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Dear Sir/Madam

NDA DRAFT STRATEGY 4

Dounreay Stakeholder Group (DSG) welcome the opportunity to provide comment to the draft NDA strategy 4 and thank you for early discussions and presentations you have provided on this subject.

The DSG consists of a number of organisations and while this response is a consensus view of the majority of members those who do not agree with statements made here are encouraged to respond to this consultation directly.

DSG response to the questions set out in your draft document are provided below:

1. We are currently developing our sustainability strategy. How ambitious should we be in supporting UK government and the devolved administrations' sustainability R&D

We believe that NDA should be very ambitious and support targets of both UK and devolved Governments. It is equally important for NDA to understand local strategies and ensure that any targets set by NDA allow the flexibility of each community achieving the aspirations they believe is important. NDA need to be clear what and how they can deliver and ensure it is a joined up approach with the SLCs alongside community aspirations.

Any activities being considered should take on board the four pillars of sustainability – economic, culture, social and environment.

Our partnership approach in Caithness and North Sutherland, via the CNSRP, has recognised this need and the CNSRP Hub is seeking to incorporate sustainable principles

into all of its decision making processes. The hub programme includes the development of a strategic decision making tool to allow organisations to adopt this approach and that, NDA, as a partner should commit to working towards trialling/using this once it is developed.

Key to this is that NDA need to ensure that this is something that is well understood amongst the whole NDA and its SLCs – if you are genuine about doing something then it needs to be full co-ordinated and there are times when this does not appear to be the case.

2. Our approach to the development of this Strategy has been to engage collaboratively with key stakeholders. In your opinion, is there anything we should have done differently during this development phase?

DSG has been pleased to be involved in pre-consultation and involved in forums that allow discussion on these topics to take place. As a group, we have pointed this out before, but it would be useful if when stakeholders are taking the time and trouble to respond to consultations that NDA provides a clear response to whether they have taken points on board and where they have not explain the reasoning behind this. We have raised this time and time again that there never appears to be any clarification on the feedback provided and it ends up with more work for stakeholders having to plough back through draft documents to find out whether any of their comments have been taken on board. Consultation and engagement is a two way thing and it would be helpful if NDA could start thinking about how they close the circle when it comes to feedback.

3. We are planning to update the document that describes the NDA Value Framework, which was originally developed with stakeholders over 10 years ago. In your opinion, does the Value Framework still capture the factors that should be considered in our decision making?

In our opinion the value framework continues to capture the factors that should be considered. We note that NDA has identified that a better need to communication with SLCs and subsidiaries during strategy development and are quite disappointed to hear this given that the sites have to deliver the strategies in place and it would appear you have been lacking in asking for the sites to input.

4. This section summarises our current strategic position. In your opinion, what are the key issues the NDA should address and are they adequately covered by this Strategy?

We are aware you are currently working on a Scottish strategy which will cover Scottish Government policy as well as UK Government. We look forward to seeing that strategy and suggest that if NDA have learnt lessons on how they engage with SLCs etc that they ensure that all three Scottish sites and stakeholders have an opportunity to input into this.

5. The NDA is committed to reviewing the way in which we express the level of concern presented by a facility to help us prioritise our work and to track our progress in reducing the level of concern. What other aspects of progress would you like us to track? How would you like to be engaged in the development of this work?

We believe this should come through the site decommissioning delivery – it would be useful if there is a particular challenging job it would be useful to provide the information on activities to undertake the task, the expected timescale and the cost – then progress could be reported through of how this is progressing. From an SSG point of view this should be ‘business as usual’ with site reporting and providing that sort of update.

6. Do you agree with our aspiration to re-use waste for a purpose on site (e.g. void filling and landscaping) where it represents a net benefit and allows the site end state to be achieved? What factors should we consider?

DSRL has been engaging with the DSG on this matter for a while now when looking at interim end states for the site. As long as this complies with the regulatory regime and it provides value for the taxpayer and provides a clear, coherent message that this does not mean nasty waste is being buried or diluted then we have no issues with this being explored. We believe that we have the ability to input locally into this via DSRL at the appropriate time.

7. As well as ensuring that remediation of our sites is safe, sustainable and publicly acceptable, we also aspire to enabling their beneficial reuse as early as possible. What are your views on using controls (e.g. land use restrictions) to protect people and the environment from residual hazards so that the site can be used in a restricted way until it is suitable for unrestricted use?

