



04 February 2020  
Ref: DSG(2020)C007

NDA Business Planning  
businessplanning@nda.gov.uk

Dear Sir/Madam

**NDA DRAFT BUSINESS PLAN: 1 April 2020 to 31 March 2023**

The Dounreay Stakeholder Group (DSG) is represented by over 20 organisations and therefore this response is one that is generally agreed by most. 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.

**Draft Business Plan**

The Dounreay Stakeholder Group welcomes the opportunity to provide comment and/or questions on the NDA's Draft Business plan.

- CEO's message: We note the CEOs message about One NDA. The DSG remain unconvinced this can actually become reality when you are still working under different models for different sites. The only way you can truly deliver a One NDA is taking all sites back in-house but as was stated publicly at a recent DSG meeting this is not 'currently' in your plans.

We welcome his statement regarding listening to stakeholders however words are easily spoken - it is how this is done in practice that will be the real test. Actions not words is now required.

- Page 7, under NDA Mission Progress, there is a typo – mssion should read mission.
- Page 15: We welcome a 'One NDA' approach but would imagine the tensions between those that the NDA manage directly while, as for the Dounreay site, a contract has been agreed and is being worked to. If NDA is not the 'controlling mind' how do you reconcile a 'One NDA' ethos alongside a contract to take a site to interim end state. This has been asked a number of times and no answer

**Please respond to:**

**June Love  
DSG Secretariat  
Dounreay.com  
Traill House  
7 Olig Street  
Thurso, Caithness, KW14 7BJ**

**Tel: 01847 890886  
Fax: 01847 893459  
Email: [info@dounreaystakeholdergroup.org](mailto:info@dounreaystakeholdergroup.org)**

has been given. It stands to reason that a site having a target cost contract means that some things that the NDA would like to implement may not be so palatable for a parent body organisation that has a contract agreed.

- Page 15: While applauding the NDA striving to achieve a number of outcomes under the One NDA, the 'increased value for money for the taxpayer' is one that you will need to demonstrate further before increased confidence can be gained. This is said in the context of two contracts taken back in house (Sellafield and more recently the Magnox sites) and the amount of money that was paid out to terminate these contracts. Achieving value for money should not be code for simply making savings. Real value for money will be driven by innovation not simply by a stroke of a pen to write something off.

Given we have noted the cancelled contracts for Sellafield and Magnox the DSG believe that the NDA are probably considering the long-term future of the Dounreay contract. If 'improved stakeholder confidence and trust' is to be recognised and met then the NDA should be acknowledging this as a potential. As a group, we have continued to ask this question with responses such as "not currently being considered" but privately there have been a number of comments made which leads us to believe that the route of travel will indeed see the Dounreay site come back under the ownership of the NDA. For the confidence and trust of the Caithness & North Sutherland community it would be useful if the NDA would be truthful in what the forward plans are for the Dounreay site – our community deserves nothing less.

- Page 18: Spent Fuels Strategy. This section is weak in that there is no direct understanding of the longer-term solution.
- Page 20: We agree with the four strategic themes and echo that these need to be closely linked. However, these need to be weighed against the skills, socio economics and procurement functions as well. At times it feels like as NDA deliver one part of their mission it is to the detriment of other work streams.
- Page 24: We note the strategic outcomes in the tables presented (pages 22 to 25) and ask for clarity whether the Dounreay milestones are those agreed with the programme as it stands now or whether this is looking ahead to the new performance plan that has recently been submitted to you.

DSG has continued to ask why Sellafield with around 100 years left of decommissioning work qualifies for such a high level of socio economic support. While other sites' socio economic offerings look patchy at best. It appears that Sellafield's socio economic budget far outweighs the entire Magnox sites and given these sites are due to close sooner (as will Dounreay) it appears that the 'one NDA' ethos does not stretch to a level playing field when it comes to socio economics.

We are aware that NDA is updating its current socio economic strategy and welcome this refresh. True partnership working is required to make sure there is a joined-up approach to this. Socio Economic funding should be considered against how sustainable the project is and must demonstrate how a project can become self-financing when funding support ceases. If this is not considered, projects that are funded with public money will simply cease to exist as soon as that funding is not available. If applications cannot demonstrate sustainability beyond public funding to pump prime an activity then these activities should be considered carefully before funding is allocated.

On the supply chain and public/stakeholder engagement/skills we question whether the NDA really believe this to be the case? These are quite high level messages but the reality on the ground may differ significantly. Within the stakeholder engagement – trust is the key word but trust has to be earned. With the constant change of NDA direction (sites under commercial management, sites taken back in-house) we believe NDA has a long way to go to earn that trust. NDA need to ensure that it ensures that all sites are treated the same for these critical enablers.

- Page 26: DSG agree with the critical enablers but emphasise the need to join these up with the strategic outcomes. As stated before, it would appear that a driver to deliver a strategic outcome may fly in the face of delivering a critical enabler and perhaps NDA need to consider this in the broadest concept.
- Page 27: On the skills piece, we welcome the focus on developing future skills. There has been some discussion around the mobility of staff across the nuclear estate but there has been little information around this – it would be useful to understand what NDA means by mobility of staff. The DSG believe that while Scottish Government’s policy is for not supportive of nuclear (caveated with there appears to be some consideration for new technology) there would be no reason that some of the skills from Dounreay could be utilised in the overall NDA mission. That said, from a socio economic point of view, we would like to see these people remain in Caithness & North Sutherland and therefore the work that may perhaps be needed would be done remotely. The Engineering Hub that is being considered from the Parent Body Organisation perspective is something that we would expect NDA to also be considering, ie does NDA have the necessary skills coming from other sites that could work remotely and service the NDA mission. This is something we want to see more dialogue and planning around. How NDA ties the skills work stream in with the Government strategy, Nuclear Sector Deal, reuse of NDA land, innovation, research and development etc would be something that is essential and should ultimately lead to ‘value for money’.

