

WhiteOx

Structured Decision Making

Review of the Operation of the Dounreay Stakeholder Group

Report prepared for the DSG

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Executive Summary

The Dounreay Site Stakeholder Group (DSG) takes time every year to reflect on the achievements and lessons learned during the past year and to discuss any changes that might be necessary to help it meet the evolving needs of the community. Every few years the DSG also undertakes an extended independent review, and this report covers the results of the latest such study.

The scope included the DSG's four main roles (oversight; socio economics; communication; and consultation) plus consideration of its structures and working practices. Conclusions were to be based on: observation of two full DSG meetings and one meeting of each of the Site Restoration and Socio Economics Subgroups; 18 structured interviews; and benchmarking against other NDA site stakeholder groups, particularly West Cumbria, Devonport, and Sizewell.

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Many Members put in huge amount of unpaid effort and the DSG is amongst the best of the NDA's site stakeholder groups in most of the things it does.

It has made good progress since the last review in 2007 and has many strengths, including: its socio economic programme and contribution to communication and consultations; its constructive relationship with Dounreay site management; and the work of the Secretariat.

It should build on them, evolving the current approach and mechanisms in the light of the changes that will be taking place at both Dounreay and Vulcan.

Nevertheless, our observations and the comments of Members and Observers suggest there are things the DSG could do better and areas where it may need to adjust its focus to meet the new challenges.

These include: longer term planning of its activities; clarity of focus on socio economics; more rigorous oversight generally and of Vulcan in particular; and - going forward - attention to the respective roles of the Chairman, Vice Chairman and Secretariat.

1 Background

Purpose & scope

The Dounreay Site Stakeholder Group (DSG) takes time every year to reflect on the achievements and lessons learned during the past year and to discuss any changes that might be necessary to help it meet the evolving needs of the community. Every few years it also undertakes an extended review. As well as being four years since the last such study in 2007 [1] [2] a number of specific factors suggested that a new one was needed, including likely acceleration of decommissioning and changes at Vulcan.

Extended reviews normally include some external input and the DSG commissioned David Collier of White Ox to conduct the independent evaluation and survey of Members' and Observers' views reported here. There is a standard conflict of interest statement in Appendix C.

The review scope included the DSG's four main roles (oversight; socio economics; communication; and consultation) plus consideration of its structures and working practices. Conclusions were to be based on: observation of two full DSG meetings and one meeting of each of the Site Restoration and Socio Economics Subgroups (SRSG/SESG); structured interviews with Members, Observers and Secretariat; and benchmarking against other NDA site stakeholder groups, particularly West Cumbria, Devonport, and Sizewell.

Interim conclusions were presented to the DSG in March 2012 and this version of our report takes account of additional discussions during and subsequent to that meeting. The final draft report was also sent to the Chairman for review but no changes were requested or made as a result. There is a list of the 17 people interviewed in Appendix A.

The remaining sections of this report consider each role in turn, followed by an assessment of the implications for arrangements, Terms of Reference (ToR), and working practices. Our conclusions are summarised in Section 6.

Acknowledgements

Our interviewees were unfailingly generous with their time and insights and we are grateful for their help. However, this report is based on our analysis and interpretation. Interview notes were not reviewed by the participants. There were some differences of view, we may have misunderstood some of what was being said, and we cannot claim to be speaking for everyone. Our comments should therefore be considered alongside their direct feedback.

We recognise that the roles the DSG undertakes are extensive, intellectually demanding, and time consuming. In pointing out any areas that might be strengthened we (and the external DSG stakeholders we consulted) are very conscious that the Group is mostly made up of volunteers who are taking on considerable responsibility sometimes working as equals alongside paid consultants and staff - without financial reward. The owners, operators and regulators of Dounreay and Vulcan, and the wider community, should be grateful for their efforts.

2 Oversight of Site Restoration Programme

Scope

Oversight comprises the monitoring and offering of safety and environmental issues, emergency response arrangements, and programme delivery generally. Before the advent of the NDA, this was the main focus of all site stakeholder groups. It remains a key role alongside socio economics.

As one interviewee pointed out, DSG Members economics, but it is the NDA and regulators that the oversight of programme and safety. DSG's oversight only provides additional assurance, it does not any regulatory function of its own. There are clearly limits to what any Site Stakeholder Group (SSG) can achieve with the resources and expertise at its disposal and the information to which it has access. Nevertheless, visible constructive challenge is widely seen as vital to community confidence as well as making a genuine contribution to maintaining NDA and site performance.

