



Please respond to:

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NDA Business Planning,  
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Nuclear Decommissioning Authority,  
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Dear Sir/Madam

## **DSG RESPONSE ON NDA'S DRAFT BUSINESS PLAN, APRIL 2015 TO MARCH 2018**

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 draft plan and would like to place on record the positive interaction between the DSG, site management and the NDA site facing team in providing timely information over the last year.

We note that while this Business Plan will be finalised and published by April 2015 there is the likelihood that there will be a spending review which will set the funding envelope for 2016/17. Therefore we are commenting on this plan on the assumption that funding for the Dounreay site will not be affected by such a spending review.

It is interesting to note that, under the 2015/16 breakdown of non-site expenditure, the 'fixed' costs have risen slightly (ie NDA Operating Costs, Insurance and Contractor fees) which would be expected through annual inflation. We note the socio economic, skills, R&D and knowledge has been slightly reduced and ask for an explanation as to why this is the case. It will become more important for the NDA and the SLC's to invest in Skills now to ensure there is a workforce for the future decommissioning work and believe that further investment should be made in this area.

Under the specific Dounreay programme, DSG

- has been informed that the date of the interim end state will be late 2029 and therefore this will be amended in the final business plan.
- Welcomes the key activity to continuous improvement in health, safety and environmental performance and expect this issue to be a regular agenda item at the DSG for the foreseeable future.

Given the draft business plan was written before the site's reprofiled ASFL programme it would be useful to get clarity as to whether the current key milestones will change in the final business plan and ask that if this is the case you provide us with this information in advance of the final plan being published.

On a wider topic of NDA key activities, we note that (on page 47) there is an activity to implement a strategic people delivery plan to enable resource planning, skills development and flexibility and mobility across the estate. While understanding that each site has different timescales for closure and different requirements for skills now and in the future it would be useful to ensure this is something that is discussed with SSGs either on a local or estate-wide basis. We would particularly like to understand how NDA/SLCs would provide flexibility and mobility of personnel given that areas are looking to diversify away from the nuclear decommissioning activities and grow a new economy within the area. It would be useful to understand this in more detail.

On transport of radioactive material we look forward to seeing DRS's maximise the Geogemas development with the transport of commercial freight. This has been an on-going discussion with DRS and we would like to see progress in the not too distant future. If no commercial opportunities are identified the NDA need to set out their future plans for this site after all fuel movements are complete. In addition, we look forward to hearing the decision on the options for the exotic material transportation as to whether this will be transported by sea. As you are already aware there are a number of communities within the Highlands and Islands who are opposed to sea transportation.

We continue to raise the issue of socio economic priority areas and believe that priority should be given to those sites that have an achievable and identified closure date.

Yours sincerely

**David Flear**  
**DSG Chairman**