

DOUNREAY STAKEHOLDER GROUP  
DSG SITE RESTORATION SUB GROUP

DSG/SRSG(2017)M001

Minutes of the DSG Site Restoration sub group meeting held on Wednesday 18th January 2017 at 1900 hrs in the Pentland Hotel (Georgina suite), Thurso.

Present:	Cllr Roger Saxon	Highland Council (Chair)
	Alastair MacDonald	DSG honorary member
	Brian Mutch	SGRPID
	Thelma MacKenzie	Thurso Community Council
	John Deighan	Dounreay Unions
	George MacDougall	Caithness West Community Council
	David Broughton	DSG member
	Roy Blackburn	DSG member
In addition:	Dawn Clasper	DSG Minute Secretary
	June Love	Dounreay Community Relations Manager (DSG Secretariat)
	Mark Raffle	NDA Programme Manager
	David Lowe	Deputy Managing Director, Dounreay
	Ella Feist	Dounreay Environmental Closure Department
	Cdr Ken Dyke	MOD Vulcan
	Sheila Hutchison	ONR (Dounreay)
	Stewart Ballantine	SEPA
	Pat Green	CNC
	Paul Dale	SEPA (for agenda item 6)
	David Collier	Consultant (Reviewing DSG)

### 1. WELCOME AND INTRODUCTIONS

Roger Saxon welcomed everyone to the meeting. He stated that he would be chairing this meeting in the absence of Bob Earnshaw, DSG Site Restoration sub group chairman. Roger Saxon welcomed Paul Dale, representing SEPA, who was attending to provide an update on the particles project. He also welcomed David Collier, external consultant, who was observing the meeting and providing a brief update on the DSG Review.

### 2. APOLOGIES

Apologies were received from:

)	David Flear	DSG Chairman
)	Mike Flavell	NHS Highland
)	Cllr Willie Mackay	Highland Council
)	Bob Earnshaw	Site Restoration sub group chairman
)	Cllr George Farlow	Highland Council
)	Alun Griffiths	ONR, Vulcan
)	James Bryson	DNSR, Vulcan

### 3. MINUTES OF LAST MEETING

Roger Saxon noted that the minutes – DSG/SRSG(2016)M003 – had been circulated to members in advance. These were accepted as a true reflection of the meeting. This was proposed by Thelma Mackenzie and seconded by David Broughton.

No issues were raised.

#### 4. ACTIONS

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

- J DSG(2016)M004/A011: June Love to liaise with Pat Green CNC about extending the invitation to visit CNC on site to DSG members. Action Ongoing: It was noted that a date for this visit would be identified shortly and an invitation would be extended to all DSG members.
- J DSG(2016)M003/A011: Stewart Ballantine to discuss with SEPA rep regarding an update/ presentation for a future restoration sub group meeting on the particles project. Action ongoing: See minute item no 6.
- J DSG(2016)M003/A016: Wendy Newton to liaise with June Love to agree appropriate sub group meetings to provide update on the future options of the site. Action ongoing: this will be discussed at April sub group meeting.

David Broughton noted that action DSG(2016)M004/A010 stated “there are no raffinate heels remaining”. He questioned whether raffinate was not still present in the acid and whether it was possible to flush all the raffinate. David Lowe responded that by carrying out four flushes the concentration and any remaining raffinate was very low. David Broughton asked if it would still be radioactive and therefore needed to be cemented. David Lowe responded that this was the case and could potentially be sentenced as low level waste.

David Broughton stated that he would comment further on action DSG(2016)M004/A008 (LLWR) later in the meeting.

#### 5. DOUNREAY UPDATE

Roger Saxon noted that a number of written papers had been distributed to members in advance of the meeting including:

- J DSG(2017)P005: Dounreay report
- J DSG(2017)P001: SEPA report
- J DSG(2017)P006: ONR report

He invited the following to provide updates:

NDA: Mark Raffle, NDA provided the following update:

- J The NDA archive, Nucleus, is now complete and a preview event would be held on the 13<sup>th</sup> February, before opening to the public on the 14<sup>th</sup> February.

