



Dounreay Site
Restoration Ltd

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Mr D Flear
DSG Chairman
Inkerman
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Direct Line:
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3 October 2016
Our Ref: 2016/022

Dear David

Thank you for making me aware of your correspondence to the Dounreay Stakeholder Group alleging poor practices in relation to waste segregation at Dounreay Site Restoration Limited (Dounreay).

Following receipt of your letter, I appointed a senior member of staff to lead a management investigation and report the findings directly to me.

This detailed investigation has now been concluded. It found that Dounreay has comprehensive procedures and practices to segregate and reduce the amount of waste consigned to the radioactive waste stream.

The site has an internal audit schedule which is required by the Radioactive Substances Act for consignors of radioactive waste, as well as a regular programme of inspections and audits carried out by the Scottish Environment Protection Agency (SEPA) and Office for Nuclear Regulation (ONR). No significant issues, with respect to the waste practices referred to in the letter received, have been identified through these processes.

Consistent with nuclear industry practices, a conservative approach will always be adopted to the off-site consignment of potentially radiological waste. Consequently, the practices and procedures in place reflect that. On this basis, I am satisfied to report that we have given full consideration to the points raised but have found no grounds for concern or issues that require action.

We take such claims incredibly seriously and, as a company, encourage everyone working at the site to report any concerns or suggestions for how we can improve the way we deliver our decommissioning projects. Above all it remains my priority, and that of the entire workforce, that we remain safe in everything we do.

Yours sincerely

A handwritten signature in black ink, appearing to read "Phil Craig".

Phil Craig
Managing Director, DSRL
phil.craig@dounreay.com

10th August 2016

Dear Sir, Madam

I wish to 'whistleblow' regarding poor behaviours and practices I observed while in temporary contract at Dounreay.

My concern is over the poor practice of segregation of radioactive wastes, with the result that more radiologically active waste ends up destined for expensive disposal than necessary.

I observed significant process and operational waste with negligible or minimum detectable levels of contamination being accepted into the 'low level' radioactive waste stream. This seemed in most cases down to simple laziness, paranoia or disproportionate caution to the potential for radioactive waste to enter clean waste streams.

In many cases, wastes were accepted for disposal to the on site disposal facility that were at 'MDC', in other words barely above or at detectable background radioactivity. This is a breach of the law regarding waste hierarchy transposed into law through the Waste (Scotland) Regulations which aims to minimise the amount and COST of waste requiring disposal.

Similar issues are resulting in unnecessarily high volumes of excavation spoil and soil from on site remediation, construction or clearance works being disposed into the 'demolition waste' vaults at Dounreay. Much of this waste would be suitable for disposal to conventional landfill or as 'very low level' waste to specialised landfill that can accept low active waste.

Insufficient effort is being made to segregate and divert such wastes away from highly engineered and costly disposal, with the result that less value for money is being secured from the taxpayer through NDA financing of waste management at DSRL.

These issues are to a large extent symptomatic of chronically poor management, leadership and communication within the waste management organisation and process on the Dounreay site that I fear have been allowed to develop unchallenged because of a 'culture of fear' or reticence to challenge established norms and behaviours.

I consider these practices to be evident of misconduct, wrongdoing and poor practice by senior management of the organisation and as such deserving of reporting to be properly dealt with.

I will also notify the NDA and SEPA of my concerns.

Yours faithfully