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22 November 2021  
Ref: DSG(2021)C050

**Please respond to:**

**DSG Secretariat  
Dounreay.com  
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Thurso, Caithness, KW14 7BJ**

**Tel: 01847 803512  
Email: [info@dounreaystakeholdergroup.org](mailto:info@dounreaystakeholdergroup.org)**

Mr Alan Cumming  
Director of Nuclear Operations  
NDA

Dear Alan

I am writing to you in my capacity as the Dounreay Stakeholder Group Chair.

The 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 or individuals, who may not agree entirely with this submission and therefore have been encouraged to provide their own response.

At our public meeting in September 2021 the DSG was not clear as to what specific radioactive waste management experience exists in the Scottish Government Radwaste team and if it does not the DSG would be interested to know where technical advice and information is being obtained.

At the meeting and subsequent to further discussions, DSG would like to note:

- An energy strategy that provides clarity as to what Scottish Government deem as 'new (nuclear) technology' is needed urgently to allow Scotland (and particularly in our case Caithness) to support and create alternative employment opportunities after existing nuclear sites (including Dounreay) are fully decommissioned. It would be useful to understand what Scottish Government's energy strategy will be and we have been informed that Scottish Government will review and consult on its strategy at some point in the next year.

The lack of clarity on its nuclear policy from Scottish Government is not helpful and is likely to lead to Scotland continuing to be out of alignment with the rest of the UK and parts of Europe in pursuing strategically beneficial policies in radioactive waste management and on the wider nuclear policy.

- Given that the Scottish Government Radwaste Team members do not appear to have experience in the nuclear industry can you provide information about where and from which source advice and information is obtained to inform Scottish Government policy on nuclear decommissioning and waste management.

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Nuclear radioactive waste management is a complex subject with unique and sophisticated scientific and engineering issues associated with it that require an in depth understanding to inform policy decisions and delivery. Members of the nuclear industry who work in the area of radioactive waste management are not only suitably qualified but have many years of operational experience and expertise to enable them to fill positions of responsibility and to take well-reasoned and sound decisions.

The Radioactive Waste Team had also intimated they planned to carry out a review (and presumably some consultation) on the higher activity waste policy. This appears to have stalled for some reason and it would be useful to understand the timelines for that review.

We are writing to you to ask whether NDA:

- Can confirm whether NDA have sufficient interactions with Scottish Government concerning the future energy strategy especially in terms of the knowledge and expertise that exists within the NDA Group.
- Has sufficient capacity to ensure that they can fully brief the Scottish Government Radioactive Waste team on matters of nuclear decommissioning which allows the Radwaste team to make informed decisions.
- Confirm whether NDA has any indication of when Scottish Government Radioactive Waste Team plan to carry out the review of its higher activity waste policy.

We look forward to hearing from you shortly.

Your sincerely

***Sent electronically without signature***

**Struan Mackie**  
**DSG Chair**

Copied to:

Gareth Taylor, NDA  
David Wallace, NDA  
Mark Rouse, DSRL

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