

**Minutes from 12<sup>th</sup> Submarine Dismantling Project Advisory Group**  
**21st July 2011, Novotel, Reading**

**In attendance**

Les Netherton (LN)	Chairman of SDP AG
Jane Tallents (JT)	Nuclear Submarine Forum
Di McDonald (DM)	Nuclear Submarine Forum
David Collier (DC)	Golder Associates
Andy Daniel (AD)	Industry representative (Babcock)
Ian Avent (IA)	CANSAR
Dr Sue Jordan (SJ)	Defence Infrastructure Organisation
Gareth Rowlands (GR)	DE&S Secretariat
Simon Tinling (ST)	SDP Asst Hd Approvals
Phil Northcott (PN)	SDP App RN
Mike Cushen (MC)	SDP MOD
Mike Denness (MD)	Green Issues Communiqué
Emma Webster (EW)	Green Issues Communiqué
Nick Bohane (NB)	Green Issues Communiqué
Dave Wells (DW)	Nuvia Limited
Sally May (SMa)	SDP Approvals
Cllr Brian Goodall (BG)	Fife Council
Shelley Mobbs (SMo)	HPA
Tub Aves (TA)	Nuclear Institute
Gary McMeekan (GM)	Environment Agency
Chris Hargraves (CH)	SDP Approvals

**Apologies**

Steve Lewis (SL)	Office for Nuclear Regulation
Laura Kerr (LK)	SEPA
Fraser Thomson (FT)	Fife Council
David Whitworth (DW)	Nuclear Institute
Cllr George Regan (GRe)	SCORRS
Dr Paul Dorfman (PD)	Warwick University

**Not present**

Bob Pirret (RP)	formerly on behalf of Babcock Stakeholder Liaison
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**1. Welcome, Apologies and Introduction**

LN welcomed members of the SDP Advisory Group (AG) to Reading.

A number of members gave their apologies, they are listed above.

**2. Notes of 11<sup>th</sup> SDP AG**

No issues were raised.

### 3. Action Grid from the 11<sup>th</sup> SDP AG

Action Number	Description	Actionee	Status
11.1	MC to investigate the additional attributes added to the TOS report and report back to the AG	EW	Complete
11.2	MC to hold discussions internally to determine whether a letter of support could be provided to assist with the grants bid process for Public Art Exhibition.	MC	Complete
11.3	ST to investigate the issue of emails from the SDP not being received by some members of the AG	ST	Complete
11.4	EW to amend the section on earlier consultation in 'SDP – Our Approach to Public and Stakeholder Engagement' and circulate to Advisory Group.	EW	Complete
11.5	EW to make the appropriate changes to the document and then upload to the website.	EW	Complete
11.6	All to send any comments through to EW regarding the SDP – Our Approach to Public and Stakeholder Engagement	All	Complete
11.7	All to send any comments through to EW regarding the 'SDP – Our Approach to the Decision Making Process' document	All	Complete
11.8	All to send through additional questions for the Q&A document to EW	All	Complete
11.9	EW to add questions about Public Inquiry process to the Q&A document.	EW	Complete
11.10	MC to consider whether the Consultation sub group could be expanded to include an additional member.	MC	Complete
11.11	MC to take away the principle of site specific discussions and report back to the Advisory Group.	MC	Complete
11.12	EW to publish the Dockyard Activities presentation to the SDP website	EW	Complete
11.13	ST to prepare a list of items for review by the Advisory Group	ST	Complete
11.14	MC to arrange presentation regarding the French and Russian Submarine Dismantling experience (DW and AD to undertake presentation)	MC	Complete
10.6	MC to discuss internally the possibility of arranging a presentation about dose risk assessment and dose control at the next meeting	MC	OBE

**Re item 10.6 MC explained that the two presentations scheduled on the agenda - Public Consultation and International Perspectives – has been prioritised for this meeting as he felt these would be most useful to the group. If members of the group wanted more information about dose risk assessment then a specific briefing note could be provided.**

## 4. SDP Update

### a. Project overview

MC took the AG through the key milestones that had been achieved since May 2009. Looking forward, the Options Analysis (OA) work had been completed which enabled the MOD to form proposals that would be shared with the public as part of the public consultation process.

MC informed the group that the intention is to start public consultation this calendar year. He stressed the importance of presenting the OA and proposals in public consultation in a meaningful way that enables the public to engage with the analysis.

