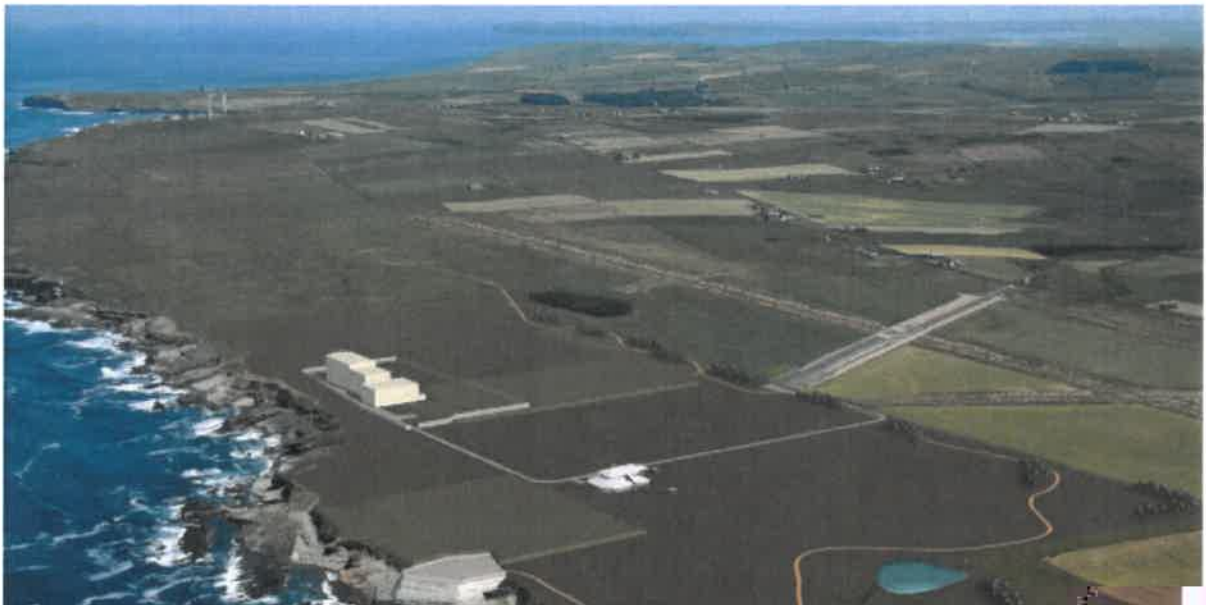


Dounreay's phase three planning submission Pre-planning application consultation report



Outline landscape strategy at IES - artist's impression.

Foreword



Cavendish Dounreay Partnership was awarded the closure contract to decommission the Dounreay site in 2012. This was a first for the Nuclear Decommissioning Authority (NDA) which awarded its first target cost contract to take a site through to its interim end state.

At that point the site had just entered phase two of the decommissioning programme which required planning approval for the activities covering 2012-2018. While additional work and changing priorities has resulted in the programme being extended to 2020-22, the work

undertaken from 2012 clearly demonstrates hazard

reduction on every front, from the destruction of liquid

metals to the immobilisation of raffinates and the removal of

special nuclear materials.

This work could not have been undertaken without the commitment and professionalism of the

Dounreay workforce and it is to the credit of our staff and supply chain partners for getting the

programme to where it is now.

We are now moving into the third phase of our decommissioning programme. Projects that were

deferred to the chance of re-entries within the programme will be completed in phase 3 along

with the other major decommissioning activities.

Work in phase 3 will include the removal of the remaining liquid metals and the removal of

high level waste from the site. It will also include the removal of the remaining special nuclear

materials and the removal of the remaining low level waste from the site.

This work could not have been undertaken without the commitment and professionalism of the

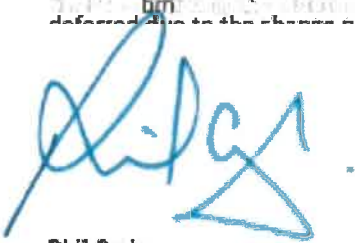
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Phil Craig
Managing Director, Dounreay

Introduction

A planning application is due to be submitted to The Highland Council for phase three of the Dounreay site's decommissioning programme in late September 2017. Phase three covers the period 2018 to interim end state (estimated to be 2030-2033). This phase will include projects such as shaft and silo decommissioning, flask handling facility (new construction); Low Level Waste pits retrieval, a number of demolitions and site remediation/landscaping.

The Highland Council, in its pre-application advice, outlined their expectations that the company carry out early consultation on the proposals contained within the planning application.

In June 2017, as a result of this advice, Dounreay Site Restoration Limited:

- Provided an outline to The Highland Council on the activities that the site would undertake to consult/engage or inform, as appropriate:
- Identified the main stakeholders;
- Outlined a programme of activities to engage with stakeholders and the public; and,
- Outlined the briefing material which would be made available to stakeholders and the public.

Since 2002, DSRL has consulted on a number of projects that could have had the potential to create a significant impact off-site and where there were real options that needed to be considered. The site team used a well-defined process to identify the best practicable environmental option (BPEO) and seeks to engage members of the public and interested parties at the earliest opportunity. Notably, consultations have been undertaken on:

- Dealing with the Shaft End State; and,
- Defining the Dounreay Site End State.

Since these consultations took place a number of assumptions that were made have now been clarified, e.g. Scottish Government's policy on higher activity waste with building and ground surveys providing improved information. DSRL recognises that this could impact on the original

Consultation/engagement activities

During June 2017 public information was published which included:

- A leaflet providing a summary of the phase three planning submission.
- A draft non-technical Environmental Statement summary.

