

**Notes and actions from 15<sup>th</sup> Submarine Dismantling Project Advisory Group 10 August  
2016, DAS Ltd, Bristol and Bath Science Park**

**In attendance**

|                         |   |
|-------------------------|---|
| Les Netherton (LN)      | Chairman of SDP Advisory Group                          |
| Jane Tallents (JT)      | Nuclear Submarine Forum                                 |
| Di McDonald (DM)        | Nuclear Submarine Forum                                 |
| Andy Daniel (AD)        | Industry representative                                 |
| Ian Avent (IA)          | CANSAR (Campaign Against Nuclear Storage and Radiation) |
| Phil Matthews (PM)      | NuLeAF  |
| Shelly Mobbs (SMob)     | Eden Nuclear and Environment                            |
| Stephen Haraldsen (SH)  | Nuclear Institute                                       |
| Sean Morris (SMor)      | NFLA  |
| John Davis (JD)         | MOD - SDP Programme Manager                             |
| Cdre Mike Robinson (MR) | MOD - In-Service Submarines Head                        |
| Claudia Lastra (CL)     | Arts Catalyst   |
| Mark Sanderson (MS)     | MOD – DIO   |
| Clare Trenholm (CT)     | MOD – Policy Secretariat                                |
| Linda Eadie (LE)        | MOD – SDP   |
| Lucy Samuel (LS)        | MOD – SDP   |
| Mark Ball (MB)          | MOD - SDP   |

**Presenting to the Advisory Group**

|                |               |
|----------------|---------------|
| Claudia Lastra | Arts Catalyst |
|----------------|---------------|

**Apologies**

|                  |                                      |
|------------------|--------------------------------------|
| Paul Dorfman     | The Energy Institute                 |
| George Hunter    | Independent environmental consultant |
| David Griffiths  | Environment Agency                   |
| Alun Griffiths   | ONR                                  |
| Jim Cochrane     | SEPA                                 |
| Roy Stewart      | Fife Council                         |
| Martin Macdonald | Scottish Government                  |

## **1. Welcome, Apologies and Introduction**

LN welcomed members of the SDP Advisory Group and all members introduced themselves.

LN informed the group that under the Terms of Reference the Chairman should be appointed annually as it was more than a year since his last appointment. By general agreement LN was re-appointed as the Chairman of the Advisory Group.

## **2. Notes and actions from the 14<sup>th</sup> SDP AG**

No issues were raised.

All actions complete.

## **3. SG Report to AG**

LN gave an account of the Sub-Group's involvement in the SDP public consultation and the ILW store site assessment process. He directed members to Annexe I of the Post-Consultation Report which gave a report on the SG involvement in public consultation and in drafting consultation documents.

LN summarised that he had been impressed with the openness and transparency shown by the MOD to the SG, due to the existence of a non-disclosure agreement. The SG met frequently, attended pre-engagement and public consultation events and workshops. The SG gave feedback to the MOD at the consultation events so that learning points could be acted on during the events themselves. The SG attended all consultation events to ensure that all the public's comments were captured.

The SG were involved throughout the consultation and site assessment process and contributed extensively, including input to the Post-Consultation Report and Response to Consultation document.

## **4. Project Update**

### **a. Site assessment**

JD took the AG through the key activities that had been completed since the last meeting. He gave a summary of the site assessment process and how feedback from the public consultation fed into the site assessment.

LN commented on the intensity and depth of the MCDA assessment approach and also noted the comments received from Scottish Government which JD confirmed had been factored into the project risk for the Chapelcross site.

DM acknowledged the work and input of David Collier to the assessment process and approach.

### **b. Basis of the site decision**

JD said that a written ministerial statement had announced the chosen site on 7 July 2016 and outlined that an existing facility at Capenhurst was the preferred option, which would not require a

new build. He stressed that the Operational Effectiveness (OE) strand of the assessment confirmed that all of the shortlisted sites were capable of meeting the project's requirements for storage of the RPVs.

JD pointed out that in storing the SDP RPVs there was a synergy with what CNS already do.

