

DSG/SRSG(2023)M001

DOUNREAY STAKEHOLDER GROUP

SITE RESTORATION SUBGROUP

Minutes of the DSG Site Restoration subgroup meeting held on Wednesday 26 April 2023 at 19:00 in the Georgina lounge, Pentland Hotel and via MS Teams.

Present:	Gillian Coghill	DSG Site Restoration subgroup chair
	Cllr Struan Mackie	Highland Council (DSG Chair)
	Thelma Mackenzie	Thurso Community Council
	Niall Watson	Dounreay Trade Unions
	David Craig	Caithness West Community Council
	David Broughton	DSG co-opted member of the public
	David Alexander	Thurso and Wick Trades Council
	Tor Justad	HANP
	Abbe Luckock	Women in Nuclear

In addition:	Tina Wrighton	Stakeholder & External Relations, Dounreay
	Carol Wood	DSG Sub Group Minute Secretary
	Dawn Clasper	DSG Administrator
	Barrie Cran	Assurance Director, Dounreay
	Audrey Chalmers	IESD Project Manager, Dounreay
	Dr Christopher Sneddon	Environmental Specialist, Dounreay
	Jay Adams	IESD Graduate
	Cdr Ian Walker	MOD Vulcan
	James Francis	ONR(Dounreay)
	Richard Faris	ONR (Vulcan)
	Linda Buchan	SEPA
	James Bryson	DNSR (Vulcan)

MINUTES

1. WELCOME AND INTRODUCTIONS

Gillian Coghill welcomed everyone and thanked them for attending.

2. APOLOGIES

Apologies were received from:

- Brian Mutch SGRPID
- Joanna Coghill Association of Community Councils
- David McIntosh CNC
- Roger Saxon DSG Site Restoration subgroup deputy chair

- Frederic Stalin Strategic Programme Director, Dounreay

Gillian Coghill welcomed Audrey Chalmers and Dr Christopher Sneddon who are delivering the site monitoring programme presentation.

Dr Christopher Sneddon gave an extensive overview of the site monitoring programme which included environmental radioactivity, regulatory oversight, site water quality monitoring network, environmental monitoring programme and environmental monitoring dissemination. Dr Sneddon gave a detailed account of each heading in his presentation to the meeting.

David Broughton expressed surprise at slide 3 of presentation, interim end state release site from regulation, given the site had interim stores. Barrie Cran replied there will be an interim end state but there will also be a release for significant proportions of site from regulation. There will still be institutional control over those areas which will still require control, and this will be done in accordance with the Guidance on Requirements for Release from Radioactive Substances Regulation. It's not 100% no regulation but it will be a significant shrinkage.

David Broughton raised a second question relating to the discharges to sea from the Effluent Treatment Plant noting there wasn't a full understanding of the shaft and its grout curtain. He explained the Shaft curtain only reduces the flow into the Shaft. His concern related to water coming in and out as unless the Shaft had all the waste removed and had been scoured, it is a significant issue and was worried the local population were unaware of what was going on there. Barrie Cran addressed this issue stating it was an important point and the strategic decisions relating to the Shaft.

Gillian Coghill noted that food stuffs were monitored and asked if beef was tested. Dr Christopher Sneddon confirmed beef is purchased directly from a local farmer and tested.

Niall Watson commented that a key focus for the DSG should be on assuring itself that Dounreay is being decommissioned in a manner that does not impact the environment or safety. Legislation and regulation should be the focus for this group. Gillian Coghill confirmed it would be incumbent on the group to leave a nuclear legacy for future generations.

3. MINUTES OF THE LAST MEETING

Gillian Coghill noted that the minutes of the last meeting – DSG/SRSG(2023)M004, January 2023 – had been endorsed at the public meeting held in March 2023. She invited members to raise any issues from the minutes. No issues were raised.

4. ACTION STATUS

Gillian Coghill noted that the status of actions had been circulated to all members. These actions are now completed.

