

**DOUNREAY STAKEHOLDER GROUP**

**SITE RESTORATION SUBGROUP**

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

Present: Gillian Coghill (GC) DSG Site Restoration subgroup chair  
Roger Saxon (RS) DSG Site Restoration subgroup deputy chair  
Thelma Mackenzie (TM) Thurso Community Council  
Niall Watson (NW) Dounreay Trade Unions  
David Craig (DC) Caithness West Community Council  
David Alexander (DA) Wick and Thurso Trades Council  
Tor Justad (TJ) HANP  
Abbie Luckock (AL) Women in Nuclear

In addition: Tina Wrighton (TW) Stakeholder & External Relations, Dounreay  
Carol Wood (CW) DSG Sub Group Minute Secretary  
Dawn Clasper (DC1) Socioeconomics & Sustainability  
Administrator  
Barrie Cran (BC) Assurance Director, Dounreay  
David McIntosh (DM) CNC  
Abbie Luckock (AL) Women in Nuclear  
Lt Cdr Phil Alexander (PA) MOD Vulcan  
James Francis (JF) ONR (Dounreay)  
Linda Buchan (LB) SEPA  
James Bryson (JB) DNSR (Vulcan)  
Allan Farquhar (AF) Wick Community Council  
Louise Cunningham LC) Next Generation Executive  
Innes Morgan (IM) Communications Summer Intern

**MINUTES**

**1. WELCOME AND INTRODUCTIONS**

Gillian Coghill welcomed Allan Farquhar, Wick Community Council, Louise Cunningham, Next Generation Executive and Innes Morgan, Dounreay summer intern. Members were elected in March and as Roger Saxon was away at the last meeting, it has confirmed he would continue as vice chair for this group.

**2. APOLOGIES**

Apologies were received from:

- Brian Mutch SGRPID
- Christian Nicolson NHS
- Stuart Ballantine SEPA
- Cdr Ian Walker Vulcan
- Cllr Struan Mackie Highland Council (DSG Chair)
- Frederic Stalin Strategic Programme Director, Dounreay
- David Broughton DSG co-opted member of the public

### **3. DOUNREAY SODIUM TANK FARM FIRE**

Barrie Cran presented a short film produced in-house explaining the sodium tank farm fire. An in-depth discussion of questions and answers followed.

### **4. MINUTES OF LAST MEETING**

Gillian Coghill noted that the minutes of the last meeting – DSG/SESG(2023)M01 April 2023 – had been endorsed at the public meeting held in June 2023. She invited members to raise any issues from the minutes. No issues were raised.

### **5. ACTION STATUS**

Gillian Coghill noted the status of actions had been circulated to all members. Following a discussion, the status of each action will be updated.

### **6. DOUNREAY UPDATE**

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

- DSG(2023)P022: Dounreay Report
- DSG(2023)P023: SEPA Report
- DSG(2023)P019: ONR Report

**Dounreay:** (DSG(2023)P022 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 2023/24
- The site's TRIR is now 0.18 up from 0.14 due to a cut finger requiring sutures. The site is monitoring leading indicators and putting considerable effort into several

areas including:

- Construction safety and the Construction (Design and Management) Regulations 2015
- Task management tools for safety which are intended to reinforce human performance tools at the point of work
- Process safety looking at more significant conventional hazards
- ONR issued two enforcement letters. One related to the operation of aged electrical switchgear and transformers. The second related to conditions for long-term storage of sodium in and around PFR which was reinforced by a “Holding to Account” meeting with ONR Director of Regulation for Sellafield, Decommissioning, Fuel, and Waste. ONR is interested in how Dounreay will approach such matters under a lifetime plan that is likely to be significantly extended. ONR has raised further concerns about the electrical distribution infrastructure and its ability to support extended operation.
- SEPA raised issues in relation to sodium storage and raised three non-compliances relating to the inspection of drums and the maintenance of facilities.
- The site carried out a “live play” security demonstration exercise achieving a “green” rating. This was the culmination of significant effort over several years and covered a very challenging scenario with multiple casualties.
- Following a review of the holdings of hazardous substances and good engagement with the ONR and SEPA, Dounreay will be subject to the Control of Major Accident Hazards Regulations (COMAH) 2015. This is driven by holdings of substances such as nitric acid and oxygen. While the site holdings are borderline at present, future work packages are likely to increase holdings. The formal processes are being undertaken with The Highland Council and the Competent Authority.
- There were two minor particles reported during this period (April – June 2023).