MC confirmed that the suite of documents for public consultation was currently being developed and that this must go through a very rigorous internal approval process before the start of public consultation.

MC briefly outlined the timeline after public consultation. The proposals would be revisited, informed by the public consultation responses, and recommendations formed which would be put to the department, leading to a Ministerial decision. This process would take approximately 18 months.

Once this has been completed the project would move into the site specific design phase, where planning and regulatory approvals would be sought, leading to the demonstrator, which is currently planned to take place in the middle of this decade.

MC confirmed that the ILW storage solution will need to have been agreed before the demonstrator phase can start. The MOD is working with DECC and the NDA to explore the potential options for ILW storage as part of a wider ILW consolidation strategy.

The issue of ILW storage will be considered at a generic level during this consultation. IA asked for more information regarding the NDA's timescales and stakeholder engagement plans for the national strategy for ILW.

#### ***Action 12.1: ST to circulate NDA strategy published in April 2011***

MC outlined the progress that had taken place since the last AG:

- OA complete
- Site screening complete
- First two stages of Strategic Environmental Assessment (SEA) complete
- Significant amount of work gone into preparation of public consultation materials
- Sub group meetings have taken place
- Website updated regularly.

### b. Options Analysis

ST took the AG through the decision making process. The analysis of integrated options has now been completed and the findings will form the basis for proposals to be put forwards into public consultation.

This is an interim analysis of the options; further analysis will be completed after the conclusion of public consultation, which will take into account the comments raised during consultation plus any further work required.

ST recapped on the three technical options being considered and the 'do minimum' option of continued afloat storage which has been assessed as a comparator.

IA asked whether the option of RPV removal and storage could be discounted, based on the Technical Options Study? ST replied that none of the technical options would be discounted at the public consultation stage and that the Technical Options Study which had been inconclusive was not a basis for discounting any options.

ST took the AG through the different types of analysis that had been undertaken as part of the evidence gathering process.

The Technical Options Study (ToS) had been formative in developing attributes (and the data required to assess them) to be taken forward into the subsequent MOD Proposed Options' Study (MPOS). The MPOS had also been inconclusive because it did not consider the integration of technical, site and storage options. The MPOS had therefore fed further into the MCDA used to assess the Operational Effectiveness of the integrated options..

A site screening exercise was conducted to identify the screening criteria and the candidate sites and this was now published on the web site.

From all of this work a long list of 30 criteria was drawn up which were developed through three MCDA workshops which refined the number of criteria to 22. ST took the AG through the 22 criteria that had been identified under the headings: Policy, Operations, Health and Safety and Environmental Impact.

Discussion took place on a number of the criteria. BG commented that the criteria titled Compliance with UK policy should be clarified as Compliance with policies within the UK to reflect the role of Scottish Government policy. ST noted the difference, and confirmed that while the phraseology within the workshop papers could not be changed, the difference would be reflected in the public consultation materials.

***Action 12.2: ST to ensure that public consultation materials acknowledge the differences between UK and Scottish policy.***

TA raised the importance of dealing with the non nuclear wastes arising from submarine dismantling. ST said that this component of the process would be dealt with at a licensed ship recycling facility and MC expanded on the point, explaining that this would be managed through the MOD's Disposal Services Authority. The MOD clarified that ship-breaking of the non-radiological hull of the submarine would be done at a licensed UK ship-recycling facility.

ST took the AG through the criteria relating to operations. The flexibility of dismantling approach to managing future classes was seen as particularly significant by some members of the AG. ST confirmed that the project scope is for 27 submarines and that the project only has a funding line for 27 submarines. Future classes of submarines will need to make separate provision for their dismantling. However, it is important to recognise that decisions made now set the context for future decision making. DM said that it is important to remember that some members of the AG are involved with the project on the condition that they will not support the dismantling of any submarines that have come into service since the project began as ISOLUS. The MOD confirmed that it recognises their position.

***Action 12.3: ST to consider the clarification regarding the flexibility of dismantling approach to managing future classes within the public consultation materials. This clarification should be shared with Di McDonald (and the sub-Group members) in advance.***

ST took the group through the Health and Safety criteria considered. The Health and Safety section relates to workers because it links back to the Health and Safety at Work Act legislation.

