

# NDA Draft Business Plan 2009/2012

Summary of submissions to the public consultation

***February 2009***

This report is a summary of the online responses only and not those received by post, fax or email. These were passed directly to the NDA for review.

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Dialogue by Design focuses on using new technologies to engage stakeholders, for example via consultation over the internet

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## Introduction of this report

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**Background.** The NDA's draft Business Plan for 2009/2012 outlines the key challenges and priorities for the NDA over this period. The draft Business Plan document was put out to formal public consultation for 12 weeks, from 3<sup>rd</sup> November 2008 to 26<sup>th</sup> January 2009. This report is the summary of all consultation responses submitted online via the NDA's consultation web pages. Responses received via offline methods are not included in this report but have been passed onto the NDA for their information. The reader will find it helpful to have a copy of the draft Business Plan to hand whilst reading this summary report.

**Invitees.** The consultation was open to the public. Targeted invites were sent to everyone on the NDA's stakeholder engagement database was invited to participate in the consultation. This included National Stakeholder Group (NSG) members and Site Stakeholder Group (SSG) members via their secretariats. The consultation was publicised on the NDA website and via the NDA email alert for anyone to participate, and people were encouraged to tell colleagues about it.

**Methods used.** The approach taken for this consultation was exactly the same as the one undertaken in 2008 for the 2008/2011 Business Plan. For the duration of the consultation people wanting to comment could either register and participate online and/or request a paper version be sent to them and return paper responses via a Freepost address.

**Participants..** 414 people and organisations registered for the consultation (180 in 2008). The number of registrations include people and organisations that have registered from previous consultations run on the NDA consultation website. A total of 57 (127 in 2008) people participated. Of these 30 went on to actually participate online (77 in 2008). A further 27 people and organisations participated via paper (50 in 2008) and 2 people submitted both online and via paper. A list of those who participated is in Appendix 1.

**Interpreting the results.** It is important to remember, when interpreting the results, that this is a qualitative consultation, not an opinion poll. Its primary purpose is to collect views and arguments. Care must be exercised therefore in attaching too much significance to the proportion of responses arguing one way or another. The grouping of comments under each section heading should not therefore be interpreted on a purely statistical basis.

The groupings are useful indicators of where there is commonality. Taken in relation to each other, they help to clarify the range of issues and concerns identified by a multiplicity of stakeholders, and where general agreement or specific differences exist. The categorisation of responses is also necessarily simplistic given their complexity, so for this reason again it would be unwise to draw firm quantitative conclusions from them. All the detailed responses are available to view on the consultation website.

The responses for each of the questions are also available online at [www.ndabusiness.dialoguebydesign.net](http://www.ndabusiness.dialoguebydesign.net)

## 1.0 Introduction, our remit

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Q1. Do you have any comments on the issues raised in this section?

25 people responded to this question. In this section the NDA specifically asked people to comment on the proposed reduction of the consultation period to 6 weeks from the current 12 weeks. 7 submissions referred to this proposal. Of those who made comments all recognised the time pressures and some gave qualified support to a reduction in consultation time provided the NDA introduced measures to accommodate their difficulties. However a few respondents expressed a preference for the 12 week period of consultation to be retained.

Other comments in response to this section addressed a number of issues; the objectives, funding and budgets, the NDA remit and a number of site specific concerns.

Objectives: there were some comments that challenged the prioritisation of the objectives and the potential conflict between objectives; a few additional objectives were suggested (increasing public awareness of the importance of decommissioning and an objective to complete decommissioning on at least one site).

Funding: There were a few comments supporting the view that as much funding detail as possible needs to be made available in the Business Plan.

Group Heading	Number of comments
Comment on NDA remit	2
Comments on language/acronyms	3
Comments on risk vs. cost	1
Funding/budget	4
Length of the consultation/timing	7
No comment	6
Objectives - suggest additional	2
Objectives - other comments	5
Other	1
Site specific comments	3

## 2.0 Overview

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Q2. Do you have any comments on the issues raised in this section?

19 people responded to this question. Most of the comments revolved around the funding issues and impacts on staff and the potential loss of skilled people at particular sites. Some participants asked for some clarification about the implication of the economic situation on the budget and the realisation of the Business Plan.