Gillian Coghill invited members to raise any questions.

GC raised the issue of the two enforcement letters from ONR. Having looked on the ONR website it stated concerns were raised due to being unable to access the remaining drums. If one drum was leaking, there is a possibility of other drums of a similar age leaking.

GC asked why an investigation had not taken place to examine the remaining drums.

BC confirmed an investigation has been carried out and the report has been submitted to both regulators. Dounreay was currently looking at mechanisms for inspection with a proper balance of risk arising from carrying out the inspection and the benefits.

GC noted the competence assessments in a hazardous environment seem lacking.

RS asked if the leaking drums were the same drums mentioned in the ONR report as well as the SEPA report.

BC confirmed they were the same drums. Site identified a suspect drum which was reported. This triggered the discussion and the interventions which the regulators carried out and formed opinions which have been shared. BC acknowledged there was work to do.

The onshore monitoring of radioactive particles diagram and table has been well received by the DSG who gave complimentary feedback.

GC spoke of the work continuing to develop a new organisational structure that can deliver the LTP. GC commented she preferred Frederic Stalin's version of route map. GC thought three years would be the most Dounreay could plan due to being dependent on the elected Government policy. BC stated the LTP is not a detailed schedule for the life of site, the LTP is the route map that takes us through the big blocks of work and the associated strategies.

DC asked if the DSG would see an early copy of the schedule beginning April 2024, to mitigate any shocks, surprises and make comment on it.

BC stated Mark Rouse would brief the DSG at the earliest opportunity.

DA queried the "big conversations" within the culture programme.

BC stated "big conversations" are a mechanism of influencing the cultures and behaviours through a series of conversations which are held locally within teams. It's a Dounreay initiative which started in September last year.

GC spoke of the first in-person supply chain engagement event and asked how Dounreay felt it went.

BC confirmed positive feedback had been received with relationships being built and consolidated.

GC congratulated nominees on the NDA Group employee awards list on their achievements.

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

**SEPA:** (DSG(2023)P023 refers): Linda Buchan noted the following:

- SEPA undertook a compliance inspection of arrangements for storage of alkali metal at PFR. SEPA identified EASR permit non-compliances related to the implementation of procedures for the storage of alkali metal and the verification of condition of drums containing alkali metal. SEPA will be engaging with Magnox Limited on its addressing of the identified permit non-compliances.
- SEPA undertook a compliance inspection of training and competence records. The inspection covered centrally held records and on-the-job training records within a number of facilities. Magnox limited was found to be compliant with the

relevant EASR permit conditions. During the inspection several Competence Assessment records were found to be outstanding and SEPA intend to undertake a follow-up session later in the year.

- SEPA is undertaking a compliance inspection of arrangements for storage of solid LLW w/c 10 July and will be visiting all LLW waste storage facilities across the site.
- SEPA was updated by site on progress with the development of the near-term work plan and route map.
- The Information Notice served on DSRL following the PFR sodium tank farm pressure excursions has been withdrawn and re-issued to Magnox Limited as the current permit holder. The requirements and timeframes remain as before.
- SEPA continued to engage with the site on matters related to decommissioning of facilities throughout the reporting period.
- SEPA has received and is determining an EASR permit variation application from Magnox Limited to add an additional gaseous discharge stack to support decommissioning of the PFR facility. The application does not request any change to current discharge limits.
- 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 will be inspecting arrangements for the provision of resources to ensure compliance with the LLWF EASR permit in August. Progress continues to be made in determining the application for variation to the permit.

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

**ONR:** (DSG(2023)P018 refers): James Francis noted the following:

- ONR safety inspectors have made four visits to site covering a broad range of subjects
- ONR carried out routine inspections of storage and management arrangements of stock of alkali metals stored on site
- Inspection of nuclear ventilation systems and processes
- Inspection of Dounreay's reporting arrangements, investigation of incidents and organisational learning
- Inspection of maintenance arrangements of equipment and training of personnel to support the site's emergency arrangements
- Assessment of Dounreay's annual site security demonstration exercise

