

**Note of Higher Activity Waste Implementation Strategy (HAWIS)  
Project Board (PB) Meeting**

**Scottish Executive, Victoria Quay, Leith  
14<sup>th</sup> September 2015  
David Broughton  
DSG Representative**

***Purpose of meeting***

1. This was the last meeting of the PB to discuss the results of the consultation on the last draft of HAWIS. The purpose was for Scottish Government (SG) officials to explain the responses received and how they intended to incorporate them or leave them aside.
2. After discussion at this PB, SG officials will make the amendments they consider necessary and will send their draft to SG ministers to consider. This submitted draft of HAWIS will be a SG paper not a consensus view of the PB members. PB members and their sponsoring bodies will be free and independent to comment, criticise or agree with points and issues in the paper.

***Introduction***

3. The PB was chaired by George Burgess (SG). There were four SG officials present, four members of stakeholder groups, and single representatives from DSRL, NDA, Magnox, ONR, EDF, CoRWM and NFLA.
4. SEPA, SCCORS and Rosyth did not attend.
5. The Chairman outlined the history of the PB. This was the 9<sup>th</sup> meeting since the Policy was published in 2011 and 15 months had passed since the 8<sup>th</sup>. The delay had been caused by the Scottish referendum and the UK general election.
6. SG officials would like to publish HAWIS in October/November 2015 but recognise it may be compromised by the Scottish Election in 2016.
7. If possible stakeholder groups will be given advance knowledge of HAWIS.
8. Although the PB will be stood down issues can be raised through the Scottish Sites' Stakeholder meeting.

***Statistics of Responses***

9. 23 responses were received from the following groups:
  - 4 Local Government
  - 2 Government Agencies
  - 3 Local Stakeholder Groups
  - 3 Nuclear Industry Waste Producers
  - 2 Private Individuals
  - 1 Regulator
  - 8 NGOs

10. Twenty-nine (29) paragraphs out of the 42 in our DSG response [DSG(2015)C052] were reflected in the SG Draft Consultation Response Analysis Report. Twenty-nine (29) specific DSG points were included in the report but not attributed.

### ***Overview of responses to consultation***

11. The responses can be split into two groups; those that suggest improvements to aid understanding of HAWIS, and those that highlight the major gaps and anomalies in HAWIS.
12. The DSG response and the discussion at the PB by the author and the DSRL representative (Alex Anderson) focussed heavily on the latter as there is still no guidance on the ultimate destination or strategy for the 70% of Dounreay HAW that is outwith the SG Policy and HAWIS. The HAWIS contains many anomalies to do with storage of HAW that is not suitable for near surface disposal but mentions at numerous points considerations of disposal in some at present unknown facility and location. The published HAWIS will therefore be of little benefit to DSRL, or more importantly, the UK taxpayer.
13. The comments to improve the understanding of HAWIS centred around the following topics:
- Clearer timelines
  - More graphics for volumes, time periods, decommissioning activities
  - Commitment from SG to monitor international (including rest of UK) developments for HAW not suitable for near surface disposal
  - Cost effectiveness of HAWIS and R&D
  - Clearer explanations of “retrievability” and “monitoring”
  - The requirement for substantial public and stakeholder engagement throughout the decades of the HAWIS

### ***Some Specific issues***

14. There was still confusion and differences of opinion on the fundamental concepts of retrievability and monitoring and how these aspects apply to storage and disposal. The SG Policy of applying retrievability to disposal and some stakeholder desires to have retrievability in disposal facilities lead, in the author’s opinion, to unrealistic and uneconomic expectations.
15. Under the UK government’s new White Paper on progressing a Geological Disposal Facility (GDF) for the rest of the UK, the NDA and Radioactive Waste Management (RWM) have an obligation to keep abreast of international developments in all aspects of HAW management. This will assist SG’s 10 yearly reviews of the Policy and HAWIS.
16. There was still some misunderstanding by SG officials that the timescales for decision making in HAWIS are generally too late for the advanced decommissioning that is currently underway at Dounreay with the result that DSRL has to make its own best practicable judgements.
17. In HAWIS SG uses the term “more challenging HAW” for Dounreay’s HAW that cannot ever be disposed of in near surface facilities. In the author’s opinion this is a euphemism and disguises the fact that the physics of the materials cannot be changed and the only disposal solution is in a GDF.

18. It was quite clear that the SG officials have no intention of pointing out to their ministers the anomalies of the Policy or trying to address these in the HAWIS. They are taking their civil service standard position of implementing the ministerial decision.

Dounreay Stakeholder Group  
28<sup>th</sup> September 2015