Some participants also challenged the NDA in regards to the competition issues and that the NDA should take time to see and to measure independently the outcomes of the competitions.

Some participants also took the opportunity to make comments about NDA specific sites.

Group Heading	Number of comments
Comments on language/ acronyms/ clarity request	2
Competition issues	3
Engagement in RWMD	1
Funding, skills and staffing issues	7
Implication of economic situation	3
No comment	5
Reprocessing	1
Site specific issue	4
Support this section	1

## 3.0 Objectives: 2009/10 - 2011/12

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### 3.1 Encourage the highest standards in health, safety, security & environmental performance

Q3. Do you have any comments on this objective?

16 people responded to this question. The majority of comments agreed that HSSE performance is of high importance but feared that the funding allocated to this objective is not well distributed. As a result there is a threat to the long-term future of the workforce as well as concern for the knock-on effects this may have on their communities.

A number of participants commented on targets and the need to ensure performance is measured by valid indicators.

Group Heading	Number of comments
Comments on HSSE	5
Comments on measuring performance	4
Funding, skills and staffing issues	3
Implementation issues	1
No comment	3
Support this objective	2

### 3.2 Deliver hazard and risk reduction

Q4. Do you have any comments on this objective?

19 people responded to this question. 5 people challenged the prioritisation process being used by the NDA. The view expressed was that it would be better to focus on clean-up at the lower hazard sites first and to complete the decommissioning of a few sites.

A number of comments mentioned the extension of the scope of the hazard baseline to cover non-radioactive materials, this is generally positively regarded.

There were a number of comments seeking clarity on the SED graph and the way the performance is measured.

Other comments made on this objective related to funding and the outcomes in terms of possible job losses.

Group Heading	Number of comments
Challenge the objective/ focus on low hazard	5
Comments on language/ acronyms/ clarity request	4
Comments on measuring performance	5
Funding, skills and staffing issues	3
Need to find repository	1
No comment	4
Non-radioactive hazard	3
Support this objective	2

### 3.3 Progress - decommissioning & clean up

Q5. Do you have any comments on this objective?

18 people responded to this question. Most comments followed a similar argument to the responses to question 4. Concern was expressed that the lower hazard sites are going to be left indefinitely and with the view that this is not the best value option. A few participants suggested that the NDA should learn from the decommissioning of more advanced sites to accelerate work at other sites.

Group Heading	Number of comments
Challenge this objective/ focus on low hazard	6
Comments on language/ acronyms/ clarity request	1
Comments on managing sites and states	3
Comments on measuring performance	1
Learn from decommissioning/ national coordination	3
No comment	2
Objectives - suggest additional	1
Support focus on high hazard sites	1

### 3.4 Maximise commercial value from our existing assets and operations

Q6. Do you have any comments on this objective?

20 people responded to this question. Most supported the view that commercial value from assets should be maximised though there were some concerns expressed that commercial activities should not increase future clean-up costs and that any plans need to be based on detailed consultation with local stakeholders.

Group Heading	Number of comments
Focus on net economic benefit/local benefit	4
Funding, skills and staffing issues	1
Implication of economic situation	1
More detailed plans suggested	3
No comment	3
Specific suggestions for maximising commercial value	9
Support this section of the plan	3



### **3.5 Ensure safe and secure management of radioactive waste and materials**

Q7. Do you have any comments on this objective?

19 people responded to this question. A number of comments were generally supportive of this objective with some suggesting it should be made a more explicit primary objective for the NDA. There were a number of views commenting on the need to find a site for the repository as soon as possible.

In addition there were a number of specific comments on funding, the need for a national strategy for non-solid waste, policy and safety issues.

Group Heading	Number of comments
Comments on managing waste	1
Comments on repository development	4
Funding	1
Need national strategy for non-solid waste	1
No comment	3
Objective - more emphasis required	2
Objectives - other comments	1
Policy issues	1
Safety issues / specific requirements	2
Stakeholder engagement / consultation	3
Support this objective	5

### **3.6 Determine the scope of the liabilities and identify opportunities for their reduction**

Q8. Do you have any comments on this objective?