ST explained the Environmental Impact criteria were aligned to the SEA criteria. ST confirmed that weighting of the environmental criteria was done on the basis of how important each criterion was after the legal minimum had already been achieved.

SMo asked what was covered by the criteria titled 'Impact from the Natural Environment'. SJ explained that it includes: climate change, coastal processes and seismic events. SMo asked whether the context of this section changed at all in light of the Fukushima events and said that the ONR have undertaken work on the impact for the UK nuclear industry.

***Action 12.4: EW and SJ to add question to Q&A re Fukushima***

JT asked where the impacts from the unnatural environment fit in, for example accidents in the dockyard? ST replied that the wider implications of undertaking dismantling in the dockyards are considered in the basic cost estimates of achieving safety standards within the Investment Appraisal and within the Operations criteria that consider the implications for other dockyard or naval base activities. However, detailed risk based analysis of different scenarios within a site would only be possible once the project moves beyond strategic options to develop detailed designs and safety cases.

LN informed the group that the response to the Fukushima incident is due to be published in September.

***Action 12.5: GM to speak to MC regarding the Environment Agency paper responding to Fukushima***

ST took the AG through the cost model and investment appraisal of the options. ST confirmed that this is an interim investment appraisal for the purpose of public consultation. It will be reviewed post public consultation to include the comments that have come forward from public consultation.

ST showed an example of a COEIA plot which takes each of the integrated options and measures effectiveness against the whole life cost. It does not include Other Contributory Factors (OCF), as by their very nature, OCF cannot be costed or measured quantitatively.

TA asked how Ministers can make an informed decision if the OCF is not included within the IA in the Main Gate business case? MC confirmed that Ministers will have a full range of documents and evidence before they make a decision and that as soon as it is possible for a cost to be placed it will then be included within the IA.

BG asked if OCF can (later on) be costed, will it just be the cost to MOD that is considered, or would it be a wider cost including, for example, the aspirations for an area? ST explained it would be the cost to the MOD that would be quantified.

ST took the group through the Other Contributory Factors.

On the earlier discussion about flexibility of facilities, DM suggested that in order to explain that there are no preparations for dismantling new build submarines, practical examples should be given, for example to say that docks will not be made bigger, if this is the case.

IA asked if there was any update on the geological disposal facility? LN said that the West Cumbria MRWS consultation is due to take place at the end of the year and that in the DECC annual report there was a statement about trying to speed up the dates for the GDF to come online. The view of CoRWM is that it would be difficult to speed up a volunteerism process. 2040 is a planning assumption.

LN observed that the discussions that the group had been having in the meeting so far, demonstrate how complex the consultation will be and the importance of making sure that the information presented is presented in a way the public can understand.

TA suggested that the project team should use Bob Pirret, Vice Admiral Matthews, Peter Whitehouse, Andy Daniel and Chris Hargraves, because of their previous involvement with the project during previous consultations. MC noted this advice.

### **c. Strategic Environmental Assessment**

SJ updated the group on progress with the SEA since the previous AG. The assessment has now finished and the project is at the reporting stage, preparing for public consultation.

The scoping report is now on the website, and the SEA sub group have fed in their comments throughout the process. The findings have fed into the OE and OCF.

A non technical summary will also be produced to be provided during the public consultation.

SJ took the AG through the key issues that an SEA considers including: biodiversity, population, human health and well being.

SJ confirmed that there will be an environmental factsheet that considers the key findings.

DM confirmed that when looking at all technical options the process should be considered from start to finish. For example if you cut out a reactor compartment, you have to have an assumption that it has to be cut up eventually. MC confirmed that the project understands that, on current plans, the GDF will not accommodate packages the size of a Reactor Compartment. It would therefore need to be cut up before final disposal.

BG asked how the outcomes from the SEA transfer into consultation, for example how will the decision be compliant with the Scottish Government policy on waste? MC suggested they had a discussion about Scottish policy as nuclear submarines are specifically exempt.

***Action12.6: MC to contact BG regarding Scottish policy further to the discussion regarding waste.***

SMo asked whether the greenfield, brownfield, licensed and authorised sites apply to both dismantling and storage sites? MC confirmed that this was the case and that if we develop a MOD bespoke solution, further public engagement likely to be required. .

## **5. Sub Group Updates**

LN referred members of the AG to the update paper circulated in advance of the meeting. Since the last meeting, members of the sub group had been involved in preparation and review of various materials. LN felt that the MOD had taken a very inclusive approach and that the input of the sub groups has significantly influenced the development of the SEA and public consultation materials.