While we can appreciate the need and desire to enable beneficial reuse of sites one size will not fit all here. While recognising that for some sites land will be at a premium and therefore the re-use of that site from a commercial/tax payer point of view should be considered as a good thing it is difficult to see what benefit that this would bring for a site like Dounreay (unless it was a re-use that required security fences etc) – the infrastructure is old, the HAW waste stores will be on site (Scottish Government policy) and perhaps the perception of businesses operating close to waste stores may not be something that businesses would wish to do unless of course NDA kept the site as a potential research and development site to solve issues that may be at Dounreay or further afield.

DSG has always noted that it would be difficult to recognise a final end state where the site was being used for new economic purposes but have always been of the opinion that the end state (and hence the end use) should be kept flexible given it is impossible to know right now whether anyone would be interested in utilising the site or parts of it.

8. Do you think it is appropriate for us to seek interim uses of our land and in your opinion, what should these include?

See above (question 7). We believe Dounreay a suitable site for the large data store planned to make viable use of the MeyGen tidal power, which will require both physical and cyber security.

9. To support the development of a suitable range of treatment technologies we need to invest now in creative thinking and innovation to secure significant benefits in the long term. Do you believe the NDA should continue to adopt this approach recognising that there could be a short-term cost burden, as delivery of the next generation of treatment facilities will take time to implement?

Absolutely agree that NDA needs to continue to look at innovative ways of dealing with legacies. As a community group we would like to invite the NDA to 'think outside the box' and look at what Caithness with its existing nuclear skills could do to support you in this mission. This would allow other sites to continue their focus on decommissioning while Dounreay could provide some of this learning and R&D for you. This could provide a lifeline to some of the DSRL workforce because if proved to be successful it could continue to deliver this type of support for NDA even after site decommissioning is complete. It does not all have to sit at Sellafield.

10. We implement the Waste Hierarchy and minimise the amount of waste we have to dispose of. However, to complete our mission we do need a range of disposal facilities to accommodate our diverse radiological and non-radiological waste inventory. Do you think our overall disposal vision is clearly articulated and do you support our key messages?

Scottish Government policy dictates that waste from Scottish sites will be stored near surface, near site. However, we are aware that there are some wastes on the Dounreay site that cannot be stored within a HAW store. We believe that NDA needs to consider a range of disposal facilities to minimise the number of stores/disposal sites that will be required across the country.

It is misleading to suggest that NDA is "directly supporting Scottish Government HAW policy and implementation strategy" with regards to the near surface stores/disposals. The UK Government HAW strategy for this form of storage/disposal is not intended/designed for HAW that needs to go to a GDF. Scottish Government HAW strategy is for near surface storage only, not disposal, of all categories of HAW.

11. How should we develop our HSSEW strategy to better support NDA group operations?

It appears that this is now being taken seriously within NDA with a number of initiatives being taken across the NDA estate. This is welcomed and should obviously continue and is now even more important since a large proportion of site staff have been working in physical isolation at home which is known can lead to mental health and wellbeing issues. However, the current initiatives are aimed mainly at support in the workplace and these may need to be reviewed, or added to, in light of the increase in remote working.

12. SAR is a new topic strategy for the NDA. Does it cover everything that you would expect? Should more emphasis be placed on group resilience?

Dounreay is a Category 1 site so we expect to see a level of SAR that encompasses the security required for site. As that hazards reduce then Security and resilience should be commensurate with the site category.

13. Cyber security is a new topic strategy for the NDA. What are your views on adopting this approach and what else should we be doing in this area?

DSG has been pleased to see some local recruitment to support the cyber security for the site. With more remote working (since Covid) has come into play it is apparent that more

and more work can be done from anywhere and equally there are more email scams being produced and sent each day. In order to maintain the integrity of your information Cyber security is probably an essential part of your considerations. We believe our local college could play a part in the delivery of this policy.

14. What are your thoughts about the scope of the RD&I strategy going beyond traditional STEM subject boundaries? What areas of research would maximise benefits to the NDA group?

If there is a need for RD&I (which there is to ensure best value for the taxpayer) we believe it should go well beyond the traditional STEM subject boundaries if that is what is required. Your question on what research would maximise the benefits is a strange one - we would have thought that given all sites should have a decommissioning plan with many risks and assumptions it would appear to us that SLCs are best placed to identify where RD&I was required for an issue that did not necessary have an answer. This is for NDA and the SLCs to come together and look at what needs to be done and is there solutions for dealing with it all and if not what needs to be done to get the answer - then you provide value for money as you simply concentrate on RD&I from a nuclear decommissioning point of view. Experience says that an innovative idea for nuclear may also be something that could support (say) oil and gas. But NDA must not lose sight of its mission and that is to decommission civil nuclear sites and that is where the funding should be concentrated on alongside any relevant RD&I.

