



Nuclear
Decommissioning
Authority

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8 April 2011

Our ref: BP-ML-09

June Love
DSG Secretariat
Dounreay Stakeholder Group
Traill House
7 Orlig Street
Thurso
Caithness
KN14 7BJ

Dear June

Re: NDA Business Plan 2011-2014

Thank you for taking the time to comment on our Business Plan 2011-2014. For your information I have enclosed a copy of our report which lists all the responses we received with a note of actions taken where necessary. We have consolidated and amended the Plan where appropriate.

This year, we received 15 responses to our consultation. The responses received were from a broad range of stakeholders including Regulators, Site Stakeholders Groups, Local Authorities and Site Licence Company employees as well as members of the public. This compares with the consultation on last year's Plan which generated 30 responses from a similar cross-section of stakeholders.

The revised Business Plan has been amended in accordance with responses received. The Plan has been signed by Government and Scottish Ministers. Copies are now available on our website www.nda.gov.uk.

Meanwhile, I would like to thank you for supporting us in the development of our Business Plan.

Yours sincerely

Martin Liefelth
Head of Business Planning

Copy to: Tony Fountain, NDA
John Clarke, NDA
Bob Earnshaw, DSG

Enc.



Draft NDA Business Plan 2011-14

Response to Consultation

March 2011

INTRODUC

During our consultation with the Authorities and stakeholders.

1. GENERAL

period we received 15 responses. The responses we received were from a broad range of stakeholders including Regulators, Site Stakeholder Groups, Local Authority and other stakeholders. The consultation on last year's plan generated 30 responses from a similar cross-section of

