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**Please respond to:**

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Dear Sir/Madam

**RADIOACTIVE SUBSTANCES ACT 1993:  
APPLICATION MADE BY DOUNREAY SITE RESTORATION LIMITED UNDER THE  
RSA 1993 IN RESPECT OF PREMISES AT DOUNREAY.**

The Dounreay Stakeholder Group (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, who may not agree entirely with this submission and therefore these organisations have been encouraged to provide their own response.

The DSG welcomes the opportunity to comment on the documents which form the consultation. Having said that there are papers within this consultation that DSG has no experience or expertise in to respond and therefore will respond on the issues we have knowledge in.

Before getting in to some of the detail within the consultation papers it would be useful to understand if the RSA is compatible with the proposed interim end state. This assurance would be required from both site and regulators to ensure there is a joined-up approach and that the RSA authorisation does not hinder the programme going forward.

**Paper 1A/AB:** DSG has no comment to make – we trust that SEPA will take comment from other expert bodies and any comments will be taken on board before making the final decision.

**Paper 2:** Application for Authorisation for the Disposal of liquid, gaseous and solid radioactive waste from Dounreay: DSG believes consideration of disposal of

radioactive waste from Dounreay is timely given the change of emphasis from an operational to decommissioning site.

**Paper 3:** DSG is pleased to see that discharges are reducing.

**Paper 4:** Prospective dose assessment by the Food Standards Agency: DSG is pleased to see that the Food Standards Agency has no objections to the application.

**Paper 5:** DSG would expect that those with the knowledge of dose assessments (including the FSA paper above) have already input into this document or will respond, via the consultation process.

**Paper 6:** We note on page 27 of this paper there is a requirement for a 3 year dose assessment for non-humans and that you ask for information from the site for a 3 year period and a 3 year look ahead. We are aware the site is looking to reduce its environmental monitoring of non-humans and therefore would like to understand how the site will be able to provide a 3 year projection. Given that the site is decommissioning it would appear to us that the limits (from a dose point of view) will continue to decrease.

**Paper 7:** SEPA's review of beach monitoring programme for fragments of irradiated nuclear fuel (particles): DSG has discussed this paper in some detail – DSG has the following comments to make:

- From a general point of view DSG would like to see a clear exit strategy within the RSA authorisation for particles and given DSG's involvement in the Particles BPEO we would ask that the exit strategy is clearly explained and engaged/consulted on before final agreement is reached.
- We note the proposed changes to the beach monitoring schedules.
- We would welcome an explanation on the current understanding of off-shore monitoring and retrieval. Is there confidence that the main off-shore particle plume has been 'cleaned' (understanding that not all particles will be retrieved as per the BPEO)?
- If there is confidence on the off-shore particle plume then one would assume that the beaches further away would have no requirement at all for future monitoring. Such a statement would provide re-assurance.
- We would like to understand why monitoring has been reduced at Melvich, Murkle and Crosskirk?
- Given Sandside's location to the site and to the main particle plume would it not be better, for public re-assurance, to continue to monitor on a monthly basis (as is at present) rather than changing to quarterly for a set period of time – this would give quicker assurance that the off-shore particle plume had been cleaned sufficiently if particles were no longer (or less frequently) coming ashore. By continuing with a monthly regime would this not allow the 'picture' to be built up quicker thus being able to take a decision in the shorter term as to whether continued monitoring is required. Given access to Sandside was only granted on a regular basis in the last

couple of years would it not make sense to continue the monitoring regime already established for a further 2 years and then reduce to 6 monthly if particle activity reduces and numbers of particles remain steady.

- DSG is not sure we understand why Murkle would be monitored once per year but you would monitor Melvich every five years. Recognising that 2 particles have been detected at Murkle does it really merit monitoring every year. Would it not be better to monitor Murkle and Melvich on a 3 yearly basis or not at all.
- Why would monitoring continue at Crosskirk given no particles have ever been detected.
- There is a broad agreement that the beaches earmarked for cessation of monitoring is the correct thing to do.
- The foreshore at Dounreay needs to continue as described on a fortnightly basis given that the most 'hazardous' particles are detected there. However, DSG would like to understand the process for review and reduction of this requirement.

In summary on the particles paper, DSG would like to understand:

- The timeline for off-shore monitoring (when will this be complete).
- What are the understood transit times for particles to Sandside and when would a reduction in finds be expected?
- The mechanism for reducing frequency at the foreshore should be considered, would this be reviewed, say, in 2 years time.
- Given the frequency of monitoring would this make the maintenance of the monitoring systems and their trained operators no longer viable.
- Has the operator been consulted on the viability of these proposals?

DSG looks forwards to receiving a response to the questions raised on the particles monitoring paper.

Yours sincerely

*Sent electronically without signature*

**Bob Earnshaw**  
DSG Chairman