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28 June 2012

Dear Delrdre

NEW LOW LEVEL WASTE FACILITIES, DOUNREAY

Following on from the discussions at the recent Dounreay Stakeholder Group meeting I wish to clarify points raised regarding the number of vaults being constructed at the New LLW Facilities and our plans for the LLW pits.

Dounreay has always stated that we were applying for planning permission to construct up to six vaults which would be built in three phases. All three phases would only be built if they were required: Phase One, currently being constructed, will commence accepting waste in 2014 and will accommodate the minimum predicted waste arising volumes; the full extent of Phase Two will be confirmed as the site decommissioning progresses and waste volumes are updated; Phase Three may be needed to cater for the LLW arising from the planned retrieval of the waste in the existing disposal facility, the LLW Pits.

Highland Council granted permission to construct up to six vaults and this is clearly stated in bold on the front page of the planning consent from Highland Council. I refer you to the minutes of the DSG Environmental Sub Group on 23 January 2008 which you attended, a copy is enclosed for your information. During this meeting there was a discussion on the number of vaults required.

With regards to the existing LLW pits on the Dounreay site, the contract with the NDA is currently to empty these pits, so the current plan includes emptying the pits and disposing of the waste in the new LLW Facilities (and this is why Phase Three is planned). However, the contract makes it very clear that a potential alternative of leaving the existing LLW pits in-situ should be considered. Once there is sufficient data to allow a decision to be made then the appropriate consultations and communications will take place.

Dounreay has always been clear about their intentions for the New LLW Facilities and this has been recorded in many documents over the last few years. I point you to the Environmental Safety Case 2010 Non-Technical Summary and Project Summary, plus the many other documents available on our website.

I trust this clarifies these points for you and apologise if the discussions at the DSG meeting left you confused.

At the Buldoe Liaison Group on 16 May, a discussion was held on the Dounreay UNOR system. As advised at the meeting, although the NLLWF is located outwith the Dounreay site, it and the surrounding area of NDA owned land must adhere to Dounreay's systems.

Dounreay now proposes to include a health and safety section in the quarterly NLLWF report issued prior to each Buldoo Liaison Group meeting. We will report on any health and safety issues within the construction site and surrounding vicinity that may be of interest to you.

As the next Buldoo Liaison Group meeting is not until 22 August I attach a paper on health and safety during the last three months.

We are copying this letter and paper to the other Buldoo residents and Bob Earnshaw, Dounreay Stakeholder Group Chair for their information.

Should you require any further information on any of the above, please contact Marie Mackay on 01847 803043.

