

NDA DRAFT STRATEGY III

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.

DSG welcomed the useful presentation provided at the last public meeting on the NDA draft strategy and understand that formal consultation of the strategic document will not take place until January 2016 but that early views were invited by mid-November 2015.

Specific comments on the NDA draft strategy (mainly relating to the questions being asked) are given below:

QUESTIONS FROM NDA DRAFT STRATEGY

General comment: Is there a link between doing things safely at all times and the overarching importance of it. Perhaps it is taken for granted that safety and security is your number one priority but may need to ensure this is stated early in the document.

Site Decommissioning and Remediation

- 1. Do you agree that the NDA should aim to progress decommissioning and remediation on as broad a front as far as resources allow or focus on priorities projects?: Good question. After safety & security should priorities be based on Treasury "Green Book" analysis, otherwise how do you secure the money?**

Decommissioning

- 2. In your opinion, is it beneficial for the stakeholders to understand when decommissioning is deferred due to an external constraint? Useful question, but could lead to all sorts of 'blame' cultures going on if NDA is reporting a constraint because of another organisation /Government etc. Needs to be related to Question 1.**
- 3. What are your views on NDA's decision to review the deferred dismantling strategy for Magnox reactors? Opens up all sorts of questions, if DSG was aligned to a Magnox site we would be arguing deferral is not cost effective – the skills lost, more cost later etc. Would imagine you will get varying views on this question. Need to ask stakeholders what their criteria might be.**

Land and Quality Management

- 4. What do you think are the merits of re-using remediation or demolition wastes on site for backfilling void and landscaping? Okay. Need to include costs in question.**

Site Interim and End States

- 5. Do you agree it is appropriate for us to stop remediating a site where further remediation will do more harm than good, and use administrative controls to protect people and the environment from residual hazards? Good question, however may open up different views dependent on the site and may lead to other questions like how do you ensure the administrative controls etc? In addition, SSGs carried out extensive consultation early in this process and it would be useful to ensure that any information which may change the initial**

recommendation for end states is communicated back to SSGs on a regular basis. I would not use the term “do more harm than good”. It begs other questions

6. For sites where the end state will not be achieved for many decades, do you agree that the end state definition should be high-level than detailed, and that we should focus on interim states to define the decommissioning and remediation journey? **Okay. Only way for Scottish sites.**
7. Land Use is a new topic strategy, do you find this a helpful topic? **No comments.**

Spent Fuels

8. What factors should the NDA consider in deciding when to conclude Magnox reprocessing operations? **A list of some suggested factors would be useful as most stakeholders will need guidance**
9. [Spent oxide fuel] Is our approach the right strategy? **No comments.**
10. [Spent Exotic fuel] Is our proposed approach the right strategy? **No comments.**

Nuclear Materials

11. In your opinion, how urgent is the plutonium disposition challenge and what factors are important in determining the pace for the management of separated plutonium? **No comments.**
12. [Uranics]: Should the NDA consider alternative disposal routes other than to GDF to better inform a UK decision to declare its inventory of depleted uranium to be a waste? **No comments.**

Integrated Waste Management

13. What are your views on the waste management principles described in this strategy? **No comments.**

Radioactive Waste

14. Do you agree that the proposed new approach to move towards the development of a single radioactive waste strategy is correct? **Okay – but you might want to consider noting the different waste policies of the different Governments. Might want to ask the question whether stakeholders even know and/or agree that there are different approaches?**
15. What specific issues do you think we should address? **No comments.**
16. [Liquid and Gaseous Discharges] Is our proposed approach the right strategy? **No comments.**
17. [Non-radioactive waste] Is our proposed approach the right strategy? **No comments.**

Critical Enablers

18. What opportunities and risks do you anticipate with our Critical Enablers’ Strategies? **Be aware that you may raise expectations and you must be seen to be on the same level playing field at all sites.**
19. Have we identified the right areas for strategic development in Health, Safety, Security, Safeguards, Environment and Quality? **No comments.**

[Research and Development]:

- 20. What role should the NDA's R&D strategy play in promoting UK decommissioning technologies abroad? No comments.**
- 21. Should the NDA's R&D Strategy do more to support science, technology, engineering and maths (STEM) development at school level as well as our existing activities in further education? No comments.**

[People incorporating Skills and Capability]

- 22. Are the three strategic priorities that we have identified the right ones? There is a need to recognise that in some areas this could include transfer into other sectors where these are being developed, ie Scottish sites will not have new nuclear and therefore you must balance your socio economic remit with your People strategies. How can communities maintain their GDP if they are all being encouraged to move within the nuclear industry?**

On page 76 you refer to Engineering Skills Centre at North Highlands College – this should be referred to as ETEC – Engineering, Technology and Energy Centre (ETEC).