June Love noted that all DSG members had received an invitation to the preview event and was currently co-ordinating transport for those who required it.

- J Steven Henwood, NDA Chairman would be in Caithness on 13-15 February and would also be attending the Nucleus preview as well as visiting the site.

- ) NDA had commenced a consultation on the proposed pension reforms which impacts on those on the defined benefits schemes. This is being managed by a small team in NDA with support from site Human Resource department and the National Union Officers.
- ) NDA continues to work with the Japanese on a number of fronts. Discussions with Japan Atomic Power Company (JAPC) have been undertaken recently and their delegates had visited the Hunterston Site. At present NDA personnel were participating in a wider UK trade mission to Japan and Taiwan.

June Love noted that Adrian Simper had been awarded an OBE and an action has been placed at the DSG Socio Economic sub group to send a letter to congratulate him.

June Love noted that Steven Henwood would be stepping down as the NDA Chairman and this would be recognised by the DSG with a small gift of appreciation for the support that he has provided over the years.

Roger Saxon thanked Mark Raffle for his input and invited questions from members.

David Broughton asked if the trade mission was to allow NDA to sell decommissioning skills. Mark Raffle responded that it was a much wider UK trade mission but there was a nuclear component. NDA's previous involvement when dealing with other countries had often been to provide information on the contract model.

[Secretary's note: Following the meeting Mark Raffle provided a link regarding the Trade Mission to Japan & Taiwan. The Japan pages are selected but this programme also operates in other parts of the world Link: <http://www.exporttojapan.co.uk/event/uk-japan-nuclear-industry-forum-2017>]

Dounreay update: (DSG(2017)P005 refers)

David Lowe, Deputy Managing Director, Dounreay provided the following update:

- ) Discussions continued with NDA on the updated decommissioning plan. The site's priorities for 2017 included safe, secure and environmental compliant operations, the Exotics program and the breeder removal and shipping.
- ) The TRIR was showing an improvement at .42 and as of 18<sup>th</sup> January the site had gone 141 days without a lost time accident.
- ) The safety culture survey was completed in November and about 400 people returned questionnaires. An independent consultant was collating the data and would be on site to speak to various groups to get further information before finalising the report at the end of March. This would be made available to the workforce and trade unions.
- ) The project team was continuing to provide information on the waste containers to SEPA, regarding the issues associated with the build-up of pressure and ullage. A trial of the grouting was being carried out to fully fill the waste containers. The work was on schedule to provide this information to SEPA in February.
- ) The Dounreay Improvement Team was stood down at the end of 2016 and the outstanding actions have been incorporated into the Chief Nuclear Officer's improvement plan. This would be a living document that will be updated on a monthly basis.

- ) The Emergency arrangement handbook was currently under review. If there were significant changes identified it would be updated and re-issued to local householders within the Detailed Emergency Planning Zones.

Roger Saxon thanked David Lowe for his input and invited questions from members.

Roy Blackburn noted that the last report had been very detailed while this report appeared to have been reduced in regards to reporting performance. June Love responded that this was due to the main public meeting of DSG which had been held mid-December, followed by the site Christmas closure, which meant there was less to report at this particular time. She noted that the format and content of the report should be considered as part of the DSG review.

Roy Blackburn noted that the Shaft and Silo project scope was reduced at present and it appeared that it was one of these projects that, at one stage, were a priority only to be delayed because of other priorities on site. He stated that this could not be good for staff morale.

David Lowe responded that the staff had been concerned when the project timescale was moved, but the site priority was exotics and several people from the shaft/silo project team were now working on the exotics programme. There was still a small project team advancing the shaft/silo project, but at this time the emphasis had to be on the exotics programme. David Broughton asked whether the water continued to be pumped out of the shaft to maintain its integrity. David Lowe responded that this was continuing and the levels in the shaft were managed and periodically pumped out water. He added that since the shaft had been grouted it had dramatically lowered the rate of influx of water.