He stated that the AWE, Aldermaston had been named as the fallback site should the Capenhurst site not be feasible for any reason. Feedback from stakeholders and the SG had raised the possibility of a fallback site.

SMob asked if the fallback option of AWE, Aldermaston would be a new build store and JD confirmed that this was the case.

LN noted that CNS had attended all of the local Capenhurst consultation events (and some others) and that they had actively been looking for the work. He also pointed out that in having a contingency site the MOD are ensuring that they won't be 'held to ransom' by CNS in commercial negotiations.

LN asked if the local community around Capenhurst had reacted to the announcement. JD and LE said that there had been no negative response and that reaction had been minimal, although there had been some general media coverage and notably in Scotland.

JD confirmed that the MOD will continue to attend the Capenhurst LLC to keep communications in the area open.

SMor, NFLA, said that he had been approached by the BBC North West for his reaction to the site announcement but he told them that he'd been happy with the way things had been run by the MOD and declined to give an interview.

Although it was discussed that CNS are very good at stakeholder engagement around their site, LN pointed out that there were still attendees at the Capenhurst public consultation events who didn't know what CNS do or what was on the site.

DM noted that none of the regulators were in attendance at the meeting and asked what their involvement had been in the assessment process. LE said that the regulators had been involved on a number of levels – they had been engaged at the consultation events, SDP hold a quarterly Regulatory Interface Forum and that there had been good engagement with the regulators to inform the site decision. The focus will now be on the regulators local to the chosen site.

#### **a. Project next steps**

JD gave an update on what the SDP's next steps are and said that the project is now moving forward to the next tranche. He outlined what will happen next on the programme and that obtaining SEPA permits for the removal of LLW from the first submarine in Rosyth are the next key milestone and they are going through due process with the Scottish Government.

IA asked if there were likely to be problems with transport and noted that it would not be an easy process. JD confirmed that there was regulatory engagement on the transport container. MB said that the issue was one of size and weight which meant that the load needed to be spread over multiple axles and would need to adhere to the heavy haulage regulations. He said that the routes to the site were doable, if challenging. IA said that the challenges were comparable to those on the railways. MB confirmed that rail was not a suitable transport option due to rail gauge constraints.

IA asked if the transport movements were similar to those for HLW, for example if they would need an escort and be transported at night. MB confirmed that an escort was not required for weight or for fissile/fuel reasons but would be required due to size. A police escort may also be used for security (classification) reasons.

MB also said that the MOD would have to engage with all the local authorities that the packages would move through as part of the heavy haulage regulations.

IA also asked if the transport flask would also be the storage container and MB confirmed that this would be the case.

LN said that there had been discussions during consultation about the class of container and asked what class it was likely to be. MB replied that it was likely to be a type B container, under special arrangement as was presented as the concept design during consultation. SMob asked if there would need to be a special arrangement for each container. MB answered that there would be a special arrangement for the first movement and then a learning from experience exercise would take place and the MOD would then go back to the regulators for additional special arrangements. As the process was refined the regulator might be happy to batch issue them.

LN asked what additional regulatory approvals CNS would need to obtain. LE said that they would need to obtain some amendments to permits and that planning permissions would need to be looked at but it would not be the permissions required for a new build. There may need to be some level of consultation if change of use permissions were required. LN said that this may mean an opportunity for the public to further comment at the planning stage.

AD asked if the MOD had a date for the store and JD answered the dates still had to be worked out with CNS. LE said that since SDP will no longer be building a new store, the store is not on the critical path for the project and will be ready to receive the RPVs when it was needed to.

SMob asked when LLW removal would start. JD said that there were some dependencies, such as SEPA permits so there are no confirmed dates yet.

PM asked if the MOD knew how much LLW/VLLW would be generated. JD confirmed that the MOD does know quantities and that Rosyth have healthy estimates which will be further refined as we learn from the demonstrator platform.

PM asked if the LLW will be transported by rail and LE confirmed that they would be transported by road. JD said that Babcock have existing processes for dealing with LLW.