15. Do you think the encouragement of a culture which promotes innovation is an important topic for the NDA, and do you support the approach being taken?

Innovation and the approach are the right thing to do. This however needs to be weighed against cost, risk and time.

16. We are keen to have greater diversity in the NDA group workforce; what more should we be doing to achieve this?

Diversity is a worthy thing to do however NDA should not lose sight of the fact that when employing someone to do a job it should be the best person for that job and not because you have some statistics to fulfil - at present it appears that NDA and its SLCs does quite a bit in the promotion and career development of all staff and you probably have the right balance in the approach you are already taken.

17. How far should we engage our supply chain in meeting any future sustainability targets?

If NDA and the SLCs are looking to undertaken sustainability targets then this should be flowed down into the supply chain contracts or what is the point! Having said that it would be useful to understand how the NDA and/or SLCs would enforce these targets and any enforcement would need to be stringent. It appears that while the supply chain is requested to include various plans within their commercial bids there does not appear to be a mechanism that demonstrates that the supply chain has successfully delivered on their promises. It would be good to see a tightening of this so that supply chain is in no doubt if they issue a plan for sustainability (or anything else, ie socio economic plan) within a bid then they are expected to deliver or there is some sort of penalty.

18. We are developing our group-wide digital vision; in your opinion, how ambitious should we be?

While we believe NDA should have ambitions on how you develop your digital vision it does need to be caveated within reason – would we want to see funding to continue decommissioning the site or set up a new group-wide digital vision. So yes, be ambitious but not to the extent that the core mission suffers. As an example of where the NDA becomes a bit disjointed – DSG could potentially argue that the lack of digital vision would mean more people would have to visit the area to access the archives and therefore there would be more spend in the local area as people visit and stay over, eat or shop in the local area. NDA needs to be aware that everything that may wish to do to improve or be visionary may also provide a negative impact to something or somewhere else!

19. How should we reduce the barriers for entry into the supply chain for local SMEs?

Companies bidding for work on a nuclear site are generally those bigger companies as they have the bandwidth to complete tender submissions etc – these companies should be encouraged to look at local supply chains to help deliver and if there is particular SMEs who have not entered the nuclear supply chain for whatever reason it would be useful if the national companies supported them through the process. This in itself would lead to a socio economic benefit for the area where the work was being undertaken.

20. How can we involve more people in our work and better coordinate our engagement activities?

DSG constantly reviews its membership and focus and every 3 years carries out a more formal review. It has been interesting to us to see that some SSG chairs have never changed since the day the NDA introduced SSGs. There are times when things can get confusing between NDA engagement and site engagement – the opportunity to engage with NDA strategy etc is good and we welcome that but would expect that most of the engagement comes via the SLC. DSG has a good network and NDA refreshing their approach and working through the best way of communicating that is something that NDA needs to do – too many times we get duplicate information from NDA and site with NDA reporting on site activities when we believe that is for the SLC to do. There needs to be a clear divide as to who is engaging with who and why.

Experience has taught us that it is better to look at ‘individual topics’ and consider ways of getting to the ‘hard to reach’ or ‘invisible’ groups. Dependent on topic and audience you are aiming to get feedback from then there is a variety of ways to get others involved – ie competitions, STEM activities, ‘topical approach to gauging views’, student’s involvement in debating topics, etc. All done by DSG with the most recent example being the Japanese project when we encouraged Thurso high school to team up with a Japanese school to learn about each other’s cultures – this was off the back of Japanese interest in Dounreay and the DSG chair visiting Japan. Sharing and learning across sites may be useful as there lots of different ways of involving people without them having to commit for the long term.

21. We recognise the value of international engagement to our mission. Where our core mission allows, how best could we utilise the capabilities of the NDA group to progress broader UK interests?

DSG believes that NDA should be proactively looking to progress broader UK interests and these should be considered as some of the sites run down. There will undoubtedly be skills and experienced staff being paid off as the decommissioning programme comes to an end unless NDA gets innovative. As mentioned before Covid-19 has taught us that work can be carried out remotely and therefore if you are really serious about this and wish to make a success of it for UK plc and the purse then we would strongly suggest you look at how you can set teams of people working in different areas of your estate into 'remote project teams' who can deliver the broader interests on your behalf. If a site has a long term decommissioning plan then it stands to reason that it would be better use of other resource to take forward broader UK interests to allow those progressing decommissioning plans to concentrate on that in full and not be side-tracked into having to do a day job plus a broader UK job. The UK nuclear sector has a lot to offer other countries and it is about time this was put on a more commercial footing where UK plc actually benefited. We would be delighted if NDA considered this as part of a legacy of the Dounreay site.