

DOUNREAY STAKEHOLDER GROUP
DSG SITE RESTORATION SUB GROUP

DSG/SRSG(2016)M002

Minutes of the DSG Site Restoration sub group meeting held on Wednesday 13th July 2016 at 1900 hrs in the Pentland Hotel (Georgina suite), Thurso.

Present:	Bob Earnshaw	DSG Site Restoration sub group chairman
	Cllr George Farlow	Highland Council
	Alastair MacDonald	DSG Honorary member
	Thelma Mackenzie	Thurso Community Council
	Cllr Roger Saxon	Highland Council (DSG Vice-chair)
	Cllr Willie Mackay	Highland Council
	George MacDougall	Caithness West Community Council
	John Deighan	Dounreay Unions
	Roy Blackburn	DSG member
In addition:	June Love	DSG Secretariat
	Mike Brown	NDA
	David Lowe	Dounreay Deputy Managing Director
	Ella Feist	Dounreay Environmental Closure Department
	Cdr Ken Dyke	MOD Vulcan
	Simon Tinling	MOD (VDAD) – for agenda item 6.
	Wendy Newton	MOD (VDAD) – for agenda item 6.
	Sheila Hutchison	ONR for Dounreay
	Stewart Ballantine	SEPA
	Paul Hetherington	Dounreay Head of Communications (observing)

1. WELCOME AND INTRODUCTIONS

Bob Earnshaw welcomed everyone to the meeting. He welcomed David Lowe to his first sub group meeting and noted that Paul Hetherington had been appointed as the Head of Communications for Dounreay and was attending to observe the meeting. He also welcomed Simon Tinling and Wendy Newton, MOD who were attending to provide an update on the future of the Vulcan site.

June Love noted that while David Flear, DSG Chairman, sent his apologies he had asked that members were informed that there had been a 5 year extension to the emergency tug vessel. He had also noted that the ONR report had been circulated electronically to all DSG members and that ONR would provide a presentation at the next public meeting outlining how nuclear transports were regulated.

2. APOLOGIES

Apologies were received from:

- David Flear DSG chairman
- Deirdre Henderson Buldoo Residents Group
- Mike Flavell Health Service
- David Broughton DSG member
- Tor Justad DSG member
- Mark Raffle NDA (Mike Brown deputising)
- Craig Brown Dounreay Support Services Director
- Alun Griffiths ONR for Vulcan

- James Bryson DNSR for Vulcan
- Martin O’Kane CNC

3. MINUTES

Bob Earnshaw noted that the April sub groups had been cancelled due to purdah. The January minutes (DSG/SRSG(2016)M001) had been endorsed by correspondence.

He invited members to raise any issues from the January minutes. No issues were raised.

4. ACTIONS

Bob Earnshaw noted that the status of actions had been circulated to members in advance of the meeting. The majority of actions were now complete.

He asked what the status was on DSG(2014)M003/A009 with regards noise from the CNC firing range. June Love noted that while contact had been made to collect the noise forms these had not been completed by the neighbours. It was agreed to check to see whether these forms were going to be completed. If not then the action would be closed out.

No other issues on the actions were raised.

5. DOUNREAY UPDATE

Bob Earnshaw noted that there were a number of written papers distributed to members in advance of the meeting including:

- DSG(2016)P013: Dounreay report
- DSG(2016)P014: SEPA report
- DSG(2016)P015: ONR report

He invited the following to provide updates:

NDA: Mike Brown, NDA provided the following update:

- The Government spending review had been a success for the NDA. DECC had asked the NDA to make around £1bn savings over the coming four years through efficiencies. This was a significant amount of saving and will be met by providing better value for contracts and delaying non-safety critical project spend.

The good news locally is that the NDA have managed to ring-fence the assured funding for the Dounreay site, currently at £177M per annum. Robust arguments were provided by the NDA and the NDA’s site facing team and the agreement to ring fence this funding clearly demonstrates the importance of the Dounreay closure contract to Government.

