DSG/SRSG(2016)M001

Minutes of the DSG Site Restoration Sub Group meeting held on Wednesday  $20^{th}$  January 2016 at 1900 hours in the Pentland Hotel (Georgina Suite).

Bob Earnshaw Chairman, Site Restoration sub group

David Flear DSG Chairman

Alastair MacDonald DSG Honorary member

Mike Flavell NHS Highland Brian Mutch SGRIPD

George McDougall Caithness West Community Council

John Deighan Dounreay Unions
David Broughton DSG member
Roy Blackburn DSG member

June Love Dounreay, DSG Secretariat

Bob Kury Dounreay Deputy Managing, Director

Ella Feist Dounreay Environmental, Closure and Demolition Manager

Cdr Ken Dyke MOD, Vulcan

Dr David Knowles Irradiated Fuels Programme Manager, MOD

Danny Gregory ONR (for Dounreay)

Stewart Ballantine SEPA

Bob Earnshaw welcomed everyone to the meeting. He introduced Dr David Knowles who was attending on behalf of MOD to provide a presentation fuel transports. He also welcomed Brian Mutch to the meeting who had taken over from Ian Lesley, SGRIPD. Introductions were made round the table.

### Apologies were received from:

Cllr George Farlow
 Cllr Willie Mackay
 Mike Flavell
 Tor Justad
 Chris Layton
 Deirdre Henderson
 Highland Council
 NHS, Highland
 DSG public member
 DNSR (for Vulcan)
 Buldoo Residents Group

- Cllr Roger Saxon Highland Council

- Nigel Lowe NDA Head of Programme

- Craig Brown Dounreay Support Services Director

- Sheila Hutchison ONR (for Dounreay) / Danny Gregory deputising.

- Alun Griffiths ONR (for Dounreay)

David Flear noted that Nigel Lowe had telephoned to apologise for his non-attendance however this was due to illness.

3. Bob Earnshaw stated that the minutes – DSG/SRSG(2015)M004 – had been circulated to members in advance. Bob Kury noted an error on page 5 (first bullet point, 2<sup>nd</sup> last line 'power' should read 'powder'.). With this amendment made the minutes were accepted as a true reflection of the meeting. This was proposed by David Flear and seconded by Alastair MacDonald.

No issues were raised from the minutes.

4.

Bob Earnshaw noted that the status of actions had been circulated in advance to members. Progress on the following actions was discussed:

• Nigel Lowe to take views on emergency tug vessels to his executive for the executive to decide whether to raise again with the Department of Transport.

In Nigel Lowe's absence, it was agreed that an update on this action would be requested and updated for the DSG public meeting.

Tor Justad to provide website link to the sea related reports.

June Love noted that Tor Justad had indicated he had sent the website links direct to Nigel Lowe, NDA.

 Stewart Ballantine to provide a timeline for the completion of the PRAG report.

Stewart Ballantine noted that an update on this action was covered in the written SEPA report (DSG(2016)P003).

 Nigel Lowe, NDA Head of Programme to provide an update on DRS and passing loops from Inverness to Thurso.

June Love noted that the NDA had updated Cllr George Farlow on this action. A written brief on the response had been requested to close out this action.

Bob Earnshaw noted that it was important that if actions were raised at the public meeting or sub groups it was essential that all correspondence go through the DSG secretary to ensure all members were provided with the same information.

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Bob Earnshaw noted that members had received three written papers from Vulcan. These were:

- DSG(2016)P008: Update from Vulcan
- DSG(2016)P004: Rolls Royce update
- DSG(2016)P005: ONR quarterly report for April to June 2015

Bob Earnshaw stated that he would invite Cdr Ken Dyke to provide an update on Vulcan followed by questions. Cdr Ken Dyke updated on the following:

- There had been no Lost Time Accidents since 30th July 2015.
- First Thoughts behaviour workshops continue to ensure safety culture on site remains good.
- The Site continues to benchmark and share good practice with participation in the UK BP Safety Representatives Forum and National Operating Experience Learning Group and Submarine Experience Learning Group.
- No issues from an environmental point of view.
- The Shore Test Facility programme is now in a phase of getting ready to defuel early next year.
- No events during the period which required reporting to ONR or SEPA.

