

Dounreay Low Level Waste Facility Variation Application Consultation: Briefing for Dounreay Site Stakeholder Group.

Introduction:

The objective of this briefing is to provide the DSG with a description of our consultation process and a brief overview of the application to vary the LLWF's permit.

SEPA's Consultation Process

You are probably aware of the changes in legislation in Scotland with the introduction of the Regulatory Reform (Scotland) Act 2014 and the subsequent Environmental Authorisations (Scotland) Regulations 2018 or EASR for short.

These changes included a requirement on SEPA to publish a "Public Participation Statement", in which we explain when and how we will involve the public and other interested bodies in our decisions on environmental authorisations. Currently this only applies to Radioactive Substances Activities.

The Public Participation Statement provides a high-level description of the consultation process and can be found on the SEPA website under Regulation of Radioactive Substances. (<https://www.sepa.org.uk/regulations/radioactive-substances/>).

Below briefly outlines the process we will be using for the purposes of the current application from DSRL LLWF.

In this initial stage of the consultation process SEPA has identified the DSG, as a group that have an interest in our determination of the application from DSRL. As such we have invited you to make representations to SEPA with any views that you have on the application. This stage of the consultation will end on the 10 December 2021.

The next stage of the consultation will be the wider public consultation which will start either just before Christmas or early in the new year.

After the public consultation and once SEPA has determined the application There will be a further opportunity for DSG to input into the consultation process. You will be provided with a draft of our determination and should SEPA be minded to grant the variation application, you will also be provided a with a draft copy of the permit for your consideration. There will then be another 6-week period where you can make any additional representations to SEPA.

The Variation Application

With respect to the variation application itself, SEPA have provided as part of the consultation the DSRL application document and the supporting environmental safety case 2020 for you information.

In summary this application covers:

1. The adoption of a sum of fractions approach for controlling the total disposed inventory that replaces the current simple inventory estimates from the Dounreay main site.
2. Revisions to the current fissile limits for waste packages to account for the presence of other isotopes as well as moderating and reflecting materials
3. Revisions to the way in which non-radiological hazards are addressed in the permit to reflect the need for any such item to be made safe in the packaged waste.
4. Administrative changes that have arisen due to the changes in legislation with the introduction of EASR and other matters that have been highlighted from the operational experience gained since the facility started to receive waste.