June Love commented, on behalf of Bob Earnshaw, that he had been delighted to read that the graduate and apprentice recruitment was continuing in 2017.

June Love also noted, on behalf of Bob Earnshaw, that one of the project milestones appeared to be at risk (D1206 – Decommissioning sample tank annex) and asked whether this was recoverable. David Lowe responded that it was at risk just now but the project team was still working and hoped to complete the milestone by the end of March. This delay had resulted from a glovebox spill of material and the clean-up and recovery from that had taken some time to rectify.

Roger Saxon handed over to Ella Feist for an update on the site end state and related projects. Ella Feist, Environmental, Closure & Demolition Department Manager reported the following:

- ) Highland Council Planning Framework: Under the Highland Council planning framework, the draft environment statement was provided to Highland Council for initial response which will help inform the application when it is submitted. Comments had been received from SEPA and the site was currently awaiting a response from Highland Council.
- ) Site end State Review: The review process had been completed and it was showing little change to the preferred end state that was determined in 2007.

The key issues for site end state would be based on the GRR as this would allow demolitions with low level waste being left in situ in the walls of deep structures and would also allow the demolitions of low level waste to be used as, for example, backfill for foundations and/or floor slabs. While this showed that the mass balance would reduce it would still require some backfill material would be required. Preparation of the decision paper, following the NDA guidance, for the business cases is underway and this will be delivered to the NDA by the end of January 2017.

- ) Interim End State Landscape: Work was ongoing with NDA to address some of the comments on the options paper that was put forward. It is anticipated these will be addressed by the end of the month and resubmitted to NDA to consider which option would be best to go forward with.
- ) Liquid Effluent Discharge System: The survey of the pipes has been completed and summary documents of the feedback from the workshops have been completed. It is evident that different options will apply to the different part of the system, ie pipes on land, pipes under the sea and the diffuser chamber. An action plan is being submitted to SEPA outlining the next steps to implement the options.
- ) Particles: A review of the Particles BPEO was underway and at present consideration of the data collected since 2009/10 was being undertaken.

In December 2016, during routine monitoring of the foreshore, a particle had been detected that was different from other particles previously found. Information had been provided to SEPA.

Roger Saxon thanked Ella Feist for her input and invited questions from members.

David Broughton noted ongoing work with the interim end state and the landscaping review but pointed out that three ILW stores would remain on site. He asked how, if the option goes forward, a heritage trail could be achieved with radioactive facilities still in place. Ella Feist responded that the positioning of the stores had been considered and would be in one central area of the site and this would be where the most highly contaminated surfaces would remain. It was feasible to utilise land further away that could be opened up to such a trail as it would free of contamination.

David Broughton asked if the new Liquid Effluent discharge system would be decommissioned before the interim end state. Ella Feist responded that this was correct.

SEPA: (DSG(2017)P001 refers). Stewart Ballantine, SEPA provided the following update:

- ) The 2015 Compliance Assessment Scheme results had now been published. The end of year compliance assessment for Dounreay would be completed for 2016 shortly. The results for 2016 would be published later in the year.
- ) The wet silo investigation was ongoing with additional information from Dounreay being provided to SEPA last month. It was hoped that this investigation would be completed shortly and the outcome would be available at the March DSG meeting.
- ) With reference to Vulcan, the Authorisation issued came into force on the 1 January 2017. This did not change the limits but updated the format and conditions.

Roger Saxon thanked Stewart Ballantine for his input and invited questions from members.

John Deighan asked what the words “broadly compliant” meant. Stewart Ballantine responded it was considered to be a compliant site. He added that there was a range of terminology that sit within in the process and broadly complaint meant that it is a compliant site overall in terms of SEPA’s Compliance Assessment Scheme and forward programming work. If this was deemed to drop

below this standard SEPA would increase their inspections until satisfied the site was compliant. At present the site was on the right side of the line.