During June 2017 the following activities were undertaken:

- Pre-briefings were provided to key stakeholders including politicians (MP and MSP), Highland Councillors, Regulators, Scottish Government Radioactive Waste team and the Nuclear Decommissioning Authority.
- The information was published on the Dounreay website accompanied by a public leaflet inviting views to be submitted.
- Invitations were sent to Caithness West Community Council, Dounreay Stakeholder Group and The Highland Council (local wards) offering presentations on the application.

- Advertisements were published in the local press detailing information of the drop-in sessions organised.
- Information was displayed in the Dounreay.com public information office week commencing 12 June with extended opening hours on Thursday 15 June (1700 to 2100 hrs).
- In addition, local drop-in sessions took place at Reay Village Hall on 12 June 2017 and Pulteney Centre Wick on the 13 June 2017 (from 1800 to 2100hrs).
- A presentation was given to the Dounreay Stakeholder Group at its public meeting on Wednesday 14 June 2017.
- A presentation was given to the Buldoo Liaison Group at its meeting on Thursday 22 June 2017.
- Posters were displayed on site week commencing 12 June for the site workforce and contractors to participate. This information continued to be available in the public information office until the beginning of September 2017.

DOUNREAY PHASE 3 PLANNING

A planning application will be submitted to Highland Council in late 2017 to cover Phase 3 (2018 to interim end state) of the Dounreay decommissioning programme.

This includes Shaft and Silo decommissioning, a new flask facility, Low Level Waste pits retrieval, demolitions and site remediation/landscaping.

To find out more drop-in sessions will be held:

- Monday 12 to Friday 16 June: 09:00 - 17:00 } Dounreay Public Information Office, Thurso
- Thursday 15 June: 17:00 - 21:00 }
- Monday 12 June: 18:00 - 21:00 } Reay Village Hall
- Tuesday 13 June: 18:00 - 21:00 } Pulteney Centre, Wick

For further enquiries please contact:

Stakeholder Relations Department, Dounreay Public Information Office, Trail House, 7 Olrig Street, Thurso, Caithness KW14 7BJ
 Telephone: 01847 890837 Email: stakeholderrelations@dounreay.com
 Website: www.dounreay.com

Feedback from the consultation

During the drop-in sessions over 70 people were provided with briefings. The Dounreay Stakeholder Group (representing over 20 community groups) received a presentation on 14 June and this was followed up at the meeting with questions and statements. The extracts of the DSG minutes which relate to the discussion around phase three planning are reproduced in Appendix 1. It should be noted that DSG also provided a collective response following the meeting and these questions are included below.

In addition, a presentation was also provided to the Buldoo Residents Group (a small group of residents who live close to the Dounreay site). They received a presentation on 22 June 2017. The questions raised at this meeting are also reproduced below.

From the drop-in session held at Reay Village Hall, Pulteney Centre Wick and Dounreay.com Public

Information Office further questions were raised and these are included below.

General:
 All questions, comments and views received have been included below. It is recognised that a number of these questions relate to wider strategic issues that are not specifically part of the scope of the phase three planning application. All have been included to ensure transparency of the process and to offer an insight into the subjects raised by members of the public.

General

Q1: Can those working on the site deliver the entire programme by around 2030 what is to say is 2033 really the interim end date?
Q2: there will not be another change of priority with the date pushing out more?

R: It is a challenging programme but the Dounreay team and the Nuclear Decommissioning

Q3: How much is the cost of decommissioning likely to be to reach interim end state?

R: The decommissioning programme is being delivered under a target cost contract and the inclusion of additional work has had an impact on that cost. The final numbers associated with the contract changes are still being finalised. The challenge remains to complete the programme while delivering best value for the taxpayer and there have already been significant savings generated by introducing innovative approaches and learning lessons from

When the site was completed there was mention of the interim end state being in the 2020s. It now appears to be pushed out to 2030/31 - why is this?

Q5: The phase three planning covers a large timeframe - why are you doing this in such a large chunk?

work undertaken elsewhere.

Q4: When the site was completed there was mention of the interim end state being in the 2020s

Q6: It is hard to look at interim end state as it is so many years away - lots could change before you get to this stage.

R: After the site was completed in 2012 there was a period of consolidation which allowed for a detailed review of the work that needed to be completed to be undertaken. The UK Government also published a strategy which included additional work to remove exotic fuels from the site. The prioritisation of this additional work has had an impact on the schedule for some of the other decommissioning projects, which means the interim end state will now be delivered later than was expected at the start of the contract.

Q7: Understanding the fuels programme is a priority for the coming year - when does NDA expect to approve the whole decommissioning plan?

The phase three planning covers a large timeframe - why are you doing this in such a large chunk?

R: When the site moved into decommissioning it was agreed to split into three phases, phase three would have originally been complete around 2023 but additional work and new scope

Q8: Is there a risk of the planning application being rejected?
for priority projects meant that the interim end state date has changed. We have a good understanding of the complete scope of work required to get to interim end state and hence continued with phase three from 2018-IES.

Q9: How much goes into the local community?

R: The site has a clear scope of work to deliver an interim end state and while there are always risks to big projects such as this there is confidence that the contract can be successfully delivered in the timeframe.

R: Our existing plan was impacted by the exotics fuel programme. Significant work has been undertaken by Dounreay and NDA on a revised plan. Further work is required to finalise the plan and it is expected that this will be agreed during 2018.

leading economic regeneration for the area. The Dounreay site also spends around £500,000 per year supporting socio economic activities.

Employment

Q10: How many people are employed on the site now?

R: There are currently just under 1,200 DSRL staff working at the site. When contractors are included there are up to 2,000 people working on the site.

Q11: When do you expect to see a significant reduction of staffing resources?