5. DOUNREAY UPDATE

Gillian Coghill noted several written papers had been distributed to members in advance of the meeting including:

- DSG(2023)P015: Dounreay Report
- DSG(2023)P014: SEPA Report
- DSG(2023)P011: ONR Report
- DSG(2023)P009: Rolls-Royce – Submarines
- DSG(2023)P016: Vulcan Naval Reactor Test Establishment

Dounreay: (DSG(2023)P015 refers)

Barrie Cran, Assurance Director Dounreay stated he would take the paper as read and noted the following:

- Dounreay continues to make good progress against key targets for 2022/23
- The site's TRIR is now 0.18 following two RIDDOR reportable events in the CNC and Guard Force involving falls on ice. We reviewed our gritting approach and have also encouraged individuals to remain on gritted paths
- ONR raised significant concerns regarding aged electrical assets including live switching of specific types of equipment and the condition of some transformers. An Enforcement Letter relating to the Electricity and Work Regulations and Health and Safety at Work Act has been received and the response plan is being developed
- SEPA has withdrawn Regulatory Notice 02 following review and confirmation of the evidence provided in December 2022. This returns the issue to business as usual and there are currently no Regulatory Notices in force. SEPA also reviewed the evidence and confirmed that 4 permit non-compliances have been closed
- Dounreay received a new nuclear site licence, environmental permits, and approvals along with several other permissions to reflect the change of company to Magnox Limited. The new permits are supported by the existing Dounreay management system, with a small number of changes to reflect the amended company board arrangements. The control of activities on the Dounreay site remain within the existing arrangements for compliance
- The Nuclear Decommissioning Authority published its draft business plan for 2023-26 for consultation. The draft plan includes key priorities for Dounreay during this period

- Our near-term work plan, setting out the key activities for the next 12 months, was agreed
- There were no particles reported as there were no particles retrieved during this period (January – March 2023)
- Megan Watson has been appointed Head of Profession – Waste
- Recruitment of programme director for balance of site activities underway
- Preparations completed for joining of Dounreay and Magnox on 1 April
- Parliamentary accountability for Dounreay moved from the Department of Business, Energy, and Industrial Strategy to the new Department for Energy Security and Net Zero lead by Grant Schapps, which likes to be called the Department for Energy or the Energy Department, if you wish to shorten it
- Our latest group of health physics surveyor trainees completed their 2-year training programme, and the latest intake started theirs. Two are employed by Nuvia and 6 by Dounreay. They now complete a 2-year training scheme to become fully qualified surveyors

Gillian Coghill invited members to raise any questions.

David Alexander made comment on the Dounreay structure and if lines of reporting will be the same – he was informed that everyone is still reporting to Mark Rouse, Managing Director but he also asked for a copy of the reporting structure above Mark Rouse.

Action: DSG/SRSG(2023)M01/A01: Barrie Cran to provide copy of reporting structure above Mark Rouse.

- David Craig passed on his thanks regarding reporting of onshore monitoring of particles section in the report and noted a new level of confidence in reporting. Gillian Coghill responded communication is vital. Barrie Cran confirmed that we keep things up to date but within the reporting periods.
- Tor Justad commented there was no mention of Great British Nuclear in the Corporate section of the report and asked if there was anything that would influence the activity within Dounreay. Barrie Cran stated Great British Nuclear is there facilitating and enabling entry to market for potential future operators. In terms of Dounreay access specifically we do not have a direct line to GB Nuclear. Our job is to deliver our mission and by doing so we will contribute to the overall nuclear endeavour of the United Kingdom.
- David Broughton queried the number of apprentices Dounreay currently takes each year. David Alexander commented the current intake number is very good given the current climate.

Action: DSG/SRSG(2023)M01/A02: Barrie Cran to investigate if the number of engineering apprentices is commensurate with Dounreay engineering decommissioning programme.

- Tor Justad asked for an explanation on what the programme director for balance of site is. Barrie Cran explained it by using the example of power stations. It comes from three parts of building a power station, the first is a power island whether that's a thermal or nuclear plant, the second is turbine island which does the generation and the third is the balance of site. We have applied the same terminology to Dounreay. We have programmes looking at reactors, fuel cycle area and balance of site. Programme directors take accountability for delivery of programmes in their area.

There being no further questions, Gillian Coghill thanked Barrie Cran for his update.

SEPA: (DSG(2023)P005 refers): Linda Buchan noted the following:

Linda Buchan, SEPA, stated a Final Warning letter was issued to Dounreay in January 2023 in relation to PFR sodium tank farm excursion.