June Love, commenting on behalf of Bob Earnshaw, noted that the site was due to go back to SEPA in relation to information on the LLW facility by the end of February. Bob Earnshaw had asked whether this would be a quick turnaround from SEPA once that information had been received. Stewart Ballantine responded that until he had read through the information provided he could not make any promises but added that he had been kept updated by the site and was comfortable with the information informally shared to date. However, until he had had the opportunity to consider all information he would not like to comment on timescales.

June Love, commenting on behalf of David Flear, noted that SEPA had provided feedback to the Highland Council on the Environmental Impact Assessment (for Planning Framework Phase 3) and asked if there had been anything contentious raised in the feedback. Stewart Ballantine responded that the comments feedback related to more focus on some of the non-radioactive aspects.

ONR: (DSG(2017)P006 refers). Sheila Hutchison, ONR reported:

- ) ONR were continuing with scheduled compliance inspections. The most significant matter during last quarter related to the glove box contamination incident that had been formally reported to ONR. ONR was satisfied with DSRL's response to the event. Due to the levels of contamination released into the facility the incident will be included in the quarterly statement of nuclear incidents at nuclear installations published on ONR's website.

CNC: Pat Green reported:

- ) CNC were continuing their community work with visits to Reay school. Invitations had also been extended to the High Schools to visit site to look round the Police Command and Control Building and provide information on planning operations. ,
- ) An invitation to DSG and the Buldoo residents had been extended to visit the site and a date was currently being considered. Invitations would go out shortly.
- ) Cllr Matthew Reiss had visited the CNC's facilities in December 2016.
- ) Support from CNC continues to Police Scotland and over the xmas/new year period CNC supported with resourcing within the local area.
- ) CNC, over the last few years, have been involved in charity events which has benefited cancer charities.
- ) There had been no major issues raised within the community since the last meeting.

Roger Saxon thanked Pat Green for his input and invited questions from members.

June Love asked if the CNC were still recruiting. Pat Green responded that they held recently held a recruitment day on the 17 January 2017.

John Deighan asked if new recruits were trained for other nuclear sites. Pat Green advised all the training was carried out Risley. Local recruitment events were held but the training was done in relation to all CNC sites and therefore it made sense to do this centrally.

John Deighan advised that, on behalf of the Dounreay Trade Unions, they would be happy to help out with any charity events. Pat Green thanked John Deighan for this.

As there were no further questions relating to the Dounreay activities, Roger Saxon thanked everyone for their input.

## 6. PARTICLES UPDATE

Roger Saxon noted that this action had been placed as a result of the PRAG(D) (Particles Retrieval Advisory Group (Dounreay)) final report which had been delayed over two years. DSG were interested in the outcome of this report as it had been expected that the final report from PRAG(D) would have indicated criteria for an end state for this project. He thanked Paul Dale for attending the meeting to provide an update.

Paul Dale stated that before he addressed this issue it was worthwhile reminding members the history of this project.

Beach monitoring was originally carried out by the site, and was now included within the sites authorisation. The requirements of the beach monitoring within the authorisation is periodically reviewed and at the last review the new authorisation included the beach monitoring programme with the number of beaches being reduced to the Dounreay foreshore, Sandside and other outlying beaches. Therefore other beaches which were previously monitored (Thurso, Scrabster and Dunnet) had ceased.

The work undertaken offshore was not at the request of SEPA nor was under the direct control of DPAG or PRAGD. The offshore clean-up was undertaken as a result of the BPEO carried out by the site and this did not involve SEPA. SEPA, DPAG and PRAG(D) had not been involved in that process and therefore the end points that were defined from the site's BPEO. SEPA had been an observer at the BPEO workshops but this was to ensure factual accuracy of the information being provided to stakeholders. The actual process and duration of offshore clean-up was a decision taken by the site.