Yours sincerely

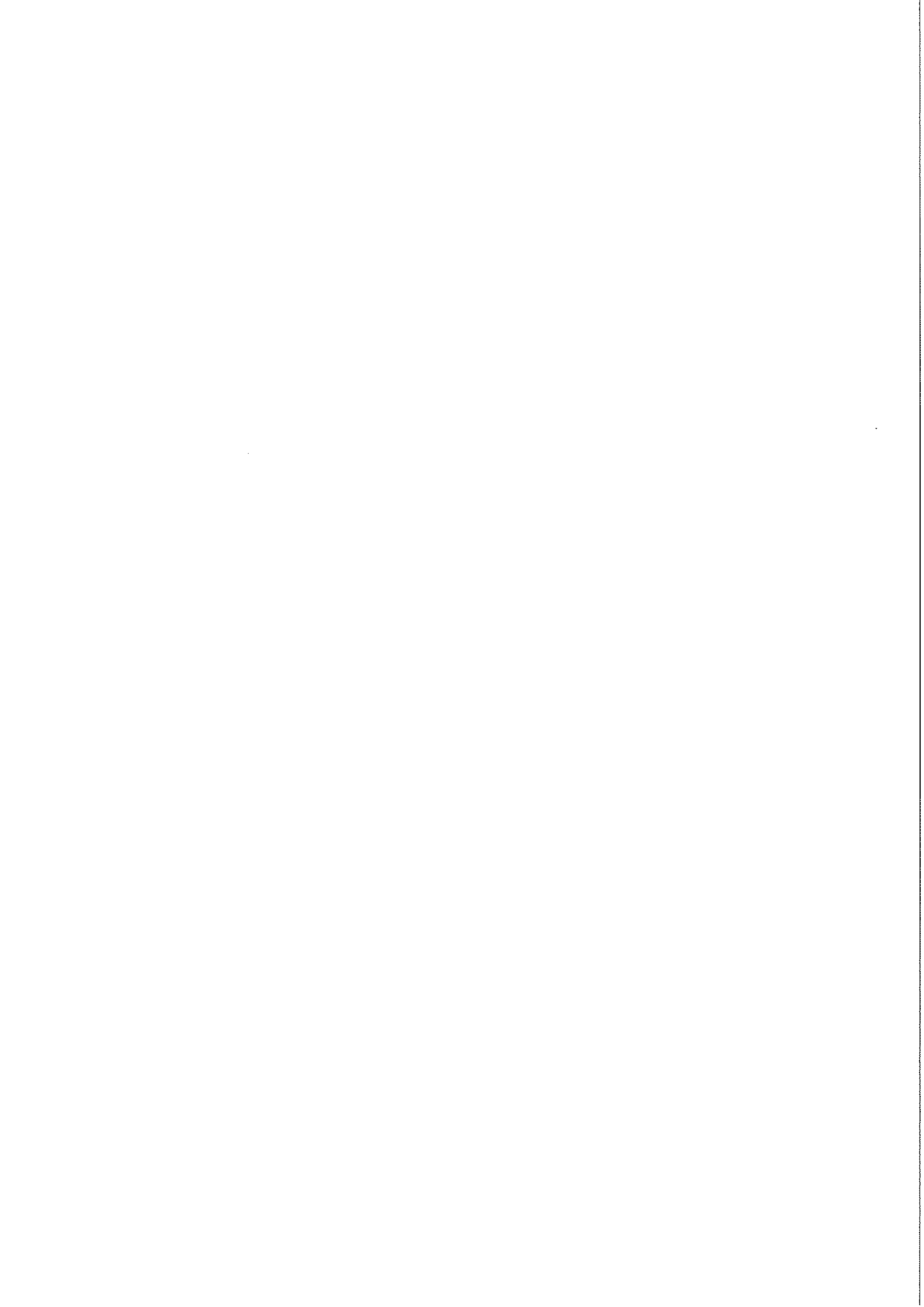


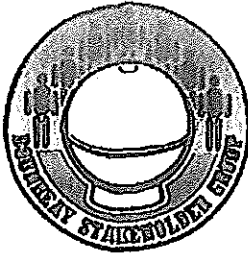
Alastair Macdonald
Change Director
alastair.macdonald@dounreay.com

cc: Bob Earnshaw, DSG Chairman
Buldoo residents

**New Low Level Waste Facilities
Health and Safety**

Date	Detail	Outcome
4 April	Considerate Contractors Scheme audit.	Grahams Construction scored 37/40 which is only achieved by the top 5% of construction sites in the UK and categorises the D3100 site as "An exceptionally good site".
24 May	Fly-rock during blasting operations outwith 100m exclusion zone.	An unusual occurrence but as a precaution the exclusion zone was extended to 165m for the next blast and thereafter was reviewed for each blast. Following three successful blasts with no flyrock the exclusion zone was reduced to 150m on 12 June and remained at 150m for the remaining blasts.





Environment sub group - 23rd January 2008

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MINUTES OF THE DSG ENVIRONMENT SUB GROUP MEETING HELD ON 23RD JANUARY 2008 AT 1330 HOURS IN THE PENTLAND HOTEL, THURSO.

