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Nuclear Decommissioning Authority  
Email: [strategy@nda.gov.uk](mailto:strategy@nda.gov.uk)

Please respond to:

June Love  
DSG Secretariat  
Dounreay.com  
Traill House, 7 Olig Street  
Thurso, Caithness, KW14 7BJ  
Tel: 01847 890886  
Email: [info@dounreaystakeholdergroup.org](mailto:info@dounreaystakeholdergroup.org)

Dear Sir/Madam

#### **NDA STRATEGY 4 - PRE-CONSULTATION**

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 have been encouraged to provide their own response.

DSG welcomes the opportunity to provide comment at an early stage of the development of Strategy 4. DSG makes the following comments:

#### **General**

- This is a high-level strategy document and therefore contains high level statements as you would expect.
- The overall objective is to "To sustainably decommission and remediate our designated sites and release them for other uses". However, a Critical Enabler objective is to "To reduce the inherent risks and hazards of the nuclear legacy and deliver our mission sustainably while improving health, safety, environment and wellbeing across the NDA group." Therefore, as a minimum we would have expected to see reference to health, safety, environment and wellbeing in the overall objective.  
The 2004 Energy Act specifically mentions health and safety and so we believe these in particular should be given due prominence.

#### **Site Decommissioning and Remediation**

- DSG agrees that the overall objective is to ensure remediation of sites and to release them for other uses.
- As land is not at a premium within Caithness & North Sutherland, DSG would encourage the NDA to discuss with Scottish Government the potential for Research and Development either within the renewables or nuclear as a potential use for the site following closure.
- DSG notes that approaches to decommissioning and remediation reflect the changing nature of hazards that exist at the site. Recognising that Dounreay's hazards continue to decrease, we strongly urge NDA to ensure funding remains at an appropriate level to take the site to

interim end state.

### **Spent Fuels: covering the topics of Oxide, Magnox and Exotic spent fuels**

- DSG agrees that fuels should be consolidated in one location, noting that some members of the DSG do not agree to the transport of nuclear material.
- This is a major part of decommissioning and the storage of plutonium will be an issue.

### **Nuclear Materials (Plutonium and Uranium)**

- ~~DSG notes the objectives and changes.~~ The strategy states that all separated plutonium has been transferred from Dounreay to Sellafield. Are there any other categories of plutonium still at Dounreay? If so, will Dounreay be obliged to retain any of their plutonium until a GDF is constructed?
- We note the Pu strategy is to place it 'beyond reach', which would imply treating it as waste. However later in the section you discuss reuse as mixed oxide (MOX) fuel for light water reactors. Which is it?

### **Integrated Waste Management**

- DSG agrees with the opportunities that alternative treatment technologies could offer and would urge NDA to consider Dounreay site as part of an R&D initiative to trial and test new technologies as these emerge. This could potentially have a long-term future in the area following the completion of the decommissioning programme and with a local supply chain who could support and have the facilities to provide off-site trials we feel the area would be well placed to provide this support into the NDA.
- We also recognise the climate challenge that will undoubtedly impact on all businesses and waste management should be a consideration of this as it moves forward.
- Have the costs of rebuilding the Interim Higher Activity Waste (HAW) Stores every 100 years been included in the overall decommissioning costs? As these costs arise from Scottish Government HAW Policy will the UK Government and NDA fund these costs, or will they be passed to Scottish Government?
- Not sure that this strategy is really developed, even after producing strategy document in 2019. Again, it looks like that there will continue to be long term storage on site for a considerable time.

### **Asset Management**

- Notes that this strategy is well developed and should continue as is.

### **Cyber Security**

- Cyber Security will be an important element of the resilience of protection of information. It is noted that as more people are working remotely from homes rather than from offices (Covid-19) this is probably more important than ever to ensure a robust system.

