

DOUNREAY STAKEHOLDER GROUP

RESPONSE TO NDA DRAFT BUSINESS PLAN 2017 – 2020

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.

The DSG welcomes the opportunity to comment on the draft business plan.

General comments:

We recognise that there will be a number of issues that Brexit will impact on especially in relation to European regulations that impact on the nuclear sector. We have discussed this in our sub groups and understand that this should not be too much of an impact as the IAEA regulations still exist and the NDA estate would then fall under these regulations. However, it is important to recognise that major changes to regulations and policies could cause confusion and/or lead to substantial delays while this sorts itself out. Perhaps the NDA, once things become a bit clearer, could commit to provide an 'easy read' update on how changes to regulation will transition and how it would affect the NDA estate. The last thing that anyone would want to see is a new set of new bureaucracy confusing the landscape of an already heavily-regulated industry.

Understanding that NDA will concentrate on high hazard reduction it is noted that the Dounreay site has had to put considerable effort into reprioritising their decommissioning programme including the additional scope of work that reflects the programme for fuels. While we understand the drive to reprioritise these activities it has to be said that this has caused a number of adverse effects on the site and the DSG will look for assurances that continued funding of the site decommissioning activities will remain following the removal of the fuels to ensure that the site can be taken to interim end state. That said, the constant additional of scope, the change of programme, the prioritisation has all impacted on the clarity of the programme moving forward and worse in the morale of the workforce who have lived through constant change before and since the competition in 2012.

We sincerely hope that following approval of the new decommissioning programme for the Dounreay site that there is a period of stability. The continuing uncertainties and challenges faced by DSRL since 2012 has not been good for morale and has resulted in a deterioration of safety performance which has, and is taking, a disproportionate amount of effort by staff on site to get back to the pre-2012 level of performance. It was therefore disappointing that the NDA did not appear to appreciate that this would be an obvious consequence of continual changes in strategy and priorities and hope that lessons have been learned to ensure that the NDA have learned lessons with regard the potential negative impact that constant changes can make.

Following on from this, it is understanding that NDA wishes to say it has all the correct strategies in place and that these are working correctly, However, NDA need to acknowledge that it is learning by its' mistakes in contract strategy in light of the Sellafield contract being abandoned and the lost court case on the Magnox contract (albeit that you state this is being appealed). The constant changes in scope of the DSRL contract has, in our view, all resulted in a reduction of control NDA originally had over this contract.

The DSG's over-riding desire is to ensure that the target cost contract continues until the interim end state is reached. This allows surety on the employment – the workforce living in our area cannot be turned on and off like a tap and there has already been an adverse impact on changing priorities versus a target cost contract.

Specifically to the draft business case:

Research and Development

We welcome the ongoing commitment for R&D and the estate-wide sharing of good practice and consistency, where appropriate, across all sites. However, NDA should recognise that by rolling out something that may be good practice at one site may have a detrimental impact on another site.

Socio Economics

NDA needs to be more transparent in this area – when NDA was first set up they identified four priority areas – Caithness being one of them. It was disappointing that there was no formal communication route informing stakeholders of the changing focus of this. While DSG recognises that the Caithness and North Sutherland area has benefitted hugely from NDA investments a greater transparency is required across all sites and we would suggest the approach for sharing best practice across the NDA estate is more transparent. Socio economics for Caithness and North Sutherland needs to remain a high priority area especially when the site's staff complement (and local supply chain which supports the site) starts to noticeably reduce.

Skills

Everyone recognises that skills are an integral part of achieving the NDA's mission. As with the comment above regarding constant changes in programmes and workforce morale it is important to ensure that skills that the sites already have are retained as well as looking at new recruits.

Planned income and expenditure summary 2017/18

From a stakeholder group viewpoint, it would be useful to have some form of communication through the DSG to inform specific sites of the eventual planned budget for 2017/18. We note that the Dounreay site has been allocated £189m but this is caveated with note 2 [final annual site funding limits will be issued in March may be adjusted] and note 3 [NDA reserves the right ...].

While recognising the final business case will provide the approved funding limits it would be useful for the DSG to have in writing the reasons why the funding increases/decreases from the draft plan to the approved one.

Dounreay Site Restoration Ltd

On page 34, the main para states that the “..... LLW repository next to the site.” It may be clearer to those simply reading this document to make it explicit that the LLW repository is next to the ‘licensed’ site. DSG also believes it would be useful to use consistent wording to describe the LLW repository and change this to LLW Disposal Facility thus leaving no room for arguments later about what does ‘repository’ mean.

The last sentence in the first para also noted that this is the “current understanding of the updated plans and are subject to change”. It would be useful if NDA could spell out what the factors are that will ‘change’ the plan and include with that the consequences for costs and contract status.

In the key milestones section the word ‘dismantled’ is too vague. Does this mean taken apart and left neatly on the ground, floor slabs removed or not, all materials disposed of or what? A clearer definition or description is required.

We note that 2022 is the current key date for DFR dismantling which is only five years away. Is there a confidence, understanding some of the technical challenges that will continue in DFR for sometime to come, that this timescale can really be met?

The Shaft/Silo project has been one of these projects that have been stalled for various reasons over the last 10 years. What is the likelihood that the regulators will give their consent for operations in 3 years' time and then the whole operation can be concluded in a further 8 years – this appears to be somewhat ambitious in its scheduling and wonder if there is too much optimism on the timescales to ensure regulatory approval to allow this sort of work to commence.

More generally, we note the current key milestones and key activities for 2017/18 and note that if the site annual funding limit is adjusted in any way this would cause a potential impact on the activities. Therefore we would also ask that once the business case has been finalised that the DSG receives formal communication explaining the changes of budget and the likely impacts this will make on the key activities going forward.

In addition, while we recognise the sharing of best practice across all the sites, with the current contract strategies and PBO/SLC set ups how can NDA expect across site working and how does NDA assume SMEs can get into the market other than through small sub-contracts.

NDA Archives Ltd

Finally, DSG would like to put on record their delight that the archives are now finally built and sited at Wick. This is a project that the DSG was involved in from the offset and we congratulate the NDA for taking this forward, with socio economics within the build and management contracts and look forward to seeing the facility up and running in the not so distant future.

Sent on behalf of Dounreay Stakeholder Group

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1st February 2017

If responding to this submission please respond to: info@dounreaystakeholdergroup.org