R: Earlier this year we announced a voluntary redundancy programme, where up to 150 DSRL staff would be able to leave the business in the next year or so, while 50 contract roles were also expected to reduce as a consequence of projects reaching a planned conclusion. The voluntary redundancy programme was oversubscribed and final numbers are expected to be confirmed soon. This is about ensuring the right mix of skills for the next phase of the decommissioning programme, which will include more construction and demolition activities. It means the site will continue to recruit specialist skills and the graduate and apprentice programmes have continued this year. DSRL staff resources will gradually reduce all the way through until the end of the contract.

Q12: Are you planning further recruitment from now until the interim end state?

Q13: Resources, in taking the decommissioning programme to IES, need to be underpinned. How are resources going to be used, is there a resource plan which takes account of gap be filled?

R: Yes – we believe the resource profile will vary to ensure we have the right skills at the right

Q14: Are there still significant project opportunities on the site?
Some of these projects will involve first-of-a-kind work at the site and we expect to see large scale construction and demolition in the years ahead. While we will look to retrain and redeploy our existing workforce, it will be necessary to bring in specialist skills to support the work programme.

Education

Q15: When do you stop taking on apprentices/graduates?

R: The original programme would have seen the apprentice programme close two years ago but, because of the additional work added to the contract, this has been extended. This year we had 11 graduates and eight apprentices join the site which is helping ensure we have the right balance of skills for the remainder of the programme. The apprentices will continue to follow a four-year training scheme, which means apprentices will continue to operate on the site for a number of years. While exact dates are yet to be agreed for closing these programmes, early discussions are taking place with others in the community about how we can continue to support the development of young people and skills in the area beyond the Dounreay specific programmes.

Q16: Will the STEM Ambassador programme continue to be supported throughout?

R: The STEM ambassador programme will continue to be supported until the point where staffing reductions mean that support for this activity can no longer be provided.

Q17: Do you support schools/education?

R: We have over 70 STEM ambassadors and carry out a lot of work to support all STEM activities. We will continue to support initiatives such as these for as long as practicable. DSRL is a founding member of the NDA funded Developing the Young Workforce (DYW) North Highlands Regional Board and is committed to developing employability skills and employment opportunities for young people within Caithness and Sutherland. DSRL has close links with UHI North Highland College and provides direct seconded support to the NHC schools liaison programme.

Shaft/Silo

The Shaft and Silo decommissioning had originally been included in phase two planning. However, due to other priorities this project was deferred and has been scheduled to recommence in phase three. Therefore questions raised from phase two planning are included here as they are still pertinent to phase three planning.

Q18: What type of waste is coming out of the shaft?

R: All waste retrieved from the shaft and silo is assessed to be intermediate level waste and will be conditioned, packaged and stored in the Waste stores which will remain on the site as per Scottish Government policy.

Q19: Where would the waste from the Shaft and Silo be disposed of?

R: The waste from the shaft and silo will be stored in the higher activity waste stores on the site. These will be conditioned, cemented and made safe for storage.

Q20: Wasn't the Shaft and Silo in phase two planning – why has nothing been done?

R: Some of the work to decommission the shaft and silo has been delayed for reasons which include the repriorisation of decommissioning activities. Work has continued to ensure that the facilities have been maintained in a safe and compliant manner and a number of contracts have been awarded to companies ready to begin the next phase of work.

Q21: Can DSRL state whether there are any plans to locate future intermediate level waste stores outside the fence.

R: There are no plans to locate any further waste facilities outside the licensed site boundary, other than the different phases of the Low Level Waste vaults, which already have planning permission. HAW must be sited on the licensed site (inside the fence) and the plans for the location of future stores have been identified and will be on site. The DCP HAW Store extension has already gained planning permission and construction will commence ahead of Planning Phase 3. While work is ongoing there might be times that storage of materials, etc may require to be stored outside the fence but this will be considered as projects kick off – these will not be permanent fixtures.

Q22: What benefit is there for the proposal that the shaft platform remains, when the planning consent states it has to be removed?

R: Under the planning conditions, the shaft platform should be removed. If a third party felt that this could be utilised for alternative activities then it would be for them to make a robust case to retain this platform.

Q23: Has the plan changed for the Shaft/Silo decommissioning?

R: No. The plan is consistent with what was expected to be undertaken in phase two planning. The emptying of the shaft will be carried out using remote equipment and will have containment buildings constructed so that the retrieval is carried out safely and with no human contact. Extensive trials of retrieving and treating the waste have been performed. As the design has been developed, there are some subtle changes to the plan in the phase two submission. Waste retrieved from the Shaft and Silo will now be treated and packaged in a single facility, located at the Shaft. Waste will also be compacted to reduce its volume.

Q24: Why is there no proposed car access to the shaft platform which could be where visitors park?

R: The current assumption is that we will remove the shaft platform as per the planning condition.

Q25: 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?

R: There is a planning condition for the removal of the platform from an earlier consent to isolate the Shaft, once all operations have ceased. If a case were made for its retention, that would be subject to an application for variation of conditions and require THC approval. That case has not been made but could be considered in future years should a use for the platform be proposed.

Q26: What are the chances of the shaft exploding again like it did in 1977?

R: The safety and security of our workforce, community and environment remains our highest priority. Our work is closely regulated and we develop extensive decommissioning strategies to reduce the risk associated with our work as far as we can. The shaft has a detailed safety case in place and a range of additional measures, such as ventilation and monitoring, are now in place. A detailed safety case for the new facilities is also being developed. Various scenarios of gas generation within the proposed facilities have been identified and assessed. In the event of ignition, none of these scenarios could result in a situation to cause a significant hazard.

Q27: The shaft explosion wasn't mentioned within the documentation and some ex-workers do not believe it was caused by a hydrogen explosion. This is the only concern in regards to safe decommissioning.

R: During phase two planning a retired member of staff provided anecdotal evidence pertaining to shaft and potential contents. This has been passed to the project team to ensure all evidence is considered within the safety case and risk assessments.