### **Health, Safety, Sustainability, Environment and Wellbeing**

- Given people is at the heart of the OneNDA we are surprised that this topic comes after Asset Management and Cyber security and believe this should be your number one priority.
- We welcome the development of a carbon reduction strategy to support UK and Scottish Government commitments on net zero greenhouse gas emissions. It would be useful to understand how this will be measured and reported on in the future.
- Mental health issues will be even more at the forefront than ever before, especially the impact they are having in our area at the moment.  
NDA need to be really proactive in this field and identify all streams of mental health problems as a priority. **With the likelihood of staff working from home or off-small-scale off-site locations due to Covid-19, mental health issues will be more difficult to identify and monitor. This should be factored into H&S policy.**

### **Information Governance**

- We welcome the introduction the requirement to develop knowledge and information improvement plans and/or roadmaps. It would be useful to understand how this will be measured and reported on in the future. **With Dounreay becoming part of 'One NDA', knowledge retention should be an important consideration.**

### **International Relations**

- The relationship with Japan is specifically mentioned here, need to ensure that Dounreay can continue to play a key role in this. Would be interested to see who is in the Corporate Centre International Relations Team. It would be useful at the earliest opportunity that the IR Team comes to Caithness and provides updates on the opportunities that the area could capitalise on.

### **People**

- People are your greatest asset and we are surprised that this does not feature first within the critical enablers.
- Good to note that skills are still high priority in this area. Interesting to see that working with TU and broader stakeholder community is priority.
- **It's also important to provide continual retraining and transition training for those transferrable skills as the workforce needs change – particularly important in a 'closure' site.**

### **Public and Stakeholder Engagement**

- Interesting to note that NDA wish to be more proactive in this area and we note the changes made in the strategy. These are welcomed but need to be put into practice. Words are easily spoken, evidence of an improved engagement of stakeholders need to be measured.
- **We note there is no mention of site stakeholder groups, which we feel need to remain supported and independent.**

### **Research, Development and Innovation (RD&I)**

- We agree that broadening out the scope beyond underpinning science and engineering to other non-STEM topics is the correct thing to do.

### **Security and Resilience**

- We welcome the NDA's aim to become a leading UK SAR organisation where learning is captured, shared and utilised to continuously improve the SAR arrangements. It would be useful to understand how this could be measured to demonstrate success and how this could be reported.

### **Socio-economics**

- Socio economics is a subject that DSG and the wider community feels is very important and the NDA needs to show some leadership in working with agency partners and the respective Governments to ensure that any investment made in an area for the operational need for a site should also relate to a legacy for the community in the future. This can only be done is Governments, Councils and those with an economic remit work together to achieve this.
- We welcome the new strategy and its focus on specific sites.
- There is a recognition that Covid-19 has had a tremendous impact on local business and while we agree with the strategy for the foreseeable future, we believe NDA and the sites need to consider how they support the economic recovery.
- We also believe that NDA has opportunities to develop support services at nuclear sites that could continue after decommissioning is complete. This would provide NDA employment for a future beyond the closure of a site and should benefit the NDA estate. This is in relation to work mobility rather than worker mobility. If NDA are serious about exploring this then work needs to start now so that these opportunities can be considered and could provide a smooth transition from a site licence company into a vehicle that provides services across the NDA estate.
- The 'Local Economic and Social Impact' strategy 2020 – 2026 should be referenced here.

### **Supply Chain**

- We agree that small and medium companies are key to supporting the decommissioning mission and every encouragement should be given to collaboration across sites to support these activities.
- Supply chain report omitted the word "local". This needs to be recognised in our area as it is a vital link.
- When Dounreay becomes part of One NDA, hopefully this will provide better opportunities for the local supply chain.

### **Transport and Logistics**

- We note that NDA invested heavily in the modifications and installation of a crane at Geogemas junction to allow nuclear transports by train.
- When this was first discussed it was identified as a potential socio-economic legacy. We are aware that DRS were due to trial a commercial freight until Covid-19 restrictions came into being.
- Should the benefits of commercial freight not be realised the NDA need to make a firm commitment to decommission the site and return it to its previous state prior to the crane being installed.

### **Non-NDA Liabilities**

- We are aware of the plans for the MOD site next to Dounreay. MOD and NDA need to be able to have an open and transparent discussion with the community to outline the plans for the Vulcan site with an expected date for NDA taking ownership of the liabilities.