	COMMENTS	ACTIONS
1.1	I support the plan. I am concerned that the plan does not take account of the long term costs of the sites. I would like to see that the Magnox sites seem to be funded at a level which will allow some key sites to continue such as recovery of wastes from the Berkeley vaults which are not a satisfactory option. The work at Bradwell and Trawsfynydd appears to be directed to getting the sites into a state where they can be transferred to a private operator. I would like to see that RSRL will be developing plans for transfers of fuel and LLW from the sites. This has been an aspiration for many years and has the potential to reduce total costs to a significant level. The work will require significant input from other SLC's and I trust that the NDA will be able to provide this. This is a very good example of where the NDA can add value by working with other SLC activities.	Noted
1.2	I am concerned that the plan does not take account of the long term costs of the sites. I would like to see that the Magnox sites seem to be funded at a level which will allow some key sites to continue such as recovery of wastes from the Berkeley vaults which are not a satisfactory option. The work at Bradwell and Trawsfynydd appears to be directed to getting the sites into a state where they can be transferred to a private operator. I would like to see that RSRL will be developing plans for transfers of fuel and LLW from the sites. This has been an aspiration for many years and has the potential to reduce total costs to a significant level. The work will require significant input from other SLC's and I trust that the NDA will be able to provide this. This is a very good example of where the NDA can add value by working with other SLC activities.	Noted
1.3	I would like to see that RSRL will be developing plans for transfers of fuel and LLW from the sites. This has been an aspiration for many years and has the potential to reduce total costs to a significant level. The work will require significant input from other SLC's and I trust that the NDA will be able to provide this. This is a very good example of where the NDA can add value by working with other SLC activities.	Noted. With the recent organisation re-structure this will be coordinated through our new National Programmes team.
1.4	The plan does not take account of the long term costs of the sites. I would like to see that the Magnox sites seem to be funded at a level which will allow some key sites to continue such as recovery of wastes from the Berkeley vaults which are not a satisfactory option. The work at Bradwell and Trawsfynydd appears to be directed to getting the sites into a state where they can be transferred to a private operator. I would like to see that RSRL will be developing plans for transfers of fuel and LLW from the sites. This has been an aspiration for many years and has the potential to reduce total costs to a significant level. The work will require significant input from other SLC's and I trust that the NDA will be able to provide this. This is a very good example of where the NDA can add value by working with other SLC activities.	Noted
1.5	I am concerned that the plan does not take account of the long term costs of the sites. I would like to see that the Magnox sites seem to be funded at a level which will allow some key sites to continue such as recovery of wastes from the Berkeley vaults which are not a satisfactory option. The work at Bradwell and Trawsfynydd appears to be directed to getting the sites into a state where they can be transferred to a private operator. I would like to see that RSRL will be developing plans for transfers of fuel and LLW from the sites. This has been an aspiration for many years and has the potential to reduce total costs to a significant level. The work will require significant input from other SLC's and I trust that the NDA will be able to provide this. This is a very good example of where the NDA can add value by working with other SLC activities.	DRS play an important role in the delivery of the MOP Programme. Where possible NDA utilises assets to offset public funding requirements.
1.6	On the face of it, the plan does not take account of the long term costs of the sites. I would like to see that the Magnox sites seem to be funded at a level which will allow some key sites to continue such as recovery of wastes from the Berkeley vaults which are not a satisfactory option. The work at Bradwell and Trawsfynydd appears to be directed to getting the sites into a state where they can be transferred to a private operator. I would like to see that RSRL will be developing plans for transfers of fuel and LLW from the sites. This has been an aspiration for many years and has the potential to reduce total costs to a significant level. The work will require significant input from other SLC's and I trust that the NDA will be able to provide this. This is a very good example of where the NDA can add value by working with other SLC activities.	Washington removed as requested.
1.7	Although the plan does not take account of the long term costs of the sites, it does take account of the short term costs. I would like to see that the Magnox sites seem to be funded at a level which will allow some key sites to continue such as recovery of wastes from the Berkeley vaults which are not a satisfactory option. The work at Bradwell and Trawsfynydd appears to be directed to getting the sites into a state where they can be transferred to a private operator. I would like to see that RSRL will be developing plans for transfers of fuel and LLW from the sites. This has been an aspiration for many years and has the potential to reduce total costs to a significant level. The work will require significant input from other SLC's and I trust that the NDA will be able to provide this. This is a very good example of where the NDA can add value by working with other SLC activities.	The publication of our draft Business Plan is determined by the Government and the latest version has come out on the heels of a major consultation exercise around our new draft Strategy and the Government's announcement of the funding settlement for the next four years. See updated table in Appendix 5.
1.8	If the plan does not take account of the long term costs of the sites, it does take account of the short term costs. I would like to see that the Magnox sites seem to be funded at a level which will allow some key sites to continue such as recovery of wastes from the Berkeley vaults which are not a satisfactory option. The work at Bradwell and Trawsfynydd appears to be directed to getting the sites into a state where they can be transferred to a private operator. I would like to see that RSRL will be developing plans for transfers of fuel and LLW from the sites. This has been an aspiration for many years and has the potential to reduce total costs to a significant level. The work will require significant input from other SLC's and I trust that the NDA will be able to provide this. This is a very good example of where the NDA can add value by working with other SLC activities.	Noted. The Business Plan is a high level view of activities across the estate, not a detailed project plan.
1.9	As the plan does not take account of the long term costs of the sites, it does take account of the short term costs. I would like to see that the Magnox sites seem to be funded at a level which will allow some key sites to continue such as recovery of wastes from the Berkeley vaults which are not a satisfactory option. The work at Bradwell and Trawsfynydd appears to be directed to getting the sites into a state where they can be transferred to a private operator. I would like to see that RSRL will be developing plans for transfers of fuel and LLW from the sites. This has been an aspiration for many years and has the potential to reduce total costs to a significant level. The work will require significant input from other SLC's and I trust that the NDA will be able to provide this. This is a very good example of where the NDA can add value by working with other SLC activities.	Comments noted, NDA recognises the need to engage with communities affected by all waste management activities.