13 people responded to this question. Most comments received on this objective were supportive, but some expressed concern that the Life-Time Plan should be more definite, with targets reviewed through clear metrics. Some people suggested more effective cost assessments to determine the scope of the NDA liabilities.

Group Heading	Number of comments
Focus on net economic benefit/local benefit	1
More effective cost assessments required	3
Need innovation	1
No comment	4
Refers to other question	1
Request for data and measurement	2
Support objective	3
Support reprocessing	1

### **3.7 Secondary objectives: Provide socio-economic support and development**

Q9. Do you have any comments on this objective?

18 people responded to this question. 7 specifically supported this objective. 8 participants wrote comments on specific sites and in particular raised concerns that the funding in their area needs to be secured and/or increased. A few respondents challenged the objective and commented that supporting socio-economic projects is neither cost-effective nor part of the decommissioning task of the NDA.

Group Heading	Number of comments
Challenge focus on secondary objectives	2
Comments on language/ acronyms	1
Need for more support to specific areas	8
No comment	3
Refers to other question	1
Support this objective/needs more emphasis	7

### **3.8 Deliver investment in skills, research & development and supply chain development**

Q10. Do you have any comments on this objective?

19 people responded to this question. 6 people specifically stated that they support this objective, and emphasised the importance of keeping skilled people at the sites for future decommissioning activity or new nuclear plants, if relevant. A number of comments suggested areas that could be developed to broaden the scope of skills investment.

Group Heading	Number of comments
Broaden, extend scope	7
Challenge this objective	1
Funding, skills and staffing issues	6
No comment	4
Support this objective	6

### 3.9 Enabling objectives

Q11. Do you have any comments on these objectives?

15 people responded to this question. 7 comments were made about funding, skills and staffing issues. Some people expressed concerns on the potential risk of sacrificing security, safety and jobs.

Group Heading	Number of comments
Detailed text suggestion	1
Funding, skills and staffing issues	7
Include more information in these plans	3
Likely cost increases	2
No comment	3
Support the objective	2

## 4.0 Sellafield Limited (section 6.0)

Q12. Do you have any comments on the key activities and/or key focus for any of the sites managed by Sellafield Ltd? (Please state which site(s) you are referring to in your submission).

14 people responded to this section, of these 5 people specifically made no comment. A few people made comments or asked questions on specific activities including Magnox reprocessing and safety issues. In addition some suggestions were made for more focus on issues such as new evaporative capacity, replacement storage tanks, and a separation area ventilation plant.

Group Heading	Number of comments
Comments / questions on activities	4
Detailed text suggestions	2
Funding	2
General approach	2
No comment	5
Suggested additional focus / activities	3
Support the activity and focus	1

## 5.0 Magnox North Limited (section 7.0)

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Q13. Do you have any comments on the key activities and/or key focus for any of the sites managed by Magnox North Ltd? (Please state which site(s) you are referring to in your submission).

16 people responded to this section. 5 stated they had no comment while 5 talked about the timing for decommissioning, with the emphasis on wanting decommissioning to progress rapidly with a clear timescale provided. A few people also talked about funding issues.

Group Heading	Number of comments
Decommissioning - timing	5
Funding issues	2
Learning / national cooperation	2
No comment	5
Refer to other question	1
Specific text query	1
Support plans	1

## 6.0 Magnox South Limited (Section 8.0)

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Q14. Do you have any comments on the key activities and/or key focus for any of the sites managed by Magnox South Ltd? (Please state which site(s) you are referring to in your submission).

13 people responded to this question. 7 people stated that they had no comment. Issues raised include the timing of decommissioning activities and the need for learning across areas.

Group Heading	Number of comments
Decommissioning - timing	2
Funding issues	2
Learning / national cooperation	2
No comment	7
Specific activities	1

## **7.0 Dounreay Site Restoration Limited (section 9.0)**

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Q15. Do you have any comments on the key activities and/or key focus for the site managed by Dounreay Site Restoration Ltd?

11 people responded to this question, 4 stated they had no comment to make. Other comments related to the need to learn from other decommissioning activities, some suggested additional activities and specific comments on the text.