The decision to transfer all Dounreay exotic fuel from the Dounreay site as part of the closure contract has added a significant amount of work to the decommissioning programme. Coupled with security enhancements to meet revised government requirements, the NDA has added nearly 50% more scope to the Dounreay closure contract. This is a huge amount of additional work and clearly comes at a cost in terms of time and money. Quality remains uncompromised with health, safety, security and environment standards paramount. The interim end date has moved out to around 2030 but to keep focus on hazard reduction at Dounreay, during the drive to transport nuclear material off site, the NDA have secured an additional £36M of decommissioning funding for Dounreay over the next two years (£22M + £14M) despite a £1bn

cut to the NDA budget. Again, this shows the importance of Dounreay decommissioning and the hazard reduction progress.

- Magnox consolidation is the other major NDA activity that has been underway with relevance to Dounreay. As explained at the June DSG meeting, Nigel Lowe is now in charge of both Dounreay and Magnox decommissioning and an NDA re-organisation means that Pete Lutwyche is now managing all NDA operational areas, Sellafield, Magnox and Dounreay with Programme Manager responsibilities for all Scottish NDA sites falling under Mark.

Magnox competition concluded in August 2015 and the consolidation has now agreed all headline activities between NDA and the Cavendish Fluor Partnership. This had been significantly more onerous than envisioned and NDA have seconded in a lot of extra resource to conclude this consolidation, including Mark Raffle. Overall this has been a good result with a significant cost reduction for the Government.

- Lots of others areas of work for the NDA including Security Week, Smarter Working, Value for Money and Communications sharing what they can do with DECC and other stakeholders. NDA also carried out a 'Womble Day', an annual event across the NDA to ensure busy people do necessary housekeeping.
- Brexit has presented significant potential change to Nuclear Law but the Government Brexit negotiations over the next two years will determine the magnitude and extent of change. Although withdrawal from the Euratom Treaty will release the UK from European Directives and Regulations much of nuclear law is enshrined in UK Legislation and UK law. Basic safety standards, Article 30, is an example where radiation protection covered under EU law is adequately covered under UK law to maintain compliance under IAEA Fundamental Safety Principles.

Research and Development may be an area for change given previous grant funding from the Joint Nuclear Research Centre.

UK legislation on Safeguards will remain in force to ensure the UK complies with various obligations under international law on non-proliferation of nuclear weapons and IAEA requirements.

Bob Earnshaw asked whether this would change the role of Euratom. Mike Brown responded that this was part of the EU treaty and while nothing was certain at this point it could be that UK move into IAEA Governance. Mike Brown stressed at this time the NDA did not know but what was certain was that regulation would still be required.

John Deighan noted that additional funding had been provided to the Dounreay site but that the site had also been asked to make savings. He noted that Dounreay in the past had realised a significant amount of savings and asked why NDA did not concentrate on Sellafield which would provide the biggest saving from across the NDA estate. Mike Brown responded that Sellafield was also being asked to find savings from the site operations but it should not be forgotten that Sellafield was also the most complex site. Sellafield currently were looking at savings in non- safety critical activities.

Cllr George Farlow asked about the Far North line and whether there had been any progress on the re-introduction of passing loops. June Love noted that this had been discussed previously and Anna MacConnell had provided George Farlow with an update. George Farlow stated there was 150,000 tonnes of fallen timber and asked whether DRS had engaged with those involved to explore whether

this was something that could be transported by train. Mike Brown said he was aware that DRS had been in discussion with a number of local contractors but was not aware of whether this had included timber operators. It was agreed that this information should be passed and progressed with the Caithness Transport Forum.

Action: DSG/SRSG(2016)M002/A001: June Love to pass Information on timber haulage to the Caithness Transport Forum.

Roger Saxon noted the site's budget of £177M and asked whether this was an expectation to save money from that. Mike Brown responded that the £177M was assured funding and that NDA were also providing a further £36M over the next two years. The NDA had challenged the site to continue to look for efficiencies which would result in savings.

Dounreay update: David Lowe thanked the group for inviting him to this meeting and gave a brief summary of his nuclear career. He indicated he would be at Dounreay for a minimum of three years and was looking forward to the challenges presented by the decommissioning programme and also working with the local community.

He noted that the written report (DSG(2016)P013) had been a slightly longer one than usual but this was because of the cancelled sub groups in April. He stated he would like to take the opportunity to reformat the way the information on the report was presented and said he would look to do that for the next meeting to allow members to provide feedback.