- Radioactive waste disposals continue in alignment with the SEPA letter of agreement for level of discharge.
- The Inspection programme continues with a transport stakeholder working group to be held on 2<sup>nd</sup> and 3rd February. Other external audits over the next 6 months included Approval of Discharge Arrangements, a Naval Reactor Plant authorisee and emergency arrangements audits.
- The Vulcan Defuel and Decommissioning programme was currently going through a Main Gate process to provide findings to higher bodies. The project team were also working with the NDA to assess the options for decommissioning of the site sometime after 2022.

David Flear noted that MOD was discussing options for the Vulcan site after 2022 with the NDA. Cdr Ken Dyke confirmed that there were a number of options from 'do nothing' to full scale decommissioning. He acknowledged he had fed back DSG's views that they wished to be engaged with at an early stage. David Flear re-iterated this stating that unless there was early engagement with the community it would be too

- David Flear asked whether the MOD had held discussions with Scottish Government on this. Dr David Knowles responded that letters had been issued before Christmas to specific Scottish Government Ministers, MSPs, MP and other officials outlining fuel movement plans.
- Roy Blackburn asked what MOD's interactions were with ONR. Dr Knowles responded that there was
  a Letter of Understanding between DNSR and ONR colleagues which covers transportation. There is
  a high degree of equivalance between ONR Licence Conditions and DNSR Authorisation Conditions
  and due to the uniqueness of the MOD's use of nuclear power for submarines, this had resulted in
  four additional Authorisation Conditions.. David Flear noted that previous discussions with Nigel
  Lowe had confirmed that conditions for the movement of fuel were almost identical to that of
  Dounreay.
- David Broughton asked whether it was envisaged to hold any local consultation or engagement.
  David Flear added that at the NDA National Event there had been a Fife Councillor who had raised his
  concerns relating to the transport of radioactive material, especially in light of the recent floods. The
  question of weather conditions had been raised at the December DSG and ONR had provided
  assurances that the weather conditions had been taken into account.

There being no further questions, Bob Earnshaw thanked Dr David Knowles for his presentation. He confirmed that the presentation would be circulated to all DSG members for information and published on the DSG website.

6.

Bob Earnshaw noted the following written papers had been received in advance of the meeting. These were:

DSG(2016)P002: Dounreay update
 DSG(2016)P003: SEPA update
 DSG(2016)P007: ONR update

Due to illness it was not possible for the normal NDA representative to attend. Therefore no update report was provided.

Roy Blackburn asked whether the outcome of the Corporate Spending Review had been confirmed. David Flear stated that at the NDA National Event the £177M per annum for Dounreay had been confirmed. He felt that this was good news for a stable budget over the next five years. The NDA, overall had to find savings of £1bn over the next five years and therefore budgets on other sites had been affected.

Bob Kury, Deputy Managing Director provided a verbal update. Of note:

- The NDA independent audit had previously been reported. Twenty-two recommendations had been included but had concluded that they liked what the site was doing in terms of addressing safety on the site. The Dounreay Improvement Team would be implementing these recommendations and work was ongoing to ensure this was given priority from a safety prospective.
- LEAN team continued to look at workable efficiencies and processes. Work was nearly complete on improvements to the process for transporting waste drums on site. The DMR (modifications) was also in the process of being looked at for improvements.
- On a safety front there had been a small number of slips, trips and falls. These had occurred during the wintry weather. A site gritting team was in operation and later in the year additional crews were set up to ensure gritting was undertaken at more appropriate times. On return to work after the Christmas and New Year holidays a pro-active safety pause was organised to focus everyone on their safety in the workplace.
- There had been three environmental non-compliances; two associated with solid waste. This was an area that site management continued to work on and look for improvements. Repeat samples came

back under the authorised levels.

- Next week SEPA would be on site for follow up inspections of non-compliances and compliance status to close out RSA and overall environmental improvement plan.
- On operational activities, the WRACS plant was now in active commissioning. Site has rallied around to get equipment up and running. There had been a good 3 month run to get it up and operational.
- Active commissioning of the Encapsulation Plant continues with 86 containers having been grouted to date (end December 2015). The active commissioning report had now been approved and was currently undergoing review.

