# DOUNREAY STAKEHOLDER GROUP SITE RESTORATION SUB GROUP

DSG/SRSG(2012)M001

Minutes of the DSG Site Restoration Sub Group meeting held on Wednesday 18<sup>th</sup> January 2012 in the Pentland Hotel (large lounge), Thurso at 1900 hours.

**Present:** George Farlow Highland Council (chair)

Alastair MacDonald DSG Honorary member Ian Webster Buldoo Residents Group

Alan Scott Caithness Contractors Consortium
Anne Chard Caithness West Community Council

John Deighan Dounreay Unions

David Flear Highland Council (DSG Vice-chairman)

**In addition:** June Love DSRL, DSG Secretariat

Tony Wratten DSRL, Deputy Managing Director

Phil Cartwright DSRL, Particles project Stuart Chalmers NDA Programme Manager

Michael Moreland MOD, Vulcan

Roger Wilson SEPA Peter Dickenson ONR

Dyan Foss Babcock Dounreay Partnership (observing)

David Collier External consultant (DSG review)

#### **MINUTES**

#### 1. WELCOME AND INTRODUCTIONS

George Farlow welcomed everyone to the meeting. He welcomed Dyan Foss, Babcock Dounreay Partnership, who was attending the meeting in an observation capacity only.

George asked that the group's condolences be sent to Derrick Milnes, and his wife Dawn, at the sad loss of their son, Stewart. A minute's silence was held.

#### APOLOGIES

Apologies were received from the following:

Bob Earnshaw DSG Chairman

Brian Mutch SGRPID

• Simon Middlemas DSRL (Tony Wratten deputising)

Stuart Currie DNSR (Vulcan)Stephen Saunders ONR (Vulcan)

Rick Nickerson
 Steven Heddle
 Gaill Ross
 Shetland Islands Council
 Orkney Islands Council
 Highland Council

Pauline Craw
 Health Service

## 3. MINUTES OF LAST MEETING

George noted that the draft minutes had been circulated to members in advance of the meeting. DSG/SRSG(2011)M006 refers.

He stated that there had been a discussion at the DSG meeting in December about publishing the sub group minutes on the website as soon as possible following the meeting. The secretary noted that to do this she required a response from all members on the draft minutes as to whether they were acceptable to be published. It was agreed that the status quo would remain at this time and would be considered when the DSG review was complete. David Collier indicated he had picked up this point for consideration in the review.

George asked whether members had any comments or changes to make to the minutes. The minutes were accepted as read and this was proposed by Anne Chard and seconded by Alan Scott.

George invited members to raise any issues from the minutes.

Anne Chard asked if Michael Foxley, Highland Council had responded to DSG's letter regarding the emergency tug vessels. George Farlow responded that the letter sent to ONR asking for clarification on emergency tug vessels had been copied to Michael Foxley for information. The secretary noted they were still awaiting a response from ONR. Peter Dickenson asked whether this was within the DSG's remit. The secretary responded that the DSG's remit looked at the Dounreay Travel to Work area but dependent on the issue it could be wider. Members believed that the coastline was within the DSG's remit and it was agreed that the response from ONR should be progressed.

#### 4. PROGRESS ON ACTIONS

The status of actions had been circulated to members in advance of the meeting. Of note:

• DSG(2011)M008/A009: Martin MacDonald, Scottish Government to send Secretary website link to site designation information.

The secretary noted that she had just received the link to the site designation information and for ease of reference had printed out the document for members (Directions to the Nuclear Decommissioning Authority (the NDA) in respect of the Dounreay Disposal Facility). This was handed out at the meeting. The link to the information could be found at

http://www.nda.gov.uk/documents/upload/Directions-to-NDA-in-respect-of-the-Dounreay-Disposal-Facility.pdf.

David Flear noted that the document referred to NDA designing, constructing and operating the facility. Stuart Chalmers responded that DSRL would be operating the facility on NDA's behalf. However, the facility was within the NDA's liabilities.

 DSG(2011)M008/A015: Secretary to ensure that minutes of sub group meeting is published on the website within 20 working days of the meeting. Action complete.

Following discussion at the sub group meeting on 18<sup>th</sup> January, the status quo would remain. However, the DSG review would take this issue into account and therefore consideration would be given to this following the March meeting when the report was finalised.