IA asked if the store at Capenhurst was an existing facility and LE confirmed that it was. IA went on to ask if the store was shielded. LE explained that it was a brick building with a steel roof and that the building itself does not be shielded. The transport container provides shielding and they would be stored within shielded bays in the store.

LN asked what the plan was for Devonport and if there needed to be a separate EIADR. LE confirmed that the application details to ONR would be the same but a separate application will be made to the environment agency.

PM asked what the design life of the store would be and LE said that the existing facility would meet the 100 year requirement.

JD went on to explain that SDP are starting engagement with ship recyclers to discuss recycling the submarine hulks and would be holding an industry day in Rosyth.

DM asked if, as the project progresses, the process will remain transparent. JD confirmed that communications will remain open but inevitably the site will now be leading on store communications. LN asked if the website would continue to be kept up to date and JD said that the website format is such that it is used to post project documents and is not used as a project blog. However, the MOD would take an action to look at how the website might be used to keep interested parties up to date on the project. DM said that the MOD has a responsibility to communicate, not just through the LLCs.

***Action 15.1 MOD to discuss what updates could/would be posted to the GOV.UK website.***

SMob said a timeline of project key milestones would be interesting and JT said she would like to see pictures of progress being made.

LN said that he found it interesting that there are diametrically opposed views on SDP but that there was agreement that something needs to be done and quickly.

LN asked if there was likely to be something added to the contract with CNS regarding their obligations in relation to communications. MR said that this would not normally be something that would be added to the contract but is part of the requirement for site licensees. AD said that the contract was likely to cover what was allowed to be shared with the public and what sign-offs on communications were required.

LN said that the Devonport LLC had become much more open when compared to how it used to be and that questions were allowed from the public.

**5. Key learning points**

JD moved on to the key learning points from public consultation and from the Advisory Group involvement in the project. He said that the SG influenced the breadth of the site analysis and had also influenced the public consultation and LE said that the documents produced for the consultation had been useful to the project subsequently, providing agreed words for use in the project generally.

LN agreed and said that the pre-engagement events had helped to raise any issues early and made the resulting public consultation more focussed and influenced the MOD's thinking.

JT thought that the timing of some of the consultation events could have been better and said that January in Scotland was not ideal for consultation events, acknowledging that the MOD had constraints that they had to work under. She went on to say that at Chapelcross councillors had been up front about saying that they would not approve a store and asked if the local councils at other sites had also attended events and been as vocal. SH said that he'd attended as a local councillor at Sellafeld (Copeland Council) and the council had a stated position about what they would seek to gain where the store to be at Sellafeld, they were most bothered about community benefits. He said that he had been impressed with the firm and measured response from the MOD regarding community benefits.

LE said that there had been different local authority engagement at each of the sites and the local authorities around the AWE sites had been less focussed on community benefits and more about transport and housing, including the impact on the DEPZ.

JD noted that the view had hardened at Chapelcross between the first round of consultation events and the second round. LE said that the Chapelcross SSG had been engaged and interested when the MOD attended their meeting but they subsequently came to a conclusion about the store which was based on benefits.

SMob asked if views changed between the events before and after Christmas. JD replied that this was only really the case at Chapelcross where views hardened towards SDP. She went on to ask if the MOD felt that events should be held separated by time and LE thought that returning to an area 4 or 5 weeks after first attending was a good thing, allowing people to review documents and consider their response.

In relation to the role of the AG and SG JD said that they had provided constructive challenge and to the project and their input into the consultation pre-training had been very helpful.

JT noted that since the MOD doesn't consult very much people came to the consultation events just to talk to MOD representatives and hoped that SDP would feed back to the rest of the MOD about consultation on other MOD issues. LE thought that the SDP project is closer to the work of the NDA where consultation is normal business. JT asked if the SDP consultation is likely to influence the rest of the MOD for more transparency.

LN said that he thought the SDP consultation had changed people's view of the MOD and felt that they only way to deal with conspiracy theorists is to open a conversation with them.

