

DOUNREAY STAKEHOLDER GROUP
SITE RESTORATION SUB GROUP

DSG/SRSG(2014)M004

Minutes of the DSG Site Restoration sub group meeting held on Wednesday 12th November 2014 at 1900 hours in the Pentland Hotel (Large lounge), Thurso.

Present:	Bob Earnshaw	Thurso Community Council (chairman)
	David Flear	DSG Chairman
	Alastair MacDonald	DSG Honorary member
	Cllr Roger Saxon	Highland Council
	Cllr George Farlow	Highland Council
	Ian Leslie	SGRPID
	John Deighan	Dounreay Unions
	Mike Flavell	Health Service
	David Broughton	DSG member
	Roy Blackburn	DSG member
In addition:	June Love	DSRL / DSG Secretariat
	Nigel Lowe	NDA Head of Programme
	Christine Lee	DSRL, Site End State Project Manager
	Phil Cartwright	DSRL Socio Economic & Communications Manager
	Cdr Ken Dyke	MOD, Vulcan
	Stewart Ballantine	SEPA
	Sheila Hutchison	ONR for Dounreay
	Paul Dale	SEPA (for agenda item 7)

MINUTES

1. WELCOME AND INTRODUCTIONS

Bob Earnshaw welcomed everyone to the meeting. He welcomed Paul Dale, SEPA who was attending to provide an update on the particles project. Introductions were made round the table.

2. APOLOGIES

Apologies have been received from:

- Deirdre Henderson Buldoo Residents Group
- Cllr Maurice Davidson Orkney Island Council
- Tor Justad DSG member
- Cllr Willie Mackay Highland Council
- Jim Williams ONR (for Vulcan)
- Peter Watson ONR (for Dounreay) – Sheila Hutchinson deputising.
- Bob Kury Deputy Managing Director, Dounreay
- Lt Cdr Chris Layton DNSR (Vulcan)
- Andy Brotherston CNC

3. MINUTES OF LAST MEETING

The minutes of the last meeting – DSG/SRSG(2014)M003 – had been circulated to members in advance. These were agreed as a true reflection of the meeting. This was proposed by David Broughton and seconded by John Deighan.

No issues were raised from the minutes.

4. STATUS OF ACTIONS

The status of actions was circulated to members in advance of the meeting. Bob Earnshaw noted progress on the following:

- DSG(2014)M003/A004: Commander Ken Dyke to provide information on the areas for improvement, as reported by DNSR, in relation to the Vulcan emergency exercise. Action complete: see DSG(2014)C071.
- DSG(2014)M003/A009: Emma Forbes, Highland Council Planning, to look into the issue of excessive noise at the CNC Firing Range and report back to DSG. Action ongoing.
- DSG(2014)M003/A011: Roger Wilson to provide information on the number of hydrogeologists that SEPA have at present and what would be required for the future. Action ongoing: Stewart Ballantine responded that Roger Wilson was still progressing establishing the number of hydrogeologists in SEPA. However in respect of the RS unit there is one principal hydrogeologist providing support, with the majority of work being associated with Dounreay. That person is aided by a scientist grade hydrogeologist as required. The Radioactive Substances unit bid into the overall SEPA hydrogeology resource pool for support on an annual basis.
- DSG(2013)M002/A009: June Love to invite Paul Dale to the next site restoration sub group meeting to outline PRAG(D) final report. Action complete – discussed under agenda item 5.
- DSG (2014)M002/A007: Secretary to liaise with Scottish Government to explore whether a presentation on Higher Activity Waste implementation would be available for the June meeting. Action ongoing:

5. VULCAN UPDATE

Bob Earnshaw noted two written reports had been received, these being:

- DSG(2014)P025: Vulcan report
- DSG(2014)P021: ONR report for Vulcan

Ken Dyke provided the following verbal update:

- The STF continues to operate as per schedule and is expected to continue until late next year.
- Inspection and audit programme continues. The next phase was a busy period with a number of inspections taking place.
- In December an audit will take place which will include an annual security demonstration.