- SEPA continues to undertake its investigation into the circumstances and compliance implications of gaseous tritium leak from a drum of alkali metal stored at the PFR facility.
- SEPA concluded its review of the steps taken to comply with the requirements of Regulatory Notice RN02.
- SEPA transferred all environmental permits falling under its remit from DSRL to Magnox Ltd with effect from 1 April 2023. All limits and conditions remain as per those in force when DSRL held the equivalent permits.
- SEPA continue to engage with the LLWF team on a regular basis and are content that the facility continues to operate in a compliant manner.
- SEPA carried out an inspection on the Site Waste Management Licence WML/L/1095876 on 16 March and was found to be compliant.
- SEPA were advised on 20 March that 4 bags of hazardous clinical waste were mistakenly uplifted and taken to Seater for disposal on 17 March. An investigation report has been submitted to SEPA with several follow up actions to be completed by 30 April.

Gillian Coghill thanked Linda Buchan and invited questions from members. There were no questions from members.

ONR: (DSG(2023)P011 refers): James Francis noted the following:

- ONR safety inspectors have made three visits to site covering a broad range of subjects.
- ONR has reviewed and accepted Magnox Limited's application to hold the nuclear site licence for the Dounreay site. This process was finalised by ONR issuing a nuclear site licence for the Dounreay site to Magnox Limited on the 1 April 2023.
- No matters of significance were reported to ONR during this period. There was one reportable RIDDOR, but this was not related to Dounreay; it concerned a sub-contractor and was minor in nature.
- ONR has issued an Enforcement Letter to Dounreay site following an inspection of the site electrical distribution systems on the 21 to 23 March 2023. It was viewed that Dounreay had breached Regulation 4(1), 4(2) and 5 of the Electricity at Work Regulation 1989, as well as the general duty on employers. ONR continues to monitor Dounreay's response to this enforcement action but is content with site's initial response.

The following events have been reported to ONR relating to the Dounreay site:

- Power Dip caused by lightning strike on 31 January 2023
- Slip on ice event (reported under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995)

Gillian Coghill thanked James Francis for his input and invited questions from members. Of note:

Gillian Coghill raised the issue of a recent visit to Dounreay where ONR looked at the FADS (Fire Alarm & Detection System) and found a few inconsistencies regarding maintenance. ONR gave a green light, with issues remaining. ONR confirmed the issues were in relation to the identification of faults and the tracking of those faults through to completion. A L4 regulatory issue was raised and the ATO holder is progressing that resolution.

Tor Justad commented on the 3rd item in the report which mentions the Nuclear Safeguard EU exit which he raised at the time of Brexit concerning Euratom stating regulation regime would suffer. Mark Foy the Chief Inspector of ONR confirmed there will be continued links with Euratom and European counterparts.

David Broughton asked if ONR, SEPA and Dounreay received any warning about the sonic boom. Barrie Cran replied no warning was given and no impact on instruments on site.

CNC: Gillian Coghill noted David McIntosh has tendered his apologies and if members wished to raise any questions these would be actioned through the minutes. No questions were raised.

6. VULCAN UPDATE

Gillian Coghill noted the following written updates had been provided:

- DSG(2023)P017: Vulcan update
- DSG(2023)P009: Rolls Royce update
- DSG(2023)P005: SEPA
- DSG(2023)P016: DNSR

MOD Vulcan: (DSG(2023)P012refers) Cdr Ian Walker highlighted the following:

- 1 minor injury in February – An individual was blown off his feet during a period of high winds.
- Cdr Ian Walker noted there have been no challenges to the Approval of Arrangements (AoA) limits during this period.
- The support equipment used during defuel has been dismantled and significant amounts have now been removed from site. Where there are other areas of the submarine enterprise that would benefit from this equipment, there is a process in place to ensure it is re-used.
- Preparations for the next stage of operations and fuel management activities within the STF are progressing to schedule and it is anticipated that permission to commence operations will be granted soon.
- Since the last meeting no events have occurred that required reporting to DNSR or ONR in accordance with their mandatory reporting criteria.
- The annual Security demonstration exercise is being held on 1 June, with the detailed planning now in progress. As an early warning the site alarms will be sounded and there are likely to be sounds of gunfire and explosions during this exercise. Further details, as always will be provided through the local press closer to the exercise.
- The Vulcan ONR inspector team has been changed from the Propulsion Division to the Decommissioning, Fuel and Waste Division. The new inspection team undertook a familiarisation visit on 23 March, with positive feedback received. ONR has provided their intentions for inspection for the remainder of this year.
- The Joint Project Team has continued with assessing the feasibility of the transfer of the decommissioning liability of Vulcan to the NDA.
- The site will again this year implement a “no May mow” in some areas, though these areas will receive reduced mowing throughout the summer to increase biodiversity on site. The trial last year was deemed a success.

