

DOUNREAY STAKEHOLDER GROUP

These notes reflect feedback and questions that DSG members raised after receiving a written update report on activities relating to both Dounreay and Vulcan (July sub group paperwork and subsequent correspondence).

Where responses have not been responded to as yet the questions have been deleted from this document and will be progressed through the next feedback document (which will incorporate feedback from the November sub group paperwork due to be issued on 11th November 2020).

FEEDBACK AND QUESTIONS RAISED

Nuclear Decommissioning Authority:

Questions on the site transition were raised in the July feedback paper. Further clarity has been requested on a number of questions. (for ease of reference the original question and answer is replicated here alongside the follow on question).

- *Does the NDA have delegated powers to decide on the annual funding for Dounreay or does it have to specifically get approval from the UK Government for each of its individual sites?*

Response: *The NDA has delegated authority to decide on funding for Dounreay.*

- For clarity, BEIS provide an overall amount, how NDA decides to spread that across the sites is NDA's responsibility?

Response: That is correct.

- *NDA's latest strategy for socio economic is welcomed and good to see focus on sites. However, the Parent Body organisation has made some very bold statements of intent, i.e. the setting up of a nuclear support hub. Can NDA commit to taking these projects forward when there is no longer a PBO?*

Response: *It's important that the PBO are allowed to make comment on any statements they made at the time. The NDA will continue to support the many projects identified to bring sustainable jobs to the area such as the Space Port, new developments at both Scrabster and Wick Harbours, and of course consideration of a whole range of other initiatives including the Nuclear Support or Engineering Hub.*

- If there is no longer a PBO it appears to me that they will not be taking forward the likes of an engineering hub in the local area. In recent discussions the whole topic moved full circle with the talk on how Covid-19 restrictions have shown that work can be done by anywhere. It would appear to me that the only way we will retain nuclear service support in the local area is through the will of the NDA. It would be useful to have some clear statements made from NDA in how this is going to be taken forward given there will be no 'private' body pursuing this as an opportunity unless of course NDA are considering looking at this in its entirety and would then seek private partners to deliver. The response provided above is at best woolly – lots of good words but progress towards delivering would speak volumes.

Response: *Any decisions about how we move forward will be taken together. It's not just about what the NDA thinks – this is about how we work as a partnership to identify common interests and act on these for the benefit of the Dounreay workforce and local communities.*

- *DSG have previously been given assurances that the decommissioning programme would not be affected by any change of ownership. How will NDA ensure that there will be no loss of momentum due to the changeover?*

Response: *NDA has worked hard with the SLC and PBO to agree a 12-month Performance Plan to ensure we have a clear path set for our decommissioning programme, and, as mentioned earlier, we are now working on the development of the Lifetime Plan. All partners involved are committed to ensuring there will be no loss of momentum to this programme.*

- We understand the plan for this year is progressing and there is also work ongoing around the next three years of the plan. Given NDA will be in prime position in April 2021 when can stakeholders expect to see the long awaited lifetime plan?

Response: We will keep all our stakeholders advised of progress as we go forward. Please be assured that we will use every opportunity to update stakeholders on progress of the lifetime plan when we have news.

Other NDA updates

- *In the previous DSG report, a question was raised and responded to: 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?"*

Response: *The cost of rebuilding the IHAW stores is not included in the decommissioning costs as the existing contract with the PBO concludes once Interim End State is reached around 2032. After this, the IHAW stores will still require monitoring and maintenance and this will be the responsibility of the NDA who will retain liability for the waste during that period.*

- *This response does not answer my straightforward question. Where is NDA going to get the money from after the Interim End State is achieved? If the rebuilding costs are not included in the full decommissioning costs, not just the PBO contract, then the decommissioning cost of Dounreay is underestimated.*

Response: *NDA's funding will come from the UK Government. The Energy Act, which created NDA, gave us the financial responsibility for cleaning up the sites allocated to us and therefore, NDA is responsible for meeting the costs and our funding comes from the UK government rather than the Scottish Government. Our budget, which comprises government funding and income from our commercial assets, is granted to us annually by the Government.*

- Your response explains the mechanism of obtaining funds but could you confirm two things: 1) Will the UK Government fund the rebuilding every 100 years of the Dounreay HAW Stores even though that requirement is not current UK Government policy but only Scottish Government policy?, and 2) Where can the fully costed estimate for fully decommissioning Dounreay including the ongoing repeating costs for the rebuilding of the HAW Stores be found?