Group Heading	Number of comments
Additional activities	2
Comments on language / acronyms	1
Learn from decommissioning / national coordination	3
No comment	4
Specific text query	1
Support PBO Dounreay	1

## **8.0 Research Sites Restoration Limited (section 10.0)**

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Q16. Do you have any comments on the key activities and/or key focus for the site managed by Research Sites Restoration Ltd?

14 people responded to this question. Of these, 7 stated that they had no comments to make. Other comments related to funding skills and staffing issues, learning from decommissioning in other areas and issues around the Life-Time Plan.

Group Heading	Number of comments
Decommissioning timing	2
Funding, skills and staffing issues	3
Learning from decommissioning / national coordination	3
Lifetime Plan issues	2
No comment	7

## **9.0 Low Level Waste Repository Limited (section 11.0)**

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Q17. Do you have any comments on the key activities and/or key focus for the site managed by Low Level Waste Repository Ltd?

10 people responded to this question. 7 of these made the statement that they have no comment to make, the other comments referred to public consultation, safety and the need for the repository.

Group Heading	Number of comments
No comment	7
Public consultation	1
Public safety	1
Support development of repository	1

## **10.0 Springfields Fuels Limited (section 12.0)**

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Q18. Do you have any comments on the key activities and/or key focus for the site managed by Springfields Fuels Ltd?

11 people responded to this question. 7 made no comment. The remaining comments mainly talked about learning from decommissioning and national coordination.

Group Heading	Number of comments
Learning from decommissioning / national coordination	3
No comment	7
Suggest additional activities	1

## **11.0 Subsidiary Companies (Section 13.0)**

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Q19. Do you have any comments on the key activities and/or key focus for International Nuclear Services or Direct Rail Services? (Please state which company you are referring to in your submission).

14 people responded to this question. Again 7 made no comment while 2 comments supported these activities, 4 people challenged the focus on these activities and a few sought clarity or more information.

Group Heading	Number of comments
Challenge focus on this activities	4
Clarity/ more details needed/specific text changes	2
No comment	7
Support the activity	2

## **12.0 Any other comments?**

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15 people responded to this question. A variety of final comments were made, mostly the comments reiterated views expressed elsewhere in their consultation responses.

Group Heading	Number of comments
Challenge role of the NDA	1
Consider reprocessing as objective	1
Consultation- other comments	6
Funding/ progress/targets	3
Length of the consultation/timing	3
Need for consistent information	1
No comment	2
Supply chain issues	1

## **Appendix 1: List of participants (online, email and paper responses)**

<b>First name</b>	<b>Surname</b>	<b>Organisation</b>
		Allerdale Borough Council Nuclear Issues Task Group
		Berkeley Site Stakeholder Group
Richard	Baldwin	Blueprint 4 Growth
		Capenhurst Local Stakeholder Group
Jill	Callander	Chapelcross Site Stakeholder Group
Ronald	Johnstone	Church of Scotland
		Copeland Borough Council
		CORE
		Cumbria County Council
		Department of the Environment, Heritage and Local Government, Ireland
		Dounreay Site Restoration Group
		Dounreay Stakeholder Group
		EnergySolutions
		Environment Agency
Stuart	Conney	Food Standards Agency
Andy	Thomas	Future Solutions
		Harwell Local Stakeholder Group
Brian	Delaney	Health and Safety Executive, Nuclear Directorate
John	Hetherington	Hetherington Nuclear Consulting
		Isle of Anglesey County Council
John	Sanders	LCS Babcock Group
James	Tott	Magnox Electric
David	Bremner	Magnox North
Paul	Stephens	Magnox North
Neil	Griffiths	Magnox North Union Representatives Committee
Barry	Sillito	Multi-design Consultants
Ivor	Roscoe	None
John	Wilkins	None
Kevin	Warren	Northwest Regional Development Agency
		Nuclear Free Local Authorities
		Nuclear Industry Association
		Nuclear Legacy Advisory Forum
Stephen	Tothill	Nuvia Limited
Michael	Bregen	PA Consulting Group
Joan	Brown	Parents Concerned About Hinkley