Oversight role

The DSG is amongst the best of the NDA's SSGs and is certainly not bad at oversight compared to its peers. It seems to make good use of subgroup forums to discuss potential issues with NDA, regulators, and site management, escalating to the public domain if progress is not being made.

However, it is perceived to have a 'light touch' approach to oversight which the overwhelming majority of Members and Observers believe will fall short of what is needed in future - not because they think there will necessarily be major safety issues, but because there will be major changes and community confidence has to be maintained. Certainly, both Dounreay and Vulcan sites appear to both expect and recognise the need for tougher community oversight in future as the pace of change increases, even if it is less comfortable for them at times.

We share this general view that more can and should be done in future to provide improved oversight across all the areas listed at the start of this section. However, there is no realistic chance of the DSG providing detailed direct scrutiny of all activities on site. An important contribution will therefore come from the DSG assuring itself of the rigour of NDA and regulatory oversight, and probing in more detail any significant issues arising. Some interviewees feel this is not done very effectively at present, but Members clearly have ideas as to how it might be improved and Observers also seem willing to help.

Working with regulators

The general view seemed to be that regulators need to be asked more often about their activities and priorities, and about the results of inspections and assessments. What do the two sites do well, what do they do less well? Several interviewees spoke of the need to be less tolerant of late or overly brief regulatory reports.

Regulators' reports have to be comprehensive enough to support the DSG's oversight work and include 'hooks' that Members can follow up on. If they are not or do not, then the DSG should have the confidence to ask for what it needs. Having said which, as one interviewee said, the more paperwork you get, the less scrutiny you give "too much to read, no time to ponder". A balance is required. A further point was made, that some regulators see it as part of their job to help inform and educate the community through their reports and presentations, and this is much appreciated.

All parties to this review were clear that regulators must not just maintain a proper distance from site management, they must be seen to do so, and seen to challenge or expand on management reports if necessary. People obviously want a sense of proportion from regulators, but also want to see evidence that they are vigilant and tough when needed. In a similar way, confidence also depends on the NDA being seen to be actively supervising and managing its contractor.

None of our interviewees suggested that Dounreay and Vulcan were not properly regulated. However, a significant proportion reported discussions and external perceptions of regulators not being challenging enough. The word 'cosy' was used more than once. It would be surprising if the regulators and NDA were anything other than reluctant to air difficult issues at a public meeting, but if there is never any criticism and reports to the DSG appear to be coordinated with those of the site management, damaging perceptions can arise.

Vulcan oversight

In our 2007 DSG review, we said that the DSG might be expected to allocate a greater proportion of its time to Vulcan's safety and environmental reports than it did. Members questioned Observers from Vulcan less (and less assertively) at DSG meetings than they did other parties.

Improvements have been made since then, but there is still a very clear view that Vulcan 'gets an easy ride' from the DSG. This is a quite widely shared perception that (we suggest) needs to be addressed.

Vulcan has an operating reactor which is arguably the major hazard within the Dounreay/Vulcan complex, but reports from the site and its regulators are noticeably brief. One interviewee characterised them as 'nothing ever goes wrong, nothing ever happens'. Perhaps because of the absence of 'hooks' in reports, Members too often just note the Vulcan reports and move on. The overwhelming majority of interviewees felt that this was a weakness.

We found MoD management and Vulcan regulators very constructive in discussion with us and our impression from the DSG and subgroups meetings we observed is that they would respond constructively to being questioned more rigorously.

Dounreay and Vulcan site restoration programmes

Communities look to the NDA as a regulator on programme and contract matters, and a similar approach will be applicable here as well. Oversight will be greatly aided by having clearer programmes for activities and milestones against which site performance and progress can be reported, monitored, assessed, and challenged.

The DSG has historically been quite forthright when speaking out on the programme performance of NDA and site licensees, and it still is on occasions. It has worked hard to get project data reported back to the SRSG. Most of our interviewees felt that it would be much easier to monitor and comment on any shortfalls or inefficiencies once the new programme was available with a clear timeline and targets.

Interviewees offered some thoughts on the likely programme oversight priorities over the next year or so. The DSG commissioned and organised a very thorough programme of engagement and option assessment to support the NDA's 2006 end state / end use consultations. Accelerated decommissioning may well require a reassessment of the end state, potentially with more wastes left 'in situ'. Members therefore expect to have to look again at new proposals as they emerge and (we deduce) potentially organise new local consultations. A related question is, what arrangements will be made to managed the Dounreay/Vulcan sites while institutional control is still required after closure?