Actions which had been completed but worthy of note were as follows:

• DSG(2010)M001/A001: Stuart Hudson to update DSG on low level waste issues relating to policy (and including licensing issues) at the appropriate time.

This action had been closed out at the DSG meeting held in December as this was a long term issue. ONR would bring back to the table at the appropriate time.

 DSG(2011)M007/A009: Secretary to circulate draft aims and objectives of the DSG review.

This action had been completed. David Collier was currently conducting one to one discussions as well as attending the December DSG meeting and sub group meetings in January. The report would be provided at the March DSG meeting for consideration.

 DSG(2011)M008/A001: DSG Chairman to write to Rolls Royce asking them to reconsider their membership with DSG, including questions raised from the recent announcement of the future of Vulcan.

The secretary noted that the DSG Chairman had received a response to his letter confirming that Rolls Royce would be happy to provide a high-level and appropriate update on the Rolls Royce Business operations at Vulcan and within the nuclear sector. This will be provided for the main DSG meeting in March.

Anne Chard asked if Rolls Royce had responded to the questions raised by members. The secretary responded that Rolls Royce had provided a communications brief along with their letter and MOD had also provided written responses to questions raised which were appropriate for MOD. The secretary said she would circulate this information to members.

Action: DSG/SRSG(2012)M001/A001: Secretary to circulate response from Rolls Royce and MOD to questions raised on the future of the Vulcan site.

 DSG(2011)M008/A002: DSG Chairman to write to ONR seeking further clarification to action DSG(2011)M007/A043 (re risk assessments for nuclear shipments in relation to the removal of emergency tug vessels).

A letter had been written, copied to Michael Foxley. DSG(2011)C272 refers. A response was currently awaited.

## 5. **VULCAN UPDATE**

Commander Michael Moreland noted that there was little to report following the December DSG meeting in that the plant was back up and running. The instrumentation update has been completed and the trials programme had restarted.

The future of the Vulcan site was ongoing. While there was no requirement to provide prototyping for the new reactor cores there were other operations which may be considered for the site.

George Farlow noted that DNSR had submitted a written report – DSG(2011)P057 refers. The paper was noted and no issues were raised.

## 6. **DOUNREAY UPDATE**

DSRL report

DSG(2012)P004 refers. Tony Wratten highlighted the following:

 DSRL had been awarded the Sword and Globe of Honour by the British Safety Council.

George Farlow noted the group's congratulations on the awards, of which DSRL was one of only three companies worldwide to receive both awards. He stated it was a credit to DSRL and supply chain staff.

- On industrial safety, there had been an increase in hand injuries and while none
  of these had resulted in lost time accidents the site was undertaking a review to
  establish the reasons and define actions to address this.
- The site had gone 19 months without a lost time accident and there had been no RIDDOR reportable incidents during the quarter.
- The WRACS (Waste, Receipt, Assay, Characterisation and Supercompaction)
  plant was still shutdown due to a broken part in the equipment.

David Flear asked what the fault in WRACS was and asked for an indication of how long it would be out of operation. Tony Wratten responded that WRACS consisted of a powerful compactor press with hold-down shafts (to allow drums of waste to be held in place to be compacted to a fifth of their actual size). One of the guide shafts had failed. At present low level waste was being assayed and characterised and then stored on site until the compactor was back in operation. It was expected that it would take approximately 2 years to be repaired.

Anne Chard asked if the plant had exceeded its design life. Tony Wratten responded that the plant had squashed a huge number of drums and likened it to a car engine whereby after a certain mileage the engine would break down. The manufacturer has never seen this type of breakdown before. However, Tony pointed out that the site had good value from the plant since it was commissioned.

George Farlow asked whether DSRL had thought of keeping spare parts for the plant. Tony Wratten responded that it was not cost effective to keep these types of spares. He noted that discussions were underway with a company in Holland who may hold a suitable replacement

- Doses for DSRL and contractor personnel were in line with expectations and were as low as practicable.
- DSRL had completed a review of the final ONR report on Fukushima, published on 12 October 2011. Twelve additional actions were identified that has resulted in an expanded response to a number of interim actions. Preparation of an updated DSRL response is underway with a target for final delivery of June 2012.