Roy Blackburn noted that the PFR Effluent Treatment Plant had been shut down due to the discovery of corroded welds. He asked whether this was an asset management problem. Bob Kury responded that asset management was critical for the site and that this was totally unrelated.

David Broughton asked what the non-compliance related to for the management of low level waste. Stewart Ballantine responded that this related to putting waste into vaults. One of issues related to BPM (Best Practical Means) and the lack of evidence demonstrating DSRL's consideration of why one package could not go for recycling, or other alternative routes to disposal. There was a requirement for DSRL to demonstrate the decision making process was robust before sentencing waste. The site had been working on this and SEPA would be updated next week.

Roy Blackburn noted the progress being made with the Water Vapour Nitrogen for NaK. Bob Kury responded that there would be a safety case for that activity prior to any operations. WVN was already used for small SID operations. Preparations for the safety case were in hand now and would continue with concept design through implementation phase which would be informed from the trials.

Roy Blackburn noted that previous presentations on the options for WVN had indicated it was going to be challenging to make a safety case. Danny Gregory, ONR responded that while it is WVN it was a slightly different technique which was proposed earlier (concentrations are different). This is talking about DFR and it was fair to say that the existing technology for DFR was not yet developed fully. There was a desire to use this technique but the trials would better inform the safety case.

David Broughton noted that the written update provided information on the PFR Tank Farm. Bob Kury responded that Tanks 3 and 4 had been removed manually following a number of enhancements.

David Broughton noted the trials for PFR raffinate which was being undertaken by AMEC. He asked whether AMEC had all the equipment necessary for the trials. Bob Kury responded that currently the site was continuing to process DFR raffinate which was a different mixture to PFR raffinate. This is a journey and the trials being undertaken by AMEC would provide RWMD with confidence to provide a Letter of Compliance. This project was on schedule and there was confidence that this was going forward well. Once DFR reprocessing was complete and once the trials for PFR were complete and the safety case made the plant would need to be modified to allow reprocessing of PFR raffinate. It was a very long process that had many steps to go.

Bob Earnshaw invited Ella Feist to provide an update on interim site end state. Ella Feist noted the following:

- Work continued with the Environmental Impact Assessment which would support the planning
  application for HC framework Phase 3. Discussions with Highland Council and stakeholders on the
  way forward would be carried out around the summer. At present the programme was being
  reviewed and once finalised key dates would be provided to DSG members.
- Supporting the HC Framework document, a contract had been awarded for the landscape options.
- Tender returns were currently being considered for technical input for the interim site end state review. All information will be collated and various options will be proposed. Although dates had not yet been confirmed a stakeholder workshop would take place to review the options and the DSG

sub group were invited to consider nominating a representative to take part in this workshop.

David Flear suggested Bob Earnshaw would be well placed to take part in workshop. June Love noted she would bring this to the table once dates were identified to ensure availability.

Roy Blackburn asked whether the change of the interim end state date would impact on this timescale and scope of this work. Ella Feist responded that they were working closely with NDA on this. The Interim End State date was not hard and fast and now was being considered within a date range, ie 2030-2033.

Bob Kury stated that following the Corporate Spending Review, the site had received confirmation of the budget of £177M per year for the next five years. Other sites across the NDA estate had not been quite so successful. The site was currently going through its exotics programme within the decommissioning baseline and this had changed some of the timelines which could potentially push other projects out to 2030-33. The new scope may possibly pressure the back end of the programme. At present, site management were in the process of finalising the decommissioning programme and looking at how this may impact on resources. The exotics programme was a planned activity with a high priority which may result in the potential movement of other projects.

David Flear noted that at the Socio Economic sub group meeting held that afternoon the CNSRP Programme Manager had mentioned staffing profiles and had asked for clarification of whether the new staffing profiles would include projections up to 2033.