LN informed the group that at least one of either himself, DC or PD had been at each of the workshops and that they had all been transparent and followed a good process. He informed members of the AG that they had been included in all of the discussions that took place. DC confirmed that the MOD had shown no signs of moderating its discussions in view of the presence of the sub-group members at the workshops.

## **6. Presentation- Public Consultation Plans:**

SMA outlined the plans for Public Consultation will be considering. She reiterated the key points on which the public will be consulted. No decisions will be made before public consultation. Decisions will show how the public's views have been taken into account. The Government Code of Practice on Consultation will be followed and lessons will be learnt from previous consultations. The consultation will last for a minimum of 12 weeks.

**a. Ways to participate**

SMA explained how interested people will be able to participate in the public consultation through local events, national events and online. The consultation section of the main MOD website will host the online element of the consultation but with links through to the submarine dismantling project section of the website.

**b. Materials**

SMA took the AG through the public consultation document hierarchy, explaining the difference between levels 1-5. SMO asked where the question and answers document sits within the public consultation documentation hierarchy? SMA confirmed that it would be within level 2.

***Action 12.7: SMA to add Question and Answers to the Public Consultation Document Hierarchy diagram***

JT asked when all of the public consultation materials will be available for the AG to see? SMA said that as much material as possible will be shared in advance of public consultation, but that it would not be possible to release certain information if it could be considered to be giving inequitable access to some consultees. ST and MC confirmed this and reiterated that as much information as proper process allows would be shared.

DM said that the information regarding the future classes of submarines would fit well within the History of the Project factsheet.

***Action 12.8: MC to consider whether the Public Consultation question set can be released in advance of public consultation to the Advisory Group***

LN said that it was important that the members of the AG determine what role they will be playing during the public consultation, some will be observers to the public consultation, others will be active participants.

The MOD will be looking for members of the group to act as observers at the local and national consultation events.

**c. Timeline**

SMA took the members of the AG through an example timeline of events during consultation. All MP and MSPs briefings will take place at the start of the public consultation. There has also been a change in the events logic; Devonport and Rosyth consultation events will take place first, followed by a break before heading to the supporting locations of Saltash, Torpoint and Edinburgh.

SMA confirmed that the dates for public consultation events will be announced one month prior to the public consultation. They will be communicated through a variety of channels.

TA asked what the involvement of the site licensees and the local MOD representation will be. MC confirmed that there would be local MOD representation, particularly from the Naval Base, but there would not be a significant role for the licensees. The company would however be briefed about what is taking place. MC reiterated that this will be a MOD public consultation and will not be unduly influenced by industry proposals.

#### **d. Events**

SMa explained the different types of events that would take place at a national and local level. A variety of different materials will be available for the public to take away with them. Workshops will also take place on a national and local level.

BG confirmed that he thought that Glasgow was a good venue for a national workshop event in Scotland.

There will also be visual materials used including a video that will be played at the public consultation. JT was concerned about the video showing the fleet in action as the submarines' role should not be glorified. MC said that the video was striving for a balanced view. DM suggested it would be better showing the submarines in the dockyard, rather than on active service.

#### **e. Stakeholder Engagement**

SMa explained how local stakeholders were being engaged in the design of the Public Consultation plans.

#### **f. Responding to the Public**

SMa took the AG through the slide relating to responding to the comments raised by the public although this was missing from the slide packs that had been circulated to the group.

***Action 12.9: SMa to consider the context/balance of the situation in the video and consultation document***

***Action 12.10: SMa to circulate the 'Responding to the Public' slide***

LN asked the AG for comments on the Consultation document. BG said that paragraph 1.1 should be changed for the same reasons as discussed with regard to the video. It was felt that 'nuclear powers' in paragraph 2.1.4 should be changed as it is a loaded term.

SMo said that the introduction did not mention anything about the previous consultations. SMa said that this was covered in the background section, but could be mentioned briefly in the introduction.

***Action 12.11: SMa to add a short paragraph regarding previous consultations into the introduction of the public consultation document.***

LN asked how the group felt about the general style and wording of the document? BG said that the general approach was understandable and that a complex subject had been explained well.