David Flear noted that he would be attending the Aarhus Convention workshop in Luxembourg on the 15<sup>th</sup> February. Part of the discussion would be in the context of a nuclear accident with durable consequences – new challenges after Fukushima. He asked whether DSRL could provide their submission as background information for this workshop. Peter Dickenson responded the ONR had carried out a comprehensive review and the final report was available on ONR's website. The secretary stated she would print out the document. Peter Dickenson also noted that DSRL had been very responsive to requests made for information.

Action: DSG/SRSG(2012)M001/A002: June Love to provide a copy of ONR's report on Fukushima in time for Aarhus Convention workshop to David Flear.

George Farlow asked if MOD had also submitted a response. Michael Moreland confirmed that they provided a report through DNSR. While similar to Dounreay's report there was different risks associated with both sites and some of the detail is classified for security reasons.

- A number of security enhancements to the site were underway with work to enhance the existing fences, install additional anti-vehicle defences and changes to the personnel access arrangements. Most of the work had been undertaken by local companies who showed a high level of commitment during some extremely poor weather to ensure delivery against the programme.
- Environmentally, all discharges remained within the authorised limits set by SEPA.
- DSRL has met four NDA targets during the quarter. All targets were on schedule
  to be met by the end of the financial year except for one complete
  decommissioning of the D1251 Sentencing Tanks which had been delayed
  during 2010/11. Work had been progressing well but suffered significant storm
  damage in November, with further damage in December which caused a
  cessation of all building activities until emergency repairs can be carried out.
- A number of other buildings on the site had been damaged due to the adverse weather and were subject to insurance claims.
- Babcock Dounreay Partnership had been announced as the preferred bidder to take over the management of the Dounreay site. At present they were in the transition phase carrying out due diligence before share transfer is completed on 2<sup>nd</sup> April 2012.
- Two significant invitations to tenders (ITT) have been issued. The ITT for the Reactors Size Reduction Facility implementation is due for return on 10<sup>th</sup> February 2012 and the ITT for the PFR Thermal Syphon Removal is due for return on 3<sup>rd</sup> February 2012. In addition, Commercial Services have issued a paper stating the procurement approach at DSRL with regards to socio economics. This has now been published on the DSRL Intranet.

Alan Scott noted the DSRL and contractor data. He asked if the contractor numbers would be more accurate given the security enhancements for entry onto the site. Tony Wratten said he would confirm whether this could be done.

Action: DSG/SRSG(2012)M001/A003: Tony Wratten to confirm whether more accurate figures on contractor numbers working on the site could be provided given the enhancements made for entry onto the site.

David Flear asked whether DSG could see the paper on the procurement approach at DSRL with regards to socio economics. Tony Wratten responded that he would provide this information.

Action: DSG/SRSG(2012)M001/A004: DSRL to provide DSG site restoration sub group with copy of procurement approach at DSRL with regards to socio economics.

John Deighan noted that Direct Rail Services had been awarded a contract to build a railhead siding at Georgemas Junction. David Flear added that NDA were meeting with Highland Council on 19<sup>th</sup> January to outline its plans for the transport of Exotic fuel from Dounreay to Sellafield. The railhead at Georgemas was part of that plan and consideration was being given to leaving a legacy for future use.

## ONR Nuclear safety report

DSG(2012)P001 was tabled. Peter Dickenson noted the following:

 ONR had issued new guidance on notifying and reporting incidents and events occurring on licensed nuclear sites. DSRL had undertaken a lot of work to comply with the new guidance and had demonstrated alertness to learning opportunities from past trends and the effectiveness of improvement implementation when the guidance came into force on 1<sup>st</sup> January 2012.

Anne Chard asked why ONR had made the decision to issue new guidance on reporting incidents and events which appeared to be more complex. Peter Dickenson responded that under Licence Condition 7 each individual licensee decides how best to report incidents. However, experience had shown that this varied from site to site and the guidance issued was to ensure a more common approach.

Anne Chard asked if the guidance was prescriptive. Peter Dickenson responded that it met best international practice. Tony Wratten added that, from a site point of view, they did not want any surprises by incidents being reported in the public domain before regulators had been informed. The secretary reminded members that they had seen a draft document for the site's policy on incident disclosure and had provided comments to that document.

Alastair MacDonald noted that while most people understood that some incidents were not significant, the media could portray something in a completely different light. David Flear agreed citing the leak at DFR as an example of the media turning this into something that it was not. In addition, recent headlines in the Press and Journal was a perfect example of inappropriate reporting by the media. Peter Dickenson responded that they could not control the press.

