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RESPONSE FROM DSG TO NDA RE EXOTIC FUELS AND NUCLEAR MATERIALS – DOUNREAY, CREDIBLE OPTIONS, FEBRUARY 2012.

The Dounreay Stakeholder Group (DSG) consists of over 20 different organisations and therefore this response reflects the majority view of the group. If organisations do not agree with this response they will provide a separate response setting out their own views to the engagement paper. [Orkney Islands Council have specifically asked to make it clear that they will submit their own views and that the views of this letter does not necessarily represent the views of the Council.]

On a general note, the DSG notes that NDA provided Highland Council with a presentation on Exotic fuels on the 19th January. DSG held a sub group meeting on the 18th and was disappointed that they were not afforded the same presentation. This was rectified by DSG requesting a presentation at their public meeting on the 7th March.

As stated, when responding to the DFR Breeder fuel engagement paper, DSG felt that this had been a 'tick box' exercise with the preferred option already identified before seeking stakeholder views. It is difficult to believe that now that the principle has been set for DFR breeder fuel to be transported by rail to Sellafield (and the investment that will be required to enable fuel to be transported by rail) that the same outcome will not come from this engagement exercise.

We also note the following:

- Hazard reduction: If the decision is made to transport exotic fuels to Sellafield does the Dounreay site continue with its present level of funding, given that the hazard begins to reduce. We are assuming that with the new closure contract for the site the programme is costed and committed to by the NDA to allow the site to reach its interim end state. We would like confirmation that our assumption is correct.

- Socio-Economics: Since exotic fuels are in the baseline programme as staying at Dounreay the programme should also reflect ongoing costs for the continued management at Dounreay well beyond the interim end state. To say that this has no socio economic detriment simply does not add up. The costs for indefinite storage at the Dounreay site must equate to building new stores, security costs, processing and monitoring well beyond the decommissioning programme.

Recent press articles from Cumbria and, indeed, your own document recognises that this has a potential to save "£100s of millions for the UK taxpayer". We request that NDA provides DSG with information on the total costs of transporting the fuel to Sellafield (and related costs of storage etc at Sellafield) as opposed to the indefinite storage of this fuel at Dounreay with all that this would entail.

DSG notes that The Highland Council has already asked NDA to consider investing savings in infrastructure that would support the wider socio economics aims of the county. DSG agrees with this and given there are substantial savings to be made for the UK taxpayer (which means there must be significant savings from not retaining fuel on the site) NDA are urged to look at this urgently.

- Costs: From a Dounreay point of view, of course, there are no savings against the current plan given that retaining the fuel at Dounreay is currently costed in the current lifetime plan. Transportation and storage at Sellafield must be a fraction of what it would cost if left to be managed at Dounreay.

The arguments presented in the NDA engagement paper seem to hinge heavily around the 'costs of security' issues which apparently dictate that should the material be transported to Sellafield it would lead to a significant cost reduction in Dounreay site security costs. It would be useful to understand why the Dounreay site has spent a substantial sum of money on major security upgrades, the CNC is currently advertising and recruiting a number of new officers and are about to spend more funding on a new police firing range. Since the fuel has been stored safely on the Dounreay site (before these current enhancements were carried out) one would question the 'value for money' in substantially upgrading security now when decisions have already been taken that the fuel will be sent to Sellafield.

- Transportation: We note that the NDA reports that transportation could go by road, rail or sea. No mention has been made of transport by air. Given that the NDA will invest in a railhead at Geogemas for DFR breeder fuel it would appear that this would also be the best cost solution for Exotic fuels. DSG would like clarification as to whether current assumptions are that Exotic fuels will be transported in a different manner from DFR breeder fuel.

Given that the NDA has chosen to engage rather than consult stakeholders on this subject, DSG feels that the decision has already been made without any due regard to views being submitted by stakeholders. The document for engagement was disappointing in that it did not provide all the information required to provide informed views. It was lacking in environmental information and contradicted itself in some areas.

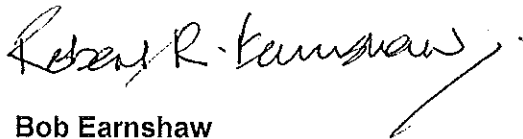
DSG would also like to understand the extent of consultation NDA will carry out if the proposed route is by rail - given that these trains will go through every town and city in Scotland down to Sellafield there is an extensive piece of work to be done here and

DSG feels that this was not adequately addressed when recommending transportation of DFR breeder fuel. It feels that NDA are simply reacting to those who 'voice an opinion' instead of carrying out a structured consultation process.

DSG requests that NDA/DSRL engage with DSG members on the emergency planning arrangements (and risk assessments) around the movement of materials from the Dounreay site. Members recognise that there will be security issues which cannot be discussed but it would be useful for members to input into emergency plans for road transport from Dounreay to Geogemas and rail transport from Geogemas to Sellafield.

DSG asks that NDA formally responds to this submission setting out answers to the questions which have been raised throughout this response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bob Earnshaw', with a long, sweeping underline that extends to the right.

Bob Earnshaw
DSG Chairman

