

Notes of 3rd ISOLUS (Interim Storage Of Laid-Up Submarines) Advisory Group (IAG)

held on 10th January 2008 at IBIS Hotel Birmingham

Attendees:

Les Netherton	Environmental Health Advisory Services Ltd (Chairman)
Maggie Taylor	MOD - Assistant Director (AD) ISOLUS
David Collier	Faulkland Associates
Son Mon Sutcliffe	Member of Public
Chris Hargraves	MOD - ISOLUS Deputy Project Manager
Dr William Thompson	Lancaster University
Paul Naylor	Environment Agency (EA)
David Senior	Health & Safety Executive (HSE) - Nuclear Installations Inspectorate (NII)
Alan Gill	MOD - Representing Naval Base Commander Devonport
Dr Paul Dorfman	University of Warwick
Di McDonald	Nuclear Information Service
Peter Lanyon	Nuclear Submarine Forum
Jane Tallents	Nuclear Submarine Forum
Tub Aves	British Nuclear Energy Society (BNES)
Ian Avent	Community Awareness Nuclear Storage And Radiation (CANSAR)
Andy Stevenson	MOD - Representing Naval Base Commander Clyde
Shelly Mobbs	Health Protection Agency (HPA)
Andy Daniel	British Nuclear Group Project Services Limited
David Whitworth	Institution of Nuclear Engineers (INucE)
Carly Amos	MOD - DES Secretariat
Lt Steve Woodley	MOD - ISOLUS team
Antony Lokier	MOD - ISOLUS Team (Secretary)

Apologies:

Dr Jane Hunt	Lancaster University
Dr Kate Rawles	Ethicist
John Shepherd	MOD - Representing Naval Base Commander Devonport
Emma Cooke	Scottish Government
David Warner	Nuclear Decommissioning Authority
Richard Griffin	Nuclear Decommissioning Authority
Dr Louise Brown	Scottish Environment Protection Agency
Dr David Littlewood	Ethicist

1. Welcome & Introductions

Les Netherton (LN) welcomed all those present and asked everybody to introduce themselves as there were some new members.

2. Presentation: Risk & Risk reduction definitions

Tub Aves (TA) gave a presentation on Risk & Risk Reduction definitions; copy at Annex A. Les Netherton stated that there was another term, As Low As Reasonably Achievable (ALARA), which generated a discussion along with the term As Low As Reasonably Practicable (ALARP). In essence, ALARP is the UK definition of ALARA, a term introduced by the ICRP (International Commission on Radiological Protection) although they are not the same since ALARP suggests a balance between risk and benefit, where as ALARA takes social and economic factors into account. ALARP is key to UK Radiation Protection and introduces a test of reasonableness ensuring that workers work down from Dose Limits rather than up to them. Ian Advent raised a concern that ALARP had fallen into disrepute with the public due to political interference.

Peter Lanyon (PL) reminded us that we will be having a major public consultation in 2 years and that we need to help the public in factoring in risk, in particular with regard to health, politics and cost, so it would be useful to have something on the website. David Collier (DC) suggested that ISOLUS should be able to learn from the CoRWM work in this area. DC took an action to highlight relevant documents from the CoRWM list.

Action 3.1: DC to identify the CoRWM documents covering risk.

LN suggested that this would be useful for the ISOLUS Team to produce a risk glossary for the website which the IAG could review.

Action 3.2: ISOLUS team to produce a risk glossary by the 22nd February 2008.

DC stated that here are two things to consider, firstly the regulation of an activity and secondly choosing between alternatives and demonstrating that you have chosen the right option. DC offered to give a presentation on Best Practical Environmental Option (BPEO) Analysis to cover the second.

Action 3.3: DC to give a BPEO presentation at the next IAG.

LN suggested that the second part of the Advantage report was very useful reading for covering the process and requested the Secretary reissue it to the IAG.

Action 3.4: IAG Secretary to re-issue Advantage report.

Di McDonald (DM) stated that people's perception of risk varies with the task, and nuclear waste is more alarming than the analytical analysis. LN stated that Dr Jane Hunt's (JH) comments in advance of the meeting covered this area and took an action to see if JH would be willing to give a presentation on Public Risk Perception at the next IAG.

Action 3.5: LN to ask JH to see if she would give a presentation on Public Risk Perception.