The DSG is aware that there is an MoD project team looking at alternative closure strategies. This is an MoD matter but the DSG could request a presentation on the process being followed and perhaps the key drivers and possible time windows. Some at the MoD may feel it is not in its interest to get involved with the DSG before it has to, but they need to work together at some point and it makes sense to build a pattern of engagement now. Many interviewees remarked that the MoD seems to be 'behind the curve' in starting to build the local relationships it will need though the decommissioning, waste management, fuel movement, and the eventual de-licensing process.

Fuel movements from both Dounreay and Vulcan sites are a big issue for many Members because of potential safety, environmental and emergency planning implications but also because of the socio economic consequences of it leaving site. Emergency response planning will need to take in the whole route, whether by road, sea, air or rail.

At national level, Scottish ILW and wider radioactive waste policy will potentially have a big impact on Dounreay/Vulcan and the DSG might be expected to play a proactive role in shaping and interpreting it. Some local people clearly feel (rightly or wrongly) that there is a risk of the Dounreay/Vulcan area becoming a de facto long term storage, consolidation or disposal facility without the necessary level of community consent.

Emergency planning

The DSG ToRs task it with oversight in respect of both Dounreay and Vulcan of local authorities and other bodies that have emergency response responsibilities.

In our 2007 DSG review, we noted that engagement on emergency planning deserved greater priority, particular since Vulcan had an operating reactor. The situation does not seem to have changed much since then however, and emergency response arrangements still get significantly less attention in the DSG than they do in some other SSGs.

SSGs often find it difficult to get involved with the institutions and liaison meetings that coordinate such matters, due to security constraints and a variety of other reasons. Some interviewees suggested instead setting aside time at a subgroup or DSG meeting for a more robust scrutiny of the lessons learned from emergency exercises, which seems to make sense.

DSG oversight capacity

Effective oversight depends on key Members having enough knowledge to interpret what is being said, and investing time (as volunteers) in preparation. Expertise is in short supply, but even with forthcoming changes to membership our impression is that the DSG *does* have enough to do a good oversight job.

Those SSGs that are strongest in oversight terms all seem to share the characteristic of having at least one person who is well informed technically and willing to take on the role of determined critic and occasional irritant, even if they are not doing it from a position of inherent scepticism of all things nuclear.

The DSG does have technically able people who have shown they take oversight seriously. This capacity can be spread and supported e.g. by drawing on available guidance (including some previously requested by the DSG [3]) and using of 'template' questions to open up lines of enquiry. The burden can be eased by Members coordinating their individual preparation across agenda items of interest.

Some interviewees noted that the TORs allowed the DSG to make use of paid external technical support, but perhaps use of funds is only likely to be supported for work on a major public safety issue such as the 'particles' or on a major consultation. Cooperation with other SSGs on issues of common interest may sometimes be a possibility, and perhaps more could be made of shared resources which are accessible through local authorities. However, all these things would take time to set up and get the most benefit from.

Some Members are better connected and have their own means of finding out what is happening on site. This is one of the reasons for having a broad membership: it gives the community confidence that if there were a major risk issue, it could not be concealed. We recognise that they may have to tread a difficult line at times and intervene only selectively, but their presence is a valuable safeguard much appreciated by other Members.

In fact, most Members have to manage the potentially conflicting objectives of both holding the NDA and site to account and at the same time negotiating a better share of the available socio economics funds. The 'island perspective' was said to be valuable, and to improve public confidence because these Members are perceived to be more independent of the main socio economic issues raised at DSG.

Subgroup working

There are significant resource constraints at subgroup level. The Site Restoration Subgroup has to cover such a wide range of topics, across both Dounreay and Vulcan, that it must be selective if it is to consider anything in enough depth to be useful. We suggest it should attempt an in-depth review of one or two key oversight issues at each subgroup and DSG meeting, either on a regular programme or according to priorities at the time.

We considered whether a new subgroup or de-merging the SRSG into programme and safety/environment subgroups would be beneficial. Clearly, it would. The SRSG basically has too much to do. However, there are limits to the demands the DSG can make on key individuals and we accept it may not be possible - though the subgroup meeting could perhaps be longer.

If it does chose to have longer subgroup meetings, the DSG might consider providing Members who attend with lunch or supper. Many of the SSGs we visit provide food at some subgroup or full group meetings, ranging from cakes to full dinners, typically to thank those working late or long days in their own time. It is often said to improve attendance but we have no evidence either way.

We do not see it being feasible to set up new issues-based subgroups e.g. on end state or fuel-related matters. But the DSG could and presumably will make use of time-limited task groups as it has done in the past. Such task groups can look holistically at issues which have both oversight and socio economic dimensions. An advantage is that it is easier to co-opt non-members if the remit and duration are clearly bounded and the objective clear.