Response: *NDA funding continues to come from UK Government and we will continue to comply with the legislation relating to decommissioning activity of our civil nuclear sites. It should be recognised that, in future years, both UK and Scottish Government policy will continue to evolve and of course we would be subject to, and abide by, any given legislation at that time. Meantime, any rebuilding requirement will be funded by UK Government, through the NDA, and in compliance with current UK Government legislation.*

NDA update (DSG(2020)P029)

- Covid-19 is obviously having an impact on Government funding and this may have a knock on affect to the funding NDA is provided for the nuclear decommissioning mission. When will NDA be in a position to know if this is going to affect their budget going forward?

Response: We have now submitted our application as part of the Spending Review. We hope to hear something early in the New Year and will keep you fully updated on Any news as we get it.

- Can NDA confirm how the UK RWM report would apply at Dounreay given Scottish Government has a different policy to England/Wales?

Response: Scottish Policy is for the Near Surface Disposal of Higher Activity Waste (HAW), and not Deep Geological Disposal as in England & Wales, for which RWM is responsible. At Dounreay, the strategy agreed with NDA, RWM & regulators, is to produce Higher Activity Wastes and to store them in purpose-built interim storage facilities on the Dounreay site, ready for when appropriate NSD facilities are available -there are no HAW NSD facilities available currently in Scotland. Wastes will be produced consistent with a "Letter of Compliance" (LoC) to ensure that the quality requirements of the waste package meet standards agreed by RWM & the regulators. The LoC agreed for Dounreay wastes is equivalent to LoC's which are produced in England and Wales for wastes which will be disposed of in the GDF. There are significant quantities of HAW which will be produced from the decommissioning of the Dounreay site which will not be suitable for near surface disposal, due to the long-lived nature of some of the radionuclides. This inconsistency with Scottish Policy will need to be resolved in due course; these wastes can however be safely stored with LoC in Interim Storage in the meantime.

- We note a number of new NDA appointments – the appointment of Hazel Blears to provide advice on social value is of particular interest to DSG and we would welcome more information (or a discussion with Hazel) to explore what this means and particularly interested in how social value can be considered across the entire NDA estate.

Response: We will be arranging an introductory session with representatives of DSG and Hazel very soon. At this session, Hazel will outline her role and how she intends to work alongside us and, in addition, how she will consult and engage with Dounreay stakeholders going forward.

- Is NDA satisfied that the timetable for the transition of the Dounreay site can be met. Can you tell us when you expect to make the announcement of the Managing Director and confirm that the MD will be put in place to allow that person the opportunity to be part of the interviewing process for the rest of the management team?

Response: We are very confident that we can meet the timetable for transition. We are currently going through a process of 'Due Diligence' and this is progressing to plan. We aim to announce the new MD in early November in order that the MD can be involved in selection of the senior team going forward.

- Can NDA outline how they will demonstrate and ensure diversity in recruitment and selection of preferred candidates?

Response: We have an open process for recruitment where personal information is redacted from the application forms – gender, age, ethnicity etc. It is so important for us that the right person is selected for each of these key roles.

- Covid-19 has in many ways dispelled a lot of myths around remote working via internet connections etc and it is pleasing to hear the discussion change from worker mobility to work mobility as we believe there are a lot of skills at Dounreay who could support the OneNDA's nuclear mission beyond the site decommissioning programme. Can NDA update us on the progress of the discussions on work mobility, for example is there an agreement of principles for voluntary movement across the businesses (either worker or work)?

Response: As part of our One NDA approach, there will be the ability for staff to move more easily across our sites. So recently, we have announced that where an employee from the businesses voluntarily transfers to another group business, they will transfer to the 'new' employer's terms and conditions with protections such as continuity of service and continuity of annual leave. In addition, all employees who are selected for inter-group interviews should have the automatic right to paid time off to attend the assessment/interview - this includes travel and subsistence costs. There will be discussion on the participation of any leadership, management, technical or functional development programme or qualification that is being progressed within their outgoing employer, and there will be the ability to access buying and selling of leave arrangements. These are just some of the many policies we are putting in place to ease the mobility of staff across the estate. (Happy to give more details as required)

Dounreay update (DSG(2020)P022)

- The Interim End State Delivery Team (page 3/ para 3): I believe it would be useful for the DSG to get a presentation on the latest thinking and developments on this project.

Response: DSRL will be happy to attend a DSG public meeting to provide a presentation on end states and latest thinking. We understand a virtual meeting of the DSG is being planned for October and if this is successful we would be happy to provide a presentation on site end states on a virtual platform at a date convenient for DSG.