- ONR conducted information gathering activities to consider the totality of Dounreay's chemical holding for the purposes of compliance against the Control of Major Accident Hazards (COMAH) Regulations 2015.
- ONR issued an enforcement letter to Dounreay site following an inspection of the site sodium storage arrangements on 25 to 27 April 2023. It was viewed that the storage arrangements did not meet relevant good practice as the duty holder has failed to safely protect the drums against degradation via air and moisture ingress, large stock of the inventory are not available for inspection due to the way in which it has been stored and, a number of the storage vessels of the material are not identified on the site maintenance system. It was viewed that Dounreay had breached Regulation 7 (1-4) of the Control of Substances Hazardous to Health (COSHH) Regulations 2002 and nuclear site licence condition 4(2) requiring the licensee to ensure that no nuclear matter is stored on the site except in accordance with adequate arrangements made by the licensee for this purpose. To further secure a commitment to return to compliance, ONR conducted a holding to account meeting with Directors of the site in June 2023.
- ONR continues to monitor Dounreay's response to an enforcement letter issued earlier this year concerning electrical safety. ONR has received responding letters and communications from site confirming the actions they have taken. ONR considers that Dounreay has taken reasonable responses and once sufficient detail of the implementation of these actions is received ONR considers it will be in a position to close out this enforcement action.

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

**CNC:** CI David McIntosh noted the following:

The regulatory demonstration exercise obtained an adequate scoring for our part in that and overall good practices. CNC continue to work within the expectations of Dounreay SAR (Security and Resilience) our stakeholder partners and confirmed attendance at the DSG meeting is important to CNC. No major changes to report.

TM asked if CNC were still monitoring the Forss straight road?

DM confirmed patrols are still carried out in that area periodically.

## **7. VULCAN UPDATE**

Gillian Coghill noted the following written updates had been provided:

- DSG(2023)P021: Vulcan update
- DSG(2023)P020: Rolls Royce update
- DSG(2023)P023: SEPA

- DSG(2023)P017: DNSR

**MOD Vulcan:** (DSG(2023)P021 refers) Lt Cdr Phil Alexander highlighted the following:

- 1 minor injury in February – there have no recorded injuries since.
- The defective sewage discharge flowmeter reported previously has been repaired and is being closely monitored. The associated investigation is ongoing. The next SEPA inspection is due on 21 September and the investigation should be complete by then.
- “No Mow” May is going well with the affected areas flourishing.
- As of the end of May 2023, the annual rolling discharge (expressed as a percentage against the maximum detailed in the SEPA letter of agreement) was well within limits.
- The Shore Test Facility Programme remains on track with information being gathered to support the Royal Navy submarines.
- Following site transition, we announced accelerating the removal of redundant equipment from site and term this as hazard reduction.
- There have been no events occurring that required reporting to DNSR or ONR in accordance with their mandatory reporting criteria.
- The annual security demonstration exercise successfully demonstrated its objectives. Planning for Exercise LONESTAR, the site’s annual nuclear emergency response demonstration in November is underway.
- The shortfalls identified by ONR resulting in a regulatory issue being raised are being dealt with. Most shortfalls are complete, and we expect to be stood down from that regulatory issue in September when the next ONR inspection takes place.
- DNSR undertook a routine compliance inspection for Authorisation Conditions 2, 8 and 16 on 7 June, there were no issues raised. The formal report has been received, a number of observations were raised, that will be dealt with through normal business.
- Our next planned interface with DNSR is the annual review of safety in August.
- The options are still being reviewed on the Vulcan decommissioning programme and are currently progressing through due process. In the meantime, the Vulcan and Dounreay site continue to focus on the safe delivery of their missions.

- Commodore Elton Sharkey, the Head of the Nuclear Propulsion Project Team, visited Vulcan for the first time in this role. The visit enabled him to gain a detailed understanding of the site capabilities and facilities as well as meet the majority of the workforce. He was impressed by their enthusiasm and commitment in delivering the programme which is supporting the operation of the Royal Navy submarines both now and in the future.

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

DC asked if redundant equipment would be offered to Dounreay or to the wider community?

Lt Cdr Alexander stated when making plans for decommissioning programme we shouldn't be foreclosing any options.

Gillian Coghill thanked Lt Cdr Phil Alexander for his input.

**Rolls Royce Update:** (DSG(2023)P020 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)P023 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:** James Francis provided the following highlights:

- There have been no regulatory interactions during the reporting period hence no submission of a written report.
- Confirmation was given there is intent to conduct an inspection in September against the Ionising Radiation Regulations (IRR).

