy and while most would probably like to see DFR preserved for national heritage it was recognised that the cost of maintenance and other issues far outweighs the advantages of retention.

In saying that, UK (and Caithness in particular) should be proud of its science and engineering heritage and the contributions made to the world nuclear energy research and development programme. An NDA heritage strategy should be developed to ensure the retention of records, photographs and information be kept for future generations.

Dounreay has developed a robust heritage strategy and DSG would encourage NDA to consider this for all sites to maximise the benefits on a 'UK nuclear heritage' strategy.

Q6 When Evaluating options for the management of spent Magnox fuels, what factors are most important for the NDA to take into account and why?

Not applicable to Dounreay.

Q7 When Evaluating options for the management of spent oxide fuels, what factors are most important for the NDA to take into account and why?

Not applicable to Dounreay.

Q8 When Evaluating options for the management of exotic fuels, what factors are most important for the NDA to take into account and why?

Site Stakeholder groups should be involved. If issues identified are estate-wide then there should be a national discussion on the subject. If issues are local then the site should be responsible along with the NDA site facing team of ensuring that all issues are considered and taken into account. Transportation would likely be a generic issue for the majority of sites in the UK.

Q9 In the development of future management options for uranium, what factors are most important for the NDA to take into account

Not applicable to Dounreay.

Q10 What are your views on the principles we describe for the management of waste on our sites?

DSG is supportive of the principles.

Q11 What are your views on consolidating storage of radioactive waste at a reduced number of sites and on the possibility of near surface disposal of some ILW at or near existing nuclear licensed sites.

A holistic approach should be taken. In particular in considering the consolidation of storage, consideration should also be given to waste which will come from the future decommissioning of the current operating EdF nuclear sites, new build and ministry of defence sites. This could create a future income to reduce the costs of maintaining and operating storage facilities.

However, DSG believes that this is unlikely to be an issue for the Dounreay site as our location would probably mean it would be more expensive to consider this as an option. We are currently awaiting Scottish Government policy on higher activity waste and this will be adhered to in Caithness, as well as other Scottish sites.

Q12 What comments do you have on how we should implement the strategy set out here?

There needs to be a challenge re the " significant" waste volumes from managing contaminated ground.

Q13 Do you think there are opportunities for managing non radioactive and hazardous waste better across the NDA estate, and if so what are they?

DSG has no comment on this issue.

Q14 When evaluating the opportunities to dispose of assets or pursue additional commercial revenue, what factors are the most important to take into account and why?

The use of some facilities (in particular) waste storage facilities may be a unique selling point to a community trying to attract new business opportunities into remote and fragile communities.

Q15 What factors do you believe the NDA should take into account in seeking the optimum standards of health, safety, security and environmental performance in the delivery of environmental restoration?

Health and safety cannot be compromised and must be a given. Environmental performance, while very important, should be weighted against cost. By consolidating materials which are a security risk into one site would reduce the national bill for security issues on the majority of sites.

Q16 What do you think about the NDA taking a broader role by coordinating R&D strategy for decommissioning and clean up across the wider nuclear sector?

Supportive as long as this broader approach involves the complete nuclear sector and not just the NDA estate. However, the NDA needs to be careful that the decommissioning of nuclear sites is not over complicated by scientists and engineers resulting in significant R&D costs. Sometimes the simplest solutions are best (eg the use of Cillit Bang at Dounreay).

While carrying out decommissioning much of the R&D successes come about with sharing of practical knowledge which could be increased by recording successful processes as they happen and the NDA could support a 'bank' of decommissioning knowledge. The EU did this in Europe with the 6th Framework projects back in the 1990's (of which WAGR was a part of). All that information is easily electronically accessed for education, training and R&D.

Collaboration should also encompass other sectors faced with decommissioning facilities contaminated with radioactive/hazardous material eg the oil and gas sector and the decommissioning challenges being faced in the North Sea.

The NDA should also ensure that R&D is also not focussed in the North West region. For instance Scottish Enterprise has awarded a contract to look at Nuclear Decommissioning Supply Chain project; there is a Scottish Nuclear Waste Research Centre involving a number of Scottish Universities; and the Scottish Universities Physics Alliance which has been looking at nuclear industry.

There is an opportunity to undertake R&D during decommissioning eg taking samples of reactor components for analysis. This information could be of great benefit to others (commercial value to NDA). An example could be samples from the Dounreay fast reactor which could be of use to others developing fast breeder reactor technology (eg Japan)

Q17 What are your views on the NDA's proposal that in order to deliver our People Strategy, we should extend our partnerships to other parts of the nuclear industry?

Very supportive of the statement "strong link exists between our people and the Socio-Economic Strategy". Indeed the NDA should consider realigning their business so that individuals with a Socio Economic Responsibility are accountable within the HR function rather than the PR Function.