Present: Alastair MacDonald DSG Chairman
 Chris Jones SEERAD
 Hamish Pollinger Calthness Against Nuclear Dumping
 Alan Sinclair National Farmers Union *
 Delirdre Henderson Buldoe Residents Group
 Rick Nickerson Shetland Island Council
 Nick Blowfield Orkney Islands Council *

In addition: Tony Wratten UKAEA
 Roy Blackburn NDA
 Joe Toole UKAEA (for item 6)
 June Love DSG secretary

1. WELCOME

Alastair MacDonald welcomed everyone to the meeting. It was noted that:

- Rick Nickerson was attending in his capacity as a Councillor for Shetland Island Council.
- Tony Marsh, Orkney Island Council, was retiring and Nick Blowfield take over his role on the DSG.

ACTION: DSG/ESG(2008)M009/A001: SECRETARY, ON BEHALF OF DSG, TO WRITE TO TONY MARSH THANKING HIM FOR HIS INVOLVEMENT.

It was noted that a chairman was required for this sub group. It was agreed that Alastair MacDonald would chair the group for this meeting and following the Admin and Procedures review of the sub group representatives a new sub group chairman would be considered.

2. APOLOGIES

Apologies were received from James Anderson, NFU (Alan Sinclair deputised), Tony Marsh, Orkney Island Council (Nick Blowfield deputised), Sandy Mackie, Scrabster Harbour Trust, Rosemary Thompson, North Highland College and Roger Wilson, SEPA.

3. MINUTES OF THE LAST MEETING

The minutes were agreed.

4. ACTIONS ARISING FROM PREVIOUS MEETINGS

Actions completed since last meeting

ESG/M008/A001: Secretary to write, on behalf of DSG, to Bryan Dods thanking him for his contribution to DSG. Action complete – DSG(2007)C105.

ESG/M008/M005: Secretary to draft letter to SEPA on transfer of authorisation application from UKAEA to DSRL. Action complete – DSG(2007)C106.

ESG/M008/M006: ESG members to comment on draft letter re authorisation application before letter is finalised and sent to SEPA. Action complete – DSG(2007)C106.

ESG/M008/A007: ESG members to consider responses to the Scottish Executive's consultation on standardising reporting of radioactive discharges. Action complete – DSG(2007)C107.

Actions ongoing since last meeting

ESG/M008/A002: ESG members to consider new sub group chairman.

ESG/M008/A003: James Gunn, UKAEA to continue to update ESG on development of heritage strategy.

ESG/M008/A004: ESG to consider how to consult with the community once the heritage strategy is further developed.

5. REPORTS FOR DISCUSSION

DSG(2007)P064 (UKAEA report) and DSG(2007)P067 (SEPA report) were discussed. Tony Wratten provided an update.

- He noted that the application was for the change of company and that the discharge authorisation limits would not change. To allow for the transfer SEPA is required to reassure themselves that the site licence company (Dounreay Site Restoration Ltd – DSRL) is capable to carry out the terms under the discharge authorisation. SEPA had carried out an audit and dialogue was ongoing in some areas which needed more clarity. A second audit would be carried out on 14th February on 2 key plants and the success of this audit would determine whether the site was on track to transfer the authorisation by the 1st April.

Hamish Pottinger asked what would happen if the site did not pass the SEPA audit in February. In response Tony Wratten noted that in terms of the authorisation the site would continue in its present shape. The site licence company (DSRL) would be unable to take over the authorisation and therefore could not operate as a stand alone company. Roy Blackburn, NDA, noted that the potential delay in transferring the discharge authorisation would impact on granting a new site licence which would be an issue for NII. The site licence and discharge authorisations went hand in hand and the potential delay was a recognised as a risk.

Rick Nickerson asked what the difficulty was. Tony Wratten stated that the success of the SEPA audit was largely in UKAEA's hands. To demonstrate compliance was complicated because there were three discharge authorisations with 120 conditions related to each and the site had to demonstrate compliance across 40 facilities across the site. It was demonstrating that the links from each facility existed which was complicated. He likened it to driving from Thurso to London; if the journey went without a hitch and you arrived safely at your destination it was likely that the trip had been undertaken successfully. However proving that throughout the journey all highway codes rules had been obeyed at all times would be harder to demonstrate.

The old authorisations were supported by a raft of underpinning paperwork which were prescriptive. The onus now is for the site to demonstrate best practical means at all times.