From the written report, David Lowe noted the following

- The Dounreay Improvement Team which is led by the Deputy Managing Director continued and the written report outlined some of the benefits from the various activities carried out since DIT was set up.
- On the safety and environment issues Phil Craig, Dounreay Managing Director had provided a full brief at the DSG public meeting in June.
- The site was delighted that NDA had agreed to provide additional funding and the site was prepared for the challenge to identify cost efficiencies.
- The decommissioning programme was currently being changed to take account of the fuel project and this was impacting on other decommissioning activities. Approval for the new decommissioning plan was expected by the end of the fiscal year.
- Progress on decommissioning activities continues and a number of successful decommissioning activities were reported in the written update. Since the report had been written:
 - The last batch of higher activity liquid waste produced during DFR fuel reprocessing was expected to be cemented into a drum on 14 July in the Dounreay Cementation Plant (DCP). In completed the cementation of all DFR raffinate the DCP would then be modified to allow PFR raffinate to be cemented. This was an important milestone in the processing of the historic liquid waste created during the reprocessing of Dounreay's three reactors.
 - Active commissioning commenced of the Wet Area Size Reduction Facility (WASRF) with the removal of a neutron shield rod from the store. The first cut started on 7 July 2016.

The WASRF is a purpose built enclosure with contamination and fire control systems to allow handling of waste containing alkali metals.

- Some organisational changes had been or were in the process of being made over the past couple of months and these were also outlined in the written report.
- An appendix of the report listed the project milestones that the site was looking to achieve during 2016/17. This would be updated for each sub group with a traffic light report to show the progress being made.

Councillor George Farlow asked about the cementing of the DFR NaK. Mike Brown responded that NaK was the liquid metal from DFR which was quite different from the DFR raffinate.

Roy Blackburn noted the work being undertaken by DIT and commented that the TRIR trends were going in the wrong direction. David Lowe responded that the TRIR trends had been increasing (getting worse) since December but recognised that health and safety performance continues to be a focus area. DIT had an action to continue to look at health and safety and focus on improvements on common causes identified from injuries and other incidents. The team had found that 40% of the injuries were caused by walking around the site and 45% due to working activities. They had identified the areas to focus on which were spacial awareness, safety advisors have been directed to review and identify unsafe conditions associated with gates as there has been a number of injuries around gates by the security force, and the gritting programme for winter. The trend of TRIRs has started to show signs of improving but further improvements would be looked at.

Roy Blackburn asked whether safety culture was a related issue. David Lowe responded that this was a key area for DIT and the workforce. He added that there was a number of areas to focus on as the statistics showed a number of common indicators. DIT was also working with the Communications team and Assurance to ensure the key messages were being cascaded to the entire workforce in a more effective manner.

Supervisor training had been implemented and 80% of supervisors had now undergone training and was expected to be completed by end of the year. Some other focus areas have been identified (e.g., improving pre-job briefs) has also been identified and an action plan was currently being developed.

Environmental Closure:

Bob Earnshaw noted that updates on the Site End State and the liquid effluent discharge system had been included in the written report. He had attended the site end state workshops and while these were very technical it had been interesting and those who had attended had challenged the thinking of the options coming forward. He had, unfortunately, not been available to attend the liquid effluent discharge system workshop but looked forward to attending the follow-up workshop in the near future.

Bob Earnshaw also noted that David Flear had attended the NDA workshop on the regulations covering the NDA sites approaching the final stages of decommissioning and clean-up. These regulations would impact on the considerations of the site end state work. No-one from Highland Council had been available to attend this workshop in May and Bill Hamilton, NDA Head of Stakeholder Engagement was now in the process of organising a further meeting to include Highland Council and other key stakeholders.

He invited Ella Feist to provide any further update on this work. Ella Feist confirmed that the workshops had been held with good attendance including NDA, Magnox, SEPA, DSG, and internal stakeholders. The workshops had identified what was required and how the options would be assessed. A long list of options had been developed along with the assessment criteria. At present the site was currently waiting for the draft reports to come through. It was felt that large areas of the site would be able to be re-used which was termed proportionate control.

June Love noted that David Flear had raised a question on whether the outcome of the site end state review differed from the 2007 consultation undertaken by DSG on site end states. Ella Feist responded that it appeared there would be no real difference from the original 2007 outcome.