The separation of the Buldoo residents group from the main work of the DSG seems to have been a sensible move from the DSG's point of view. The Group appears ready to put its weight behind the residents if it feels they have a valid issue that is not being resolved, escalating it through the SRSG to a public DSG meeting if necessary. We are as yet unclear whether the residents are content with the current arrangements and with DSG's level and speed of support, or want something different.

3 Socio Economics

Scope

The DSG's socio economics role comprises participating in and overseeing the operation of site and national NDA socio economic programmes, and more generally working with stakeholders to secure the long term future of the community: 'working at corporate and site level to do our best for the area, then monitoring and holding NDA at both levels to its commitments'. These have been the DSG's main focus over the last year or so for most Members they will undoubtedly remain the most important activities.

The relevant ToR clauses are currently Dounreay-specific but interviewees almost all thought they should now extend to Vulcan as well.

There seem to us to be six strands to the socio economic discussions we have heard at DSG and subgroup meetings:

- Working with site on the site-funded socio-economic programme;

- Working with site on workforce and local supply chain issues;

- Working with others to obtain the maximum benefit from funding coming direct from NDA;

- Encouraging NDA and the PBO to play their part in championing the area as a good place to invest and do business, involving them in initiatives and development partnerships;

- Helping develop a wider vision for the local area and wider region; and

- The Communities Fund.

Site programmes

The general view seems to be that the site licensee will be contracted by the NDA to deliver a socio economics programme which will improve clarity, focus and accountability. Presumably this programme will be the subject of discussion with the DSG. One might envisage a DSG consensus view carrying the most weight but member organisations and other stakeholders will presumably also make their views known directly.

Interviewees' views varied on the relative importance of different drivers underlying any site licensee's commitment to delivering a socio economics package, but there was a general recognition that business benefits would need to be articulated more clearly. The DSG would need to continue to monitor implementation and hold site management to account as appropriate. Particularly when scrutinising programme delivery, there may be much in common between the oversight approach needed by the Socio Economic and the Site Restoration Subgroups.

Supply chains

The DSG pays close attention to workforce, apprenticeships, training and supply chain issues at Dounreay (though not yet at Vulcan), with good contributions from union and contractor representatives. Compared to our previous DSG review, we detected a much greater emphasis on developing the local and regional supply chains to provide jobs and investment for the short and longer term.

The DSG has already been working with DSRL to see if stronger socio economic tender clauses and greater weighting on the corresponding responses during assessment are feasible, but it was suggested to us that more could still be done to encourage local content in major contracts at Dounreay/Vulcan. For instance, the socio economic content of large contracts could be reported to the DSG, so that Members can support and monitor delivery. The DSG might publish guidance for contractors on the sort of things the community would benefit from, drawing on best practice and examples from elsewhere.

This highlights a perceived shortage of business expertise on the Socio Economics Subgroup which several interviewees said should be addressed. If they were working on something directly related to their interests, it might be easier to recruit them.

Strategic challenges

Many Members have a role on other bodies with a primary remit for regeneration matters and local infrastructure improvements, and everyone on the DSG has a view on the strategic challenges facing the region and on priorities for strategic investment. It is therefore natural that the DSG spends time discussing strategic needs and opportunities where site or NDA support might make a major contribution, albeit that the DSG usually has a supporting rather than a lead role.

Members recognise there is no basis for a long term regional strategic partnership similar to the one West Cumbria has with the NDA, but there are nevertheless opportunities to negotiate an NDA contribution to meeting infrastructure or other strategic needs. Some interviewees particularly emphasised the need to make business case arguments to the NDA for infrastructure investment rather than compensation arguments.

Some clearly feel that bodies with regional responsibilities can never be as committed to fighting for the Dounreay/Vulcan travel to work area as locals would be, but Members also recognise that they need to work actively and collaboratively with neighbouring regions and key regional and national stakeholders. There may sometimes be potential tension between investment in the travel-to-work area and the wider region but Members did not want to be seen as too parochial, or always asking for treatment as a special case in relation to other communities.

Members acknowledged the inevitable problems of geography. An example quoted by one person was the benefits package associated with the forthcoming LLW facility. The distances involved and limited specialist resources make it much harder for the Highland Council to remain alert to all the possibilities and put its full weight behind negotiating benefits packages, monitoring proposed inventories etc. than it is for its West Cumbrian counterpart, and there is no equivalent to Copeland Borough Council and its nuclear team.