IA asked for the word radioactive to be added into section 1.4. Clarification was sought on the comments regarding space for afloat storage in paragraph 2.1.2

***Action 12.12: SMa to circulate to the AG the opening sections of the public consultation document in word rather than PDF***

***Action 12.13: All to email comments about the public consultation document to SMa and EW by 29<sup>th</sup> July 2011***

### **7. Presentation – International Perspectives**

Presentations were given by Dave Wells from Nuvia regarding the Russian experience of submarine dismantling and Andy Daniel from Babcock regarding the French experience.

## 8. Future of the Advisory Group

LN informed the group that some members of the AG had suggested that it would be helpful if there was another AG before public consultation took place. MC stated that he would consider the need for another AG when the timing for public consultation is confirmed. LN felt it would be beneficial to have one further AG after the public consultation once the responses to the public consultation have been completed. This would provide the opportunity for learning from experience to be received before any decision is made. The AG members were happy with this proposal and it was noted that the situation regarding the storage route should also be clearer by this point in time.

**Action 12.14: MC to consider whether there is the requirement for another advisory group, before public consultation.**

## 9. AOB

SMo informed the AG that she is leaving the HPA at the end of September to work for a small consultancy firm, therefore from September she will no longer be able to represent the HPA on the AG. LN asked whether the group would like the MOD to approach the HPA for a new representative? DMc asked that the SDP contact the HPA so that it has a contact within the HPA to consider safety issues in the future.

The group asked whether it would be possible for SMO to continue on the AG? SMO said that she would need to speak to her new employers.

Members of the group asked for their thanks to the HPA, for the valuable input that Shelly has provided since working on the project, to be recorded.

**Action 12.15: MC to write to the HPA to thank them for the support and assistance of Shelly Mobbs and to enquire about further support following her departure.**

LN informed the group that he had been asked to be part of the Scientific and Technical Advisory Committee (STAC) review by the Director of Public Health (Plymouth) and explained that he did not envisage any conflict of interest because his involvement with SDP had been focussed on consultation, while the STAC would focus on the health issues. LN asked the group if they had any comment about his potential participation. TA felt that any involvement from LN would be for the benefit of Plymouth City Council and also the wider community.

**Action 12.16: All to email any comments regarding LN's involvement with the STAC to him in the next few days if they did not raise them in the meeting**

Meeting closed at 16.07pm

Action Number	Description	Actionee	Status	Due date
12.1	EW to circulate NDA strategy published in April 2011	EW	Ongoing	21st August 2011
12.2	ST to ensure that public consultation materials acknowledge the differences between UK and Scottish policy	ST	Ongoing	TBC
12.3	ST to consider the clarification regarding the flexibility of dismantling approach to managing future classes within the public consultation materials and share with Di	ST	Ongoing	21st August 2011

	McDonald (and sub-Group members) in advance			
12.4	EW to add question to Q&A re Fukushima	EW	Ongoing	21st August 2011
12.5	GM to speak to MC regarding the Environment Agency paper responding to Fukushima	GM	Ongoing	21st September 2011
12.6	MC to contact BG regarding Scottish policy further to the discussion regarding waste	MC	Ongoing	21st September 2011
12.7	SMa to add Question and Answers to the Public Consultation Document Hierarchy diagram	SMa	Ongoing	21st August 2011
12.8	MC to consider whether the Public Consultation question set can be released in advance of public consultation to the Advisory Group	MC	Ongoing	21st September 2011
12.9	SMa to consider the context/balance of the situation in the video and consultation document	SMa	Ongoing	21st August 2011
12.10	SMa to circulate the 'Responding to the Public' slide	SMa	Ongoing	21st August 2011
12.11	SMa to add a short paragraph regarding previous consultations into the introduction of the public consultation document	SMa	Ongoing	21st August
12.12	SMa to circulate to the AG the opening sections of the public consultation document in word rather than PDF	SMa	Ongoing	TBC
12.13	All to email comments about the public consultation document to SMa and EW	All	Ongoing	1 week from receipt of word doc
12.14	MC to consider whether there is the requirement for another advisory group before public consultation	MC	Ongoing	21st September 2011
12.15	MC to write to the HPA to thank them for the support and assistance of Shelly Mobbs....[as above]...	MC	Ongoing	21st August 2011
12.16	All to email any comments regarding LN's involvement with the STAC to him if they did not raise them in the meeting	All	Ongoing	25 <sup>th</sup> July 2011