On the liquid effluent discharge system Ella Feist noted that this covered the pipe under the sea of both the old and current effluent system. An options assessment for the remediation of the system had been requested looking at how best to decommissioning the structure. Two workshops had been held with representatives from SEPA and Magnox and again was looking at all the options. Those at the workshop recognised that there would be different options for different parts of the system. A further workshop would be held in September to look at the final options. Following that an action plan would be developed.

Bob Earnshaw asked whether these activities would be included in the Highland Council Planning Framework document which was currently underway. Ella Feist confirmed that all activities would be included.

Roy Blackburn stated there was an interesting comment in the written report in relation to constraints. This suggested there were several options that would challenge the current constraints. Mike Brown responded that the current constraints could refer to such things as the current IES date and challenges to such assumptions would need to be considered very carefully. Ella Feist said when considering such options they have tried not to put the constraints at the front end but that it may mean that constraints would come out later in the process. At this point in time all options were being looked at without constraints being considered.

Roger Saxon said that defining the interim end state now was a bit 'chicken and egg'. Decisions made now may constrain future use of an industrial site. Bob Earnshaw responded that some of the options considered included discussion around the future uses and how the different options would impact on that. Mike Brown added that at the interim end state there would be no more physical work would be carried out by DSRL and it would be essential to identify any early future use.

John Deighan stated that, on behalf of the Dounreay Unions, he would like to see a new reactor being built on the site.

Cllr Farlow stated it was essential that the tenants around the site should also be considered. Alastair MacDonald added that there had always been a certain amount of radioactivity in the ground before Dounreay had even been built.

SEPA report:

Stewart Ballantine noted comment on SEPA attending workshops and stated that attendance at these was a challenge to SEPA to balance supporting the decommissioning of the site, while maintaining its position as a regulatory body. While they wished to be helpful and can where possible provide clarity on SEPA guidance or policy they cannot fully participate in the workshop. . In the case of the recent NDA workshop SEPA had attended to provide support on the relevant GRR

guidance, which is currently being consulted on by the Environment Agencies. . Therefore while SEPA did attend these workshops on occasion, to do so does not compromise future regulatory decision making.

From the written report, Stewart highlighted the following:

- DSRL's application for approval of its Corporate Radioactive Waste Advisor arrangements was approved and received complement from the approval board for the quality of the submission.

There had been no non-compliances identified during inspections since the last meeting, however SEPA continue to investigate the discharge of unmonitored Krypton 85 previously reported. June Love noted that David Flear had submitted a written question on PRAG(D) asking when the end state for particle clean-up would be defined. He had made the assumption that PRAG(D) were content that there would be no further offshore monitoring and therefore it would be useful to understand how the site arrived at an end point for the on-shore monitoring. He asked if a briefing could be provided on the work that was required to complete this piece of work and asked members to consider whether it would be useful to have a short update/presentation on this subject. Stewart Ballantine responded that while he could not answer the questions raised he was happy to take an action to discuss how best to respond.

Action: DSG/SRSG(2016)M002/A002: Stewart Ballantine to discuss with SEPA rep regarding an update/presentation for a future restoration sub group meeting on the particles project.

Cllr George Farlow noted that SCCORRS had changed their remit and covered all nuclear materials now (previously it was radioactive waste) and included topics such as particles. The representatives at SCCORRS were keen to engage on this topic and had also expressed an interest to visit the site. It was agreed that dates would be offered to SCCORRS that coincided with DSG meetings and that a request would be made to site to accommodate a site visit at the same time.

Action: DSG/SRSG(2017)M002/A003: DSG secretariat to seek approval for SCCORS to visit site and to provide DSG meeting dates for proposed visit.

ONR Report: Sheila Hutchison reported:

- The site emergency planning exercise had been deemed adequate by ONR. The exercise had been quite challenging in that there were two separate 'incidents' with one relating to a radiological safety event and the other a conventional safety event. This was also used in parallel to drive the local authority's triennial demonstration of off-site response.
- Joint inspections by ONR nuclear inspectors and transport inspector were undertaken looking at management systems on the site to confirm that they were aligned to meet nuclear safety and transport requirements. These included inspection of quality plans associated with loading and packaging, adequacy of hold points in place and demonstration that the necessary steps were being taken and verified. Further inspections of training and record of competencies of people and how DSRL demonstrates it complies with transport certificates were also considered. It was shown that there was an adequate evidence of compliance.
- The Annual review meeting was held in April and was a very positive meeting. Those attending from ONR had found Dounreay to be very open and transparent on what has gone well and identified areas where improvement was required.