- The RN contingent will once again be supporting the RNLI summer fayre which is scheduled for Saturday 3 June.

Gillian Coghill invited members to raise any questions. Of note:

David Broughton asked about contractual arrangements on waste management. Cdr Walker responded that suitable contractual arrangements were in place for the transfer of liquid radioactive waste, and solid low level waste to Dounreay. Cdr Walker further stated, like all facilities, Vulcan needs to demonstrate that the waste that is being transferred meets the Conditions of Acceptance; for the solid low level waste Vulcan are in the process of providing that evidence to Dounreay.

Cllr Struan Mackie commented the sign at the entrance to the Vulcan site looks very tired, is there any way to improve it. Cdr Ian Walker confirmed the sign would either be improved or removed.

Rolls Royce Update: (DSG(2023)P009 refers)

Gillian Coghill noted that there was no Rolls Royce attendance at this meeting. If members wished to raise any questions that could not be responded to these would be actioned through the minutes. No questions were raised.

SEPA (DSG(2023)P014 Refers) Linda Buchan highlighted the following:

- SEPA continues to be engaged with the relevant parties on the future of Vulcan

Gillian Coghill thanked Linda Buchan for her input and invited questions from members. No questions were raised.

ONR: Richard Faris, provided the following highlights:

- Richard Faris took over from Vik Winspear-Roberts in March as the nominated inspector for Vulcan and one of the site safety inspectors for Dounreay when James Francis is unavailable.
- Vulcan has transferred from our Operational Facilities Division to our Decommissioning and Fuel and Waste Division which is an internal change which had no change to the regulation.
- Handover took place in March with a familiarisation visit, useful to understand the facility and inform our inspection programme for the coming year.

Gillian Coghill thanked Richard Faris for his input and invited questions from members. No questions were raised.

DNSR: (DSG(2023)P008refers) James Bryson highlighted the following:

- This reporting period, focuses on the transition inside the NDA engagement of all regulators looking at work in the future landscape up to January 2026.
- All inspections will now coincide with the DSG timetable.
- Operational inspection carried out today with a score of adequate.
- A site visit is also taking place tomorrow involving inspecting materials.

David Craig expressed his appreciation that inspections will now coincide with the DSG meetings and James Bryson will be in attendance in person.

Gillian Coghill thanked James Bryson for his input and invited questions from members. No questions were raised.

7. CORRESPONDENCE

Gillian Coghill noted correspondence received since last meeting:

DSG(2023)C011: Letter to Andrew Bowie, MP

DSG(2023)C012: Vulcan response to Action DSG/SESG(2022)M02/A004

DSG(2023)C014: Letter to DSG re: Dounreay Magnox Joining

She noted that all correspondence received had been circulated to members and had been dealt with.

8. ANY OTHER BUSINESS

Before opening to other members, Gillian Coghill noted the following:

- Roger Saxon and Peter Faccenda were replying to 2 consultations – Nuclear Decommissioning and Management of Radioactive Substances Consultation and the Draft Energy, Strategy and Adjustments Consultation. Gillian Coghill stated that DSG had to have a voice, can't disagree with things if you don't express an opinion. Deadline of 9 May 2023.
- Tor Justad attended a meeting in Crewe with NGO's Nuclear Transport Solutions raising the issue of Georgemas Junction and confirming it is still actively looking at the possibilities of being a multi-use facility.
- Cllr Struan Mackie – Following the recent Scottish Government reshuffle, the transition proposal consultation on the draft Energy Strategy and Just Transition plan continues to be a priority.

9. CLOSE

There being no further business, Gillian Coghill thanked everyone for their input and formally closed the meeting.

Gillian Coghill
DSG Site Restoration Subgroup Chair
16 May 2023

ACTIONS ARISING FROM THIS MEETING

DSG/SRSG(2023)M01/A01: Barrie Cran to provide copy of reporting structure above Mark Rouse, Managing Director.

DSG/SRSG(2023)M01/A02: Barrie Cran to investigate if the number of engineering apprentices is commensurate with Dounreay engineering decommissioning programme.