John Deighan stated he was pleased to see the Ministry of Defence Police at Vulcan were recruiting and asked whether that was an indication of the site increasing its activities. Ken Dyke responded that the fact was they did not have enough people across the Force.

Roy Blackburn noted that consideration was being given for Pgs inspection anion anion arBlackbu was ople across th

regarding this and suggested, that given no response had been forthcoming, a follow up letter would be sent.

Action: DSG/SRSG(2014)M004/A001: DSG Secretary to follow up letter to UK Government Minister on PWR3 considerations and request response re timing of report.

ONR and SEPA confirmed they had nothing to add to their written reports in relation to Vulcan.

6. NDA UPDATE

Bob Earnshaw noted that NDA had issued two written updates since the last meeting – these were:

- DSG(2014)C067: NDA Site stakeholder briefing, October 2014
- DSG(2014)C072: NDA Site stakeholder briefing, November 2014

Nigel Lowe, NDA Head of Programme, provided a verbal update. Of note:

- NDA had now received the formal change control for the re-profiling of the programme in line with the Annual Site Funding Limit (ASFL.) Due diligence was currently being carried out on the change control by the NDA Site Facing Team which is anticipated to continue into January 2015. The background to the reprofiling and what the proposal is will be the subject of a presentation to DSG in December.
- The NDA had published its response to stakeholder comments on its proposals for virtual reprocessing.

Action: DSG/SRSG(2014)M004/A002: DSG Secretary to circulate NDA's response to virtual reprocessing to DSG members for information.

- The contracts for the National Nuclear Archives (construction and commercial partners) had now been split into two parts. This is in part because of the management contract now taking into account work from Harwell earlier than anticipated. The procurement for the construction phase was still on target and a public planning event was being organised for 25th November. It was expected that the contract for a commercial partner would be placed around May 2015.

The name for the National Nuclear Archives would change as the National Archive at Kew had objected. While the name would change the facility will remain the archive for the whole of the UK nuclear business.

- NDA has started work on the next Government spending review in line with all Government departments. The review would come into effect in the FY16/17 financial year and at present it was not known whether it would cover a 3, 4 or 5 year period. A decision on the time period would probably be taken following the general election.
- A new Managing Director for Sellafield Ltd would be announced shortly.

Cllr Roger Saxon noted that local Councillors had been given a presentation by Simon Tucker on the National Nuclear Archives. He wondered whether it was possible to weave in Highland Archives into the new name. Nigel Lowe responded that he had spoken with Simon Tucker and that Simon was considering running a competition for a new name. Nigel added that a public event would be held on 25th November and if planning permission was successful it was expected this would be granted around January/February 2015.

David Flear noted that DSG had requested an update on the NNA following a google alert for the construction project. He, as Chairman, had written to Simon Tucker asking for an update and for re-assurance that there were socio economic elements within this contract. Anna MacConnell had provided a full brief on the current progress on both contracts and had confirmed that there would be socio economic elements in both construction and the commercial partner contracts. Simon Tucker would be visiting Caithness in January and had intimated he would meet with DSG members to provide a further update.

David Broughton noted that NDA had recently held a National Risk Forum and he indicated his surprise that there were no lay people on the group who would have a completely different view on risk. Nigel Lowe agreed but added that the overall focus of that meeting was to carry out a root and branch review on how the NDA deals with risk because it had not had the level of prominence that it should have had within the NDA. The forum was largely looking at the mechanics of risk management but there was agreement that it might have benefitted from a much broader view.

David Flear noted the October NDA brief and in particular the new office accommodation in Cumbria. He stated that DSRL and HIE were in early discussions about off-site accommodation which would also support a legacy for the future. Nigel Lowe responded that the Albion Square project in Cumbria was so far looking to be a tremendous success with the facility being delivered under budget, ahead of schedule and likely to inject significant funds into the local economy as the offices became populated. He, personally, would be very pleased to see a similar project in Thurso and encouraged those working on an equivalent to move quickly with any business case they are considering developing since in his opinion, the time for a credible business case to exist was rapidly running out and indeed may have already done so.