PRAG(D) was formed in order to provide information and advice to the site to optimise that offshore recovery programme within the constraints of the sites defined recovery programme. In terms of the offshore recovery programme, a significant number of particles were detected and removed. It was acknowledged at the time of the BPEO that particles offshore could only be recovered from a specific depth and some of particles were likely to be buried deeper and therefore could not be recovered. At that time, it was hypothesised that because a period of time had elapsed since any significant storms that those deeper particles would remain in situ for a protracted period of time and due to radioactive decay the hazard posed would reduce. Following completion of the offshore work by the site, there was a significant storm in 2013 and it is believed that this may have remobilised the deeper buried particles and brought them back to the surface which resulted in the detection of particles on the Dounreay Foreshore .

The work of DPAG and PRAGD suggested that there might be a significant time delay of depletion of any offshore caches and the effects on the onshore detection rates at Sandside Bay. This could mean that if a significant cache of particles had been disturbed by the storms these could migrate to the Dounreay foreshore or Sandside a number of years after the storm .

Particles continue to be detected on the foreshore and Sandside and that is why these continue to be part of SEPA's authorisation requirements.

When SEPA reviewed the requirements for the authorisation consideration was given to reducing the beach monitoring programme and comments received from site and a number of other parties expressed a desire to continue with a monthly programme at Sandside. The programme, in terms of what is specified by SEPA requires, is only the beach monitoring program.

SEPA would consider the an end point for beach monitoring when it is assessed that particles which could cause significant harm and encountered by the public are not continuing to come on to the shore. The end point for the offshore recovery programme remains for the site to consider as that programme was the result of the BPEO.

Roger Saxon thanked Paul Dale for his input and invited questions from members.

Roy Blackburn asked how a suitable period of time would be determined, would it be over a suitable period of time or the frequency that particles are returning to the shore? He also asked whether any further studies are being undertaken to try to estimate the remaining cache. He felt that there must be some method that can determine an estimated timescale or criteria which could clearly define the end point. Paul Dale responded that there was logic in the consultation document that proposed a stepwise reduction in the beach monitoring programme however there were various triggers that could be introduced to review the programme. This will be refreshed at an appropriate opportunity but at this point in time there was no reason to reduce the beach monitoring programme.

Roger Saxon noted that the BPEO was currently being reviewed. Ella Feist responded that they are in the process of reviewing this as with all BPEOs it was useful to look back after a period of time and consider if there had been advances made in technology, or that additional information not known at the original BPEO could result in different considerations going forward.

June Love asked Paul Dale to explain how the process of considering the data collection of particles was now being considered given that PRAG(D) in its present form had been disbanded. Paul Dale responded that SEPA has a group called Environmental Radioactive Monitoring Task Team (ERMTT), chaired by Paul Dale, with representation from Scottish Government, Food Standards Scotland, SNH, Public Health England (formerly NRPB) and other invitees as and when appropriate. This group was a standing committee and looks at all radioactive monitoring programs across Scotland and ensure these are fit for purpose. The grouping that used to be DPAG and subsequently evolved into PRAGD is now a sub group of ERMTT and now reports through that process. It was felt that this was an appropriate forum to take discussion through so everybody who has an interest is informed on the work that the sub group is undertaking and the advice provided is appropriate. Representation from the Dounreay site is invited to attend in an observer capacity.

Roger Saxon commented that he had not seen any recent announcements in the press regarding the detection of particles. June Love responded that every particle detected and recovered is now updated through the site's website. Alastair MacDonald noted that in the past any particle detected resulted in very negative headlines in the local press and did not necessarily reported the potential low risk of a particular find.

David Lowe responded that risk was a relative factor and the perception of risk was something that was very difficult to quantify. All the site could do was provide factual information however it was recognised that journalists were there to sell newspaper and that headlines sometimes did not concur with the actual information provided.