Construction of new buildings

Q28: How many construction jobs are there likely to be for all the new construction required on site?

R: The exact number is difficult to predict as it depends on a range of factors. It is likely that some staff will be retrained and will be able to undertake some of the work. For large scale construction and demolition projects, the support of specialist supply chain companies will be required which will involve additional workers on the site. Dounreay is in the process of putting a number of framework contracts in place to support this. The exact number of workers will depend on who wins those contracts and what resources they believe they require to successfully deliver the projects.

Q29: What happens to all the new buildings? Could they be re-used for other things after the site is closed?

R: They will be decommissioned, then dismantled and removed where possible for re-use elsewhere, particularly the modular, steel framed/clad, containment buildings. The NDA currently runs a programme to enable assets to be redeployed within its estate where this is practical.

Q30: Noting the number of construction projects it is likely that traffic will increase as this could impact on residents living nearby?

R: A traffic management plan will be produced in collaboration with The Highland Council for use by phase three contractors and suppliers. The aim will be to minimise extra traffic using the site access junction during the peak morning and late afternoon periods. The extra traffic has been estimated and the impacts assessed, regarding noise and air quality. No significant impacts from the phase three works are predicted. The assessments for both noise and air quality indicate there will be very little change to the existing conditions.

Q31: Noting the number of construction projects (and potential increase in traffic) it is likely that noise pollution will also increase. What working hours would contractors be working to?

R: The answer above refers. The working hours will be stipulated and agreed with The Highland Council.

Waste

Q32: 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?

R: The current security building is substantial and relatively new. It is our policy to minimize the amount of new build and retain buildings where possible and therefore the existing building was planned to be retained. However, the questioner makes a good point and this will be passed to the appropriate team for consideration.

Q33: What type of security is required when the waste stores are the only buildings remaining?

R: At Interim End State it is currently envisaged that the high security fence will be removed but that some form of simple fencing will still be required.

Q34: The present security building appears overly large for a much reduced security/admin function post IES. Could any spare space be used for community functions, or other business ventures?

R: Any proposal for another use for a building would have to be formally considered and would require the input of the site licence company, NDA and regulators.

Q35: Where is all the demolition waste going?

R: The demolition waste will be subject to the waste hierarchy – prevent, reduce, re-use, recycle, disposal. It is anticipated that the majority of waste meeting the appropriate criteria could be used to backfill voids and other areas on the site. Where there is contamination present in the material, it will be managed in the appropriate way.

Q36: If waste was being re-used on site what area would be used for crushing materials?

R: It is planned that the existing area D6500 (Spoil Compound) would be used.

Q37: How long will waste be stored on site?

R: Scottish Government policy is to store higher activity waste near site, near surface indefinitely. Therefore we assume that these stores will be on site as per this policy. The actual building would have a design life of 100 years and therefore, if the policy remains unchanged, appropriate action would be required in the future.

Q38: Can Dounreay say whether there are any plans to locate future intermediate level waste (now termed Higher Activity Waste (HAW)) stores outside the licensed site boundary?

R: There are no plans to locate any further waste facilities outside the licensed site boundary, other than the different phases of the Low Level Waste vaults, which already have planning permission. HAW must be sited on the licensed site (inside the fence) and the plans for the location of future stores have been identified and will be on site. The DCP HAW Store extension has already gained planning permission and construction will commence ahead of Planning Phase 3. While work is ongoing there might be times that storage of materials, etc may require to be stored outside the fence but this will be considered as projects kick off – these will not be permanent fixtures.

Q39: Detailed information was requested for big block (bulk quantity) demolition safety cases.

R: There is no detailed information available at this stage. Big block will only be looked at in a small number of cases. It is not yet decided and will be given consideration during the next 12 to 18 months. It is not envisaged that any significant increase in road transport would result.

Q40: Will the use of bulk disposal/demolition, ie encasing the interior of buildings with concrete result in a large increase of lorries to the site?

R: It is inevitable that a decommissioning project as large as Dounreay will result in lorries on the road to the site at particular times. The company will seek to reduce this as far as possible – for example using appropriate waste material already on site to backfill voids. Where lorries do need to travel to the site, the company will look to schedule these in a manner which reduces any disturbance as far as practicable.

Q41: Will the use of “big block” demolition method result in a greater volume of waste?

R: Yes, the volume would be greater but this is outweighed by the advantages with regard to safety, schedule and cost. However, most demolition will be by conventional techniques and the waste spoil generated will be reused for filling voids and creating the landscape profile.

Q42: Would big block (bulk quantity increases) demolitions meet with SEPA and Highland Councils' waste hierarchy of waste minimisation/volume reduction?

R: The company has a responsibility to comply with all regulations under which it is governed.

Q43: Would big block (bulk quantity increases) demolitions result in the reduction of jobs available up to interim end state?

R: Dounreay is working with the Caithness and North Sutherland Regeneration Partnership to supply updated resource projections for the remainder of the programme. Some of the wider construction and demolition activities will require supply chain support, in partnership with Dounreay staff. The company will need to work with its preferred supply chain partners – when this detail is agreed – to understand the exact resources required to deliver projects.

Q44: Will the contact handleable waste store being demolished over time, if so where was the waste going?

R: The contact handleable waste store would be demolished. All waste stored within this building will be relocated to one of the two waste stores which will remain on site as per Scottish Government's policy on higher activity waste.

Q45: Would the waste hierarchy be complied with for recycling of steel frames and structures and would contaminated metal be recycled in Inverness?

R: The site has an integrated waste strategy that is focussed on meeting the principles of the waste hierarchy. Most waste materials leaving the site will be recycled as far as reasonably practicable.

Q46: If site has a lot of clean waste that needs to be disposed of in landfill it would be worthwhile talking to HC re capacity at Seater and what alternatives will be in place.

