



Please respond to:

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Dear Sir/Madam

#### **DSG COMMENTS ON DRAFT NDA BUSINESS PLAN**

The Dounreay 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 these organisations have been encouraged to provide their own response.

DSG welcomes opportunity to provide comment to the draft business plan. We also welcome the comments made in the foreword by the new Chief Executive that he wished to maintain strong relationships with stakeholders and we look forward to meeting with him and the new Chairman to ensure that these important relationships continue in a way that allows members of DSG and others to highlight any areas of concern and/or positive activities within the area. We look forward to seeing this happen and perhaps having a meeting in Caithness in the not so distant future.

Specific comments from the business plan include:

**Foreword:** The foreword refers to "Work with HMG to implement workforce reforms across NDA group estate". It would be useful for NDA to explain what this refers to?

**Page 13:** While we note the comment made about working with nuclear new build and neighbouring site organisations it would be useful to understand whether this extends to the Dounreay neighbouring site which is operated by MOD (Vulcan) but with the land owned by NDA and NDA's involvement in the future of the site as decommissioning of Vulcan moves forward.

**Page 18/19:** DSG notes a number of key programmes for the NDA estate and especially those attributed to Dounreay. We recognise that until such times as the new decommissioning programme is approved there is uncertainty over the dates for delivery and ask whether the dates in this are likely to change. If there is a substantial change to these dates it would be useful to understand this at an early stage.

**Page 21:** Provides summary of NDA funding 2018/19 onwards and notes a decrease of Government funding from 2018/19 to 2019/20 which is offset by income. DSG would like to understand how secure the income funding is.

**Page 22:** Funding on non-site expenditure shows the socio economic, skills, research and development, knowledge management, other all included together. It would be useful to understand the breakdown of the spend against each of these activities. DSG continues to question Sellafield's requirement for socio economic funding at this point in the site's decommissioning activities and with the potential future new build and the possibility of the GDF. Other sites will close in the next decade leaving sufficient time for Sellafield to benefit from socio economic funding in later years.

**Page 36:** Planned expenditure for Dounreay site for 18/19 is £192 million which appears to be an increase from 17/18 (£187M). DSG would like to understand whether this increase is due to inflation or whether additional funding has been provided for specific projects which would mean a potential reduction of funding for 2019/20.

**Page 36:** DSG notes the current key milestone headlines for Dounreay and also notes the key activities and timescale for delivery. It would be useful to understand why the NDA has not approved the site's new life time plan and suspect that this will lead to further slippage in the programme. Can NDA please explain why it is taking so long to confirm and approve the complete plan or provide a timeline for that approval process? Given the Parent Body took over the contract in 2012 and even with the addition of new work, it appears to have taken a very long time to consider and agree a working programme that can be bought into by the workforce and supply chain to ensure that the site achieves the interim end state.

With the issues around the Magnox contract, Sellafield already going back in house it is difficult not to be concerned about the lack of an approved lifetime decommissioning plan for Dounreay. We believe that the milestones for Dounreay are unlikely to be achievable given the lack of lifetime plan. The dates 2019-2021 occur on activities which will be sequential therefore the dates give no real indication of an integrated programme.

**Page 40:** DSG would be interested to understand what NDA means by working with other sites on other options for disposal of Higher Activity Waste (HAW). The physical properties of the HAW will determine its final resting place. It would be useful to have a better understanding of this.

**Page 41:** DSG had a useful update from DRS at the public meeting held in December. One of the issues that has been raised within DSG and the Caithness Transport Forum is the use of Georgemas for commercial freight. While we appreciate these things don't happen overnight it was pleasing to hear that DRS were planning to do a commercial freight trial within the next six months. We would like to see this as one of DRS key priorities within the business plan so that this is not lost sight of. At some point, if commercial freight is not realised and once fuel transportation is complete there needs to be a clear way forward for this site.

**Page 42:** DSG would like to take the opportunity to thank the NDA for honouring its commitment to site the NDA Archives in Wick. As an area steeped in nuclear history and a closure site this facility and the jobs it has created is welcome in this area. In relation to Nucleus, one of our members believes that, records from the numerous news items, documentaries and local campaign groups who have opposed certain activities at Dounreay (ie Caithness Against Nuclear Dumping and, more recently, Highlands Against Nuclear Transport) should also be included in the archives - these stories are as much part of the Dounreay story as any other.

**Page 42:** We understand NDA is looking to rationalise their property and land portfolio. One of the pieces of land, Viewfirth, is based in Thurso and is being currently considered for a potential sports facility - while we recognise this project has had some major delays we would ask the NDA to continue to hold this piece of land as we believe this project will start to build momentum over the coming financial year. The land will be a critical point in view of Sports Scotland potential funding support for such a complex.

**Misc:** One of the things that DSG is not clear about and clarification would be welcome is the status of the workforce at Dounreay. When NDA competed all the sites it was the belief that the Site Licence company workforce, working for a parent body, became private sector employees albeit there appears to be mixed messages about this. With Sellafield and Magnox site licence workforce now (or in the future) reporting directly to NDA would mean that they are now public sector workers. With the Dounreay closure contract the Parent Body still exists and therefore the models for working within the NDA will have different aspects. It would be useful if the NDA can clarify how they are going to deal with two completely different working models between the sites.

We look forward to receiving a response from you on the queries raised.

Yours sincerely



**Roger Saxon**  
**DSG Chairman**