David Broughton commented the while it was understood that the risk was relatively low the cost was enormous to the taxpayer. Paul Dale responded the problem was that the risk was a dynamic one and the principles were well established in terms of the proportionate risks with some of the sources that have been recovered offshore and on the Dounreay foreshore which could give a significant health consequence in a very short timescale.

What was actually being undertaken in terms of the requirements for the beach monitoring was proportionate to the hazards and the occurrences on the basis of the knowledge that exists at this time. The response of any risk is based on not only what is known now but includes the confidence on what might change in the future (the precautionary principle). Although the beach monitoring programme is specified in SPEAs authorisation, SEPA had proposed to reduce the frequency of beach monitoring but the site had responded with a preference to continue with a more intensive programme of beach monitoring.

Action: DSG/SRSG(2017)M001/A001: Ella Feist to provide an explanation of why the site chose to continue frequency of beach monitoring.

June Love, commenting on behalf of David Flear, asked when the site reaches the interim end state what guarantees were there that monitoring would continue if required. Stewart Ballantine responded there would be a requirement for an authorisation to be in place for a considerable period of time after interim end state that would include the requirement to monitor different areas of the site.

## 7. VULCAN

Roger Saxon noted three written reports had been received prior to the meeting.

- ) DSG(2017)P008: Vulcan update
- ) DSG(2017)P002: Rolls Royce update
- ) DSG(2017)P007: ONR report

Cdr Ken Dyke highlighted the following:

- ) There had been no lost time accidents, injuries or RIDDOR reportable incidents in 2016.
- ) There had been 3 key safety campaigns scheduled in 2016 and these were all complete.
- ) Future safety workshops and campaigns would continue during 2017.
- ) There were no environmental non-compliance incidents since the last report to the DSG.
- ) The figures for the radioactive waste disposal were previously measured against the SEPA AOA which was in force until the end of last year. There would be a change in the next report as they will be aligned to the new approval that has been received.
- ) Shore test facility programme continues with training being undertaken for the defueling of the facility. There have been no events that required reporting to the regulators.
- ) The Vulcan Defueling and Decommissioning programme continues. There had been a change in management with Steve Firth no longer part of the management chain. Wendy Newton has been given responsibility for the whole scope of the Vulcan programme.

) As mentioned by David Lowe in the Dounreay update, the Emergency arrangement book was currently under review and this ties into the Hazard Identification and Risk Evaluation that Vulcan has submitted to ONR for determination of what the Emergency Planning requirements should be.

Roger Saxon thanked Cdr Ken Dyke for his input and invited questions from members.

June Love, commenting on behalf of David Flear, asked when were all the options for the future of the Vulcan site going to be published to allow stakeholders to provide views. Ken Dyke responded that it was quite difficult to identify as MOD did not have the same requirements as the NDA when it came to consultation with the community. He recognised that the DSG had strong views on this subject and there was also recognition that stakeholder expectations would have to be managed. Wendy Newton is aware of the action from a DSG meeting and a response was outstanding.

No further questions were raised.

The Rolls Royce and ONR updates were considered with no questions raised. June Love noted that Bob Earnshaw had asked that his congratulations were provided to Rolls Royce for the continued apprenticeship programme.

#### 8. DSG REVIEW

Roger Saxon noted that DSG members were aware that a review was currently being carried out. He invited David Collier to provide a brief update.

David Collier noted that he had carried out many reviews over the past 5, 10 and 15 years. The first was for the DTI (Department for Trade and Industry) to explore the best model for the stakeholder groups within the NDA estate and the Dounreay SG had been the model that was then mirrored by others.

He briefly provided some background information on the last review undertaken and intimated that he would be speaking with as many DSG members and observers as he could to ensure that he had a full picture of the various views. A report would be structured following the various discussions.