R: We expect to re-use the majority of clean inert waste (such as concrete, brick, stone, rubble and glass) for backfilling voids on site where it is feasible to do so. Remaining clean waste will be sent for recycling off-site where possible, and failing that, sent for disposal at landfill. This comment was noted and would be explored with Highland Council to ensure there was an awareness of any changes to capacity within Seater.

Q47: Would there be consideration of community benefits for the higher activity waste stores similar to the low level waste facility.

R: It would be a matter for The Highland Council to discuss but note the higher activity waste stores are not part of the Phase 3 development.

Q48: 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.

R: See above.

Low Level Waste

While the new low level waste facility is not part of the phase 3 planning (planning approval for up to six vaults had been previously approved) it was recognised that phase 3 planning activities would have an impact on this facility given the low level waste produced on site would eventually be disposed of in this facility. Therefore, while not part of this planning process it was appropriate to listen and respond to questions relating to this facility.

Q49: The existing low level waste pits which are situated within the licensed site will be emptied. Does the site know exactly what is in these pits, as there is a belief that there is also intermediate level waste within these pits?

R: A comprehensive inventory of the Pits has been developed, which has reviewed all historical documents and records of disposal to the Pits, as well as incorporating anecdotal evidence from a retired worker to support the data gathering. The retired worker provided some detail and this information has been shared with the project team who will factor this information, as well as all other evidence and records into the safety case/risk assessments required to demonstrate to our regulators that there is a robust plan in place. Low Level Waste Pits will have waste checked for radioactivity before packaging and disposal to LLW vaults.

Q50: Do you know how many low level waste vaults you will need to achieve interim end state?

R: Planning approval for the vaults is subject to a separate process and agreement is already in place for up to six vaults. Two of these vaults have already been constructed and a number of factors, including the waste hierarchy and future innovation, could affect the amount of waste generated and the subsequent requirement for how many of the remaining approved vaults are constructed.

Q51: 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 five and six?

R: See response above.

Q52: When will phase one vaults be covered?

R: The volume of waste predicted for disposal in the first two vaults has been slower than originally planned at this stage of the programme due to lower waste arisings from decommissioning following re-prioritisation of the overall site plan. The current plan is to cover over all the vaults with a final capping together at the end of the programme.

Q53: Do you need vaults three and four if SEPA agrees that the demolition waste can be re-used to backfill the low level waste pits on site?

R: Planning approval was given for up to six vaults. Work is on-going to estimate the volume of all low level waste as the site continues to decommissioning and it is difficult to say at present if vaults five and six will be required. The uncertainty of the volume was why the site went for a phased approach to building the vaults as we will construct only as many as required to reach interim end state.

Q54: When will phase two of the low level waste vaults be constructed?

R: The original plan was to start construction in 2018. Following the review of the revised site programme we believe construction will start around May 2020, following the re-prioritisation of the site due to the Fuels programme.

Q55: In the non-technical environmental summary there was a reference to waste stores and it was not clear that these would be on the licensed site (page 16 refers).

R: It was agreed that new wording was required to make it clear that the higher activity waste stores would remain on the licensed site. These comments have been passed to the Environmental team to make this change and would be reflected in the final document.

Q56: When the site constructed the first two vaults for the new low level waste store were those living close-by affected badly? What are you going to do to make sure you have learnt lessons from the first construction phase to make it easier for those living close by when you start constructing the next two vaults?

R: Construction of further vaults is subject to a separate planning application which has already been approved. During the construction of the first two vaults there was a lot of dialogue with residents living close by. As a result of the planning process, a formal committee was set up between NDA, Dounreay and the Buldoo Residents and this is chaired independently. A liaison officer is appointed to ensure that any concerns are dealt with as quickly as possible. All issues raised from the construction of the first two vaults have been logged and a lessons learnt document was developed to try and address some of those concerns ahead of any future development.

Q57: The Caithness and North Sutherland Fund had been set up with community benefit funding for the new low level waste facilities. The fund was very well used and well managed and the difference this funding has made is vast. The respondent felt this was worth noting.

R: Dounreay and the NDA are pleased that the Caithness and North Sutherland Fund has made a vast difference to many local projects within the Travel to Work area. We note that the funding provided by the fund has levered substantially more funding into local projects.

Q58: 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.

R: Detailed plans of all Dounreay, and other NDA sites, will be kept as part of the record management control. These records will ultimately end up stored in Nucleus, the NDA's archive. The Intermediate Level Waste Stores will remain on a licensed site (with a fence) and therefore will be well signed as to what these stores are. Consideration will be given to signage at the low level waste facility once the facility is closed off.

Fuels

Q59: When do you expect to get all the fuels off-site to Sellafield?

R: Dounreay is being closed down and all nuclear materials are being removed from the site. This is expected to be a process which continues until the early 2020s.

Q60: Why do you continue to transport fuels down to Sellafield – why can't they be stored at the Dounreay site.

R: It is UK Government policy to remove fuel from Dounreay in preparation for the closure of the site.

Q61: What happens to the armed guards you have when all the fuel is gone?

R: The security of the site and the materials contained within it are a top priority for Dounreay, the Civil Nuclear Constabulary (CNC) and its regulators. The security arrangements in place are proportionate to the hazard and, while specific details remain confidential, the levels of security at the site will continue to be proportionate to the hazard on the site.

Q62: 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?

R: The planning conditions for the firing range consent do not allow for use by others so if another user were identified there would need to either be a variation of current planning consent or a new planning application made. At present the plan is to decommission the firing range site and return it to its former condition.

Q63: There has been talk of the crane at Georgemas junction (primarily for use of fuel transports) could be used for commercial activities later? It's been a while since this was first mooted and appears that it is not easy to attract commercial activities? Does the NDA have a plan B – ie decommissioning the crane and re-instating the platforms as they were before the crane was erected?