3. Presentation: Contrary Objectives in ISOLUS

DM gave a presentation on her perception of the contrary objectives in ISOLUS with regard to Reactor Compartment (RC) Cut-up and RC Cut-out, Copy at Annex B.

Bob Pirret (BP) expressed a number of concerns regarding the presentation. However, due to time constraints, he stated that he would be more comfortable if the title had included "public perceptions" rather than "objectives" so that they were in a different context which he could accept.

TA stated that a lot of experience had been gained over the last 50 years since Dreadnought first entered service and that internationally the Russians had now cut-out 120 Reactor Compartments.

DC stated that the presentation was a timely reminder that decisions are taken on political as well as technical grounds, for example the [decommissioning of?] the Dounreay shaft.

Andy Stevenson made the group aware that a number of components are replaced or temporarily removed in the reactor compartment as part of normal business for maintenance, and not all the material in the compartment is waste. Chris Hargraves stated that the MoD has a commitment to demonstrate sustainability. Only approximately 15% of the reactor compartment was estimated as being classified as waste and we would endeavour to recycle the remainder. Dr Paul Dorfman responded that this raised another issue for future discussion regarding clearance and exemption of potential materials for re-use/recycling.

LN stated that the presentation and subsequent discussion had been very useful and whilst there was not enough time to go into detail at this meeting, could all members send any comments to the Secretary for collation and circulation before the next meeting.

Action: 3.6 All to comment on the presentation by the 22nd February 2008.

Action: 3.7 IAG Secretary to collate comments and circulate to members by 7th March 2008.

4. IAG Workshop

a. Technical Summary Reports

LN stated that the Technical Studies CD had been issued. Lt Steve Woodley updated the meeting on the work he had done to produce this CD. He was working to obtain a plain English version of the summaries through the MOD system as MOD has corporate membership of the Plain English Campaign. It was emphasised that these reports had been provided for historical information, and had not been peer reviewed. Future reports would be subject to peer review. Ian Advent asked if these studies were going to be discussed. The value of looking at them at this stage was considered, and DC suggested that members reserve the right to do so if new studies depend on previous work.

LN summarised that the main issue was to bring everybody up to a common level of understanding, not necessarily to seek agreement of these studies. It was agreed to hold an educational workshop to bring everybody up to speed and to cover any other areas.

Action: 3.8 All to provide offers of presentations and/or topics required by 15th February 2008 to the IAG Chairman.

PD raised a question regarding re-imburement of members' time outside of the meeting and offered to provide a link to the Department of Health's guidance.

Action: 3.9 PD to provide re-imburement guidance.

(Post Meeting Note:

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4138523)

b. Technical Options Study

CH went through the issues raised in Annex C of the workshop report and how they had been incorporated into the revised scope of work for the Technical Options Study.

Shelly Mobbs raised a number of general comments and it was agreed to include the diagram with the scope. BP requested that the contractors be involved in information gathering as they hold a lot of additional data. DC asked if the work was expected to cover social issues and TA suggested that we should make it clear whether or not social and site specific issues were included. BP was concerned that not looking at sites was not realistic due to the practical aspects. CH stated that implementability/practicality would be considered later. Peter Lanyon raised a reminder that all this information will need to be available for the next consultation. CH stated that other work is to follow as per the flow chart generated at the workshop.

A discussion followed regarding future consultation. CH advised that MOD planned to hold a competition to enlist a stakeholder engagement convenor. A question was raised regarding the lessons learnt from the previous ISOLUS consultations. It was stated that at the time Lancaster University carried out a Lessons Learnt review after the Consultation on ISOLUS Outline Proposals (CIOP) and it was acknowledged that Industry had not been involved in it. DC pointed out that the Best Current Practice on consultations had developed significantly over the years since CIOP. Due to the shortage of time at the meeting, DC offered to liaise with Dr Jane Hunt (JH) and PD to produce some bullet points to consider before the next IAG to facilitate a discussion regarding the content of the consultation box in the flow chart at Annex B of the Workshop report.

Action: 3.10 DC/JH/PD to produce some consultation bullet points by 22nd February 2008.

There were no concerns raised regarding the process used for the workshop held on 5th December 2007.

5. Draft proposals for Peer Review and Preview, including potential contested/uncertain data

CH stated that this area would be developed for future consideration.

