

**PUBLIC CONSULTATION ON ONR'S INTERPRETATION OF 'BULK QUANTITIES' OF
RADIOACTIVE MATTER – SUPPLEMENTARY**

DOUNREAY STAKEHOLDER GROUP RESPONSE

Respondent's details:

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The Dounreay Stakeholder Group's primary purpose is to be the main interface between the community, the site operator and the Nuclear Decommissioning Authority.

The DSG is represented by over 20 organisations and therefore this response is one that is generally agreed by most organisations. However, there are some organisations, within DSG, who do not agree with these comments, and therefore those organisations that have differing opinions are encouraged to submit their own response.

CONSULTATION QUESTIONS AND RESPONSES

1. Do you agree that we should address the potential anomalies from a risk perspective by changing the original proposal to have a single figure threshold?

Yes - we believe it would it much clearer as to what is required.

2. Do you agree that option 3 above is a reasonable way to address this?

Yes - appears to be the most common-sense approach to addressing this issue.

3. **Do you think that option 3 above is a better overall approach to interpreting "bulk quantities" than the original single figure of 100 x REPIR Schedule 2?**

Yes - appears to be more flexible and a more sensible approach.

4. **Are you aware of any current installations that, having taken account of statutory exemptions, and exempting sealed sources, would fall into this discretionary range?**

No

5. **Are any businesses contemplating making a commercial decision to enter into this area of work where the use of the discretionary range as described would have an impact?**

No

Submitted electronically on 25th July 2012