On the same, but separate note, there is no mention of NDA Shared Services and something that our area believes we could capitalise on and continue to provide NDA services across the estate far beyond the interim end state of the Dounreay site.

- Page 27: Research and Development: This is something that, for whatever reason, does not appear to be well advertised across the supply chain companies dependent on the area you live. We believe more should be done to promote the potential for research and development and ensure there is a level playing field for all supply chain companies to be alerted to the potential funding that could be made available. It may simply be that DSG is not sighted on this information and it would be useful for NDA to outline how it reaches the supply chain when opportunities for R&D are raised.
- Page 31: We note the comments on commercial income – it would be useful to understand how successful NDA is when pursuing commercial opportunities. This, as far as we are aware, is not something that is regularly reported.
- Further, we note that the budget is set for the coming financial year but is then subject to the spending review. Therefore you cannot guarantee delivery of the mission beyond financial year 2020/21 as funding has not been agreed. If the spend review does not provide the requirements to continue with the programmes how does NDA expect to fulfil their mission. If after next financial

year the NDA's funding is cut it is important that NDA set out how that impacts on the various sites around the estate and how priorities will be identified. While we recognise there are major hazards on sites that will require continued decommissioning other issues (such as continuity of decommissioning plans, effects of areas if cuts are sudden, etc) require to be considered before any major cuts to site budgets are made and it is imperative that the NDA are honest as early as it can be about the potential funding allocation for sites during year 2 and 3 of this business plan.

- Page 37: notes that DSRL will continue to recover Dounreay spent exotic fuel. We are assuming that this is the residuals that are left following successful completion of exotic fuel transportation to both Sellafield and US.
- Page 53: We note some of the milestones for delivery at Dounreay and find it hard to believe that the site can reach its interim end state by 2033. The shaft/silo is a major project that has been constantly deferred due to other priorities. Again, continuity is required to ensure that there is enough resource both in people and funding to allow the Dounreay site to reach its end state mission. At this time it is hard to believe anything regarding dates in the business plan in relation to Dounreay.

We also note that no mention is made of the Higher Activity Waste Stores that will remain on the site. Under 'site progress' your document says free from Radioactive Materials – this will never be the case, or certainly not for a huge extended period due to Scottish Government policy. Scottish Government policy needs to be something that is taken on board here alongside other Scottish Sites.

- Page 54: the business plan notes 'support SMEs at Dounreay'. There is no strategic outcome referenced here and therefore it is difficult to understand the scope and/or targets that have been set for this.
- Page 55: Our original question was to ask for clarity on whether NDA has taken this information from the old plan or was utilising information from the new performance plan that we believe was submitted to NDA for comment/approval in September. We were informed at a recent meeting that the information for Dounreay is based on the old plan. If this is the case, the current shift of the interim end state date (2032-2033) as opposed to 2030-33 would lead us to believe you have considered the new performance plan going forward but clarity on this would be welcome. We would also like to note that there continues to be a degree of scepticism as to whether 2033 is actually achievable. Perhaps the long awaited new performance plan will be clearer in achieving interim end state. The most important thing here for our community and for the Dounreay workforce is the new performance plan which clearly needs to demonstrate it is credible.

Again, as we are on the subject of the performance plan, it appears to DSG that this has been dragging on and while we understand that the draft performance plan was submitted to NDA in September it would be really useful to have a full timeline of when that performance plan is expected to be finalised and approved – this will give the workforce and community some confidence on the delivery of such plan. It also allows for our regeneration partnership to understand the potential staffing profile to try to mitigate the decline in numbers working on the site into new employment. As you can imagine there has been a lot of rumours circulating about the site's performance plan and the staffing level as well as rumours of what potential redundancies could have resulted in financial year 2020/21 had the NDA accepted the Parent Body proposal.

These rumours, we believe, have been fuelled by NDA personnel. DSG do not care about the politics between the parent body and the NDA – what we care about is our community and how our area survives life after Dounreay. Posturing between NDA and PBO does not help and will only continue to breed the uncertainty that has been prevalent over the last couple of years.

- On a general point, DSG asks what consideration the NDA has given to when it can announce its mission is complete from an area. As example, while we appreciate the interim end state is around 2033 and there would be a phased reduction of staffing long before that end state date, we are also aware that the higher activity waste, the low level waste facilities, etc will remain in situ for hundreds of years beyond the interim end state date. Therefore, it is essential for NDA to clarify and ensure expectations are set as to when the NDA believe their mission is complete. This will allow more clarity around when NDA exits from an area especially in terms of socio economic commitments going forward.

As we have taken the time and trouble to read through the NDA Business Plan and considered and collated our views we would expect to receive a response to this letter prior to the NDA draft business plan being finalised and published. Since the last review of the business plan where DSG submitted a response and despite promises that NDA would respond in full a response was never forthcoming. Therefore we expect to see a response to this submission as quickly as possible.

Yours sincerely



**Roger Saxon**  
**DSG Chairman**  
*Sent on behalf of Dounreay Stakeholder Group*