



Please respond to:

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Dear Sir/Madam

NDA DRAFT BUSINESS PLAN 2011-2014

The Dounreay Stakeholder Group welcomes the opportunity to respond to the NDA's draft business plan.

On a general note, the NDA is to be congratulated for the work they have done to secure the funding settlement in the present financial climate.

The DSG recognises that the NDA's effort has been mainly focussed on the funding settlement and the re-organisation. Now that these issues are clearer it is important for the NDA to provide clarity on what the refocusing of effort means to the sites and their Parent Body Organisations (PBOs).

A minor point is that on page 14 of the draft business plan (Appendix 1 – NDA Sites Location Map) the location of Dounreay and Forss has been reversed and are therefore shown in the wrong location.

Of particular note:

- **Funding:** It is imperative that predictability of funding is given to each site to allow them to build robust lifetime plans. Continuity of funding also allows site's to reach its interim end states with retention of the skills required to complete the mission. The impact of site closure, the lifetime plan dates, should also be taken into account when it comes to allocating appropriate funding.
- **Site Restoration:** DSG is pleased to see NDA's commitment to taking Dounreay to its interim end state. However, we have seen how difficult this can be when

funding is reduced and work has to be concentrated on re-aligning a lifetime plan. Predictability of funding to allow the lifetime plan to progress is essential.

- **Spent fuel:** We note that consideration is being given to transferring breeder fuel to Sellafield. DSG would expect to be fully consulted on this issue, in conjunction with Scottish Government, and taking into account the positive and/or negative potential socio economic impacts that this may have.
- **Nuclear Materials:** As above, DSG would expect to be fully consulted on any transfer of materials to Sellafield.
- **Integrated Waste Management:** DSG agrees with this objective that wastes are managed in a manner that protects people and the environment. We note that DECC has recently published a consultation on low level waste within the non-nuclear industry and would like to understand NDA's position on accepting low level waste in current and/or future low level waste facilities.
- **Critical enablers:** Clarity now needs to be provided as to how NDA moves forward with enabling activities. The NDA has indicated that they may look at different delivery mechanisms for such things as socio economics and it is essential to ensure that these mechanisms are clearly set out and engaged on, via the Site Stakeholder Groups.
- **Dounreay Site Restoration Ltd:** Key activities look reasonable and DSG looks forward to hearing about the site's progress against these milestones in the future. However, we note that there are no key milestones for the clean-up of radioactive particles in the off-shore environment and believe that this should be highlighted. While we recognise that this is not seen as a 'high hazard' it is uncontrolled contamination and is essential to the community's image to ensure that this work continues to allow the clean-up to be completed.
- **2011-2012 key activities:**
 - **Review business case for potential consolidations of nuclear materials:** The NDA should ensure that there is a transparent consultation with site stakeholder groups on the transfer of nuclear materials.
 - **Continue development of effective stakeholder engagement:** DSG wish to see clear proposals as to how NDA now proposes to engage on a national level. While we are aware of what the NDA do not want to do greater clarity is required in how engagement will take place in the future.
 - **Embed new ways of working in the NDA and estate following the organisational review:** DSG believes that this needs to be carried out as soon as possible to avoid misunderstandings or duplication of effort. If NDA are taking a more 'hands-off' approach this must be done right across the estate and clear guidelines on 'NDA's new ways of working' is now urgent to allow sites to deliver the decommissioning of their sites.
 - **Combined development of skills and people strategy:** DSG believe that this is a sensible way forward and request that NDA provide information on this, as part of the NDA's commitment to engage, at the appropriate time.

- **Reconsider future of National Nuclear Archives:** DSG has raised concerns about the progress of this project in the past and is disappointed at the recent announcements about lack of funding at this time. Members will continue to take an active interest in this project and look forward to seeing the National Nuclear Archive built in Caithness in the future.
- **Review delivery of NDA's socio economic obligations:** DSG would welcome early engagement on NDA's current thinking on the delivery of NDA's obligations for socio economics.

Yours sincerely

Sent electronically without signature

Bob Earnshaw

Dounreay Stakeholder Group, Chairman

cc. DSG members

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Anna MacConnell, NDA

Simon Middlemas, DSRL MD