

SEPA'S DRAFT NUCLEAR POWER GENERATION AND DECOMMISSIONING SECTOR PLAN RESPONSE FROM DOUNREAY STAKEHOLDER GROUP

Note: This was an online questionnaire which was duly completed and the information detailed below was the submitted information in the on-line form.

Introduction

1. This response does not reflect any additional commentary that might have been pertinent and may have been highlighted at the conference scheduled for 24th January 2019 in Stirling that was cancelled at indecently short notice which incurred costs for DSG.
2. This response has comments as asked for under the Consultation Questions but includes more commentary on the text in the relevant sections.

Question 1 –Do you agree with the vision?

SEPA Chief Executive Officer Terry A'Hearn's preface:-

- This section is possibly too grandiose and too aspirational as SEPA has no remit outside Scotland.
- It is not currently obvious that “prosperous societies” will use low amounts of water, materials and carbon based energy and create little waste, as the two most successful business countries at present are China and USA which clearly do not follow this route.
- The clause “If everyone in the world lived as we do in Scotland....” does not observe that many people and countries have no intention of living and behaving as the majority of us in Scotland do.
- The global “One Planet Prosperity” is outside the scope or abilities of SEPA, Scotland or the UK and is not a reasonable headline vision or aspiration and should be changed.
- The theme is to do better than current or legal environmental standards. Throughout the document not enough emphasis is given to embarking on this only if there is business case for it, is practicable and is not financially crippling.
- It needs to be stated up front that in many of the sector operators covered by this plan receives its funding from the UK Government and value for money for the taxpayer is paramount.
- It is not clear whether the Scottish Government has to approve this plan. It may have different views and priorities.

Introduction:-

- “moving beyond compliance” needs industry discussion on merits of particular projects and scenarios, particularly on the business cases, financing and resourcing. These limited inputs may be required on more important requirements.
- As above “...means of one planet...” is too grandiose and meaningless.

- Figure 1 is fine but a complementary “Financial Flows” is required.
- It is part of SEPA’s responsibility to use enforcement tools to bring companies into compliance. If there are serious problems which preclude a company from complying these need to be understood as, in the end, a balance needs to be struck between reasonable environmental standards and the prosperity of a company and its financial and social importance to a region or community.
- The MOD Vulcan site uses the radioactive waste services of Dounreay.

Our vision etc.

- It is to be applauded that the “best possible environmental and social outcome is sought...” is at last coupled in the document.
- It is hoped that the Scottish Government note the statement: “The generating sites continue to produce low-carbon energy efficiently”.
- SEPA could help to introduce general industry to accept recycled products from the nuclear industry.
- In the Sector Roadmap Figure 2 it would be useful to list who SEPA’s partners are.

The nuclear power generation and decommissioning sector:

- The statement that “Nuclear power stations provide 42.8% of the electricity produced in Scotland...” needs greater exposure to the public to counteract the cleverly worded data provided by the renewable industry.
- The statement “ the care and maintenance stage may last for up to several decades” is not true for Higher Activity Waste (HAW) as Scottish Government policy means it has to be stored above ground indefinitely and decay of radioactivity for this waste is not applicable. The only solution is for Scottish Government is to rejoin the Geological Disposal project of the UK Government.
- Page 5, Facts and Figures- Figure 4 is extremely useful and should have much greater exposure to the public.

Question 2: Are there environmental impacts which have not been adequately considered?

- Environmental impacts – Figure 6:- There is a major error in the “Final site clearance” box. There should not be radiation from low level waste (LLW) *stores* as storage of LLW is not allowed. It has to be *disposed* at the National LLW Facility or in Dounreay’s case in its New LLW Facilities. Also visual impacts will be temporary and irrelevant.
- The place of European Directives will have to be reviewed.
- The statement is made that “SEPA and ONR work closely together...apply a consistent approach....” Are the management policies the same? Are the individual responsibilities and

freedoms of action the same for the site inspectors?