Dounreay update (DSG(2020)P029)

General comment:

- Good to read about the apprentices and on-going recruitment of young people. That is what makes them stay here.
- Apprentice Recruitment : Encouraged to see that the apprentice recruitment has continued throughout this difficult period. Good to note that all engineering apprentices that have completed training have been recruited.
- Really good to show too how much input Dounreay has given to the community in this crisis. They are very much hands on.

Questions raised from DSG(2020)P029

- You reported an incident that happened in July where an individual was lifted off the ground. This must be extremely disappointing for the site as this mirrors an early incident where the 'work was stopped, evaluated, investigated, etc' but appears to have happened again. This must be a concern for the site and it would be useful to clarify who is responsible for supervising these lifting arrangements as this raises issues of whether supervision is competent and adequate.

Response: Any such event is concerning and we have a well-established investigation process that is used to understand contributing factors and learn lessons when required. All lifting arrangements have to be suitably planned and agreed, with appropriate supervision in place, before they can proceed. In line with our outlined processes a full and detailed investigation was conducted which indicated a number of improvements which have been implemented and tested by the regulator.

- Can you update us on the transition of the site – is it going to plan and how is site personnel coping with the additional strain of working through transition at the same time as trying to ramp up decommissioning activities on the site with the Covid-19 restrictions. It would appear to me that the site management have a lot on their plate right now (even without Covid-19 the workload for senior management must have doubled to ensure a smooth transition).

Response: The transition process is progressing, with the expectation that ownership will change at the end of March 2021. Throughout the transition process, the aim is to minimise the impact on the wider workforce and, for the overwhelming majority, preparations are taking place in the background. This allows most people to remain fully focused on Dounreay's core mission. For those who are directly impacted, such as those on secondment from a parent company, regular dialogue is taking place and support is available.

- It is noted in the update report that Mark Steele has been appointed to support the site transition and reports to the Dounreay MD. I note that both DSRL and NDA have work streams and then meet as a transition board. Can you explain who sits on the transition board?

Response: The transition board is attended by senior representatives of the NDA and Dounreay – Mark Rouse and Mark Steele for Dounreay, and their opposite numbers from the NDA. In addition, the director responsible for safety at Magnox attends to ensure that any learning from its recent transition is considered and implemented. The workstream leads from both the NDA and Dounreay also regularly meet with the transition board.

- Noting that there will be a virtual meeting on the 14th October and if this is successful can I suggest another useful topic for a similar type meeting would be for DSRL to provide an update on the 3 year performance plan which should include links into the Implementation Strategy alongside the transformation/people plan workstreams.

Response: Work is continuing to develop a revised near term work programme. We would be happy to provide an update at an appropriate time in the new year when more details are finalised.

- In the written report you outline the mobile robot being used for one of the most contaminated and inaccessible parts of the site. Can DSRL inform where this most contaminated and inaccessible part of the site is?

Response: The robot included in the last report was part of a trial undertaken in the D1200 labs within the Fuel Cycle Area. It is expected that the technology could be used in a number of facilities if the trial proves successful.

- The shaft and silo contract has been awarded to Nuvia alongside other companies including Graham Construction. Can DSRL (or Nuvia and their partners) provide an update on the socio economic activities they intend to carry out as part of this contract?

Response: DSRL is currently awaiting information on what activities within the socio economic plan that was provided during the tender process will be taken forward as part of this contract. Details and progress made will be reported through the Dounreay Socio Economic report at the earliest opportunity.

- I am delighted to see that recruitment continues with graduates, apprentices (engineering and business). As the development of the new site 3 year plan and resultant lifetime plan is DSRL now in a position to let us know when recruitment of these young people needs to stop? As a follow up question to this can DSRL outline what they are doing to demonstrate and ensure diversity in recruitment and selection of preferred candidates?

Response: We are still finalising the updated decommissioning plan. However, we recognise the contribution that graduates and apprentices bring, both to the business and to the community. Development of skills such as these are a big focus across the NDA Group.

We are also working with local businesses through the Caithness Chamber of Commerce, looking at options such as a community apprenticeship, to ensure a sustainable future as we do begin to reduce numbers in the future.

A number of actions are taken to encourage diversity in recruitment. These include looking at how job adverts are written and what requirements are included, as well as identifying different and broader channels for advertising specific vacancies. 'Blind' shortlisting is also undertaken, so that those undertaking the process are not influenced by the specifics of who has applied.

- Useful to hear about the funding provided for additional resource for the CNSRP Support Hub - Have the positions of Project Manager and Business Development been appointed?

Response: We understand that this process is currently ongoing and further information will be confirmed by CNSRP when available.