 Due to the breakdown of the WRACS facility, interim solutions for storage had been discussed with SEPA and ONR and both were satisfied with the approach being taken. DSRL had been quick to put alternative plans into action to ensure that the site did not choke with low level waste.

George Farlow asked if there were any pinch points identified. Peter Dickenson responded that there had been some security enhancements made with the alternative solutions.

 ONR had completed its final report on Fukushima which revealed no fundamental safety weaknesses in the UK's nuclear industry. The report is available on the ONR website.

## SEPA report

DSG(2012)P002 refers. Roger Wilson noted the following:

 SEPA were in the final stages of determining the application for the new low level waste facility and had developed a new authorisation template for the disposal of LLW at new facilities. This would be consulted on during March 2012.

David Flear asked whether the consultation would be written with lay people in mind. Roger Wilson responded that this was a difficult subject to articulate but that SEPA would provide a non-technical summary for use by stakeholders. It was suggested that SEPA come to DSG meeting in March to brief DSG members on the consultation.

Action: DSG/SRSG(2012)M001/A005: SEPA to attend DSG in March to provide information on low level waste draft authorisation consultation.

lan Webster stated that the consultation carried out by SEPA on the PPC permit (for emplacement of the excavated material) was a discretionary consultation rather than a public one. Roger Wilson responded that SEPA had taken the opportunity to discuss this with Buldoo residents. Ian Webster acknowledged that the residents had found this useful. He asked if the public consultation documents on the new authorisation could be made available in Thurso. Roger Wilson stated that the documents would be published on SEPA's website. [Secretary's note: Hard copies of the consultation documents will be made available to members when available).

 SEPA had responded to Scottish Hydro Electric Transmission Ltd with respect to their consultation for a possible 132 KV subsea electricity connection between the west coast of Orkney and Dounreay in Caithness. The secretary noted that DSG had also responded to this consultation as had DSRL. Roger Wilson agreed to circulate SEPA's response to this consultation.

Action: DSG/SRSG(2012)M001/A006: Roger Wilson to provide a copy of SEPA's response to Scottish Hydro Electric Transmission Ltd consultation for a 132 KV subsea connection between Orkney and Caithness.

#### Landfill 42 and Particles update

Phil Cartwright, DSRL provided a verbal update. Of note:

- On landfill 42, good progress was being made despite the recent bad weather.
  The membrane and rock armour was now in place and work had started on the
  top dressing material. The Melvich gravel being used as the top dressing was
  suitable for nesting birds.
- SEPA had been extremely supportive with the provision of advice as the project progressed. A two year monitoring programme will be established and subject to monitoring DSRL will surrender the application.

Roger Wilson noted that DSRL had made good progress with landfill 42.

On the particles clean-up project, PRAG(D) had met recently and had discussed
in detail the difference in numbers predicted by a Kernel density approach to
build up the particles plume and the numbers predicted in the DPAG (Dounreay
Particles Advisory Group) plume models. Both models predict the same plume
shape, which is not a surprise as shape was also confined in the DPAG model by
sampling and not finding particles. The main difference between the two models

is in the actual population being found. The work planned for 2012 will help to explain the differences.

- There had been a discussion on the planned coverage for 2012. PRAG(D) were
  not convinced that sufficient work will have been done to allow completion of the
  offshore work in 2012. They did not believe sufficient seabed coverage could be
  completed to cover each of their areas of concern.
- Following this meeting a discussion had been held with NDA and a way forward was agreed by targeting various areas within the plume to provide sufficient data to confirm whether the new models were a better representation of the plume. NDA had agreed in principle to the work being undertaken, subject to further improvements in contract performance. One specified area for monitoring was outside the fishing exclusion zone and DSRL had contacted the local fisherman to ask for his co-operation with respect to fishing gear placement.
- The next PRAG(D) meeting would be held on 2<sup>nd</sup> February and this would focus on their report for 2011.
- DSRL were in the process of making arrangements for this summer's offshore work and it was expected to start around mid-May.
- Beach monitoring had continued throughout the period. Since December, 1
  particle had been detected and removed from Sandside beach and 1 particle on
  the Dounreay foreshore. Both were in the minor category.
- Last year 45 particles had been found on Sandside which was fewer than
  expected. At this time it could not be determined whether this was as a direct
  result of the off-shore clean-up. Eleven particles were found on the Dounreay
  foreshore during last year.