Collaboration

The DSG collaborates with a wide range of other bodies. Many of them are represented on the DSG and there is significant overlap at individual level. We have summarised points made to us on this topic below, but it is not within our remit to offer an opinion as to whether the balance and nature of external relationships is as it should be, even if we were in a position to do so.

The DSG collaboration mentioned to us most frequently was with the Caithness and North Sutherland Regeneration Partnership (CNSRP). The CNSRP is a partnership of the main public sector agencies / authorities with a remit to address the socio-economic effects of decommissioning at the Dounreay site (and hopefully also the Vulcan site). It has a remit to 'promote existing employment, encourage new employment and promote the area as an attractive location in which to live and work.'

Though the CNSRP Advisory Board currently meets only twice a year, there is an argument that strategic issues should be debated and negotiated primarily within the CNSRP arena with the DSG focusing on oversight of that process, ensuring that it is effective and transparent etc. The DSG can certainly encourage NDA and site management to play a full part, but some Members thought that less DSG time should be spent on strategic matters, because negotiations on strategic investment belonged in other forums. Others were less concerned about this distinction.

Either way, the general view is that there is less overlap than there used to be, and so long as it feels as if everyone is pulling in same direction no one wants to risk reopening old arguments through attempts to fine tune the process. A common approach adds collective weight, either in preparing a single position for the Group to endorse or in coordinating the submissions and lobbying activities of organisations which belong to one or both bodies.

The Scottish Government convenes regular 'Scottish Nuclear Sites Meetings' which bring site operators, SSGs, regulators, and officials together for 'two way engagement between the Scottish Government and stakeholders on issues which affect the nuclear sector'. It has been suggested to us that the DSG (and Scottish SSGs generally) might get more out of this forum with greater preparation, coordination, and influence over the agenda. This would require the Scottish Government to set meeting dates and get paperwork out early enough for the SSGs to prepare properly and canvas Members' views.

Local visions and national policies

We were specifically ask to consider the extent to which the DSG could do more to help develop a vision for the local area and wider region, perhaps through community visioning and community-led development of waste storage or waste disposal compensation plans linked to volunteerism.

New DSG work on end states may require something along these lines, but our interviewees generally felt that it would not be the DSG's job to develop wider community visions or plans; there are other bodies with more directly relevant remits. The DSG of course can, and should, encourage them to take a systematic and evidence based approach.

There is no volunteerism context as there is at some other UK and overseas national facilities, but there will be potential future benefits packages to negotiate and allocate, and there will be scope for engaging the community to help decide the priorities.

Communities Fund

The Communities Fund comes from the NDA, supplemented through a workforce safety dividend by Babcock International Group. The fund is currently administered by DSRL in association with the DSG. Recommendations are considered by the SESG. Our impression is that this is a useful but uncontroversial task for Members and no one raised any related issues during our interviews.

MoD and Rolls Royce

The DSG is aware of the proposed ending of the MoD's reactor testing programme. Even though it is not inevitable that the site will close completely, the socio economic effects will be significant and interviewees frequently referred to the need to understand as soon as possible the likely implications for the workforce and supply chain. The MoD seems not to have a socio economics remit or budget in respect of Vulcan.

Separately from this, many interviewees drew attention to the potential benefits for both the community and the company of increasing engagement by Rolls Royce in local socio economic initiatives, especially now that the MoD's position is becoming clearer. Rolls Royce is a major employer and a high profile company with an excellent reputation. Thurso is proud of its presence and would like to make more of it, including as part of marketing the area to the energy sector and other businesses. The region is currently missing an opportunity but interviewees suggested that the company is also losing out on the regional stakeholder support it could mobilise in attracting new business to its site and building institutional support.

4 Communication and Consultation

Interviewees spoke very positively about the DSG's contributions in both the Communication and Consultation roles.

Communication

The general aim is to facilitate communication between the community and site owners, operators, , and facilitating/encouraging other forms of communication between the various parties whilst at the same time letting them speak for themselves.

Some of the issues we raised in our 2007 report remain. Members still find it difficult to canvas views before meetings or consultations and then feed back points arising and the results of discussions. There is still therefore sometimes uncertainty as to whether Members are representing their own points of view or those of their constituency / organisations. This remains a challenge for all the NDA's SSGs.

The DSG communications 'network' functions well and Members seem to quickly learn about events or issues of importance to them. Other stakeholders also appreciate the good communication from the DSG and the occasional 'heads up' about things that might concern them. Clearly, the Secretariat functions very effectively in this regard, and long standing relationships and understandings mean that it is a proper two-way process. The balance between letting people know early of important developments and maintaining confidentiality seems to be carefully maintained. Members' questions are quickly answered: "you always get quick, knowledgeable response from Secretariat if you ask questions".

