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RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Dounreay Stakeholder Group

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Love

Forename

June

2. Postal Address

Dounreay Stakeholder Group, Secretariat		
Dounreay.com		
Traill House, 7 Olig Street		
Thurso, Caithness, Scotland		
Postcode KW14 7BJ	Phone 01847 890886	Email info@dounreaystakeholdergroup.org

3. Permissions - I am responding as...

Individual	/	Group/Organisation
<input type="checkbox"/>	<i>Please tick as</i>	<input checked="" type="checkbox"/>

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

Yes, make my response available, but not my name and address

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site). Are you content for your **response** to be made available?

Please tick as appropriate

Yes

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

The Dounreay Stakeholder Group (DSG) is made up of representatives of 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.

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1. The Dounreay Stakeholder Group (DSG) has a particular interest in this consultation as neither the Scottish Government's (SG) 2011 Policy on Higher Activity Radioactive Waste (HAW) nor this proposed Implementation Strategy (HAWIS) provide any final solution for 70% by volume of the Dounreay site's HAW.
2. This amount of HAW at Dounreay represents 99% of the radioactivity to be managed at the site and around 40% of the radioactivity in HAW in Scotland.
3. This lack of strategy and vision has an impact on the physical state of the environment and the socio-economic climate that the DSG has a responsibility to be involved with for the benefit of Caithness and North Sutherland.
4. Under the Policy and HAWIS it would appear that the area will have HAW stores at Dounreay for a very long and indeterminate time. This will inhibit alternative developments and provide little economic benefit for the local population.
5. During development of the draft HAWIS the Project Board had discussed addressing some of the shortcomings of the Policy but para. 1.1.4 makes it clear that no revisions to the 2011 Policy are included in the draft HAWIS. The DSG considers this a missed opportunity and leaves the Policy and HAWIS as unfinished work, relevant to an unknown percentage of Scottish HAW, but less than 50%; and irrelevant to Dounreay's HAW.

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6. Para. 2.1.3 is a key feature of HAWIS as the 10 yearly reviews are a mechanism to review whether Scotland wished to remain isolated from England, Wales and Europe in not joining the process for acquiring a Geological Disposal Facility (GDF); or whether it would consider this at one of these future reviews that it was now sensible to join that approach.
7. It has taken the Dounreay site operators 10 years to achieve planning permission for new Low Level Radioactive Waste (LLW) near surface disposal facilities and 16 years to bring them into operation. SG should reflect on this to consider whether near surface disposal facilities for HAW could ever be secured without SG imposition on an area and community.
8. Para. 2.2.5“Long term does not mean indefinite storage”. Without a strategic final end point this is merely abdicating responsibility and leaving the problem to future generations. The costs will be substantial to constantly rebuild stores and is the taxpayer to be the funder?
9. Para.2.2.7 It should be sensible not to waste operators' time and money in duplicating information on volumes and activities of HAW that already exists in the NDA's UK Radioactive Waste Inventory. This already sets out data for UK countries and sites.

10. Para. 2.2.11 The HAWIS purports to consider “The demonstration of the safety and effectiveness of management options currently being explored”. It would be useful to understand how much of the inventory could become low level waste in a short timescale. However, having said that, SG has cut itself off from the major programme of investigation of a GDF. This paragraph is generally a vague unstructured hope.

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- 11. Para. 3.1.4 This paragraph could lead to considerable costs for future generations with no indication of the funding mechanism. The replacement of stores will not only include financial costs but radioactive dose budgets for operatives and exposure to radioactive risks.
- 12. Also this paragraph once again confuses the basic strategy of disposal which is not to retrieve. The costs of providing the means of monitoring and retrieval of disposed wastes would in all probability mean it was uneconomic to dispose and so one would end up with permanent storage again with all its drawbacks.
- 13. Paras. 3.3.1 > 3.3.4 There is a contradiction in these paragraphs because the Letter of Compliance (LoC) system is still going to assume that HAW might eventually go to a GDF. The fact that during the LoC process very long term storage is going to be assessed hardly makes for a “new baseline”. It will be embarrassing to read in Scottish sites’ baselines that the end point for HAW is unknown.
- 14. Para 3.3.9 The words “may be a range....” and “....near surface disposal solution is deemed viable” exhibit a strange, though probable, anxiety that the Policy is ill founded. Also “technically suitable” has to be accompanied by political and social acceptability.

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15. Generally the plans are compatible and with little difference from sites’ current plans. Dounreay is in the forefront of decommissioning and is producing HAW earlier than other Scottish sites so the “review” period is of little value. Dounreay has to make decisions in the next decade on what to do with its 30% of HAW that could possibly be disposed of in near surface facilities. Current plans are for storage and not pursuing a disposal facility. It is not clear from the proposed HAWIS whether this is acceptable.

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- 16. Sites are likely to make little progress on near surface disposal (para.3.4.6) without major SG input and backing as site operators are unlikely to want to create community upheaval when they can build stores relatively easily. SG involvement is unlikely. Was the Hunterston A graphite near surface disposal project not cancelled by NDA?
- 17. Para. 3.4.10 Treatment solutions for HAW can increase costs as well as reduce costs. Any treatment involves remote handling.

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18. Para. 3.5.2 This paragraph infers that a “significant portion of HAW” can be disposed of in near surface disposal facilities. To make such a statement the HAWIS must state percentages of HAW

by volume and activity. The proportion could turn out to be “insignificant”. Earlier in the draft HAWIS some nervousness is evident that near surface disposal facilities may not come to fruition.