R: The rail facility at Georgemas is currently available for other organisations who wish to make use of it. This is just one example of the infrastructure improvements financed by NDA to support both the decommissioning programme and as part of the socio-economic support to help the community in the future.

Environment

Q64: Would the levels of contamination below the clean-up levels result in 'waste disposal' and therefore require a separate RSA authorisation for solid waste disposal on site.

R: There may be situations where contamination levels are below clean-up levels but are still considered radioactive waste. This is more likely to occur if the contamination is at depth and not 'near' the surface. To be able to do this we would need permission from SEPA/ONR via agreement with our Site Waste Management Plan and Site Wide Environmental Safety Case (SWESC). It would require an RSA Authorisation however the SWESC allows for this. The location of the contamination would be documented in our Site Waste Management Plan.

Q65: What about the particles – is this project going to be finished by interim end state – how do we know you have recovered everything that could be dangerous? Who would take this forward when the site is done?

R: The monitoring and retrieval of particles for onshore beaches is covered with our site authorisation from our independent regulator, SEPA. Therefore until such a time that SEPA deems this is no longer required, monitoring of the beaches will continue. Monitoring would also be required after the site enters an interim end state for the waste stores and low level waste facility. The current working assumption is that a small number of people will work at the site to undertake these activities and ensure the site is managed in accordance with regulatory requirements. A technical review of the particles project is currently underway and we anticipate ongoing discussions with SEPA and their independent advisers on a way forward.

Q66: Will the fishing ban zone be lifted if monitoring for particles ceases?

R: This is something that would require the input of organisations such as Marine Scotland, SEPA and others if a point was reached where this was felt to be appropriate.

Q67: How can the site provide reassurance that no further monitoring for particles is required?

R: There is currently no proposal to do this. Any such decision would be for the independent regulator, SEPA, and would be based on evidence to suggest it was an appropriate way forward.

Q68: Will the sea effluent pipeline be removed?

R: Plans to remediate the old (and new) liquid discharge system are being considered now. It would appear that the best option would be to completely remove the pipework on the landward site of the site, to grout the pipeline which remains under the sea and to enclose with concrete the chamber. These options are being looked at and a number of considerations and discussions with regulators will have to take place before we get to a fully detailed programme to remediate.

Q69: What about vegetation, will it be maintained?

R: Landscape management and maintenance plan will be developed by DSRL for the landscape post IES; and will be agreed with The Highland Council.

Q70: Will Dounreay beach be accessible?

R: In Scotland there is a right to roam and therefore the Dounreay beach has always been accessible. However it is not an easy beach to walk to and, as the majority of significant particles have been washed up on the foreshore, people are encouraged not to access it.

Q71: Will the castle be made safe to allow public access?

R: It is unlikely that further work will be carried out on the castle. Over the years we have done some work to make it as safe as possible. However in recent years we have restricted access to anyone visiting the castle on safety grounds. This is likely to remain the case.

Interim End State

Q72: Who owns the site after the interim end state – if there is a small number of people remaining to work on the site – who are they working for?

R: The Nuclear Decommissioning Authority remains the owners of the site on behalf of the UK Government throughout the decommissioning process and beyond. The current contract is for Cavendish Dounreay Partnership to be the parent body organisation of DSRL and runs until the site enters its interim end state. Detailed arrangements beyond this point will be finalised as the decommissioning progresses.

Q73: For Cavendish Dounreay Partnership when does this contract expire? It would be useful to understand when CDP's responsibility for the site ceases and whether it is then NDA's responsibility to continue, eg is does CDP's responsibility stop at the stage where landscaping is complete or when all the buildings are decommissioned and demolished.

R: See above.

Q74: Will NDA still have a presence after IES or will this be managed remotely, ie no staff in the area?

R: Detailed arrangements for managing the site beyond the IES will be finalised as decommissioning progresses. This sits outside the scope of this planning application which takes the site to interim end state.

Q75: 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.

R: The current contract will be completed when all the activities within the client specification of the agreement with NDA have been delivered. Detailed arrangements for managing the site after this point will be developed as the programme progresses, ensuring that all regulatory requirements are met.

Q76: Who is going to regulate the site after IES?

R: Regulators are considering a range of proposals for how they continue to regulate the site once it has entered an interim end state.

Q77: What happens to Vulcan site next door?

R: Vulcan is run by the Ministry of Defence. They announced that the testing of submarine reactors would cease and this has happened. Vulcan at present is looking at options for the Vulcan site but it is likely to close around the same time as the Dounreay Interim End State.

Q78: Do you think the site will be used for alternative employment?

R: Highland Council wishes the company to be flexible to allow for economic development if this arises.

Q79: Are you planning to have something on the site to commemorate what used to be there?

R: A heritage strategy was developed a number of years ago and activities from this continues. As part of this strategy there was agreement that there was potential for a local competition to design a 'gate guardian' to commemorate that the site used to be there.

Q80: While recognising there will still be a secure fenced area for the waste stores left on the site – is there going to be anything at the front entrance to highlight the fact that Dounreay was once there?

R: See above.

Q81: Why is the iconic sphere being demolished when it could have a useful tourist function, especially in light of the burgeoning interest in the NorthCoast 500 route and need for visitor attractions?

R: Having held various discussions with (then) Historic Scotland regarding the listing of the dome it was agreed that there could be significant complications for decommissioning DFR if the building was to be listed and/or retained. Further discussions and extensive consultation resulted in a heritage strategy being developed to ensure the site captured the technical and social history of the site. One such activity within the heritage strategy was to build a 'gate guardian' which would be situated close to the main entrance (main road) to highlight that the Dounreay site used to stand here.