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

**DNSR:** (DSG(2023)P017 refers)



James Bryson had to leave the meeting to catch a flight. If members wished to raise any questions that could not be responded to these would be actioned through the minutes.

## 8. CORRESPONDENCE SINCE LAST MEETING

Gillian Coghill noted correspondence received since last meeting:

DSG(2023)C027: Neil Cook and Frederic Stalin response to points raised by Gillian Coghill and Struan Mackie at the DSG public meeting.

GC asked if the current regulatory enforcements which are now going to be put in place are going to influence the Dounreay budget considerably. Considering inflation and changes how do you see things moving forward?

BC replied there were several things which put pressure on all our budgets which lead us to make choices. For some things there is no choice and we must do them. We then must balance resource against the work we can stop and the work we can pause, which doesn't mean it will save any money. There is no black and white answer, we have various pressures we must make decisions on.

GC asked if a more defined answer could be given to the original question asked *“where you talked about investments and organisational structures for Dounreay, can you explain in more detail what it will mean to the community at large and if your spending power is going to be eroded by inflation how this is going to impact?”*

**ACTION: DSG/SRSG(2023)M02/A001: Neil Cook to provide more information regarding DSG(2023)C027 on how additional pressures will impact the community and how this will impact on spend.**

AF asked if the Dounreay budget has been confirmed as £221m for 2023/2024 and if there was a resource profile available for the Near Term Work Plan (NTWP) and Life Time Plan (LTP).

BC responded that part of the LTP is an aggregated resource profile. Part of the NTWP that is being derived from the plan is a substantially more granular understanding of the resources that are required to deliver each task which will give an improved short-term view. We have a funded resource profile for the year coming.

The budget for 2023/2024 is £213m which was confirmed on the Magnox website.

## 9. ANY OTHER BUSINESS

Gillian Coghill, socio-economic subgroup members and Focus North members met with the NDA socio-economic team when they visited Caithness on Wednesday 21 June to discuss the pre-consultation meeting and NDA local socio-economic impact strategy and found it very informative and open.

GC confirmed a conversation had taken place earlier during the day about combining the Buldoo residents' group and the local community liaison group with the possibility of meeting once a year. This will be looked into and discussions held.

GC noted an action had been taken at the socio economic sub group regarding working from home. She asked if they could provide the percentage of staff that work from home and how effective this is. She also asked how effective it is and how you can evaluate what is happening and how it impacts on the work being carried out at Dounreay?

BC noted that there was no fixed percentage of people working from home as there is flexibility. He also stated that we must not discount the tangible parts of effectiveness which include the relationship and understanding part of working from home. There is work that is being looked at in terms of accommodating people who want to work from home, those who want to work from site, and those who want to work a combination of the two. The key factors are what are the outputs and outcomes expected from individuals.

DC asked if there were checks being carried out on staff who work from home regarding their welfare?

BC confirmed there are several ways of checking up on staff welfare. We have a moral duty to check up on staff for their wellbeing.

TW confirmed there is support available to staff – mental health allies, proactive signposting.

GC noted there had been an article in the local newspaper Caithness Courier regarding unfair pay deals to lower paid staff.

NW confirmed the headline was about alleged concerns from a small number of individuals about lower paid workers at Dounreay not being treated fairly. Several senior union representatives were approached by the press and the quote NW gave was that "the key priority for the Dounreay unions currently is seeking to secure a fair pay increase for all our members, with a particular focus on helping those in lower salary scales who we recognise are likely to be experiencing the cost-of-living crisis more acutely. A key aspect of our role as unions is to look out for the (common) interests of all members, irrespective of grade." NW indicated that nobody had personally raised this issue with him. Hence, NW was not aware that it was a systemic issue, although he recognised that individuals may have frustrations. NW indicated that he would have preferred this had not been played out in the press, but that the press was persistent in pursuing this.

DM (CNC) highlighted Superintendent Hernandez is the Superintendent at Dounreay which is the first time we have had a Chief Inspector and Superintendent for approximately 7 years.

Gillian Coghill thanked everyone for their input and formally closed the meeting.

**Gillian Coghill**  
**DSG Site Restoration subgroup chair**  
22 July 2023

**ACTIONS ARISING FROM THIS MEETING**

**DSG/SRSG(2023)M02/A001: Neil Cook to provide more information regarding DSG(2023)C027 on how additional pressures will impact the community and how this will impact on spend**