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28 January 2022  
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NDA Business Planning  
Business Plan Consultation  
E: [businessplanning@nda.gov.uk](mailto:businessplanning@nda.gov.uk)

Dear Sir/Madam

#### **NDA DRAFT BUSINESS PLAN APRIL 2022 TO MARCH 2025**

The **Downreay 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.

**General Comment:** It would be useful if NDA could provide clarity on how you propose to address any comments, issues or questions raised within this submission prior to the finalisation of the business case.

In addition, comment was made on the fact that the key dates are not realistic given that a new life time plan is under development but will not be available for at least another year.

On specific topics of business plan:

#### **Page 8: Chief Executive message**

- We note that continued restructure of the governance arrangements and the fact that Downreay will become part of the Magnox Board. The joining of Downreay and Magnox has seen another change to the Downreay site with the change of the PBO contract model. Following the change in the contract arrangements we stressed the need for some time to allow the site to settle back down under the OneNDA and assurances were given. Six months later, the announcement of the joining of Magnox/Downreay was announced and again most change for the Downreay site. We would strongly urge the NDA to ensure this is the last major change to the Downreay site to allow the site to settle down under the new structure and start to make real progress in

finalising the life time plan and getting on with the decommissioning activities required to take the site to end state.

- We were pleased to note that NDA received an outline three year funding settlement and given the state of the country in a whole we congratulate you for this successful outcome to allow the civil nuclear sites to continue to decommission.
- It is pleasing to see the important work at Dounreay will continue on the shielded radioactive waste store for storage in accordance with Scottish Government policy. We have and continue to request timelines for the review of Scottish Government HAW policy and ask how you intend to work with Scottish Government to allow the review of the policy to align with the needs for the Scottish sites that continue to progress their site storage activities. We understand that not all Dounreay waste is suitable for a long term storage facility and therefore clarity on what can and what cannot remain on site would be helpful.
- It is good to see NDA taking sustainability seriously and those comments re carbon net zero. However, the sustainability agenda has four pillars and DSG wishes to seek assurances that NDA are looking and considering the four pillars of sustainability when looking to take forward the sustainability agenda.
- We note the recent announcements of AGRs coming into NDA. It would be useful if NDA and MOD can also make clear the future decommissioning of the Vulcan (MOD) site once operations in 2025 are complete. We believe there must be economies of scale for Vulcan and Dounreay to be decommissioned in a parallel and there are concerns that MOD may issue a contract for decommissioning that subsequently gets rolled into the NDA overall mission of decommissioning. This would not be a good use of taxpayer's money.

#### **Page 14/15: Planned income and expenditure.**

The table of planned income and expenditure shows the site spend going from £100m to £205m (which is around 1.2% increase with the UK Government goal of 2%). Inflation in 2019/2020 was 1.5%. While we appreciate there is no data yet for 21/22 it is expected that inflation will be more than the 1.2% increase of Dounreay site funding. Where do inflationary pressures arise and alternatively which part of the plan is most susceptible to greater than 1.2% inflation (there must be a risk around construction projects?). Could this have the potential to affect decommissioning progress?

#### **Page 26: Bringing the Group together**

DSG notes that further refinement to the NDA group will continue and while it is heartening to read there is no fundamental change to the current work programme at Magnox or Dounreay there is reference to 'overtime, will bring more opportunities for collaboration and enhance our sharing of skills and knowledge'. DSG notes this and while understanding the need to continue to address efficiencies and sharing of skills and knowledge it would be useful to understand NDA's long term thinking on this.

It would appear to us that while NDA talk a lot about socio economics (and we are grateful for the investments of NDA into our area) it appears that doing 'good work in one part of the NDA can be negated by another part of the NDA. By way of explanation, our area has a long term aim to maintain or increase the GDP of the area. If this is to be realised then local jobs for local people are

key and if NDA start to move skills around the estate this could have a detrimental impact on our community and in turn large knock on effects to depopulation of the area, schools, services etc. NDA need to think carefully how they join all this together to ensure positive impacts for all areas. There are times when it is difficult to see the joined up thinking of the collective NDA and there is an opportunity now to ensure that this is articulated under the sustainability (four pillars) focus.

### **Page 51: Important Milestones (Dounreay)**

- On a general note: the activities below are extracted from the current site Lifetime Plan. A revised Lifetime Plan is in development following the transition to an NDA subsidiary, and the dates shown are therefore subject to change. DSG has been asking for sight of the new lifetime plan over a few years now and more recently been informed that this is not likely to be available until April 2023 (governance and approvals by the various Government bodies dependent). Elsewhere in the document it states that Dounreay plans are unlikely to change.

DSG (and the wider community) have already voiced they do not believe the interim end state date is achievable and we expect this to change when the new life time plan is complete and approved.

Under the PBO model there was an interim end state date and DSG ask for clarification as to whether there will continue to be an 'interim end state' and 'final end state' and provide clear messaging as to what the difference is between the two if indeed the interim end state date continues to be highlighted.

- The dates for dismantling DFR (by 2025) and PFR (by 2027) appear unrealistic unless the strategies for leaving parts of these structures in-situ has been agreed.
- It is also stated that "all ILW disposed by 2125"- unless Scottish Government's review of HAW policy aligns with the aspirations within the business plan how will be this achieved?
- In addition, "all land de-licensed by 2135". This would require all HAW waste stores to be moved from the Dounreay site. How does this align with Scottish Government policy?
- There is no mention in the key activities for the emptying of the Shaft and Wet Silo. We believe the design and plans to do this should be seen as key activities.

We look forward to receiving clarification on the questions raised and whether comments from this submission have been considered and (will be) included in any changes to the business plan when finalised.

Yours sincerely

*sent electronically without signature*

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