In a recent evaluation of the West Cumbria SSG, a key point was that facilitating communications and consultations means just that, and that the communications and consultations should be with

unnecessarily in direct communications between the NDA or sites and stakeholders. The DSG has a different tradition and we are not aware of any current problems in this area, but it is a perspective worth bearing in mind.

Meetings of some site stakeholder group are valued by potential contractors and others as a forum where they can meet site management and other stakeholders. The DSG seems to be less used in this way, perhaps because site and NDA staff are generally accessible anyway. Many Members maintain their own relationships with NDA and site for communication and advocacy purposes, and it is right that they do so.

Some SSGs put more effort than the DSG into encouraging better direct communication between the various parties and the community, and to build awareness of nuclear issues within the community. For instance, Sizewell's SSG organises seminars to inform people and stimulate debate on local emergency arrangements, safety issues such as coastal erosion and regulatory oversight arrangements. It also explores locally or nationally controversial issues by pairing speakers who hold different views and letting participants make up their own mind.

These events attract a larger audience but to maintain a programme of this standard takes a lot of organisation and depends on the drive and organising ability of a (probably small) subset of Members and the Secretariat. Some potential topics risk raising not only awareness but also anxiety. We do not have a recommendation for the DSG but we do think the possibility should be considered, perhaps in the context of forthcoming site restoration programme issues.

Consultation

Consultation covers offering advice and acting as a consultation partner on emergency arrangements and specific local and national projects and strategies.

Consultation is an important route for shaping NDA strategy and other factors affecting the site. The Group needs to engage on the important issues, helping determine which option is selected or how things will be done e.g. fuel movements. The site consults less often on local technical option appraisals than it used to, but there are many more high level NDA consultations.

Interviewees thought the process of picking up on, prioritising, and preparing a jointly-agreed response was very well organised by the Secretariat and yielded useful results: "consultation is a model of good practice". The process often got people together, sometimes with people they would not normally be in the room with, and enabled them to say as a group what their own organisation might not be in a position to say. The DSG is well placed to host consultation workshops or events if appropriate.

Programming

It was suggested that working with the new site restoration plan would enable the DSG to understand where the future decision points were and agree and schedule any associated consultations. The DSG can be proactive about deciding what needs engagement; it need not be just a passive consumer of opportunities offered.

More generally, there are a limited number of meetings before decommissioning is largely complete. We suggest that the DSG should think now about its work over this period and draw up an outline long term, task-driven, programme to sit alongside the site clearance programme. It needs to be clear about what it wants to achieve, what needs to be done, and by when. Ruthless prioritisation may be needed at some points to match DSG workload to available resources and Members' interests.

5 Arrangements and Working Practices

DSG Meetings

DSG meetings are well prepared, well managed and focused on the business in hand. They are a huge improvement on the meetings we observed in 2007. Papers for the meetings are generally well written and available on time.

The potential problem most often mentioned to us was the risk that, with any potential controversial matters handled in subgroups and only exposed to the press and public as a matter of last resort, the DSG meetings become or appear to be too well managed or scripted in advance. They would then lose their purpose of maintaining public confidence by visibly exposing site owners and operators to constructive challenge. Just as DSG Members say the regulators must be seen to be robust, so must the DSG be seen to be doing its job. This is not currently a major issue but Members are clearly aware of the need to avoid falling into the trap.

DSG meetings have a decent mix of DSG business items and presentations or updates from site, the NDA, regulators etc. Subgroup reports highlight key issues and do not simply summarise subgroup proceedings. Again, there seem to have been significant improvements since 2007, though some interviewees would still like more in-depth exploration of a smaller number of issues. Most SSGs keep a fairly consistent balance from meeting to meeting, but not all do - the West Cumbria SSG programme (for instance) alternates 'report focussed' and 'issue focussed' meetings. There is no one right model, it depends on circumstances and Members' preferences.

In comparison with other SSGs, DSG meetings are well attended by the public and press, although the audience is never likely to be large unless the topics being discussed are particularly controversial. Holding them in the evening and at a convenient location helps, although of course holding every meeting in Thurso (and specifying it in the ToRs) must increase perceptions that the Group is overly Thurso-centric.

None of our interviewees seems to have thought the DSG should rotate venues, but there were some interesting suggestions for occasional excursions. For instance, it might meet in Inverness once every two years and focus on wider regional impacts and opportunities. This would attract a more varied audience and participation from more of the major stakeholders' senior staff.