1.10	<p>required</p> <p>There is a discrepancy in the way that DFR breeder is described in various parts of the Business Plan 2014. For example: Spent Fuels: "Site Export capability completed for out of reactor breeder fuel transfers to Sellafield Limited SLC Summary - Spent Fuels: "Progress capability to receive and reprocess Sellafield" Sellafield Limited SLC Summary - Spent Fuels: "Complete the capability to transfer DFR Spent Fuels to Sellafield" SRL SLC Summary, Spent Fuels 2011-12: The statement "Site export capability for out of reactor breeder fuel transfer to Sellafield" seems to align with the Sellafield however, the Nuclear Materials section on the same page says "Start removal of out of reactor material which seems to be misaligned with the spent fuels statement for Sellafield. SRL SLC Summary - This refers to the "out of reactor breeder flask shipments to Sellafield" stated. This looks odd as the Sellafield capability to receive the material is only completed in this timescale.</p> <p>In order to ensure clarity we suggest that consistent terminology is used for the breeder (i.e. either refer to it as "breeder fuel" or "breeder material") and that it is categorised under the heading of "Spent Fuel" in the document. We further suggest that a check is made to ensure that the detailed description for despatch and receipt of breeder material/fuel at Dounreay/Sellafield are fully aligned. We support NDA's Business Plan strategic objectives and mission statement. Would like to see the important aspect of NDA's contribution in enabling potential new nuclear stations in the future.</p>	Text updated.
1.11	<p>As with the previous business plan this document is focussed upon what the NDA's priorities are, and we believe that it lacks in providing the information of how these will be achieved, which we consider fundamental to delivering a successful business plan.</p> <p>We would like to thank NDA, Energy Solutions and Magnox Ltd in seeking to develop the long term strategy of the area and would hope the NDA continues this work and to pursue options regarding the possibility of continued electricity generation until 2014. Such work is important to the Wyifa workforce is retained on the island in the period leading up to the completion of the build.</p>	As a Decommissioning Authority we have no specific role in the new build programme other than support to Government when required. Noted. The Business Plan is a high level view of activities across the estate, not a detailed project plan. Noted
1.12	<p>As with the previous business plan this document is focussed upon what the NDA's priorities are, and we believe that it lacks in providing the information of how these will be achieved, which we consider fundamental to delivering a successful business plan.</p>	Noted. The Business Plan is a high level view of activities across the estate, not a detailed project plan.
1.13	<p>I would like to thank NDA, Energy Solutions and Magnox Ltd in seeking to develop the long term strategy of the area and would hope the NDA continues this work and to pursue options regarding the possibility of continued electricity generation until 2014. Such work is important to the Wyifa workforce is retained on the island in the period leading up to the completion of the build.</p>	Noted
1.14	<p>A minor location</p>	Map amended
1.15	<p>The overall size of the programme is encouraging given the pressures on public spending.</p>	Noted
1.16	<p>Recons We have recent interest in future.</p>	Noted
1.17	<p>We welcome</p>	Our Business Plan is the vehicle through which detailed milestones and outcomes are set out for a three year period. We will consider

	business planning process and when we might expect to start to see its impact reflected in subsequent business plans.	whether we can include a medium term picture of milestones and outcomes in next year's Business Plan to enable stakeholders to gain a better understanding of intended progress beyond the three year plan. The Strategy Management System and engagement in its development will impact future business plans as preferred options are matured and adopted.
1.18	Combined development of skills and people strategy: We 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.	Noted
1.19	Review delivery of NDA's socio economic obligations: We would welcome early engagement on NDA's current thinking on the delivery of NDA's obligations for socio economics.	Noted. We now have a business led engagement model to be published on the NDA website 1 April 2011.
1.20	Embed new ways of working in the NDA and estate following the organisational review: We believe 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.	The organisational effectiveness review is nearing completion and will be effective from 01/04/2011. SLCs are, and will continue to be, involved with the development of the new model.
1.21	Development of plans for disposal of VLLW - we would expect to see this activity listed in the planned activities for most other sites, but note that currently it is not. We assume that this is an oversight, as such plans will need to be developed at various sites (and this should be done in liaison with the relevant local authorities).	Noted

2 FUNDING/ BUDGET

	COMMENTS	ACTIONS
2.1	In the appendix 5 there is mention of R and D expenditure which is grouped with other items. I suspect that some of this spend is for work carried out by the NNL. I would have liked to see some specific mention of the objectives etc of the work.	NNL is not reliant solely on NDA for funding therefore we would not publish their activities in our business plan.
2.2	In appendix 5 I notice that some asset sales are expected to contribute £157M in 2011/12. This appears to be a very volatile market and I would hope that the SLC are protected in some way from cuts if the asset sales fall short of the predictions.	Noted
2.3	Whilst future budgets might be open to uncertainty, the report should at least have been able to talk in "ball-park" terms (for example, to the nearest £0.1m). Page 8 suggests that Government funding has been secured for the next four years (to 2015) - what is this funding, and what are NDA's expected incomes from commercial activities during this time.	See updated table in Appendix 5. We are now able to give you forecast figures for the next four years both for government funding and the NDA's expected incomes from commercial activities. Please note that forecast NDA commercial income is reliant on ageing operating plant and support infrastructure, and so is subject to change.
2.4	We welcome that the funding commitment to socio-economic, skills, knowledge management and R&D remains consistent, as reflected in Appendix 5. However, it would be beneficial, as in 2010/11, to breakdown these categories independently.	Noted
2.5	We welcome the positive outcome that has been secured from the Governments Spending Review (SR) and the high-level explanation in the CEO's Foreword and the statement about 'Our Funding'.	We have included a table showing the 4 year Spending Review outcome. Our Business Plan is the vehicle through which detailed