Cllr George Farlow noted the recent incident with the MV Parida and asked the NDA who had the responsibility for the decision to sail out of the harbour when all other boats had remained until weather conditions improved. Nigel Lowe responded that he was not aware that all boats had stayed in the harbour boundary but he had talked to the harbour masterr mast

The issue of continuing occurrences of particles on local beaches remained the focus of PRAG(D) considerations and SEPA were currently looking at this. The PRAG(D) report was currently outstanding and it was hoped that this would be finalised and delivered early in 2015 following a meeting to be held in January/February 2015.

A further report by the group would consider two years' worth of beach data since the off-shore particles clean-up had been completed. Both PRAG(D) and COMARE would then consider whether there was a need to carry out future off-shore work. In addition, a decision on whether PRAG(D) continues or whether the work programme is subsumed into other groups will be taken by SEPA in consultation with DSRL.

At present, PRAG(D) continues to receive updates from DSRL. Consideration has been given informally but 2 years of continuous on-shore monitoring would be required before a decision to go forward would be made.

The PRAG(D) report would be published in early 2015 and at that point SEPA would propose that discussions were held with DSRL to agree an appropriate way forward. SEPA has a standing committee that includes SEPA representatives from across Scotland which will consider and agree the appropriate monitoring regimes. Current thinking is that it would be best suited to draw on the experience of this group but that was yet to be decided.

Nigel Lowe noted that the equipment used for off-shore clean-up had now come to the end of its life. If a decision was made that further off-shore particle retrieval was required the equipment would need to be re-instated and this could not happen overnight. Paul Dale responded that SEPA acknowledged that position but there may be the potential for further off-shore retrieval and this position had been repeatedly stated over the last two years.

David Flear noted that monitoring beaches now included Strathy and Murkle and it was understood that Strathy community would like to know how long this monitoring is likely to go on for. Paul Dale responded that at SEPA's last public consultation they had indicated a reduction of the monitoring at Sandside but PRAG(D) and DSRL had asked for the frequency to continue as it had been.

There was a need to look at the monitoring being undertaken. If there is a possibility of particles migrating from offshore the monitoring data (for 2 years) would be examined to determine what monitoring regime goes forward in the future.

Roy Blackburn asked what the outstanding PRAG(D) paper would report. Paul Dale responded that the outstanding report was never intended to be a report which would address the situation following the completion of the offshore recovery programme. A further report would consider the time period and particle finds following the completion of that programme.

Cllr George Farlow stated that if he had understood Nigel Lowe correctly the NDA would do what they are asked to do by SEPA. Nigel Lowe responded that this was correct and would do so as quickly as was possible.

Paul Dale noted that the off-shore particle recovery was as a result of the site carrying out a BPEO (Best Practical Environmental Option consultation). It was not a simple question of what would be required by the regulator going forward. Nigel Lowe responded that the only concerns raised were that the barge had now gone back to its normal commercial work and had not been preserved on the site for the sole use of particle recovery. Christine Lee added that the equipment had met its

end of life and much of the equipment would need to be rebuilt if required. June Love noted that the particles project team would be attending a forthcoming Community Council meeting in Strathy to discuss the monitoring required.

Bob Earnshaw thanked Paul Dale for his update and stated that DSG would look forward to seeing the PRAG(D) report when available.

8. DOUNREAY UPDATE

Bob Earnshaw noted that DSRL had provided a written update for the meeting – DSG(2014)P026 referred. As Bob Kury was unavailable to attend, Christine Lee provided a verbal update.

- There had been a number of safety and environmental occurrences over the last few months notably a fire in the PFR sodium tank farm and failure of a back-up ventilation system. The site management were taking these issues very seriously.

Bob Earnshaw suggested that the views of SEPA and ONR were important in relation to these occurrences and invited both to add their comments.

Stewart Ballantine responded that SEPA had covered a number of these issues within their written report, within the compliance section. SEPA were taking these occurrences very seriously and had held a number of discussions with DSRL. SEPA had also spent a lot of time looking at DSRL's Environmental Improvement Plan and will assess DSRL against this within the compliance assessment scheme. There is a substantial list of improvements identified by DSRL going forward and SEPA will continue to monitor DSRL's implementation of these. If DSRL does not continue to carry out these improvements it will be reflected in their annual assessment score. Discussions had taken place today at senior management level and the message was clear that SEPA expected DSRL to look at issues across the site and make significant improvements.