- As Covid-19 restrictions continue, can DSRL provide an update on the number of home workers and how they and their welfare are being monitored. In addition, the number of people now working back on site and whether all those who are back are essential business need or whether some of these are people back on site because they cannot (for whatever reason) work from home. The question is raised in the context of how quickly can you get some short term accommodation in place to cater for those who simply can't work from home but do not necessarily have to be on site?

Response: Around 52% of the workforce are currently working from home. We take the welfare of all our staff seriously. The primary link is with an individual's line manager and team, but we also have a number of company-wide arrangements in place to brief staff and keep them engaged. Our senior team are also undertaking virtual 'management walkdowns', using video and telephone calling, to ensure people are getting the support that they need.

The remainder are currently working on the site, although not all at the same time. These are people that are required to keep the site safe, secure and compliant, or who are unable to do their job working from home. Decommissioning work on a number of projects has resumed with arrangements in place that are compliant with government guidance.

We are close to final business case approval for a short-term office in Thurso. Recognising that we will be asking the majority of our staff who can work from home to continue doing so well into next year, we are currently considering the best way to configure that office- providing facilities such as COVID compliant meeting rooms and printing.

- As a follow up question to this could DSRL provide an update on the short-term accommodation and when this is now likely to be set up?

Response: We are close to obtaining final approval for the facility. We then expect it to take a number of weeks to prepare for use and will confirm further details when available.

ONR, Dounreay (DSG(2020)P021)

- *Does ONR know when The Highland Council are expected to implement their revised off-site arrangements under REPP19?*

Response: *ONR and Highland Council are in regular contact regarding progress in this matter. The current expectation is that Highland Council will be in a position to implement their revised off-site arrangements under REPP19 by the end of November 2020.*

Comment raised from DSG(2020)P029:

- It is pleasing to see an update in the updated report received (P29) with confirmation that THC expect to finalise the revised off-site arrangements under REPP19 by end of November 2020.

SEPA, Dounreay (DSG(2020)P019)

- *In respect of an aqueous discharge via the non-active outfall 2 from a sump collecting groundwater in the vicinity of the D1208 facility. Was there any relevant danger to neighbours from the discharge of radioactive material. Can you confirm that this was discharged into water rather than on land?*

Response: *I can confirm this discharge was via outfall 2 which discharges to sea and not to land & that SEPA believe any impact on the environment to be minimal given the levels of radioactivity identified. SEPA will shortly be concluding its investigation into this incident and will report the outcome to the DSG at a future meeting.*

Questions raised from DSG(2020)P029:

- I have noted the samples containing low levels of radioactivity from a sump collecting groundwater and note that SEPA stated that the impact on the environment is likely to be minimal. However, you issued a final warning letter – can SEPA explain why they issued such letter if it was such a minimal impact. Have the issues in the final warning letter been addressed and if so by whom? It would also be useful for SEPA to explain what the impact to the environment was?

Response: A final warning letter was issued by SEPA in line with SEPA's Enforcement Policy and associated guidance, a copy of which is available at <https://www.sepa.org.uk/regulations/enforcement/>.

DSRL's Environmental Authorisations (Scotland) Regulations (EASR) permit does not include the non-active drainage system (where the sump discharged to) as an authorised disposal route for radioactive aqueous liquid waste. In addition, DSRL failed to conduct analysis of samples necessary to adequately characterise the liquid waste and identify the presence of radioactivity which would have identified the requirement to dispose of the liquid waste to an authorised disposal route. It is for DSRL to address these failings, and this will be subject to future regulatory oversight by SEPA. DSRL redirected the discharge from the sump to the Low Active Drain system, two days after its initial notification to SEPA during the period of Covid-19 restrictions being in place

It is relevant to SEPA's decision to issue a final warning letter (in line with the above policy) that in August 2017 DSRL notified SEPA of the detection of Cs-137 in a non-active drainage system discharge (outfall 2). SEPA subsequently wrote to DSRL and advised DSRL to *consider the likelihood of further incidents of this nature occurring during site decommissioning works. Should DSRL consider it likely that further discharges of radioactive waste will occur via routes only authorised to receive non-active liquids DSRL should consider making application (with the appropriate supporting information) to include those routes within its RSA93 Authorisation.* DSRL did not make any application to include additional liquid waste disposal routes within its authorisation.

Although very low levels of radioactivity were identified in samples taken from the sump, the levels of radioactivity at the point of discharge to the marine environment were below limits of detection. Any impact on the environment is likely to be minimal given the low levels of radioactivity identified as we do not believe there would be an effect on the public, we have not undertaken a dose assessment.