SMor said that it had been very hard to get the MOD to be open about Dalgety Bay, although they were gradually coming to the view that they needed to talk to the public and he thought the SDP experience should influence this shift.

MS asked if there was an intention to carry out a formal learning from experience (LfE) review. LE said that this had already happened for the store assessment process.

JT asked if there was anywhere to leave feedback on the whole process and LE replied that the AG meeting was the forum to do so.

DM made a statement giving her views on the role of the AG and SG. She said that it took a leap of faith and imagination from the MOD to consult on the project, going back as far as the initial consultation in 2003. She went on to say that it had not been an easy 16 years for the MOD or for those looking for nuclear disarmament but that there was respect and understanding where there had been none before. This had been achieved via the development of personal relationships, over coffee and dinner etc. She said she looked forward to future consultations on nuclear weapons.

LN said that the early workshops at Lancaster University, with CoRWM had been ground breaking at the time.

AD said that he felt that the early consultation had caused suspicion because they didn't have the research or technical facts to underpin it. LN agreed and noted that the learning point is that

consultation for consultation's sake was not useful and consultation shouldn't happen too early. AD said that at the consultation events for the RPV store the MOD had answers to every question thrown at them.

JT paid tribute to Jane hunt, who, in the early days, held the MOD to reporting on all comments gathered during consultation.

JT said that getting such a diverse group of people into a room, each with their own acronyms and jargon was an achievement and DM said that the human connections are what break down barriers since people don't generally engage with the MOD on a human level.

SMor said that setting up the Sub-Group was very helpful. He had found signing the NDA<sup>1</sup> had been hard for him but it allowed the MOD to share information which the SG could review line by line which resulted in a better conversation. He felt that there was still a reluctance in other government departments to be open with the public. He had found it quite intensive in terms of the time commitment which should be considered in the future.

SMob thought that the discussions held in the SG helped to clarify understanding of exactly what the issues were and it is important that the MOD is not afraid to be challenged. She thought that the SG had worked very well and that she had cared personally about the project because of her involvement in the SG. She felt that opinions had been valued and that everyone was just trying to get the project to work. She hoped that they would be able to be kept up to date on progress on the project.

LN raised a point that he thought might be sensitive but he said that the MOD should give more consideration to the consultancies that they choose to work with. In the early days the employment of Green Issues had caused suspicion since they were known as lobbyists. Using the in-house team and SG for drafting reports much improved the process. JD noted that Instinctif Partners had been used only for facilitation and event planning and LN acknowledged that this is what they were good at.

SMob wished to note that a number of the AG members have been involved with SDP for 10 years and during that time the MOD team has changed and therefore the AG has been the constant.

SH stated that he joined the AG in 2013 and had been impressed by the ability for everyone to move on from a difference of opinion around the table. He thinks that the AG has been conducted by the MOD with an earnestness and seriousness which are to its credit. He has seen a lot of consultations in the Copeland area, some of which take too much for granted. He wished to congratulate the MOD team.

JT thought that the visits to Devonport and Rosyth had been very useful, in order to see the problem first-hand.

## **6. Thanks from the Commodore**

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<sup>1</sup> Non-disclosure agreement

MR noted that his attendance at the 15<sup>th</sup> AG was his first but he wanted to thank the SG for their personal commitment and time and for their input in challenging the MOD. He reflected on the fact that communications are vital for the successful running of any project.

### 7. Arts Catalyst presentation

CL gave a short presentation on the Arts Catalyst Material Nuclear Culture project, run by Ele Carpenter for the past 4 years, including details of the exhibition held in Plymouth. SMob had attended the exhibition and had been impressed with the deep level of research carried out by the project.

CL went on to show a video produced on HMS Courageous.

### 8. Closing Remarks

LN closed the final AG with the thought that it had been 'a voyage' and he offered thanks to all members and thanks to everyone for supporting him as chairman.

| Action Number | Description  | Actionee | Date to be completed by |
|---------------|--|----------|-------------------------|
| 15.1          | MOD to discuss what updates could/would be posted to the GOV.UK website. | JD       |                         |