



Please respond to:

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Dear Sir/Madam

NDA BUSINESS PLAN 2019-2022

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.

DSG thanks you for the opportunity to respond to the draft business plan. Our comments are set out below:

General comment: While we appreciate that the majority of the nuclear civil sites are now subsidiary companies of the NDA the Dounreay site continues with the contract awarded in 2012 to Cavendish Dounreay Partnership. While the ethos of 'one NDA' is a good one we would like it noted that Dounreay has an additional layer which cannot be ignored especially as the contract is a target cost contract and therefore will be slightly different to the rest of the nuclear sites across the NDA estate.

Delivering value to our businesses: Again, we note here that NDA believes that by taking over the responsibility of Magnox Ltd will allow further use of the unique advantages of having a group-wide view to simplify and standardise the way NDA works. This can be true for both Sellafield and Magnox but there is no reference to Dounreay and it's now 'unique' contract.

We agree that health, safety, security and environment should be over-riding factors in everything that you do. On the socio economic activity again we would like to stress that transparency and consistency in this across the NDA would be useful. We are aware you are looking at a mechanism of being able to report impacts on socio economic interventions across the NDA estate and we welcome this as a consistent method of providing useful information across the estate.

Our funding: We note and are pleased to see no reduction in the planned spend across socio economics, skills, research and development, knowledge management, other. It would be useful to understand on a yearly basis the breakdown of spend across these activities and also on a site basis.

Dounreay: As a general comment, we are aware that there is work ongoing to complete a new decommissioning programme and NDA will need to approve this before it is published and this is not expected until later in 2019. Therefore it is difficult to understand what dates you are currently reporting in this draft plan. It would be useful to understand if these timescales have taken on board the new programme or whether this is information from the programme that exists right now.

Key activities: It is not clear what timescales NDA are trying to address here as it clearly goes beyond the business plan years and but does not take account of activities up to interim end state. As examples of this:

- The continued transfer of LLW to the LLW vault will continue well beyond the 2020 dates (probably until interim end state) and indeed we would have expected to see some activity of the next two vaults being under construction.
- Regulatory control (permissioning in support of IES definition and arrangements for Dounreay: Surely the agreement from regulators will be required earlier than 2022 if there is going to be economically planned decommissioning and demolition of the reactors in 2025/26.
- There is no mention of the existing LLW Pits 1-6 being emptied and decommissioned and again we would have expected to have seen this as early activity. We believe this will be a particularly difficult project with a considerable amount of interaction with the regulators before approvals are gained therefore we would have expected some activity to be undertaken in the next three years.

Yours sincerely

Sent electronically without signature

Roger Saxon
DSG Chairman