6. Update on International Practice for submarine disposal

MT agreed that an update was required and that this would be carried out as part of normal business in the future.

7. Workshop issues raised for available information or future agenda items: briefing on the Regulatory Framework, smelting/melting processes

The regulators had issued a paper as an aide memoire, copy at Annex C. It was agreed that this and the other items could be discussed at the proposed educational workshop.

8. Minutes of the 2nd IAG 27/09/07 and matters arising

The minutes of the 2nd IAG had been ratified outside of the meeting and placed on the website.

The updated actions are as follows:

- **“Action 1.2: John Shepherd to liaise with the Devonport Local Liaison Committee (LLC) to determine if they wish to be represented on the IAG.”** - Action ongoing. This would be raised at the next LLC in January 2008.
- **“Action 1.6: Di MacDonald to provide a point of contact for Environmental Justice.”** - Action ongoing
- **“Action 1.12: MT to raise the possible update of project title at the MISG.”** – Complete. This was raised at the MISG on 8th November 2007. See item 9
- **“Action 1.13: All to provide any comments to MoD on the website by the 24th August.”** - Complete
- **“Action 2.1: Secretary to provide supporting information as identified by DM.”** - Complete
- **“Action 2.2: The ISOLUS team to start a short regular newsletter.”** – Action ongoing
- **“Action 2.3: Secretary to contact Bob Pirret”** - Complete
- **“Action 2.4: PL to provide points of contact for Greenpeace and Friends of the Earth.”** – Action ongoing.
- **“Action 2.5: Secretary to write to the identified points of contacts in Greenpeace and Friends of the Earth.”** – Action ongoing. Awaiting Action 2.4
- **“Action 2.6: DC to provide a reference for identifying roles.”** – Complete. Ref on roles in current MRWS consultation document (June 07) is paragraph 1.18.
- **“Action 2.7: The secretary to provide an updated paper with a section on roles for comment.”** – Action ongoing. It was agreed that it would be more appropriate to include the roles as part of a governance paper rather than incorporate it into the communications strategy.
- **“Action 2.8 DC to provide reference for CoRWM formulation.”** - Complete.
- **“Action 2.9: AL to provide MoD guidance”** – Complete. All questions from the press will have to be directed to Defence Equipment & Support press office.
- **“Action 2.10: All members to provide details of nameplate display requirements to the Secretary”** – Complete.
- **“Action 2.11: ISOLUS Team to produce an overview of the decision process.”** – Action ongoing.
- **“Action 2.12: ISOLUS Team to produce overview of the links and differences with the civil process.”** – Action ongoing.
- **“Action 2.13: ISOLUS Team to produce a glossary of terms for the website.”** – Complete. 1st draft included on Technical Studies CD.
- **“Action 2.14: ISOLUS Team to issue CD by 9th November 2007.”** – Complete.
- **“Action 2.15: IAG to comment on summaries by 7th December 2007.”** – Complete.

- “**Action 2.16: ISOLUS Team to provide a short induction for new members.**” – Complete. Will be done for future new members joining after the forthcoming educational workshop.
- “**Action 2.17: ISOLUS Team to issue explanatory diagram and further information by 14 November 2007.**” – Complete.
- “**Action 2.18: CH to advise MISG on the requirement for a Strategic Environmental Assessment.**” – Complete. The MISG was advised on the 8th November 2007.
- “**Action 2.19: ISOLUS team to issue draft scope of work for the study by early November.**” – Complete.
- “**Action 2.20: ISOLUS team to organise workshop.**” – Complete. Workshop held in Bristol on the 5th December 2007.

The one outstanding item is the draft progress tracking report on public consultation recommendations. JH had given a number of comments before the meeting as she was unable to attend; MT took an action to respond directly to her latest e-mail

Action 3.11: MT to respond to JH e-mail dated 8th January 2008.

9. MOD ISOLUS Steering Group (MISG) held on 8th November 2007

LN stated that the one item raised from the IAG at the MISG was the possible update of the project title. The MISG agreed to keep the title, as it was pronounceable and it had “brand recognition”. The one action from the MISG for the IAG Chairman was to review the overlap of attendance at the MISG of IAG members. LN stated that he had discussed this with JH and PL and they had both expressed a wish to continue attending both meetings. PD made an offer to stand in for JH if she was unable to attend the MISG in the future. LN took an action to determine if substitution was possible.