Bob Earnshaw noted that SEPA had provided a written report – DSG(2016)P003 refers. He invited Stewart Ballantine to provide a verbal update. Of note, Stewart Ballantine reported the following:

- The PRAG(D) report was due to be finalised sometime around April/May 2016.
- SEPA would be carrying out a number of inspections next week. The SEPA report on performance for compliance runs on a calendar year. The inspection gives Dounreay the opportunity to demonstrate to SEPA that improvements have been made. An earlier inspection at Dounreay had shown their desire to make improvements and that they had resolved some issues across the site. Once the inspection was complete this will inform the final end of year Compliance Assessment Scheme score.
- A revised waste management license had been issued to Dounreay which now includes the area of land around LLW facility.
- The PPC permit for excavated material had now been revoked and that area of site covered by waste management licence. The excavated material from the vaults is not covered under this licence as it has been claimed by DSR it could be reused in the form it is in on the site of production and therefore it does not fall under the category of waste.

David Flear noted that the PRAG(D) report was now considerably late. He asked Bob Kury whether Dounreay would be able to re-start off-monitoring if PRAG(D) recommended this. Bob Kury responded that if PRAG made such a recommendation for further monitoring a discussion would be held with SEPA to take this forward.

David Broughton noted SEPA's update on LLW and asked whether SEPA's observations and questioning had come as a surprise to Dounreay. Stewart Ballantine stated he could not comment on whether the site had been surprised. Bob Kury responded that this was about practices and processes and related to the interpretation and understanding of BPMs. SEPA had challenged the site to provide evidence that improvements were being made and Dounreay had accepted this.

Bob Earnshaw noted that ONR had provided a written report – DSG(2016)P009 refers. Bob invited Danny Gregory to provide a verbal update.

Danny Gregory noted he would take the paper as read but would be happy to respond to any questions. He noted:

- A number of inspections had taken place and compliance was good against all the areas looked at.
- Two permissions had been provided during this period an agreement to install and carry out inactive commissioning of the UFCF mezzanine floor and approval of the revised Dounreay Emergency Plan.

Bob Earnshaw noted that a written heritage update had also been provided to members – DSG(2016)C002 refers. David Flear stated it was good to see that the PFR stone would be going into the new NDA Archives.

7.

Bob Earnshaw noted that the NDA was now consulting on its draft Strategy III and Business Plan. Some comments had been provided to the secretary already and he encouraged all members to provide views to the secretary as quickly as possible. The closing date for these consultations was the  $15^{\rm th}$  February.

8.

David Flear stated that he and Derrick Milnes had attended the NDA National Stakeholder Event and had attended the SSG Chair's forum. He had found the SSG Chair's forum a little disappointing in the subjects discussed. Magnox SSGs had been unaware that Nigel Lowe was taking over the management of the Magnox contract along with the Dounreay contract. The NDA National event had provided a few interesting workshops to enable input into the themes of the NDA Draft strategy. Some members had expressed disappointment that no politicians had attended although it had been pointed out that Scottish Government was represented by an official.

David Flear also noted that DSG representatives had met with Scottish Government Minister, Fergus Ewing. This had resulted following DSG's response to the GMB press release on safety concerns and regeneration. It had been a positive meeting with representatives discussing a number of topics, including the outcome of the UK Government's Corporate Spending Review in terms of Dounreay's budget, Berriedale Braes, opposed to any thoughts on tourism tax and the work of the CNSRP. In addition, Vulcan was discussed including the options for the site following defueling activities. John Deighan added he thought it had been a positive meeting and had given a number of people the opportunity to hear first-hand what was being done in the county. David Flear noted that the NDA and Dounreay had held a meeting prior to DSG one and this again had been extremely positive. Mr Ewing had been delighted with the liaison between DSG and Scottish Government and intimated that the DSG was seen as one of the most pro-active SSGs.

David Flear noted that he had been approached to provide a short video clip to an organisation in Australia relating to the planning process and community engagement around the new low level waste facility. He noted that interactions with DSG had come from Brussels, Canada and Japan and felt this was not only good from a DSG point of view but also for the Dounreay site who was looking to become the Decommissioning Reference site for Europe.

9.

There being no further business Bob Earnshaw thanked everyone for their input and formally closed the meeting.

DSG Site Restoration sub group chairman  $24^{th}$  January 2016

meeting for an update on the VD	June Love to write to Steve Firth, MOD to attend a forthcoming DSG AD programme.
Lonestar.	Cdr Ken Dyke to identify date for DSG observer to attend Exercise
All members to provide any comments/views on the NDA's draft Strategy III and NDA draft business plan.	