



28<sup>th</sup> August 2017  
Ref: DSG(2017)C029

Dounreay Site Restoration Ltd  
Dounreay  
Thurso, Caithness, KW14 7TZ

**Please respond to:**

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Dear Sir/Madam

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 provide comment/views on the Dounreay Planning Phase 3 which is outlined below:

- When the competition for the site was competed it was estimated that it would take to around 2023-25 and cost around £1.5 billion to complete the job. We have been told that additional work was placed after the contract was awarded and that is the reason the date has pushed out to the 2030s – can you provide the total decommissioning cost now in comparison to what was announced when the contract was awarded.
- Understanding the fuels is a priority for the coming year – when does NDA expect to approve the whole decommissioning plan – isn't it in your best interests to get this approved so the planning for site and the impact on resources can be managed appropriately?
- DSG members are unclear as to whether responsibility lies with the NDA or Dounreay and up to what point responsibility changes. Clarity would be useful as to when the CDP contract terminates, ie what does reaching interim end state mean (does it complete after the site is completely landscaped). It would be useful to understand where responsibility stops under the CDP contract.
- For Cavendish Dounreay Partnership when does your contract expire? It would be useful to understand when CDP's responsibility for the site ceases, eg at the stage where landscaping is complete or when all the buildings are decommissioned and demolished.
- The site's intention is to empty the existing low level waste pits which are currently situated on site. Does this mean that you now know how many of the six vaults in the new facility you will require. We are aware, under separate planning approvals you have the ability to construct six vaults. You have recently announced the next two will be constructed – have you got a measure on whether you

will need vaults 5 and 6?

- We note the shaft/silo facilities are programmed to be emptied during this phase of decommissioning. What happens to the shaft platform once remediation of the shaft is complete.
- The final artist impressions of what the site looks like when all decommissioning is complete shows the waste stores and a security building. Why wouldn't you put a new security building sitting within the footprint of the stores to reduce the size of a licensed site. That would leave the rest of the area completely open.
- What type of security is required when the waste stores are the only buildings remaining?
- Consideration should be given to community benefit/planning gain for the Higher Activity Waste Stores (noting that one has already received planning). The community benefit funding related to the low level waste facility is of value and is being well utilised. The higher activity waste stores will remain on site forever (under current Scottish Government Policy). This means there is an inter-generational blight and community benefit should be considered.
- Are you going to have some signage on the site so that future generations know there is a low level waste facility in the area as well as the intermediate level waste stores.
- Are you planning putting something on the site to commemorate the fact the site used to be there?
- Does the site have a clear idea of when the emergency arrangements for those in the emergency zone cease?
- A new firing range was constructed for CNC police training. We believe the planning conditions include knocking this down when no longer required. What would happen if a community group came along and asked for it to remain as part of a commercial venture? Who would take the decision on this if planning was minded to consider changing the planning condition?
- It would be useful to have some clarity on the particles clean-up project as the site moves into phase 3 decommissioning. Will monitoring continue after interim end state or is this considered no longer a problem?
- What would happen if your planning was rejected at this stage?

Yours sincerely

**Roger Saxon**  
**DSG Chairman**