The SRSG used to be held in the afternoon of the main DSG meeting. This meant fewer trips for some Members and Observers with a particular interest in oversight, but apparently did not allow sufficient time for the preparation of subgroup reports or scheduling of discussion on issues emerging. Members are better placed than us to judge which is preferable.

Chairman & Secretariat

The feedback we received is that the DSG is well Chaired and that the DSG 'management team' do a good job and make sensible use of business meetings to organise the Group's work.

The DSG will continue to need strong Chairing over the next decade. Attributes mentioned include: having local credibility; being reasonably neutral; having the time and commitment to do the job; having an eye for the significant issues; the capacity to challenge and gain the respect of site management; and the ability to liaise on behalf of the Group with public, press and key stakeholders.

That is a daunting list, but in practice no SSG Chairman covers all the tasks or needs every attribute to the same degree - it takes a team effort from Chairman, Vice-Chairman, and the Secretariat, supported by some key Members. At different SSGs, the role is split up differently. For some, the key relationship is between the Chairman and site management and the Chairman is regularly on site; in others the Chairman takes more of an overview and it is the Vice-Chairman who drives the oversight programme. For Dounreay/Vulcan, the Secretariat is (uniquely) in a position to act as a bridge between the SSG and site management.

Big changes are imminent at Dounreay/Vulcan, and a change in relationships will inevitably follow from the change in personnel. The extensive coordination role of the current Secretariat cannot be taken for granted. It might be that the Chairman/overview + Vice-Chairman/oversight model will be the one the DSG adopts, but it is obviously not something we can pronounce on.

As we have already noted, SSGs which have a good oversight track record all seem to involve someone with knowledge and persistence, and the willingness to be an 'irritant' if necessary. Sometimes it is a Member who undertakes this role (Dounreay, Sizewell), sometimes it is a member of the public (West Cumbria, Devonport). It doesn't seem to matter who it is, but there apparently needs to be at least one constructive critic.

Although it might make meeting management a little harder, allowing members of the public to ask questions after presentations or important discussions might also help here, rather than waiting until the end of the meeting. Members can pick up on what is said, actions can be placed, and Observers can respond if necessary. This works well at several other SSGs.

Membership and capacity building

Comments made to us during this review on membership are generally similar to those made in 2007. We do not mean to imply that no progress has been attempted, just that the challenges in involving young people, pressure groups, and the business community (for example) are inherent in the nature of SSGs and have not changed.

Some people will attend SSGs just because they have a remit to represent their organisation, but enthusiastic participation requires that there be issues of interest and relevance to them. In the circumstances, the Chairman and Secretariat seem to be doing a good job of monitoring attendance and trying to minimise the number of absentee representatives.

They are also conscious of the need always to look for ways to minimise the burden of active participation and reduce the amount and length of paperwork that Members have to read. There is always a balance to be struck, but several interviewees seemed to have quite strong views on this subject.

There is a substantial section in the ToRs on capacity building and the induction process for new Members but it is not clear to us that it is being applied. There were only a few comments relating to the induction process and familiarisation with Dounreay and Vulcan sites but we think some work may need to be done in these areas.

It was suggested to us that if Members do not visit the site, it is bound to result in a different sense of what is important - perhaps a focus on the conceptual and socio economic at the expense of oversight and engineering issues? Certainly, seeing some of the issues first hand e.g. shaft, pits, etc. might be useful for Members who have not worked on site, and may help focus minds on the most significant ones. Perhaps a programme of occasional briefing visits should be restarted.

Access to information

The DSG website is very much improved from our previous review. It may not be a particularly slick design, but most papers and meeting information were easy enough to find (having said which, we could not find the DSG's Terms of Reference using the navigation or search facilities).

Terms of Reference

We have already commented on aspects of the DSG's Terms of Reference . They are also reproduced in Appendix B, reordered slightly to better relate the 'role' ToRs to the work of the DSG and its subgroups.

The terms of reference relating to Dounreay and the DSG's 'toolkit' mainly follow the NDA's guidance. The general opinion seems to be that they allow the DSG to do anything it currently feels it needs to, and that there are no superfluous items.

On the other hand, those relating to Vulcan appear deficient in that they do not provide any guidance on the relationship between the DSG and MoD on socio economic matters, and they focus solely on the site owner whereas the Dounreay clauses facilitate communication between the DSG and both the owner and operator. Circumstances have changed and it seems to us that there is a strong case for revision.

Funding

Vulcan should be funded from the NDA budget. One or two thought that the costs of setting up and managing the necessary arrangements might outweigh the potential benefits but it does still seem to be an anomaly that needs definitively sorting out one way or the other.