No questions were raised in relation to the ONR report.

Bob Earnshaw noted that no-one from CNC was in attendance. He stated that following the DSG public meeting in June Superintendent Martin O’Kane had offered an update to the sub group meeting. This was noted and would be discussed at the business meeting.

Action: DSG/SRSG(2016)M002/A004: DSG Secretariat to raise CNC update at next business meeting.

6. VULCAN

Bob Earnshaw noted two written reports had been received prior to the meeting.

- DSG(2016)P010: ONR report for Vulcan (Jan to Mar 2016)
- DSG(2016)P012: Rolls Royce update

Bob Earnshaw noted that DNSR reports were no longer being received and asked if there was a reason for this. Cdr Dyke responded that he was not aware of a reason for this report not being provided and suggested DSG get in touch with DNSR direct.

Action: DSG/SRSG(2016)M002/A005: DSG secretariat to contact DNSR with a view to receiving written updates in time for site restoration sub group meetings.

Cdr Ken Dyke apologised for the lateness of his report. Hard copies were provided at the meeting (see DSG(2016)P016). From the written report, Cdr Dyke highlighted the following:

- There had been no lost time accidents or injuries, since 30th July 2015. No RIDDOR incidents had occurred during this period.
- There had been no environmental non-compliances.
- The behaviour safety continued to be a focus on site with refresher training sessions on handsafe and the importance of the Stop, Think, Observe, Proceed (STOP) principle which was delivered in June. New starts would undertake behavioural safety workshops which were scheduled for July.
- SEPA were currently reviewing the letter of agreement for the site. The review was to create an agreement that related to the site activities as they were now (ie the change from operational to post operational. It was expected to be in place by the end of the year. Stewart Ballantine confirmed that it was SEPA’s intention to have this complete by that time.
- The shore test facility had been shutdown for a while and decay heat reduction continues to allow work to commence on the defueling activities.
- The site has submitted its hazard identification risk evaluation to the ONR as part of the required REPPIR (Radiation Emergency Preparedness and Public Information Regulations) submission. This will allow ONR to carry out their assessment to determine the detailed planning zone for the site.
- A number of internal audits had been undertaken.

- The Lonestar 2016 exercise had been successful and had been deemed adequate by the regulators.

Stewart Ballantine noted that Hugh Fearn SEPA inspector for Vulcan had indicated his willingness to come to DSG to provide an update at any time. Bob Earnshaw noted this and said this would be considered for future meetings.

John Deighan congratulated the Vulcan site on its apprentice programme. He asked whether the site also had a graduate programme. Cdr Dyke responded that if this was referred to the MOD then the answer was that it did have a graduate programme. However he could not respond to this in relation to Rolls Royce.

Action: DSG/SRSG(2016)M003/A006: DSG Secretariat to enquire whether Rolls Royce has a graduate programme.

Roger Saxon noted that defueling of the submarine reactor was due to commence in 2017 and asked whether regulatory audits would take place. Cdr Dyke confirmed this and added that DNSR were looking at planning audits to ensure processes were meeting requirements.

No further questions were raised.

Vulcan Defuel and Decommissioning Programme (VDAD):

Bob Earnshaw handed over to Simon Tinling and Wendy Newton who attended the sub group to provide an update on VDAD.

Simon Tinling thanked the group for inviting him to provide an update. He began by describing the role of his VDAD project team. He leads a team of 6 people most of whom are based in Abbey Wood at Bristol and have responsibility for planning, business case development and contracts for the Vulcan post operational phase and assessing options for the decommissioning phase. The team works extremely closely with the Vulcan site and especially with Cdr Ken Dyke who has overall responsible for day to day management of the site.

With a lot of the planning required at site level it has become important to base more of the VDAD team at Vulcan and Wendy Newton is now based in the area and working out of the Vulcan site. In addition, the decommissioning project manager post will be based in Caithness from August 16. This trend, towards basing the project team on-site, is expected to continue as the VDAD programme moves forward.