		<p>We think that there would be value in providing further clarification of how the planned expenditure for 2011-12 is firm but further analysis is needed to confirm activities in 2012-14. The CEO's Foreword refers to this need and points to the scope of work, but there is no clear explanation in the draft plan of what and what scope might include.</p>	<p>SR outcomes will consider whether we can include a medium term picture of milestones and outcomes in next year's Business Plan to enable stakeholders to gain a better understanding of intended progress beyond the three year plan.</p>
2.6		<p>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 sites to reach its interim states. Funding extension of the skills required to complete the mission. The impact of site closure, the lifetime taken into account when it comes to allocating appropriate funding.</p>	<p>Noted</p>
2.7		<p>The projects would appear to be in keeping with the NDA's prioritisation of funding (page 3) where priority will be focussed on 'the highest hazards and risks'. Finally, we would expect to see an amendment to the cost of decommissioning and clean up for Hunterston A as indicated in Appendix 5 page 42, to show additional funding for other projects.</p>	<p>Noted</p>
2.8		<p>Appendix 5 - 2011-2012 Planned Income and Expenditure Summary, page 42</p>	<p>The SLC will determine the funding which is rolled into the Magnox Optimised Decommissioning Programme (MODP) proposal that the NDA have accepted. The funding where applicable is included in the figure on page 40. (Funding future projects will be balanced against other site priorities.)</p>
2.9		<p>We welcome publication of the table, but would find it helpful if footnotes, reasons where expenditure at specific sites for 2011-12 will be significantly different to expenditure in 2010-11.</p>	<p>Noted</p>
2.10		<p>We note on page 20 of the Draft Business Plan the NDA comment that two are still generating, as functions are actively being sought to maximise commercial income". However, when looking at Table 1 '2011/2012 Planned Income and Expenditure Summary' lists the operating costs for Wyifa as £74M and Wyifa as £81M, totalling £155M in operating costs for these generating reactors. The '2011/2012 Breakdown of Income by Category' lists the income from electricity generation as £14M. SEPA would appreciate clarification on this issue.</p>	<p>Table 1 shows the costs of running Wyifa and Oldbury and table 3 shows the income from these two sites. Oldbury is due to stop generating in June 11, therefore the costs don't go down in the same proportion when generation stops. We have an aspiration to continue Reactor 1 at Oldbury beyond June 2011 for a short period and to continue running both Wyifa Reactors for a short period beyond 2012. This is dependant on regulator approval.</p>
2.11		<p>We welcome the maintenance of on site expenditure on socio economic development, skills development, knowledge management and R&D at £21M. However, we note that this is aggregated. We understand that it is proposed to invite external organisations nationally to bid for the £21M and NDA will award funding on the basis of strongest bids. It is not clear whether the £21M will be removed from socio economic funding and it is not clear whether the £21M will continue to be prioritised by NDA for socio economic support will continue to be prioritised. We would welcome clarification about how the NDA intends to move forward, including how future non site funding is to be administered and the criteria that will be applied in the selection of funding applications.</p>	<p>Allocation of funding will depend on the quality of business case submissions received and approved in line with the Socio Economic Policy.</p>
2.12		<p>The NDA's socio-economic commitment has been significant to Anglesey and Wales region in the past with funding secured to pursue socio-economic and development of the Energy Island Programme and we believe that provides the NDA with a key opportunity to further contribute towards the development of the Energy Island Programme and it is imperative that the NDA retains its socio-economic funding at a significant level. In particular it should continue to give priority in terms of allocation of funds to Anglesey and Meirionnydd and support the facilitation of the developing Energy Island work programme and the wider North West region.</p>	<p>Noted</p>
2.13		<p>It is imperative that the NDA retains its socio-economic funding at a significant level. In particular it should continue to give priority in terms of allocation of funds to Anglesey and Meirionnydd and support the wider North West region.</p>	<p>Noted</p>

that are important to the...
 Gas-cooled Reactor...
 and their continued... delivering UK strategic energy objectives. As an example, their ongoing... depend on NDAs. Sellafield facility for...
 with EDF Energy operation provides important major security of supply as...
 these ongoing operation is also a source of significant income for the NDA...
 the key... covering AGR spent fuel services. Investment, where...
 operations should therefore receive the appropriate priority...
 high level... deliverables of this Draft Business Plan...
 impact that...
 deliverables are detailed. However, from our perspective...
 within the Magnex Operating Programme (MOP) could have...
 demands careful consideration and it is vital that a joined-up...
 which the potential impacts on AGR operations are fully...
 under the objectives section...
 be added under the "Spent Fuels" heading to identify...
 of AGR fuel from British Energy (BE)/EDF Energy since...
 EDF Energy for the provision of this service...
 p.41 of the Plan...
 a long term Geological Disposal Facility appears as...
 we strongly believe that the GDF...
 the section of the Plan dealing with Integrated Waste...
 an important...
 The NEA future nuclear development programme that the government...
 of enhancing the UK's status standing among the World...
 to ensure that the value of its work in this area is fully...
 and decommissioning plans. We suggest that the...
 with this longer term objective would be valuable...
 Graphite at Hinton facility feasibility study...
 plan is to pursue a feasibility study of on site disposal of...
 the results from this study, the...
 Energy does not...
 Scottish Government's HAW policy and on...
 final disposal of LLW and HAW radioactive waste...
 Energy Power Station sites.