Recalling previous reviews, there were a number of areas to look back on to see how these had moved forward including such things as long range planning for DSG activities and toughening up the oversight element particularly at Vulcan, as well as looking at potential overlaps (within the socio economic remit) of other groups and committees.

He noted that, at this point, he was observing DSG and the sub groups and would have discussed with a number of stakeholders their views by mid-February which would allow a draft report to be developed. The report would be ready for the March meeting however it would not be a topic for that meeting as there would not be enough time for members to digest the information coming forward. It was planned that a workshop for DSG members would be held as soon as possible following the March meeting.

Roger Saxon thanked David Collier for his input and invited questions from members.

Ken Dyke noted that Vulcan had a very different remit to the NDA site at this forum with the requirements under the authorisation conditions to have engagement with the local community to demonstrate that the site was operating in a safe manner.

June Love noted that Phil Craig has agreed to provide a presentation on decommissioning progress for 2015/16 and to outline key activities going forward in 2017/18. This may allow consideration of topics to be discussed at a meaningful time.

#### 9. CORRESPONDENCE

Roger Saxon noted correspondence which had been received since the last DSG meeting, including:

- J The NDA Site stakeholder briefing for January (DSG(2017)C0001 refers). This was noted by members.
- J NDA Business plan 2017 (out for consultation). Roger Saxon stated that members had received a copy of the draft business plan and asked for comments/views to be provided to June Love to allow DSG to submit a response to this consultation.

Action: DSG/SESG(2017)M001/A002: DSG members to provide comments to June Love on the draft NDA Business Plan.

John Deighan asked how Brexit would affect the NDA draft business plan and the wider NDA estate going forward and whether there was a plan B in place? Mark Raffle responded that it was difficult to be prescriptive at this time and until the full extent of Brexit is known the NDA is working on the assumption that little impact will be made on funding issues. However, there would be changes to the laws which govern the NDA estate and there was a possibility to revert to IAEA regulations but this was still being considered at this point in time.

Roger Saxon asked whether NDA would remain working under the Euratom regulations. Mark Raffle responded that this question had been asked before and this was currently being considered in terms of all the nuclear regulations which are currently part of UK being within the EU.

- J SG Higher Activity Waste policy: Roger Saxon stated that members had received a copy of the document.
- J Guidance on Requirements for Release of Nuclear Sites from Radioactive Substances Regulation: SEPA, along with Environmental Agency and Natural Resources (Wales) had published a report summarising the analysis of consultation comments setting out how finalised guidance will be developed in relation to the release of nuclear sites from radioactive substances regulation. The report had been circulated to members electronically and hard copies (without appendices) had been provided within the paperwork for this meeting. Roger Saxon noted that if any member wished a full copy of the report to request that directly from June Love. David Broughton asked for copies of the full document.

Action: DSG/SRSG(2017)M001/A003: June Love to provide David Broughton with a hard copy of the full document on Guidance on Requirements for Release of Nuclear Sites from Radioactive Substances Regulation.

- J The Scottish Government and SEPA had begun a joint consultation on proposals for a new integrated environmental authorisation framework. This new framework plans to bring together the authorisation, procedural and enforcement arrangements for existing regimes relating to water, waste, radioactive substances and pollution prevention and control. The consultation also has some proposals for changes to the existing regulatory regime for radioactive substances in Scotland. The consultation document had been circulated to

members in advance of the meeting and it was noted that SEPA had stated they would be conducting engagement sessions during the consultation period which runs to 12<sup>th</sup> April.

June Love asked Stewart Ballantine if he knew whether SEPA were intending to hold an engagement session in Caithness or whether DSG representatives would be invited to attend a session elsewhere. Stewart Ballantine responded that he was not aware of the arrangements being put in place but would ask the question and respond.

Action: DSG/SRSG(2017)M001/A004: Stewart Ballantine to confirm whether SEPA are considering holding an engagement session in Caithness in relation to the consultation on the new integrated environmental authorisation framework.

