

**NDA Draft Strategy III consultation
Dounreay Stakeholder Group response to consultation**

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.

1. What are your views on the NDA prioritising the progress of decommissioning and remediation for benefits other than that purely based on risk reduction (for example, progressing decommissioning and remediation at Winfrith to reduce maintenance costs, demonstrate our ability to complete the mission, and allow beneficial reuse of the land)?

While understanding that hazard/risk reduction is important to UK Government, DECC and NDA it would appear sensible that if by prioritising other benefits allows the earlier decoms0%o [?] e com s0%o [?] e

wastes. However, the re-use of decommissioning waste may have some impact (possibly only perceived) on the options for future re-use of a site.

4. From your perspective, what are the benefits and detriments of focusing on interim states for those sites (or parts of site) where the end state will not be achieved for many decades?

There needs to be a clear intent or what is the PBO working towards. However, having said that recognising that some end states are many decades away it would appear sensible to have a high level statement of intent of each site and review on a regular basis as things change.

5. Land Use is a new topic strategy; do you find this is a helpful topic and if so, why?

This would be a helpful addition to focus attention and effort on the future re-- v 

alternative routes) which would not realise value but ensure disposition of all the inventory?

This is really something that would need to consider cost versus benefits to come to a conclusion as to whether recycled routes should be considered. Also need to consider the timescale for the GDF and whether or not it would be able to accept these uranics.

9. What are your views on the waste management principles described in this strategy?

A sensible approach, in particular, applying the waste hierarchy and using it as a framework for decision making.

10. Do you agree that the proposed new approach to move towards the development of a single radioactive waste strategy is appropriate and what issues do you think we should address?

Different Governments have different approaches and therefore unless there is an agreement between Scotland, Wales and England as to develop one single strategy this will always be problematic.

11. Which areas should we focus on in the strategic development of HSSSEQ?

As per the section on strategy development, NDA need to be more pro-active in supporting the SLCs. As well as applying a proportional approach to HSSSEQ, the NDA should identify best HSSSEQ practices across the estate and pro-actively encourage all SLCs to adopt these, where appropriate.

Safety should always be first priority and this is set out in the NDA strategy. All aspects of Health, Safety, Security, Environmental and Quality are important and it is essential that all are maintained at a high level.

12. Should the NDA do more to support science, technology, engineering and maths (STEM) development at school level as well as our existing activities in further education (see Socio-Economics and Research and Development)?

The Dounreay site is already very supportive of STEM activities and we are sure other sites within the NDA estate are the same. It would appear to be more appropriate to allow the sites to continue with their support in STEM activities. These activities could be delivered in partnership with the NDA but allow the sites to lead – this should be part of their Corporate Social Responsibility or as part of the site individual socio economic plans. NDA could take a lead in ensuring consistency across the estate.

13. What changes in NDA contracting approaches would make the biggest positive impact to encourage innovation?

Innovation requires fundamental understanding of the issues and problems to be addressed. This knowledge is often held by SLC employees with considerable experience. Putting contracts out to external contractors with little direct experience often does not

produce the "new approach" that was expected. Contracts should therefore be framed so that external contractors and relevant SLC personnel can work together beneficially without the SLC personnel feeling they are just being "milked" for information."

14. How can we best measure and report on the impact of our socio-economic activities?

This can be a difficult one. DSG has many times had conversations with NDA and site operators about how best to measure and report on the impact of socio economic activities. Some of your interventions are funding for infrastructure type projects which become the catalyst for various regeneration activities but measuring these too early will show little impact.

We also note that on page 86 of the strategy document the rewording of the socio economics has changed. It would be useful to clarify whether there are now no longer priority areas and what that will mean to Caithness and North Sutherland. While it is good to see any investment from NDA linked to regional economic growth strategies it is essential that NDA makes clear communications on its intention as to how it will link up and more important how stakeholder group (and CNSRP) play a part in ensuring that the NDA Socio economic funding is aligned.

Again, consistency of approach for the NDA is important here. Each site or group of sites appear to do something different from a socio economic point of view and having a transparent process which is common to all NDA sites would be useful.

15. Should the NDA consider regional and/or SLC-based engagement? If so, how would it work in practice?

There is a balance to be made in regional and/or SLC-based engagement. You could look at Scottish sites, Welsh sites and English sites but given the Magnox sites cover all three areas it would become difficult to ensure everyone was up to the same speed on topics.

The NDA National event has its place but we believe NDA should consider different engagement processes for different topics – this could be done by having regional/SLC based engaged on a quarterly basis culminating with one national event for all.

16: What factors should we consider when thinking about stakeholder engagement around Magnox reactor sites entering in to periods of quiescence?

Closure of sites, job losses, workforce transition, maximising benefit while sites are still under decommissioning.

16. When evaluating the opportunities to dispose of assets (including land) or pursue additional commercial revenue, what factors are the most important for the NDA to take into account and why?

Each site is different – some will have pressures around the sites as land will be at a premium and should be sold off bringing revenue to the NDA. Having said that, each

disposal of asset(s) would still require to be on a case by case basis – one size will not fit all.

17. Where should the NDA focus its attention to help maximise the benefits of international engagement?

In the international arena the NDA should focus on how the Scandinavian countries nuclear operators, NGOs and stakeholders interact with their countries' regulators. In those countries the regulators are held in higher regard by stakeholders than in the UK and are not seen to be "part of the industry". For their part the regulators appear to be able to be seen to be separate from the operators but do understand the programme and commercial aspects the operators are working to.

Dounreay Stakeholder Group
11th February 2016