Rick Nickerson asked if the final approval came from SEPA or did it rest with a minister. It was confirmed that it would go through the Scottish Government who were already carrying out discussions with SEPA and it was likely that if SEPA agreed to the transfer the Scottish Government would be content that due process had been carried out.

- A contract had been awarded to JGC for the D1209 duct replacement and stacks for the fuel cycle area. The existing system is almost 50 years old and does not meet modern standards.

- Rick Nickerson noted that there was no report on the shaft isolation project in the UKAEA report. [Secretary's note – there was a progress statement but this was under the site operations section of the report which was discussed at site operations sub group]. A presentation on the shaft isolation project was requested and agreed.

ACTION: DSG/ESG(2008)M009/A002: SECRETARY TO REQUEST A PRESENTATION ON THE PROGRESS OF THE SHAFT ISOLATION PROJECT FOR THE NEXT SUB GROUP MEETING.

6. PARTICLES UPDATE

DSG(2007)C108; a progress report up to end of October 2007 had been circulated in advance and was noted.

Dr Joe Toole updated provided an update. Of note:

- BPEO: the final stage of consultation had closed on 12th December 2007. Thirty-two responses had been received and independent facilitators Entec were currently finalising their feedback report which would provide UKAEA with recommendations to consider when updating the BPEO. It was expected that the final BPEO would be submitted to SEPA by end of January/early February. SEPA would carry out a small statutory consultation when the BPEO was submitted formally.

- UKAEA continued to support DPAG's (Dounreay Particles Advisory Group) work.

- o Off-shore mapping of the seabed in summer 2007 had identified over 60 particles.

- o A survey between the diffuser and Sandside bay had been carried out and it was now believed that an estimate of 400-500 particles could be in transit to Sandside bay. The rate of arrivals is something which DPAG are very interested in.

- o The majority of relevant and significant particles appeared to be clustered around the old diffuser area on the seabed.

- o Trials had been completed by one company on a retrieval capability for the remotely operated vehicle. This test had proved successful and four particles had been retrieved. It was planned to test a second system in March and following that an evaluation of both systems would be made.

- o Investigation work in the old diffuser was continuing. More work would be carried out at the risers to try and gain access to the chamber. If this failed a second option to send a crawler down the nine inch pipe would be considered.

- Particles research

- o Dissolution tests: It had been recognised that while MTR and DFR particles were fairly robust,

one particle in a batch subjected to experiments on biological availability was found to have dissolving characteristics. On the request of DPAG 150 particles were selected and tested and all but three were found to have no dissolution effects. This work was important to understand the potential dose from a particle if it was ingested into the body. From the findings of the tests DPAG have decided that the potential for increased health effects had not changed and therefore the categories of particles (minor, relevant and significant) would not change.

- o Density tests: DPAG wanted to understand whether the density of particles was a factor for their movement and whether these findings would align to the computer model predicting the transportation of particles. The measurements of density showed that the MTR fragments were similar to grains of sand, while DFR fragments had higher densities which could make them more liable to sink and be more deeply buried; however DFR fragments show a porous structure and further assessment of depths of finds would be a useful check.

- Beach monitoring:

- o COMARE had carried out a beach validation on the monitoring vehicles. Working with DPAG, and in the presence of SEPA, they found that the detection system was capable of finding big particles deeper and small particles on the surface. The tests were carried out on Dunnet beach. COMARE's report was currently awaited but initial feedback showed that the system had improved.

- o Monitoring continued on local beaches except at Sandside where access to the beach had been withdrawn by the landowner.

Members agreed to raise their concerns regarding access to Sandside beach at the full meeting.

- o The contract for beach monitoring was due for renewal and in accordance with the Official Journal of European Union (OJEU) would be re-tendered.

Rick Nickerson noted that Nukem had gained a lot of experience in the detection of particles. He asked how UKAEA would ensure that other systems would be as robust and meet the specifications required. Joe Toole responded that credible testing would be carried out independently.

- o Peadie Sands, Murkle and Dunnet beach would be monitored sometime in February (dates to be confirmed). Discussions with landowners at Dunnet were currently ongoing to renew the wording of the signs.