George Farlow asked if the end state would be determined by the lifting of the fishing exclusion zone. Phil Cartwright responded that the end state would be determined by SEPA. It was asked if the end state was to be consulted on. Roger Wilson said he would find out and report back.

Action: DSG/SRSG(2012)M001/A007: Roger Wilson to find out if SEPA intends to consult on the end state for the particle clean-up project off-shore.

#### Low Level Waste update

George Farlow noted that Eleanor Scott had been appointed as independent chair for the Buldoo Residents Group meeting. Eleanor had agreed to provide a short report to DSG if any contentious issues could not be resolved. George asked Ian Webster if there was anything he wished to raise at this meeting, Ian responded that there were no issues to be raised at this time.

## 7. NDA UPDATE

The NDA had provided updates for December and January – DSG(2011)C283 and DSG(2012)C001 refers. Stuart Chalmers noted the following:

 David Batters, Chief Financial Officer has been appointed interim Chief Executive until a new CEO is appointed. Interviews for the new CEO are underway.

- A meeting with the Highland Council had been arranged for the 19<sup>th</sup> January to outline the NDA's plans for the transportation of DFR breeder fuel and the potential to move Exotic fuel.
- An engagement paper on Exotic fuels will be published at the end of January.
- Sean Balmer, NDA had visited Dounreay in early January and was impressed by the work that DSRL is undertaking.

David Flear noted that he and Bob Earnshaw had met with Sean Balmer and Nigel Lowe and outlined the expectations of the local community with regards to the national nuclear archives. Discussions had also taken place on the end state for Dounreay since this was the first site closure contract.

Anne Chard asked if the end state consultation previously carried out by DSG would have to be repeated. Stuart Chalmers responded that the conclusions of the DSG's consultation on site end state was still the basis of which the site would be decommissioned.

Anne Chard believed that the local community would not be aware of how the new landscape had changed and was simply wondering whether the site end state needed to be re-looked at.

Peter Dickenson responded that ONR and SEPA were currently in discussion with NDA and DSRL on what level of radioactive material from the operation of the site could be left in the ground on the licensed site at the Interim End State.

Anne Chard responded that she understood this but was not clear whether that meant that the DSG would have to undertake another consultation on the site end state. The secretary noted that the NDA had indicated an engagement plan around site end states and she would circulate the information to members for information.

Action: DSG/SRSG(2012)M001/A008: June Love to circulate information on NDA's forthcoming engagement on site end states.

 NDA had published a draft business plan for consultation. This had been circulated to members – DSG(2011)C283 refers.

The secretary noted that the consultation closed on the 3<sup>rd</sup> February and therefore comments by members would be required by the 27<sup>th</sup> January to allow a final check on the draft response before submission to the NDA. June agreed to email all members to remind them of the dates for response.

Action: DSG/SRSG(2012)M001/A009: June Love to email all DSG members setting out timeline for responses to NDA draft business plan.

## 7. CORRESPONDENCE FOR NOTING

DSG(2011)C281 – summary of DSG meeting held in December was noted.

## 8. ANY OTHER BUINESS

• David Collier noted that the review was going well and that everyone he had spoken to had been extremely co-operative. He was on schedule to present his

Final – endorsed at Site Restorations sub group on 25<sup>th</sup> April 2012

findings at the March meeting.

• Roger Wilson noted that SEPA had a new Chief Executive – Professor James Curran. David Sigsworth had been re-appointed as Chairman.

There being no further business George Farlow thanked everyone for their attendance and input and formally closed the meeting.

George Farlow DSG Site Restoration sub group chairman 23<sup>rd</sup> January 2012.

## **ACTIONS ARISING FROM THIS MEETING**

DSG/SRSG(2012)M001/A001: Secretary to circulate response from Rolls Royce and MOD to questions raised on the future of the Vulcan site.

DSG/SRSG(2012)M001/A002: Secretary to provide a copy of ONR's report on Fukushima in time for Aarhus Convention workshop to David Flear.

DSG/SRSG(2012)M001/A003: Tony Wratten to confirm whether more accurate figures on contractor numbers working on the site could be provided given the enhancements made for entry onto the site.

DSG/SRSG(2012)M001/A004: DSRL to provide DSG site restoration sub group with copy of procurement approach at DSRL with regards to socio economics.