Action 3.12: LN to determine if substitution at the MISG was possible.

10. IAG Terms of Reference

The Secretary stated that the Terms of Reference had been agreed at the last meeting with the additional statements in the notes of the 2nd IAG.

11. Membership of IAG

The Secretary stated Dr David Littlewood (Ethicist) had agreed to become a member of the IAG in the future. No response had been received from Greenpeace and Friends of the Earth, DC had provided contacts and it was agreed that they would be contacted.

Action 3.13: IAG Secretary to invite Greenpeace and Friends of the Earth again.

12. Review of parked issues

MT notified the meeting that sale of Devonport Management Limited to Babcock’s had completed and they are now known as Babcock Marine. The other industry change is that British Nuclear Group

Project Services Ltd was sold to the Vosper Thorneycroft Group. Andy Daniel stated that the completion of this deal was expected to be the end of January. MT stated that the impact on the project of these changes was being assessed.

13. Any Other Business

None.

14. Dates and venues for future IAG meetings

It was agreed that an educational workshop would be held on 3rd April 2008 at Lancaster and the IAG meeting would be held the following morning.

It was also agreed that the following meeting would be held in Edinburgh on 18th June 2008, with the potential opportunity to visit Rosyth dockyard the afternoon before to be investigated.

Annex A – Risk & Risk reduction definitions



Annex A IAG
100108.ppt

Annex B – Contrary Objectives in ISOLUS



Annex B IAG
100108.ppt

Annex C – Regulatory Aide Memoire

ISOLUS ADVISORY GROUP MINISTRY OF DEFENCE NUCLEAR SITE REGULATION

	<p>Civil Nuclear Site e.g. Nuclear Power Station, Devonport Royal Dockyard, Rosyth Royal Dockyard.</p>	<p>Ministry of Defence Nuclear Site e.g. HM Naval Base Clyde, HM Naval Base Devonport.</p>
<p>Health & Safety General</p>	<p>Health & Safety Executive (HSE) regulates under:</p> <ul style="list-style-type: none"> • Health & Safety at Work Act (1974) • Associated Regulations 	<p>Health & Safety Executive (HSE) regulates under:</p> <ul style="list-style-type: none"> • Health & Safety at Work Act (1974) etc <p>No Crown exemption sought but 'HSE/MoD Agreement' sets out the regulatory principles to account for the unique defence environment.</p>
<p>Nuclear Safety</p>	<p>HSE - Nuclear Installations Inspectorate (NII) regulates sites under:</p> <ul style="list-style-type: none"> • Nuclear Installations Act (1965) • Ionising Radiation Regulations (1999) • Radiation Emergency Preparedness and Public Information Regulations 2001. <p>Sites are Licensed by HSE-NII and regulated using Licence Conditions and Licence Instruments such as Consents, Approvals, Specifications etc.</p> <p>The legislation provides for enforcement activity as required.</p> <p>Note: MoD licensed sites are also subject to DNSR Authorisation process.</p>	<p>The MoD Defence Nuclear Safety Regulator (DNSR) regulates where MoD has been granted exemption from legislation and regulations.</p> <p>DNSR 'Authorisation' mirrors 'Nuclear Site Licensing'. Sites are Authorised and regulated by DNSR using Authorisation Conditions and Authorisees are appointed.</p> <p>HSE Nuclear Installations Inspectorate (NII) regulates under:</p> <ul style="list-style-type: none"> • Ionising Radiation Regulations (1999) • Radiation Emergency Preparedness and Public Information Regulations 2001
<p>Radioactive waste disposals including environmental discharges</p>	<p><u>England & Wales</u></p> <p>Environment Agency (EA) regulate under a Radioactive Substances Act (RSA 93) Authorisation</p>	<p><u>England & Wales</u></p> <p>RSA 93 does not apply to MoD. EA regulate by issuing an Approval which is, in practice, equivalent to RSA authorisation</p>

	<p><u>Scotland</u></p> <p>Scottish Environmental Protection Agency (SEPA) regulate under a Radioactive Substances Act (RSA 93) Authorisation</p>	<p><u>Scotland</u></p> <p>RSA 93 does not apply to MoD. SEPA regulate by issuing an Approval which is, in practice, equivalent to RSA authorisation</p>
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