- o It was noted that Sellafield were also utilising the vehicle detection system on local beaches.

7. LOW LEVEL WASTE UPDATE

DSG(2007)C113 was noted. Buldoo Residents Group had written to the DSG asking for support in providing an independent review of the proposed location of the low level waste facility.

Deirdre Henderson, Buldoo Residents Group noted that it had been a difficult time for the residents of Buldoo. Their concerns were raised further when the Scottish Government announced they were looking for national sites for high and intermediate level waste.

The residents wanted to understand why the facility could not be located within the site security fence. The proposed siting meant that it was behind their homes and the residents felt that this would change their lives completely. She noted that while UKAEA's logo was to 'restore the environment' the residents believed they were destroying theirs.

She noted that they had held talks with UKAEA over two years ago which was the first time they had seen the proposed location which was situated just behind their homes. The reason given was that, based on the geological work carried out by Nirex over 20 years ago, this was the most suitable location.

Further studies carried out showed that the fault line identified was not consistent with the Nirex data. UKAEA then revisited the location and presented revised plans to the residents. During this discussion UKAEA presented a change to the vault size which would make the facility twice as deep.

Rick Nickerson noted that Shetland Islands Council had responded to the low level waste consultation which had been carried out in 2003. He felt that if proposals were being changed significant this could essentially negate the consultation which had been carried out.

Deirdre Henderson noted that the residents were also concerned that low level waste from Dounreay and Vulcan would only be the start. Tony Written noted that the number of vaults proposed would be built in a phased approach. It was difficult to predict the total volumes of waste and the vault numbers were worked out by using 'worse' and 'best' case scenarios. It was not UKAEA's intention to take waste from anywhere else and the planning application was for Dounreay/Vulcan waste only. The group noted that the possibility of other wastes being disposed in the facility would be an NDA issue.

The group discussed how they could support the Buldoo request for independent advice. It was agreed that agreement in principle for support would be requested at the DSG meeting. In addition it was suggested that SEPA be contacted to find out what independent assessment they had carried out. It was agreed that linking up with SEPA would be a good start to understanding how the UKAEA documents had been reviewed.

ACTION: DSG/ESG(2009)M009/A003: ESG TO ASK DSG FOR APPROVAL IN PRINCIPLE FOR SUPPORT FOR BULDOO RESIDENTS GROUP TO SEEK INDEPENDENT ADVICE.

It was noted that this would have to go back to DSG when full scope of work and costs were identified.

Updates from the NDA were also noted. NSG32 and NSG37a refers.

Rick Nickerson noted that local authorities were concerned about proposals for smelting contaminated metal. The concern was that the contaminated metal could end up in the steel market and ultimately into landfills.

RAISED IN THE INFORMATION SHEET.

- NSG32: Site and status
- NSG37: Ecological impact to the Marine plan
- NSG37: NSG's contaminated land
- NSG32: Committee on Nuclear Site Management

Heritage strategy: It was reported that James Gunn had been appointed as Heritage Strategy project manager. Discussion of content of development of a heritage strategy that deals with the area around the site and the surrounding area. It was noted that the successful contract would start work in mid February. Historic Scotland were also due to start work in February.

AGENDA

AGENDA CONTINUING FROM PREVIOUS MEETING

1. AGENDA 2. MEMBERS 3. DOUNREAY NEW SUB-GROUP CHAIRMAN

4. DSG/M008/A003 James Gunn: Update to update ESG on development of heritage

5. DSG/M008/A004: ESG to consider how to consult with the community once the heritage strategy is further developed.

THANKING YOU FOR THE INVOLVEMENT

DSG/ESG(2009)M009/A003: ESG TO ASK DSG FOR APPROVAL IN PRINCIPLE FOR

DSG/ESG(2008)M009/A004: ESG MEMBERS TO CONSIDER NSG37 - NDA WASTE STRATEGY DEVELOPMENT AND IWS - WITH A VIEW TO ANSWERING THE QUESTIONS RAISED IN THE INFORMATION SHEET.

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