Q82: How long will NDA support the local/regional socio-economics as the local area and region transition to a post-IES economy?

R: NDA is committed to supporting the community in its preparations for the closure of the site to ensure Caithness and North Sutherland is sustainable in the future.

Q83: What is being done to attract new business to the Dounreay site or wider area?

R: The NDA and Dounreay support the Caithness and North Sutherland Regeneration Partnership (CNSRP) which aims to ensure economic generation in the area as a result of the rundown of Dounreay. CNSRP has recently updated its priorities for the next three years and a number of opportunities have been identified including offshore wind, tidal energy, west of Shetland oil and gas etc. A lot of work is ongoing to ensure that there is investment in the right infrastructure, business and skills development initiatives. To date NDA has invested over £10M in the area in a number of infrastructure projects. The NDA and Dounreay will continue to support CNSRP activities.

Q84: Could the land be used to test small nuclear reactors?

R: DSRL's mission is to decommission the site to interim end state. If further economic activity was to be carried out on the site this would be a discussion with other agencies responsible for economic development. It should be noted that current Scottish Government policy would not support testing of small nuclear reactors.

Q85: How high will be the new security fence? Will it be visible to nearest farms/habitats?

R: While the specifics of security arrangements remain confidential, any fences will be selected to ensure they adequately protect the site.

Q86: Will there be a security presence with road patrols?

R: Specific proposals for the site after it enters an interim end state will be developed between now and the expected closure date in 2030-2033.

Q87: Will the site be returned to green fields as per pre-World War II condition?

R: The Dounreay site is a large development. While some areas can be restored, others will continue to be utilised beyond the interim end state, such as places where waste is stored.

Q88: Forss Business Park has a windfarm, will Dounreay eventually have a similar one?

R: Dounreay Site Restoration Limited is contracted to deliver the decommissioning of the site. It is not for us to comment on any proposals for future development beyond that. If a robust business case comes forward NDA would consider its' merit after IES.

Q89: Does the site have a clear idea of when the emergency arrangements for those in the emergency zone is likely to cease?

R: In compliance with legislation, DSRL reviews the hazards on the site which could give rise to a reasonably foreseeable nuclear off site emergency. This information is submitted to the Office for Nuclear Regulation who determine the emergency planning zone around the Dounreay site. The timing on when the emergency planning zone is no longer required around the site is a decision that will be made by ONR.

Q90: Will the site continue to have an annual emergency exercise?

R: The site will comply with all requirements set out by regulators appropriate to the level of risk on the site. Other sites closer to a care and maintenance phase have made a successful case to withdraw from REPPiR (Radiation (Emergency Preparedness and Public Information) Regulation) as hazard at the site has reduced, but if a similar view was taken for Dounreay a specific case would need to be made to the regulator.

Q91: Will near neighbours still have to keep their emergency information manuals in case of an incident?

R: See above.

Q92: Will the site be lit up at night?

R: Specific decisions will be taken as the programme develops to ensure the site remains safe and secure.

Q93: Will the site be seen as a soft target by terrorists?

R: Safety and security will remain high priorities for those responsible for the site and arrangements will be put in place that are appropriate for the level of the risk.

Q94: Will there be 24 hours access to the heritage trails and coastal viewing points?

R: Specific details will be developed as the programme progresses.

Q95: What will happen to the copper cabling and other underground metals?

R: The NDA has an asset management process whereby sites within its estate can receive equipment and assets from other sites. If this sort of equipment is of value and required by another site it could be moved to support that work. If it is surplus to requirements it may be recycled or sold to offset costs.

Landscaping

Q96: Is the landscape remediation strategy new?

R: It was always envisaged that by interim end state the site would have only a security building and waste stores left in situ, along with supporting infrastructure and utility services needed to serve the retained facilities. The NDA requested that the site look again at how the site would be left at interim end state and various options were considered in detail. The outline landscape strategy taken forward in the phase three planning application is believed to be the best option as it leaves the site as an attractive green open space at IES, but provides flexibility for other uses should future economic opportunities arise.

Q97: With reference to the landscaping at interim end state – would you consider softening the area around the pond?

R: The Outline Landscape Strategy plan already includes the pond being part of a wider wetland area along this part of the Mill Lade. Wild flower meadow and grassland is also planned in the adjacent areas. However, a detailed landscape scheme (Landscape Plan) will be considered and agreed with The Highland Council in the later stages of the phase three period and is expected to be a planning condition.

Q98: Would you consider putting in more trees within the landscape?

R: More extensive tree planting has not been ruled out and would be considered at the appropriate time (as above), particularly if there was strong stakeholder support.

Q99: Sometimes it is better to leave the land alone and let it evolve naturally. Would it be better simply not to interfere with nature?

R: Unless a suitable landscape scheme is developed and implemented, following the decommissioning and demolition works, the land would essentially be a brown field site with semi derelict appearance, with large surface areas of hardstanding, redundant roads and floor slabs. The aim is to remove most of these hard surfaced areas and create a landscape that blends with its existing surroundings with a mix of grassland and flower meadow with native seed mixes. A degree of self-seeding will also take place naturally, as demonstrated in vegetation trials.

Next steps

Taking on board comments and views provided during the consultation period the Environmental Statement has been updated and finalised for submission with the planning application.

Conclusions

Dounreay Site Restoration Limited:

- would like to thank those who provided input to the project team
- found that early consultation on the proposed planning application was well received and was worthwhile.
- remains committed to the phase 3 planning application as described in the pre-planning consultation.

This document will be submitted to The Highland Council when submitting the planning application.