He noted that members were aware that the Shore Test reactor Facility (STF) reactor had been shutdown in July 2015 and the site had moved to a post-operational phase in which the STF reactor is to be defueled and fuel cleared from the site to be transferred to Sellafield for safe storage. It was expected that clearance of fuel from the site would be completed in the early 2020s which would then be the earliest stage at which decommissioning could begin. Between now and 2020, a business case and procurement strategy would be developed (requiring Treasury approvals) to deliver an agreed decommissioning programme. This was at an early stage and it will take a couple of years to get to the key preliminary decisions, including:

1. Confirming that the site can be released by MOD for decommissioning, ie. that MOD has no further uses for the site.
2. Deciding the timescales for decommissioning would take a number of considerations and a number of options had been identified from going straight into full decommissioning to care

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Action: DSG/SRSG(2016)M002/A007: Wendy Newton to liaise with June Love to agree appropriate sub group meetings to provide update on the future options of the site.

Simon Tinling commented that MOD was working with NDA on how options would be assessed and how this process is commissioned. Consideration would be taken into account to factor in how DSG is involved. He added that how the NDA and MOD worked together was at early stages and would be considered in more detail taking the Dounreay lifetime plan timeline into account.

Cllr Farlow stated that one of the most important assessments would be an economic impact assessment so that negative impacts of the site closure could be mitigated.

Roger Saxon asked whether MOD felt they could simply hand the site back over to NDA and leave quietly. Simon Tinling responded that this was not the case adding that MOD had responsibility for the liability of the site and this would remain the case until such time that the process for discharging this liability was defined and agreed. This would also take into account what (if anything) is needed for handover to the NDA which was still in discussions. Bob Earnshaw asked for clarification that no final decision in handing the site over to the NDA had been taken. Cdr Ken Dyke responded that the MOD still had a job to do to transfer fuel from the site which meant that currently they were getting infrastructure in place to allow this to be done. The fuel movements were expected to take over the next six years and therefore the site's liability would remain with MOD for some time to come.

Roy Blackburn said his understanding around the Magnox sites was that decommissioning referral for storage for 100 years into care and maintenance had now changed with more immediate decommissioning to continue rather than being put into a care and maintenance regime. Mike Brown responded that this was a multi variable equation. Cost was a significant factor in these decisions but it also had to tie in with UK Government to take forward.

Bob Earnshaw emphasised that the DSG would not want to turn up to a future meeting to be told that the site was being mothballed.

Cllr Roger Saxon noted that the future of the site would also have an impact on Rolls Royce although it was pleasing to hear public statements that they wished to remain in the county once Vulcan is closed.

There being no further issues raised, Bob Earnshaw thanked Simon Tinling and Wendy Newton for attending and providing the update.

7. ANY OTHER BUSINESS

Cllr George Farlow asked when the next RIFE (Radioactivity in Food and Environment) report was due to be published. Stewart Ballantine responded that it would be published by the end of the year.

Cllr Farlow noted that Graham Humphries, KIMO was to be congratulated for his endless engagement with Highland Council and others to ensure the extension of the emergency tug vessel.

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

Endorsed on 16th November 2016

Bob Earnshaw
DSG Site Restoration sub group chairman
22 July 2016

ACTIONS ARISING FROM THIS MEETING

DSG/SRSG(2016)M002/A001: June Love to pass Information on timber haulage to the Caithness Transport Forum.

DSG/SRSG(2016)M002/A002: Stewart Ballantine to discuss with SEPA rep regarding an update/presentation for a future restoration sub group meeting on the particles project.

DSG/SRSG(2017)M002/A003: DSG secretariat to seek approval for SCCORS to visit site and to provide DSG meeting dates for proposed visit.

DSG/SRSG(2016)M002/A004: DSG Secretariat to raise CNC update at next business meeting.

DSG/SRSG(2016)M002/A005: DSG secretariat to contact DNSR with a view to receiving written updates in time for site restoration sub group meetings.

DSG/SRSG(2016)M003/A006: DSG Secretariat to enquire whether Rolls Royce has a graduate programme.

DSG/SRSG(2016)M002/A007: Wendy Newton to liaise with June Love to agree appropriate sub group meetings to provide update on the future options of the site.