First name	Surname	Organisation
		Prospect
John	Simpson	Prospect Branch of NUKEM Limited
		Scottish Environment Protection Agency
Phil	Hallington	Sellafield Ltd
Helen	Cassidy	Sellafield Ltd.
		Shetland Islands Council
Steve	Whitehead	Springfields Site Stakeholder Group
Phyllida	Parsloe	Thornbury Town Council
		Trawsfynydd Site Stakeholder Group
Graeme	Stonell	UKAEA
		Unite representatives at Hinkley Point A site
		Unite the Union
Gregg	Butler	University of Manchester
Tony	Lawrence	West Cumbria Business Cluster
John	Roberts	Wylfa SSG
Steve	Balogh	
Richard L.	Bardsley	
Ann	Goldsmith	
David	Lowry	
Kerry	Trout	
Denise	Varley	
Rachel	Western	

## 9.0 Dounreay Site Restoration Limited

### 1.1.1 Overview

- Filtered on the Additional activities group

Q15. Do you have any comments on the key activities and/or the key focus for the site managed by Dounreay Site Restoration Ltd?		
UserID	Groups applied	
<a href="#">User ID: 244</a>	Additional activities, <a href="#">Learn from decommissioning/ national coordination,</a>	
	1) There seems to be no start of grouting of difuser & under-sea discharge line - completed in 2011/12. 2) No mention is made of sub-sea particle retrieval. 3)The site and waste discharges should be managed to ensure doses to the public, via the food chain are as low as is reasonably achievable	
<a href="#">User ID: 2120</a>	Additional activities,	
	Key SLC activities 2009-2012 - HSE's Nuclear Directorate believes that these should include development work to enable removal and conditioning of wastes from the shaft and silo.  Key Site Activities 2009/10, 2010/11 and 2011/12 - should include NaK destruction, testing and commissioning of equipment for breeder removal from DFR, development of passivation process for reactor residues (ie Water Vapour Nitrogen process).  Regulatory matters 2009-12 - there are several more 'approvals' which could be mentioned: DFR decommissioning safety case; pre-operational safety report for NaK destruction plant; Agreements for breeder removal; WVN preconstruction safety report; etc.	

Q15. Do you have any comments on the key activities and/or the key focus for the site managed by Dounreay Site Restoration Ltd?		
UserID	Groups applied	
<a href="#">User ID: 1056</a>	Comments on language/ acronyms,	
	You need to spell out what this means so taht we can understand waht teh future holds	

Q15. Do you have any comments on the key activities and/or the key focus for the site managed by Dounreay Site Restoration Ltd?		
UserID	Groups applied	
<a href="#">User ID: 78</a>	Learn from decommissioning/ national coordination,	
	seems to me that dounreay and sellafield are the cost burnden they are due to successive governments trying to plaster over years of indecision by creating, integrating and closing companies in the industry so the public can't understand what is progress or otherwise is being made.	
<a href="#">User ID: 118</a>	Learn from decommissioning/ national coordination,	
	NDA needs to ensure learning from other sites is applied to Dounreay (or that Dounreay has access to it) and that learning from decommissioning / waste management at Dounreay is applied at other sites. There needs to be greater coordinated thinking on these subjects nationally.	
<a href="#">User ID: 244</a>	<a href="#">Additional activities,</a> Learn from decommissioning/ national coordination,	
	1) There seems to be no start of grouting of difuser & under-sea discharge line - completed in 2011/12. 2) No mention is made of sub-sea particle retrival. 3)The site and waste discharges should be managed to ensure doses to the public, via the food chain are as low as is reasonably achievable	

Q15. Do you have any comments on the key activities and/or the key focus for the site managed by Dounreay Site Restoration Ltd?		
UserID	Groups applied	
<a href="#">User ID: 125</a>	Specific text query,	
	DCP is mentioned on p 57 but not p58 which looks odd.	
	I wonder how high the priority is for PFR decommissioning once all the Na has been removed. Are DFR and the FCA facilities a higher priority?	

Q15. Do you have any comments on the key activities and/or the key focus for the site managed by Dounreay Site Restoration Ltd?		
UserID	Groups applied	

[User ID: 2165](#)

Support PBO Downreay,

NWDA welcomes announcement of  
the competition for a new PBO for  
Downreay Site Restoration Ltd.