Sheila Hutchison, ONR stated that the failure the ventilation system due to work on associated back-up plant had raised concerns within ONR as the former was key safety related equipment. ONR had now received DSRL's investigation report but had not yet taken a view on the adequacy of the resultant actions going forward. On the PFR sodium tank farm fire ONR had carried out a preliminary investigation and as a result it had issued an Improvement Notice to the site. DSRL had 21 days to appeal against the Notice. Bob Earnshaw asked what the compliance date was. Sheila Hutchison responded that this was the 30th June 2015.

Bob Earnshaw then opened up the discussion to members.

David Broughton stated that he found the paragraph on the ventilation issue difficult to understand. Phil Cartwright responded that there was a maintenance operation underway and they had actually isolated the back-up system. This was a case of people not fully understanding the systems they were working on and the importance of thorough work control procedures.

David Broughton noted that the MV Parida incident had been a perfect case of the media raising this because of its nuclear cargo. Phil Cartwright noted that the vessel had recently been through re-validation and was accepted by the authorities in UK and Belgium. However, this was the result of a fault which was not uncommon with heavy oil fuelled vessels. Phil pointed out that this was a marine incident as opposed a nuclear one. This vessel was INF1 compared with the INF3 class which would be used for the movement of nuclear fuels.

David Broughton acknowledged this but stated that to the public it was a nuclear incident. Phil Cartwright agreed this was the initial focus of the incident. There was a team of people from the site, including NDA, who provided support to firstly the MCA and then to Police Scotland and there had been really good co-operation between the multi-agencies. The incident had been co-ordinated well however this did not stop the story from being widely distributed and for other dimensions to be included such as the provision of emergency tug vessels. The evacuation of the oil rig was decided following the enactment of their own emergency procedures. Overall the incident had highlighted a number of issues that needed to be brought to the table.

David Flear noted that one media article had been quite measured in that the evacuation of the oil rig would have been the same result even if the cargo had been feathers. He did however recognise this had raised a number of questions in relation to the lack of emergency tug vessels and he had raised this with Adrian Simper at the NDA national event. Adrian had provided David Flear with a statement which had been promptly circulated to all DSG members. David Flear noted that this subject had become quite political within UK, Scottish and local authorities. DSG would wait for a response back from UK Government and ensure this is fed back to those interested. David pointed out, however that there was a number of vessels sailing through the Pentland Firth which no-one had any knowledge about which has the capacity for incidents similar to the Parida.

Roy Blackburn noted the graph (in the DSRL report) had three TRIR tracks and associated definitions and asked what the difference was. Christine Lee responded that the site took the decision to report all work injuries however some of these were not included within the NDA reporting requirements. Roy Blackburn asked which one was used for reporting purposes. Christine Lee responded that it was the NDA one which is compared across the whole of the NDA estate.

Roy Blackburn noted that he had previously raised concerns regarding the trend of the TRIRs and suggested that improvements had not been forthcoming. Christine Lee agreed and stated that the site management team shared these concerns.

Cllr George Farlow asked whether transport of nuclear material was allowed through the Channel Tunnel. Phil Cartwright responded that he understood transport of hazardous substances was not allowed and while this had been looked at a number of years ago it had never formed part of the tunnel safety arrangements. Cllr Farlow asked if that meant that the transport of nuclear material was not safe through tunnels. Nigel Lowe responded that the two were not related. The Channel Tunnel was operated by a private company who had taken the decision not to include nuclear as part of their permitted cargoes just like some tunnel operators elsewhere have placed restrictions on such cargoes as edible vegetable oils following their contribution to a severe tunnel fire in mainland Europe.

Cllr Roger Saxon asked that, when reporting the potential discharge limits had the site changed the rules. Stewart Ballantine responded that under the old RSA the site would not have breached the limit however the new RSA authorisation had assigned limits in a different manner. The decision was taken that 100% of the discharge would not come out in a single discharge and SEPA had agreed that DSRL would release this over a number of months. The new RSA authorisation had been breached but there was no impact as it had remained in the limits for the overall site discharges. Roy Blackburn asked whether it was tritium or Krypton that was breached. Phil Cartwright confirmed that it was tritium levels.

