

29th January 2021
Ref: DSG(2021)C002

To: businessplanning@nda.gov.uk

DSG RESPONSE TO NDA DRAFT BUSINESS PLAN

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 welcome opportunity to respond to the draft NDA business plan.

As a general comment, we note that responses will be considered and draft document will be revised as appropriate. It would be useful if a response can be provided to demonstrate where comments provided here have made a difference to the finalised business plan and therefore, in line with similar requests, we ask that a response be provided to DSG to outline the responses you deemed appropriate and where revision was made.

We would also ask for clarification as to whether, with DSRL now becoming a subsidiary company of NDA in April 2021, will the plans going forward now focus on the end state rather than the interim end state (understanding the focus on interim end state was where the PBO contract was due to conclude). If NDA/DSRL is now focussing on end state then perhaps a response to lifetime costs for Higher Activity Waste can now be addressed.

Specific questions or comments are given here:

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We note that NDA reserves the right to reallocate funding to meet prioritised programme needs. We would like a further explanation around this, i.e. how do you square this if you take budget from one site and provide to another in terms of retaining the skills base at the site who may be allocated less than their planning assumptions.

We note that funding for 2022/23 and 2023/24 is to be agreed and understand that Covid-19 has impacted on the spend review. Do you anticipate having these figures in place prior to the business plan being published. If not then it will be difficult for sites to plan these years in terms of work programme to accommodate potential budget cuts.

In addition to this, it would be useful to understand whether NDA is preparing a special group or committee to address the minimum care and maintenance costs and manpower required for all its sites in the potential event of major budget cuts from the Treasury to NA as a result of the UK's severe economic downturn?

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The breakdown of non-site expenditure – can you clarify what the 'other central spend is' and why that has increased from 2020/21 (£76m) to 2021/22 (£93m)?

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Within your five themes we note that the strategy, under the Site decommissioning and remediation activity, NDA intend to release land for other uses. This needs further clarity as to what the process is for NDA to consider releasing the land for other uses. If other uses are identified will the NDA look to potentially 'accelerate' the site activity (and alongside that provide budget) to ensure that any future site use (that could see new job opportunities) is moved forward in a timely way while ensuring the decommissioning programme is not impacted on.

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It would be useful for NDA to outline how they intend to integrate Scottish Government waste policy with UK Government waste policy. We as a group have been asking NDA to provide us with details of the overall lifetime costs associated with Higher activity waste in line with Scottish Government policy and while this is not new we are surprised that no-one from NDA can provide us with a response. Surely NDA is aware of the potential costs that each site will require to adhere to policies such as this?

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Leadership Academy - it is noted that the DRSL apprentice and graduate programmes are well respected in industry and provide valuable employment opportunities in the Dounreay travel-to-work area. Will the Leadership Academy supplement these schemes as the transitional period becomes final, or is it expected that the Leadership academy replaces existing programmes?

Sustainability – carbon net zero: Sustainability is a buzz word at this time with lots of brave comments/statements around the word sustainability but it would be useful to understand from the NDA what is actually meant by this and what is intended in terms of milestones and reporting to understanding. We look forward to seeing the roadmap when available.

We also note that you intend to work closely with the supply chain and again it would be interesting to see what your expectations with them are.

Partnership working: We appreciate the funding provided by NDA to support economic activity in our area working alongside other external partners.

Enhancing cyber security skills: It is good to see that NDA take cyber security seriously and note that investment in funding for the Cyber Lab classroom based in Cumbria. Should NDA consider basing such initiatives close to other sites who are running down a lot quicker than Sellafield and where employment is needed. Cyber security can be provided across the NDA estate by other site locations and could be a potential socio economic offering to an area who could provide the pipeline for cyber security experts to continue this for many years to come.

Page 49:

Dounreay is preparing to be transitioned back under the OneNDA estate and note the 'important milestones' and interim end state to be achieved. However, it is surprising not to see an 'end date' now on this page rather than interim end state.

In addition, are these dates still correct, given there is transition of the site and a change of management about to happen in the next 3 months will these dates remain. There is suspicion that once site is transitioned these dates will go out to the right? Noting that there is a number of 'TBD'

in the achieved/expected progress it seems to us that there is no way you can identify an interim end state date of 2032-33.

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NDA Archives - there has been much local discussion about the current capacity at the Wick Airport site, with a number of suggestions that an extension will be needed in the short to medium term. However there has been differences of understanding and therefore it would be useful for NDA to clarify whether Nucleus does need to extended (in building physical terms) or not.

The Development of a Hub and Spoke Delivery model create a degree of worry. When the Archives were unveiled there was a clear commitment that Nucleus would be the sole archive centre for the NDA and that the facility would support the collective records of the estate at large. Will a hub and spoke model dilute the original intentions for the archives?

Conclusion

DSG looks forward to correspondence providing detail to respond to questions detailed in this submission.

Yours sincerely

Cllr Struan Mackie

DSG Chair

sent on behalf of DSG members