6 Conclusions

The scope of the independent review reported here included the DSG's four main roles (oversight; socio economics; communication; and consultation) plus consideration of its structures and working practices.

Many Members put in huge amount of unpaid effort and the DSG is amongst the best of the NDA's site stakeholder groups in most of the things it does.

It has made good progress since the last review in 2007 and has many strengths, including: its socio economic programme and contribution to communication and consultations; its constructive relationship with Dounreay site management; and the work of the Secretariat.

It should build on them, evolving the current approach and mechanisms in the light of the changes that will be taking place at both Dounreay and Vulcan.

Nevertheless, our observations and the comments of Members and Observers suggest there are things the DSG could do better and areas where it may need to adjust its focus to meet the new challenges.

These include: longer term planning of its activities; clarity of focus on socio economics; more rigorous oversight generally and of Vulcan in particular; and - going forward - attention to the respective roles of the Chairman, Vice Chairman and Secretariat.

References

- [1] DSG 2007. Review of the Operation of the Dounreay Stakeholder Group. Faulkland Associates report C2048 R01-2, August 2007. Presented at DSG 19th September 2007 as DSG paper DSG(2007)C097.
- [2] DSG 2007b Dounreay Stakeholder Group Admin and Procedures Sub Group. Proposals to Take Forward Recommendations from the DSG Audit. DSG paper DSG(2007)C124.
- [3] DSG 2008. SSG's Approach to Oversight. Faulkland Associates note, March 2008. DSG paper DSG(2008)C206.

Appendix A: List of Interviewees

Alan Scott	Member
Anne Chard	Member
Bob Earnshaw	Chairman
David Flear	Member
Eann Sinclair	Member
George Farlow	Member
June Love	Secretariat
Koreen MacDougall	Member
Martin MacDonald	Scottish Government
Michael Moreland	MoD
Rick Nickerson	Member
Roger Hardy	BDP
Simon Middlemas	DSRL
Steve Heddle	Member
Stuart Chalmers	NDA
Stuart Hudson	Scottish Government
Trudy Morris	Member

Appendix B: DSG Terms of Reference

Dounreay

Site Restoration Programme Oversight

To give an opportunity for questioning the operator, the NDA and regulators.

To comment on the performance of NDA and site operator with regard to achievement of plans, value for money, etc.

To review arrangements for such matters as emergency response.

To scrutinise and input into the prioritisation of work programmes.

To provide views on the NDA contract with and the performance of the operator.

Socio Economics

To scrutinise and input into the priorities of socio economic activities by the NDA, PBO and the site licence company and how these link into the Caithness & North Sutherland Regeneration Partnership.

Consultation & Communication

To provide an active, two-way channel of communication between the site operator, the NDA and local stakeholders.

To represent local views and input timely advice to the NDA and site operator

Toolkit

To commission and receive reports about activities and their impact on, for example, safety, the environment and local economy.

To set up sub-groups to address specific issues relevant to the clean-up programme.

To facilitate participation in the wider local consultation via public meetings and other mechanisms as required.

Vulcan

To provide an active, two-way channel of communication between the Ministry of Defence and local stakeholders.

To give an opportunity to question the Ministry of Defence operator and Defence site regulators.

To review arrangements for such matters as emergency response.

Appendix C: Review Team & Conflicts of Interest

White Ox

White Ox is a network offering specialist evaluation and consultancy services in support of strategic and project level decision making, with or without stakeholder involvement. It is based in Bristol, UK.

White Ox's individual reviewers are generally expert in the application of environmental decision support and stakeholder engagement methodologies rather than in the technical detail of individual alternative courses of action or attributes under consideration for any particular context.

Reviewer Team

three key aspects of decision making: structured methods; human factors/human error; and stakeholder involvement.

Much of his work nowadays is concerned with structured option assessments and involving stakeholders in projects and programmes, particularly as an independent methodology peer reviewer on high-profile projects and often in the nuclear sector.

He has a BSc in Chemical Engineering, and is a Registered Member with the UK Institute of Ergonomics & Human Factors and the International institute for Public Participation. He was appointed in 2010 as a Senior Visiting Fellow at the London School of Economics Department of Management, working mainly with the decision science team.

Potential Conflicts of Interest

None of the parties involved are aware of any direct conflicts of interest affecting this project, but for the sake of transparency the following points are included under this heading.

David has in the past undertaken consultancy work for Dounreay site and for the DSG. Details are available on request.

David is currently providing stakeholder engagement consultancy support for the MoD, on the unrelated Submarine Decommissioning Project.