DSG/SRSG(2012)M001/A005: SEPA to attend DSG in March to provide information on low level waste draft authorisation consultation.

DSG/SRSG(2012)M001/A006: Roger Wilson to provide a copy of SEPA's response to Scottish Hydro Electric Transmission Ltd consultation for a 132 KV subsea connection between Orkney and Caithness.

DSG/SRSG(2012)M001/A007: Roger Wilson to find out if SEPA intends to consult on the end state for the particle clean-up project off-shore.

DSG/SRSG(2012)M001/A008: June Love to circulate information on NDA's forthcoming engagement on site end states.

DSG/SRSG(2012)M001/A009: June Love to email all DSG members setting out timeline for responses to NDA draft business plan.

#### **ACTION COMPLETED**

DSG(2010)M001/A001: Stuart Hudson to update DSG on low level waste issues relating to policy (and including licensing issues) at the appropriate time. Action complete – Latest updates can be found under DSG(2011)C165 and DSG(2011)C248. At the meeting on 14<sup>th</sup> December it was agreed that this action could be closed out as this was a long term issue. ONR would bring back to the table at the appropriate time.

DSG(2011)M007/A009: Secretary to circulate draft aims and objectives of DSG review to DSG working group for comment. Once finalised the draft paper will be circulated to all DSG members for endorsement. Action complete – draft paper went to working group for comments on 21<sup>st</sup> August 2011 and then circulated to all members for views. Subsequently endorsed by DSG Socio Economic and Site Restoration sub group meetings on 2<sup>nd</sup> November 2011.

DSG(2011)M008/A001: DSG Chairman to write to Rolls Royce asking them to reconsider their membership with DSG, including questions raised from the recent announcement of the future of Vulcan. Action complete.

DSG(2011)M008/A002: DSG Chairman to write to ONR seeking further clarification to actions DSG(2011)M007/A043 (re risk assessments for nuclear shipments in relation to removal of the emergency tug vessels. This letter should be copied to

Michael Foxley, Highland Council, who was leading a working group on the removal of the emergency tug vessels. Action complete – DSG(2011)C272.

DSG(2011)M008//A003: DSG Chairman to write to Deirdre Henderson to ask that Buldoo Residents Group consider alternative representation at DSG site restoration sub group meetings. Action complete.

DSG(2011)M008//A004: Secretary to request the LLW project team to provide information on the proposed geo-sphere enhancements. Action complete.

DSG(2011)M008/A005: George Farlow to provide Secretary with forthcoming dates for Highland Council and CHP meetings to ensure co-ordination between meetings. Action complete.

DSG(2011)M008//A006: Secretary to consider dates for 2012/13 for DSG and sub group meetings taking on board dates from various meetings including Highland Council and CHP. Action complete.

DSG(2011)M008/A007: DSG chairman to write to NDA asking for clarification at the earliest opportunity whether the preferred bidder wishes to attend DSG. Action complete.

DSG(2011)M008/A008: Secretary to draft response to David Collier providing the required information to allow the DSG review to commence on the 14<sup>th</sup> December. Action complete – DSG(2011)C268 refers.

DSG(2011)M008/A009: Martin MacDonal

following discussion at the sub group meeting on 18<sup>th</sup> January the status quo would remain. However, the DSG review would take this issue into account and therefore consideration would be given to this following the March meeting when the report was finalised.

DSG(2011)M008/A016: Secretary to circulate draft response on ONR's consultation on bulk quantities waste for comment. Action complete – DSG(2011)C269.

DSG(2011)M008/A017: Secretary to write to Graham Construction to ask how many local people have been recruited so far and how many were expected to be employed throughout the duration of the low level waste project. Action complete – response received as follows: "At present Graham Construction employ two direct local staff and one local operative through a labour supplier. This is three out of a total of thirteen = 23% local labour.

Our earthworks subcontractor currently employs two local operatives out of a total of thirteen = 15% local labour. They plan to employ another two local operatives after Christmas. We also presently have five local operatives employed by local service subcontractors.

Combining these current numbers totals ten local labour out of a total of thirty-one on site = 32%.

Labour numbers will be fluid and will vary with regard to the changing activities and subcontractors on site. The future numbers of local labour employed will depend on the requirements of other subcontractors. These subcontracts have not as yet been signed."