Partnerships should be extended beyond the nuclear industry as currently there is no nuclear new build in Scotland. Therefore other sectors are becoming more important for understanding their future people needs.

No mention is made of the Engineering Skills centre in Thurso which is currently being built. Why is the focus always in the North West (Energis; Dalton Cumbria Facility)

The People Strategy needs to make a significant contribution to the wider energy industry agenda - this is of particular importance in Scotland.

4. 5 Contracting and Incentivisation

Caution has to be exercised in relation to shared procurement services. Whilst an estate wide solution may deliver a cost saving to the NDA, there could be a resulting increase to some individual sites as a result of the shared procurement. This increased cost to an individual site should not be seen to affect their budget.

Additionally, some services are procured from local businesses. By moving to a NDA wide approach may result in the loss of business to a local company and resulting in job losses/ company closure. Extreme caution should be exercised on the socio-economic impact for sites in remote areas with a high dependency on NDA work.

The NDA should look to the SLCs to flow down socio-economic criteria into contracts or consider this when letting contracts. The contractor should also be encouraged to make information on the socio economic support available, for example this could be by recruiting locally, apprentice training, etc). This is of particular importance in some of the NDA priority areas for Socio-Economics.

Mention should also be made of the supply chain charter.

Q18 To what extent should the NDA focus on knowledge management compared to information management compliance.

Both are extremely important and are probably equal in status. There is an opportunity to share knowledge from the decommissioning of facilities to improve the design of new facilities (thus potentially providing a commercial value to the NDA).

Q19 What alternative approaches could be considered in the delivery of our socio economic activities?

DSG recognise NDA's delivery of some sound socio economic funding on various sites. However, it needs greater clarity on why or why not a funding application was accepted and consistency of approach is essential.

The site's budget to support socio economic activities should remain and the Parent Body Organisation also needs to take a pro-active role in this. The socio economics of an individual site should be seamless between NDA, PBO and SLC.

DSG notes that NDA will continue to monitor the socio economic impact of the site restoration activities on local communities. DSG would be interested in receiving information on the results of such monitoring.

A clear distinction needs to be made between Corporate Social Responsibility and Socio Economics. CSR should be seen as being the 'good neighbour' (donations, stakeholder engagement, etc) which socio economics should be considered in the context of workforce transition into sustainable employment. In addition the site's support to the Caithness & North Sutherland Regeneration Partnership should continue to ensure funding of enabling projects to attract new business is maximised between various organisations.

DSG believes that the priority areas should be reviewed with clear criteria of how these are identified and taking into account the length of lifetime plans for each site and the emerging opportunities that does not need NDA funding to attract them. NDA describe the four priority action plans which DSG is aware of. The most up to

date plan is dated 2009 and DSG would recommend that NDA now update these (following a transparent assessment of the priority areas) in partnership with the Caithness & North Sutherland Regeneration Partnership.

DSG also notes that NDA are considering the mechanism for delivery of socio economics throughout the NDA estate. We welcome this review and suggest that as NDA plans formulate there is engagement with DSG and CNSRP to ensure that whatever mechanism evolves it is supported by the local area.

There are perceived benefits from some procurement of 'shared services' but this should not have a detrimental impact on local communities in fragile areas.

The NDA reports that the strategy is mature. DSG would conclude it is still evolving and will continue to evolve and plans and programmes for site restoration are refined. DSG looks forward to supporting the continued development of the strategy.

4.10 Public and Stakeholder Engagement and Communications

Where the supply chain is used to assist in delivering decommissioning projects, they should be given appropriate credit by the NDA, PBO and SLC. This will assist these companies (in particular those local to an NDA site) to sell their expertise in diversification. Therefore the strategy should include a bullet point stating " be fair and respectful.

The NDA also need to provide a clear and simply statement on how it plans to continue with stakeholder engagement in the future.

Q20 What emphasis should the NDA place on using transport rather than duplicating assets and capabilities in numerous locations across our estate?

Transport will be an issue that has varying opinions from different stakeholders and will need to be handled sensitively and sensibly.

The NDA should continue to co-ordinate transport to maximise the effectiveness across the estate. However when taking a strategic view of transport issues the NDA need to consider options which may bring a Socio Economic impact to an area. The working group should include someone with a socio-economic view who does not look at this issue in isolation of one site.

4.12 Funding

Consider what information maybe of interest to other nuclear bodies (UK and overseas) from decommissioning activities. This could be metal samples from material exposed to varying radiation fluxes which could potentially assist in the development of new nuclear facilities.

4.13 International relations

This could potentially assist in the development of new nuclear facilities elsewhere and sites should be encouraged to provide information and assistance if appropriate.

Yours sincerely

Sent electronically without signature

Bob Earnshaw
DSG Chairman

cc. Stuart Chalmers, NDA site facing team

Simon Middlemas, DSRL Managing Director
DSG members