John Deighan noted the increase of apprenticeship and welcomed this.

Phil Cartwright noted that a new monitoring vehicle for on-shore particles had been received on site. Christine Lee added that the new vehicle would be providing monitoring in conjunction with the two hill cats previously deployed.

SEPA update

Bob Earnshaw stated that SEPA had provided a written update – DSG(2014)P022 refers. Stewart Ballantine said he had nothing new to add to that report.

David Flear noted that SEPA had intimated some shortcomings within DSRL's paperwork for the operations of the new low level waste facility and asked for an example of these. Stewart Ballantine responded that this related to a number of things and there had been around 50 forward actions identified some to do with minor changes to wording etc and some more significant in relation to the Environmental Monitoring plan and the need to have in place appropriate maintenance arrangements. SEPA had made a number of suggestions that had been already been taken into account. DSRL were in the process of redrafting these documents and it was expected that these would be submitted to SEPA around the 27/28th November by which time DSRL will have addressed all the outstanding issues. Following receipt of these SEPA will undertake a further inspection of DSRL's arrangements for compliance with the site authorisation. SEPA will then go through its own internal review process, prior to giving DSRL written permission to operate the facility, when it is satisfied DSRL have everything required in place.

ONR update

Bob Earnshaw noted the ONR report – DSG(2014)P020 refers. Sheila Hutchison noted the following:

- ONR conventional safety inspectors had been on site over the last two days.

David Flear noted that within the ONR report there had been mention of ONR's concerns over the leadership and management of safety. He felt this was a worrying situation as it had now been over two years that the PBO had taken over the contract and asked whether NDA was also taking an interest. He added that his concerns extended to the fact that in another two years' time there would be another change of personnel on the site and it would appear that the bedding in process was difficult.

Nigel Lowe responded that the NDA had for sometime been very concerned about what has been happening with regard to environmental, health and safety performance and they had progressively escalated this with DSRL and the PBO. Following ONR delivering the Improvement Notice, NDA had written to DSRL and the PBO clearly setting out their position and expectations without intruding into the principle of the controlling mind. NDA and DSRL are in dialogue now and DSRL needs to get their Board sign-off before formally issuing their plans to the NDA. In summary the NDA wants to see something that delivers the improvements required by the regulators and not something set by the NDA.. Nigel Lowe emphasised that there was no doubt whatsoever within the PBO/DSRL senior team how seriously NDA view this matter and the long term environmental, health and safety performance.

Bob Earnshaw asked whether the 2 yearly rotation of PBO personnel was part of the problem. Nigel Lowe responded that NDA had been discussing succession plans with Senior Management and this is now carried out every three months. The topic was discussed as recently as two weeks ago and there has now been more focus on the succession plan being carried out in a phased approach as opposed to "all at once." Lessons had been learnt for the Magnox competition but the two year secondment period for Dounreay had been driven by the tax system and issues around this. The

NDA had been working with the PBO to spread this out as much as possible so that PBO secondees did not all leave at the same time. This is now starting to happen but is still a challenge.

Bob Earnshaw said that hopefully this would be a wakeup call and that a number of stakeholders were very concerned about this situation. Nigel Lowe suggested that this was something that should be put on the DSG agenda for December.

Action: DSG/SRSG(2014)M004/A003: DSG Business meeting to consider topic of change management and safety/environment occurrences on full DSG agenda for December.

David Flear said that what concerned him was the workforce, as this did not help with morale and he felt that DSG should consider concerns of the workforce as well.

Christine Lee re-iterated that the senior management was taking this very seriously and there had been a number of discussions/meetings and improvement plans being developed and implemented.

David Flear noted his disappointment that Bob Kury, Deputy Managing Director had been unable to attend this meeting.