Dounreay Site Restoration Limited
1 October 2017

Appendix 1

Extract from DSG minutes (held June 2017)

- John Deighan noted the construction projects which would be required to continue to decommission the site. He stated these were multi-million pound contracts and asked how the community could maximise the local benefits from these. Phil Craig, Managing Director, responded that contracts over a cost threshold now required a socio economic plan to be submitted as part of the bid. In addition, the Commercial Department were looking to implement an SME programme where the site would look to put out scopes of work to SMEs locally and throughout the area to come up with innovative ideas to help solve some decommissioning challenges.
- John Deighan stated he remembered a major contract around five years ago where there had been little socio economic benefit to the area. It was important to ensure that apprentices and local youth employment was available to leave a legacy. David Lowe responded this specific contract had been five years ago and since then there had been a lot of on-going work to put a specific requirement into bids associated with socio economics. A number of contracts had been advertised over the last two years with the specific ask for a socio economic plan and these, once the contracts are placed, will be monitored against these plans. Phil Craig stated the Commercial Department had gone out to the supply chain to get some support for DMTR. Five returns were received from UK national contractors of which three had come back with bids using local labour or with the indication that they had been in discussion with local supply chain companies and were looking to formalise partnerships in the area.
- Donald MacBeath stated that he had found the presentation very helpful. Following up on John Deighan's comments he stated that the North Highland College would be interested in looking at any specific training requirements to ensure that skills were readily available in the area when required. While apprentice training was a key element it should be acknowledged there was other training provision available locally. At this stage, it would be useful to understand what skills would be required for the future and the offer was made to set up partnership to help address that. David Lowe responded that the apprenticeship and graduate programmes were continuing with a new intake in August this year. Work had begun on other aspects of training with North Highland College and the site would continue to work with NHC in the future.
- Bob Earnshaw asked how confident was the site that the IES would be reached by 2030-2033. He also questioned the number of staff reductions around 2025 and beyond. Phil Craig responded that between now and the IES almost all 1200 staff will leave. Work was on-going to provide more detail on the resource profile and this information will come through to sub groups and CNSRP later this year.
- David Flear asked in light of the amount of information received relating to phase 3 planning would DSG be providing a collective response. Roger Saxon agreed this would be appropriate.
- David Flear noted that there were plans for two intermediate level waste stores with one already receiving planning approval. He asked whether consideration should be given to planning gain and community benefit for the second store which falls into phase 3. He reminded members that community benefit had been provided for the low level waste facility and the ILW stores would be in existence for a lot longer in view of the Scottish Government's

higher activity waste policy which changed the original plan to remove waste from the site.

- While recognising the new low level waste facility had its own planning approval David Flear noted that in light of the decision to empty the existing low level waste pits on site did the site now know how many of the vaults would be required to get the site to the IES. David Lowe responded that there was planning consent for six vaults, two of these had been built and plans were being finalised for the construction of another two vaults. Work to estimate the amount of waste was on-going and decisions would be made on whether the last two vaults (5 and 6) would be required.
- David Flear asked what would happen if the planning was rejected. David Lowe said if the planning was rejected the site would have to work closely with Highland Council to resolve these issues prior to 2018 to allow decommissioning to continue. David Flear added that the net result could be a planning enquiry. Roger Saxon said that he understood this to be a framework which sets out all activities required to be undertaken but that following acceptance of this then individual planning applications would be required.
- Trudy Morris noted, in relation to the supply chain and young people, the Chamber had been supported by Dounreay to develop a video and nuclear directory showcasing the capability in the area. These had been distributed at a Suppliers' Day in Manchester where the Chamber had been invited to attend. Around 100 USBs had been distributed on the day. All those who had attended had been encouraged to get in touch with the Chamber on socio economics or DYW project and she had asked her team to report back if any of these companies get in touch to see what the impact was on the Chamber's attendance.
- Ronnie Johnstone stated, picking up on John Deighan's point re contracts with no local benefit, there had been a track record of this. He felt there needed to be some method of monitoring what these benefits were. He reminded members he had raised this issue when the guidance of community benefit was published whereby he had pointed out that there was a lot of 'where possible', 'if possible' etc which seemed to be so many qualifications. He had come to this group with a great deal of confidence which had decreased over the years and since 2012 has significantly lessened. While he offered his delight at the assurances he emphasised that confidence was required, confidence bred faith which was more difficult to establish. Roger Saxon said that contracts would have to be considered on a case by case basis.

Phil Craig responded that he had made a commitment and that had been honoured with socio economic criteria now in all contracts (value above £500K for Supplies/Services and £1M for Works). There had been submissions coming through showing commitment to engage (and work) with SMEs, apprentices, local labour etc.

David Flear stated that the comments made had been a little unfair as a lot had happened with local benefit in contracts over the last two years. DSG had worked on this alongside the Chamber and others to make sure it happened. Mark Rouse (former Dounreay MD) and Phil Craig had honoured their commitments and taken this forward and David felt it was in a far better place. He also pointed out that reports were being made through the socio economic report which highlighted the contracts coming forward.

David Broughton noted that while understanding the interest in training and apprentices etc there was still benefit into the county if a company came in to do the work without local support. This benefit came in the form of hotels, restaurants and other local spending.

- David Broughton asked whether the contactable handleable waste store would be demolished over time and if so where was the waste going. David Lowe confirmed that this waste would be moved in the existing waste stores).
- Alan Scott (member of public) noted the discussion around skills. He emphasised the need for the underpinning of resources in relation to socio economics. He asked how were the resources going to be used, was there a resource plan which took account of demographics and skill sets, were the skill sets largely available now or how would the gap be filled. David Lowe responded that a resource plan was being developed focussing on what type of skills and numbers required and this would continue to be updated to allow the IES to be achieved.

Phil Craig added that the site had been working with NHC to explore what potential training could be provided in environmental and safety case courses which the site will need for around 10 years' time. In recognition of how long these can take this is something that has been taken forward early and in conjunction with SEPA as an example of known skills required for later years but to access in the county will require early implementation.