- Does the industry or the public want the “transformational change” that SEPA wants for its grandiose “One Planet Prosperity” objective which has been commented on earlier. It would be more effective if SEPA was seen to be regulator Scottish plants – the planet can only be saved if all other countries join in but if SEPA concentrate on what they can improve upon then Scotland could become a blue print for other countries.
- Comment has already been made on the number of issues that need to be addressed before “beyond compliance” is instigated if it requires significant resources.

Question 3: Are there other key influences on the nuclear power generation and decommissioning sector, which should be included here?

- Key influences – Figure 7 and Consultation question 3 (RWM Ltd) ought to be listed separately as well as NDA. It is quite correct to include Environmental groups and Media in the “Influencers” box but SEPA and decision makers need to keep constantly in mind that these groups can also, as well as adding constructively to the debate, be vehicles for single issue groups and non relevant local and personal issues.

Question 4: What other beyond compliance opportunities are there for water?

- The text and figure 8 are confusing with the SEPA average 90.9% appearing to jar with the text.
- Page 16 last bullet point:- It is absolutely essential for consistent environmental regulation across all areas and sites commensurate with specific site issues and constraints. Historically this has been a problem when site inspectors have changed and brought different views. This links back to a previous comment on management systems and the necessity of a hierarchical chain of command for policy and inspection.
- What are the opportunities to go further?:- The words “climate change” and “sustainable” should be used with caution as they are both ill defined and mean different things to different people and groups. Sustainable economic growth is more allied to the current Brexit issues than environmental issues e.g. Philips and Dyson and possibly Airbus relocations. This section needs to address more of the business case requirements and financial and social issues to weighed alongside environmental issues in decisions being made on “moving beyond compliance”. The case studies are weak examples as they do not address or demonstrate business growth from enhanced compliance to the site operators themselves, nor say what emissions or other have been reduced.

Water

- Consultation question 4:- Other opportunities are the use of brown water and further understanding and monitoring of the effect of pollution on the Continental Shelf and deeper North Sea.

Energy

- Page 20 – It is pleasing to note that it is not mandatory for business to implement recommended measures above compliance.

Question 5: What other beyond compliance opportunities are there for energy?

- Another beyond compliance issue is what can be done in the compliance and environmental field to ensure base load generating stations can operate as continuously and efficiently as possible.

Question 6 (wrongly numbered question 7): What other beyond compliance opportunities are there for materials?

- The first paragraph in bold appears straightforward logic but there is an omission that is generally missed in all discussion on waste routes etc. An energy balance needs to be undertaken on any major waste minimisation or recycling operation. An apparently “green and environmentally good” recycling or resource utilisation project can on studying actually use more resource or energy than leaving the waste route as it is. SEPA should know what these are and those that are beneficial and use them as examples.
- Consultation question 7:- The whole purpose of the Fast Breeder Reactor and Reprocessing was to recycle materials to achieve maximum energy from the uranium! The demise of this research programme is perhaps a good example of how complex the interplay of efficient resource management, environmental “beyond compliance” and government finance issues are intertwined, not to mention the social issues that SEPA has used as examples in this document’s case studies.

Question 7: What other beyond compliance opportunities for future land use?

- Future land use has to take account of HAW stores that under Scottish Government policy will be there for centuries with rebuilding and waste transfers with radioactive effects every 100 years.

Question 8: What actions would you like to see prioritised for 2019-2020?

- Prioritised actions suggested are:
 - Provide support and guidance to the sector etc.
 - Ensure SEPA has sufficient experienced staff etc.
 - Work with Scottish Govt. etc.

Question 9: Please provide any other comments you may have on the nuclear power generation and decommissioning sector plan?

- On the circular diagram in the Stronger business segment the “Going beyond compliance” section ought to add if the business plan indicates it to be worthwhile. Also in the section about sharing experience it should also note that experience and knowledge can be *sold*.
- SEPA must be in line with ONR and Environmental Agency so that it does not put Scottish industry in a less favourable position than UK wide industry.
- The “One Planet” header as mentioned before is inappropriate and might be better as “Business and the Environment Better Together”

Dounreay Stakeholder Group
6th February 2019