June Love noted that Deirdre Henderson, Buldoo Residents Group, had tendered her apologies this evening. She had asked however that the issue of litter and the tying down of heavy kit was raised. David Flear said that this was not the first time these types of things had been raised by Buldoo. Christine Lee responded that action had been taken but there was a need to take a closer look as to how effective this had been. Phil Cartwright added that he had attended a meeting earlier that day with Buldoo and the Project Director responsible for this had held robust discussions with his project team to ensure they took action to improve the situation.

Bob Earnshaw noted that a procurement presentation had been provided by DSRL at the DSG Socio Economic sub group meeting. The presentation would be circulated to all DSG members.

David Broughton asked whether the Flask Arrestor Gear crane at PFR was actually working. Christine Lee agreed to provide a written response.

Action: DSG/SRSG(2014)M004/A004: Christine Lee to ask for an update on the PFR Flask Arrestor Gear crane.

David Broughton noted there had been supercompaction trials for the shaft and silo waste. Phil Cartwright responded that compaction would allow improved packing of containers and would be used on assayed, dewatered sludge and shredded waste. This would be an intermediate level waste compactor with the appropriate containment and handling equipment.

9. HERITAGE UPDATE

Bob Earnshaw noted that DSG(2014)C070 was the heritage update. This was taken as read.

10. CORRESPONDENCE

Bob Earnshaw noted the following correspondence:

- DSG(2014)C064: DSG response to SEPA's new enforcement measures.
- DSG(2014)C065: DSG response to ONR's strategy 2015-2020.

David Broughton asked whether the responses and way forward on the consultations (noted above) would be available for stakeholder group members. This was confirmed.

11. ANY OTHER BUSINESS

Bob Earnshaw invited DSG members to raise any items that had not been covered.

David Flear noted the following:

- He had attended the NDA National Stakeholder Event where a discussion on NDA Strategy III had taken place. Stakeholder feedback had been requested and it was agreed that this information would be circulated to allow members to make comment. Other discussions had centred on the newly awarded Magnox/RSRL contract. Time had run out before the stakeholder and socio economic presentation was given and it was circulated after the event. This would also be circulated to members to provide a vehicle to feedback views.

Action: DSG/SRSG(2014)M004/A005: DSG Secretary to circulate NDA Strategy III questionnaire and stakeholder engagement/socio economics presentation for members to provide comments/feedback.

- A Scottish Government Scottish Nuclear Sites Meeting would take place on 20th November and a DSG update would be provided for this meeting.
- Representatives from the STUC were visiting Caithness on Friday 14th November and members of DSG were involved with this visit as well as Union reps and the CNSRP programme manager.
- David Flear suggested it would be useful to hold a follow up discussion with the NDA Head of Programme on various site environmental, health and safety topics. This was agreed.

Action: DSG/SRSG(2014)M004/A006: DSG Secretary to organise meeting between NDA Head of Programme and DSG Business Meeting.

- The DSG Chair and secretary had met with one of MoD's junior lieutenants who was currently undertaking studies including looking at risk communication. Advice and the DSG structure had been provided. Ken Dyke thanked David for taking the time to meet with him.

12. CLOSE

Bob Earnshaw reminded members that the next meeting was the public DSG to be held on 10th December where a presentation on the new reprofiled decommissioning plan would be presented. He emphasised the importance of this and encouraged members to attend or if not available to send a deputy.

There being no further business he thanked everyone for attending and formally closed the meeting.

Bob Earnshaw
DSG Site Restoration sub group chairman
16th November 2014

ACTIONS ARISING FROM THIS MEETING

DSG/SRSG(2014)M004/A001: DSG Secretary to follow up letter to UK Government Minister on PWR3 considerations and request response re timing of report.

DSG/SRSG(2014)M004/A002: DSG Secretary to circulate NDA's response to virtual reprocessing to DSG members for information.

DSG/SRSG(2014)M004/A003: DSG Business meeting to consider topic of change management and safety/environment occurrences on full DSG agenda for December.

DSG/SRSG(2014)M004/A004: Christine Lee to ask for an update on the PFR Flask Arrestor Gear crane.

DSG/SRSG(2014)M004/A005: DSG Secretary to circulate NDA Strategy III questionnaire and stakeholder engagement/socio economics presentation for members to provide comments/feedback.

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