Please respond to:

Ref: DSG(2014)C003 13th January 2014

NDA Business Planning NDA

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Dear Sir/Madam

NDA DRAFT BUSINESS PLAN 2014-2017

The Dounreay Stakeholder Group 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.

DSG members welcome the opportunity to provide views on the NDA's draft business plan and make the following comments:

- Page 9 Planned income and expenditure summary: We note that the spend for the Dounreay site was 175.0 for 2013/14 and then reduces in 2014/15 to 171.9. We believe this may be due to additional funding provided this year for additional work but would like our understanding of this clarified.
- Page 10 Breakdown of Planned non-site expenditure: We note the small reduction in funding planned for socio economic, skills, R&D and knowledge. DSG would like to see a further breakdown associated with each topic.

DSG would also like clarity of the funding for the national nuclear archives. While members welcome the national nuclear archive and note that it is mentioned on page 43 as a key activity in this period there is no mention of funding for this facility.

On a general socio economic topic DSG feels that NDA, along with site operators, should consider more innovative ways of providing socio economic activity for sites which are closing. This could include the potential commercialisation of services which are currently carried out on site where a

robust business case on its growth potential.

- Page 11 Spent Fuel: It was noted that all out of reactor Breeder fuel shipments will be complete during 2014/15. DSG members would like to reiterate the need to ensure the Georgemas development becomes a positive legacy for the future and does not end up as a memorial for fuel transports.
- Page 12 Nuclear Materials: It was noted that the first transports of exotic fuel will take place during 2014/15. DSG members look forward to full engagement on this topic at the appropriate time.
- Page 30 Dounreay Site Restoration Ltd, Key Activities. It was reported at the December DSG that the Dounreay site was currently re-profiling the decommissioning programme to ensure that the funding available and work activities are consistent. DSG would like clarification that this may affect the planned activities referred to in this document and ask how NDA plan to communicate any changes in the intervening period of this plan being published and the change to the plan.

There is reference to Dounreay regulators approval of the transport safety plan in the period 2014/15. It would be useful for DSG members if a timescale for this could be provided along with information on which regulators are involved and whether it involve public consultation?

- Page 43 Direct Rail Services. There is reference here to "Flask Carrying Vehicles" being replaced. Can an explanation be provided as to why these are being replaced and when within the period of the business plan will this happen? Will the replacements be of the same design and built with the same materials as existing ones?
- Page 43 NDA Properties Ltd. As mentioned above, DSG members welcome the construction of the National Nuclear Archives. It is also noted that there will be a continued programme of disposal of property assets surplus to the requirements of the NDA mission. DSG members are aware that the majority of land around the Dounreay site is currently tenanted with some having a 'right to buy' clause.
- Page 44 International Nuclear Services Ltd. There is reference to movement of remaining nuclear materials at Dounreay to Sellafield by sea. While we appreciate that the return of waste to Belgium has been carried out by sea DSG were led to believe that options were currently being considered for the movement of exotic fuel. We have to assume that the statement in your business plan is for exotic fuel and would ask for clarity around this. It would also be useful to understand, within the bounds of security, whether this is indeed the exotic fuel, what quantities are involved and the timescale for transporting this to Sellafield.

As we have a public meeting in mid March it would be useful to have a response to our queries in advance of this meeting.

Yours sincerely

Sent electronically without signature

David Flear Chairman. Dounreay Stakeholder Group