DF	as	nd	R	his	nd	cal	n	ar	on
			Noted. The ongoing ability to receive AGR fuel from (BE/EDF) sites is a priority activity for NDA.			This is a 3 year plan with focus on activities in 2011/12. At this stage in the process the local authority in Cumbria are engaged with local communities before it's decided to move forward to the next stage. NDA does acknowledge the importance of maintaining progress on GDF development.		Noted	

ACTIONS

Changed from Regulator to Site Restoration

Noted

			for a comprehensive C & M entry programme. Finally the focus at Hunterston is on the Solid Active Waste, with benefits from the learning at Bradwell and Trawsfynydd supporting its ongoing programme.
4.18	We welcome your commitment to continued generation at Wylfa until 2012, however, we believe that this Business Planning period would provide timely intervention to review the relationship between Wylfa and Trawsfynydd. Developing a strategic timeline between the completion of decommissioning in Trawsfynydd, and the beginning of decommissioning and new build at Wylfa would ensure that key skilled staff could be transferred ensuring they are retained in the local economy.		Business Plan updated
4.19	Whilst we have ongoing concerns about the various options for disposal / storage of HAW on site, we wish to state that: 1. We continue to support A radwaste remaining on site 2. We are appreciative of Magnox North keeping us informed about the Graphite Feasibility Study as this allows us to better consider the many implications that any future adoption of this option would / could have on our community 3. Although not mentioned as such, but nonetheless a priority for us, any waste management option in the business plan that, in the longer term, might directly or indirectly facilitate radioactive waste from out with the site being treated, stored or disposed of at Hunterston will be received negatively.		Noted
4.20	Magnox Limited: Magnox Programme, page 20 'Development options of disposal for Graphite' - we seek clarification on what the options are		Wording changed in document to Development of ILW management options including graphite pathfinder project
RSRL			
4.21	We note that planned activities for 2011-14 include: - developing a plan for the transfer of ILW away from the Winfrith and Harwell sites; and - development of plans for disposal of VLLW. The first activity illustrates a reason for asking how the new strategy, once adopted in spring 2011, will begin to influence the business planning process. More specifically, we would welcome clarification of when and how we might expect to see complementary activities at other sites relating to the development of plans for the receipt of ILW from Winfrith and Harwell.		Our Business Plan is the vehicle through which high level activities are set out for a three year period. Any potential re-location of materials is scope to be taken into consideration with other sites and stakeholders.
RWMD			
4.22	RWMD now have the responsibility for developing the disposal facility for ILW and a range of higher activity wastes such as spent fuel and high level waste. The state of development of the facility for disposal of the spent fuel and high level waste is well behind that of ILW in many ways. I would like to have seen some specific mention of the need to "catch up" on these wastes. The ability to dispose of spent fuel is closely linked to "new build" of reactors.		Noted - NDA has taken this into account with the recent re-organisation of its structure with new National Programmes team.
SELLAFIELD			
4.23	As slightly more than half of the money is spent at Sellafield it is disappointing that more is not said about the programme at Sellafield. The Magnox sites have quite a good introduction which gives a better flavour of what the NDA is trying to achieve on the Magnox sites.		Noted
4.24	One of the problems in commenting on the document is the very concise scope of work on some sites. This makes it difficult to see what work is not being done which perhaps should be being done! On one specific item there is no mention of the Windscale piles in the Sellafield section apart from a comment at the start of the Sellafield section which notes that the decommissioning of pile 1 is "a significant		Set against the priorities within the Sellafield Ltd Site Licence Company, decommissioning activities associated with the Windscale Piles has been deferred to later years. There is a robust safety case for the fuel to remain in situ for a longer period.

	challenge". Has the work been delayed?	
TRAWSFYNYDD		
4.25	Under Trawsfynydd Maentwrog is mentioned, at one time Maentwrog was managed by Wyifa but perhaps it has changed.	Resources are managed by Traws and Funding and portfolio work comes through Wyifa

Conclusion

We are grateful for the volume of carefully considered comments from a broad cross section of stakeholders. We thank all of those who have responded for their continued interest in our work and for supporting us in the development of this year's Business Plan.