- Can SEPA provide a bit more detail on DSRL's application to vary its permit for radioactive substances.

Response: The variation application requests:

1. To authorise the receipt of radioactive waste in the form of debris in fuel flasks received from Sellafield.
As members will be aware from previous reports flasks received from Sellafield have been

- found by DSRL to contain items of debris, which is a breach of DSRL's EASR permit. This variation seeks to amend the conditions of the permit to allow for receipt of that waste.
2. To authorise the receipt of radioactive waste in the form of items found during environmental monitoring.

Historically discrete items of waste have been found during DSRL's environmental monitoring, which SEPA allowed to be returned to the Dounreay site. This variation seeks to amend the conditions of the site EASR permit to allow for receipt of that waste on to the Dounreay site should further items be found in future.

The application does not seek to change any authorised limits within the permit.

The Highland Council (DSG(2020)P029)

- Noting the update from The Highland Council on the new emergency arrangements (REPPiR) can THC confirm how this is going to be rolled out to residents that will be affected by this?

Response: Public Information Leaflets will be delivered to residents within the Detailed Emergency Planning Zone. A copy of the Leaflet will be available on The Highland Council website.

Scottish Government update (DSG(2020)P029)

- I welcome the update from the Scottish Government. On the HAW Scottish Strategy it would be useful for Scottish Government to provide DSG with a short presentation on what the 10 year review should encompass followed by updates on the draft policy.

Response: Officials in the Scottish Government would be happy to provide the Dounreay Stakeholder Group with a presentation on the HAW policy review process at the next available date.

- The Scottish Government update report states that policy officials are in regular contact with NDA. Is there any evidence of this? The team will engage with key stakeholders and local communities as required. What evidence do you have that this is indeed taking place?

Response: Scottish Government officials meet regularly with the NDA officials to discuss a range of matters. This has included recent participation at a Senior Officials Group meeting as the NDA prepare to take over the running of the Dounreay site in 2021 and attendance at the NDA Strategy IV (virtual) workshop on 19 October.

- On a separate note is Scottish Government planning to set up virtual meetings for the Scottish Nuclear Sites meeting which have not taken place since Covid-19 restrictions were brought in?

Response: The Scottish Government has been exploring online platforms for hosting the Scottish Stakeholder Sites Group. Zoom for example does not meet SG IT Security standards, however MS Teams and Web-Ex are possible alternatives (subject to further trials). Further information on this and potential dates for a virtual SSSG meeting will be provided as soon as possible.

- I note in the SG report they outline the social and economic impact strategy for NDA. Can the Radioactive waste team confirm who they engage with in Scottish Government on this topic – there must be economic departments in SG that should be in a better position to discuss this topic with NDA and the sites and it would be interesting to find out if indeed any formal engagement between departments takes place?

Response: The Scottish Government's radioactive substances and nuclear decommissioning policy team is liaising with officials in Rural Economy, Transition and Office of the Chief

Economic Adviser (Economic Strategy) to help analyse the NDA's draft socio-economic strategy update. Scottish Government have welcomed and noted DSG correspondence to the NDA (DSG letters dated 11 March 2020 and 24 July 2020) and have written in similar terms to officials in the NDA, asking for clarity on the NDA's socio-economic methodology and commitment to transparency. We await a response from the NDA on this.

VULCAN REPORTS

General comment:

- It should be stated that as usual, DSG members are disappointed by the apparent lack of information from Vulcan from MOD. Surely there must be some work progressing that could be updated or highlighted or even an update on market engagement, discussions with NDA re future of the site etc would be useful additions but we constantly make these comments and it makes little change to the MOD attitude.

MOD, Vulcan (DSG(2020)P025)

- *We note the online Market Engagement Day and welcome the opportunity for representatives of DSG to present local information. It is pleasing to hear that MOD are now placing a strong bias on Social Value. The CNSRP has just launched a new project that will place sustainability at the heart of everything that is done. Would MOD and Rolls Royce consider getting involved with these initiatives as pilot projects come forward?*

Response: *MOD would be interested in finding out more about the initiatives and how it could get involved in the future.*

- In response to the question and response below, MOD should get in touch with Peter Faccenda, CNSRP programme manager to discuss the priority programme and how MOD could get involved with social value and sustainability. We look forward to MOD confirming that this has been done and active engagement is now taking place.

Response: Wendy Newton has written to CNSRP Programme Manager and a meeting has been organised for 10th November 2020.

Correct as of 5th November 2020