Skills follow work so this relates back to question 1.

[Asset management]

- 23. Do stakeholders agree with the continued use of PAS-55 as a working standard in light of the publication of ISO 55000? No comments.**
- 24. Are there any essential asset issues not dealt with that require further consideration? No comment.**

[Contracting]

- 25. Do you think having a range of Contracting models including the PBO model is appropriate? Good question. Should ask whether the upstream role of NDA needs changing.**
- 26. Should the NDA look to have collaborative working as part of its contracting practice? No comments.**
- 27. What aspects of the NDA's contracting approach do you believe needs modifying and in what way? Would like to see the NDA encourage SLCs to have socio economics requirements in contracts, including development of skills without excluding other local benefits.**

[Supply Chain Development]

- 27a. What changes in NDA contracting approaches would make the biggest positive impact to encourage innovation? Please note there is a repeat number so you have two questions numbered 27 – to get back into sync with the questions this one has been re-numbered 27a.**

A supplementary question in this section should be "What changes in NDA contracting approach would make the biggest positive impact to encourage the desired safety behaviours and practices?"

[Information Governance (including information and knowledge management)]

- 28. Is our proposed approach the right strategy? No comments.**

[Socio Economics]

29. Our strategic priorities of Employment, Education and Skills, Economic and Social infrastructure and Economic Diversification remain unchanged. Do you think they are still the right ones? **No comments.**

30. Do you agree that the four areas detailed in the Delivery section above are the right ones for the NDA and SLCs to focus on? **No comments.**

31. Are there any other issues that you think should be included? **Should reinforce the UK and Scottish Government wishes for “Sustainable Skills Development through Construction and Infrastructure Projects to improve the economic, social, and environmental wellbeing” and facilitate the involvement of small and medium enterprises, third sector bodies and supported businesses in the process.**

32. How can we best measure and report on the impact of these activities? **No comment.**

[Public and Stakeholder Engagement]

33. Should the NDA consider regional, SLC based and topic led engagement? **Good question however subsequent questions will lead to a number of views coming forward. Given Spending Review and the obvious need to save funding it might be worthwhile redefining this – maybe the questions here should be reconsidered with what NDA requires to adhere to public and stakeholder engagement and what the SLCs do. Option 2 and 3 may end up costing more money and will not address all the things you have to consider, ie Scottish groupings for waste, GDF for England/Wales, Magnox sites together, Dounreay/Sellafield. Very difficult to come up with a solution.**

34. When considering a regional approach to stakeholder engagement, we have identified three options that we could use: **See above.**

- a. **Option 1: continue with current format of national events and issue led engagement**
- b. **Option 2: replace the national event with a series of regional or SLC based events**
- c. **Option 3: continue with the current format of National Events and issue-led engagement and add periodic events at Dounreay and Sellafield in conjunction with SSGs**

35. What factors should we consider when thinking about stakeholder engagement around Magnox reactors sites in quiescence known as Care and Maintenance? **No comments.**

[Transport and Logistics]

36. Should the NDA continue to rely on SLCs and the supply chain to ensure the continuing availability of assets and routes or is there a viable alternative? **No comments.**

37. Do you think our existing strategy to promote rail over road is the right approach? **Need some background on UK network and resources to enable question to be asked**

[Revenue Optimisation]

38. When evaluating the opportunities to dispose of assets or pursue additional commercial revenue, what factors are the most important for the NDA to take into account and why? **No comments.**

[International Relations]

39. What emphasis should the NDA put on international relations? **No comments.**

40. Where should the balance be between engaging with overseas organisations to support the NDA mission and undertaking broader international engagement (eg sharing our expertise and helping to promote UK industry)? **No comments.**

[Land and Property Management]

41. Recognising that the NDA has already sold over £500 million of real estate is our proposed approach the right strategy going forward? **No comments.**

David Flear
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