- ) Highland Council response to Regulation of nuclear sites: Highland Council had provided DSG with a copy of its response to the regulation of nuclear sites nearing completion. DSG, along with HC, had been represented at a workshop in Manchester before Christmas and DSG had submitted views to this.

#### 10. ANY OTHER BUSINESS

Before opening up to the members, Roger Saxon the following:

- ) The DSG business meeting would be held shortly and would focus on the arrangements for the upcoming AGM and public meeting. At the March meeting Phil Craig, MD for Dounreay would provide a presentation on the progress of decommissioning activities and key milestones for 2017/18.
- ) A Scottish Government Scottish Nuclear Sites meeting would be held on 23<sup>rd</sup> March and DSG would be represented at this. At the last meeting the DSG Chairman had taken an action to write to the Cabinet Secretary to invite her along to the next meeting and this invitation had been sent jointly by Dounreay, Chapelcross and Hunterston stakeholder group chairs. The invitation had been accepted and if members wished to see anything raised at this meeting they should speak to June Love who would co-ordinate a briefing document for this meeting.
- ) The DSG AGM would obviously bring about some changes to the chair, vice-chair and sub group roles and every attempt will be made to keep members up to date prior to the AGM. Previous correspondence had been circulated relating to individual's willingness to be nominated or continue in an official role but this did not preclude others from volunteering or being nominated if they wished. If anyone had an interest in being considered for an official position within the DSG they were free to do so in advance or at the AGM.

Roger Saxon then invited all members to raise anything further.

- ) June Love commented that there had been a Freedom of Information request to the Scottish Government regarding fuel moves and transportation. The document DSG(2016)C037: Transport of nuclear materials had previously been provided to Scottish Government and therefore would form part of their response.
- ) David Broughton asked about consistency and possible regulation between England and Scotland in that there appeared to be differences within the regulatory regime for the low level waste facilities at Drigg (Cumbria) and Dounreay. As an example the Dounreay facility was designed with roofs while the Cumbrian facility didn't have any roofs and were open to the elements. It appeared that the Environment Agency and ONR were content for the facility to be

open to these elements which would rust away over time. Meanwhile at Dounreay there was concern over a minor problem of gas build-up of grout which if a few holes were drilled into the lids would alleviate this issue. He concluded that there appeared to be a big disparity in the management of low level waste. Stewart Ballantine responded that, in terms of the containers requiring a couple of holes to fix them, there were far wider issues than that and Dounreay had been asked to look at this in terms of the long term structural integrity of the vaults and how this would align with the performance assessment that supported the decision to give the facility an authorisation. The inclusion of the roof came about through a long process between DSRL, their contractors and consultants, and the regulatory agencies and this had been concluded as the most optimised design for that facility.

- ) David Broughton asked if DSG would receive an update on the solution of the gas evolution in the waste containers once it had been reported to SEPA. Stewart Ballantine responded that once all the information from Dounreay had been received and reviewed he would be happy to update the group.

#### 11. CLOSE

There being no further business, Roger Saxon thanked everyone for their input and formally closed the meeting.

Roger Saxon  
Acting DSG Site Restoration sub group chairman  
1<sup>st</sup> February 2017

ACTIONS ARISING FROM THIS MEETING

DSG/SRSG(2017)M001/A001: Ella Feist to provide an explanation of why the site chose to continue frequency of beach monitoring.

DSG/SESG(2017)M001/A002: DSG members to provide comments to June Love on the draft NDA Business Plan.

DSG/SRSG(2017)M001/A003: June Love to provide David Broughton with a hard copy of the full document on Guidance on Requirements for Release of Nuclear Sites from Radioactive Substances Regulation.

DSG/SRSG(2017)M001/A004: Stewart Ballantine to confirm whether SEPA are considering holding an engagement session in Caithness in relation to the consultation on the new integrated environmental authorisation framework.