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19. Para 3.5.3 and para.3.5.14 SG would need to have a significantly greater role than just through the planning system. Effective leadership and facilitation was required and provided by SG in securing Dounreay’s LLW near surface disposal facilities. Unless similar, and indeed greater direction for HAW, was forthcoming little progress would be made (see para 16 above).
20. With the current range of site owners and operators and the contracts binding them and defining their responsibilities and funding it is inconceivable that any meaningful programme of site identification for consolidation of stores or near surface disposal facilities is likely to happen. It would be useful to understand whether DSRL will be required by SG and NDA to have suitable materials prepared for and in near surface disposal facilities by the end of the existing Interim End State contract. Has any formal position been reached even on the simple matter of Hunterston B using Hunterston A’s store after all these years of “studies”? If SG was serious about progressing this it would have to create similar bodies that England and Wales have had to for progressing the GDF.
21. The concept of “near site” is fudged and meaningless in the concept of consolidation.
22. The HAWIS needs to address the long term challenges of who would be responsible for ensuring suitable HAW is disposed of in near surface disposal facilities if this is planned for the period after the existing Interim End State contract. Also who would be responsible for deciding on where a near surface disposal facility would be situated to cater for Dounreay HAW and possibly other sites?
23. During the planning process the issues of community benefit and gain would need to be considered.

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24. Para. 3.7.11 This paragraph ends with “...and compatible with plans for transportation and emplacement in a future geological repository.” So, SG in this draft HAWIS is accepting that for some, perhaps all, HAW disposal in a GDF is the only long term solution. Once again the Policy and the practicalities are in contradiction.
25. Also see para.13 above.

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26. Paras. 4.1.11 > 4.1.13 All this is inconsistent with the concept of disposal. As stated earlier building systems in for retrieval of waste from disposal facilities is likely to be extremely costly and render the project financially unviable. Would there be a requirement to rebuild retrieval systems every 20, 50, 100 years as the facility and waste changes? The concept is completely flawed.

27. Also monitoring of a disposal facility is achieved by monitoring the environment it is situated in. For a store its own environment and the packages are monitored and identified. To try to introduce storage type monitoring into a disposal facility would be, as for retrieval, extremely costly and render the project financially unviable.

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28. In general the proposals are sufficient but NDA must ensure that contract and contractor changes do not produce gaps and opportunities for records to be lost. This happened with UKAEA was privatised.

29. DSG welcomes the progress of the NDA Archive in Wick.

30. Previous studies have indicated the principle use of paper for very long term records.

31. Models of stores with numbered and coded packages are also useful for operators of the future.

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32. Over short and long time periods the make-up of a community and stakeholders can change e.g. employment changes, house and land ownership, industrial and housing developments, environmental issues versus local benefits, etc. This makes defining a community difficult. It should be noted here that there was differing views on this from those DSG members who provided comment and therefore the comments provided here are not supported by all DSG members which shows how difficult the subject of 'community' can be. SG should make itself aware of the work being done by DECC with its Community working group which is looking at these issues in the context of a GDF. This working group is also looking at the tests for public support but also recognise that all areas are unique and therefore one size may not fit all.

33. Difficulty arises over who are genuinely stakeholders. Some are obvious like local community groups, near neighbours, trade unions and business leaders in local industry. However such groupings can be outweighed by "professional" single interest pressure groups that have little attachment to the locality and its interests. In a similar vein academics with particular viewpoints can also be very vocal in this area but may not represent local community views.

34. However if national Scottish near surface disposal sites are being considered SG has to plan for balancing views between those who have a particular 'single issue' versus the local community which will be more directly impacted.

35. It is very important for whoever is running the programme to have worked out a mitigation plan for all the conceivable reasons for hold ups, challenges etc. Equally important is the decision on who personally speaks and presents to stakeholders and challengers.

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36. The NDA may be able to ensure through its contracts that the current site operators undertake local skills training and promote apprenticeships or trainees but is difficult to see how this can be sustained past the terms of the current contracts. The follow on contracts are likely to be far more restricted and offer little scope for realistic apprenticeships/trainees when only care and

maintenance at a reduced level is going on.

37. The SNP SG is not supportive of nuclear development so there is only a declining nuclear industry. This does not provide the future, vision and excitement for youngsters to want to join it.
38. Past experience shows that given a reasonable contract and reasonable financial gain there are always contractors available and eager to undertake any work. Supply is not a problem for the site operators but it may have deleterious consequences for the local community. The contractors' travelling workers will be used rather than locals and the contractor may have its own embedded supply chain. Forced changes on the contractor by the client can lead to inefficiencies and contractual wrangles.
39. Para. 4.1.41 It is not made clear in this section what the changes in SEPA's role will be. As the Policy is likely to be storage for the foreseeable future the regulatory lead is with ONR.

' < . ; 26 ° ~ ~ – Do you have any further comments on the proposed Implementation Strategy?

40. Para 5.1.3 How can waste producers provide a long term solution for the final disposition of their wastes in Scotland if the only option for most of their waste is geological disposal and this is ruled out by the Policy?
41. The proposed HAWIS adds little specific detail to the Policy or direction to site operators and is therefore likely to be of limited value. This response has highlighted the contradictions evident throughout it. However this is unlikely to have any impact on site operators' current plans which are well established with NDA and the regulators for the foreseeable future.
42. It is of particularly little use to DSG and DSG notes that it does not deal with the HAW that will remain indefinitely in its environment and sphere of responsibility.