



Nuclear  
Decommissioning  
Authority

# Strategy

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Stakeholder Response Report  
March 2021

# NDA Stakeholder Response Report

## Executive Summary

This document provides a summary of the feedback received to the public consultation published in August 2020, of the Nuclear Decommissioning Authority (NDA) Strategy; and the NDA responses to them.

In April 2016 the NDA published its previous Strategy setting out the strategic direction and long-term objectives for the NDA.

The Energy Act (2004) requires that the Strategy is reviewed, updated and consulted on every five years. The most recent review process commenced in June 2019 and a draft was published in August 2020 for public consultation.

Having considered the consultation feedback to the draft Strategy, the NDA has concluded that the overall direction of travel for the Strategy is correct. The Strategy has been reviewed and updated in response to the feedback provided during the public consultation. The Strategy was submitted to the Secretary of State for the Department for Business, Energy and Industrial Strategy (BEIS) and Scottish Government Minister and has been approved for publication.

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# 1 Introduction

We published our draft Strategy and its associated Integrated Impact Assessment between 17<sup>th</sup> August and 8<sup>th</sup> November 2020 for public consultation. The draft Strategy was compiled to comply with Part 1, Chapter 1, paragraph 12 of the Energy Act (2004). Our Strategy is presented as strategic themes and topics, which provides clarity and a consistent basis for communicating with our stakeholders. The draft Strategy included a number of questions identifying specific areas for some strategic topics where we were looking for input. Prior to and during the consultation, we undertook a period of engagement where we gave a number of presentations, both face-to-face and virtually, to interested stakeholders and statutory consultees. These included Site Stakeholder Groups, Trade Unions, local authority representatives from England, Wales and Scotland, and our subsidiaries and Site Licence Companies (SLCs).

For the public consultation we received 77 sets of feedback on both documents from a wide range of stakeholders, including individuals, public bodies and private organisations. The feedback received in relation to the Integrated Impact Assessment is discussed in the Post Adoption Statement published alongside Strategy (2021). Of the 71 responses received for the consultation on the draft Strategy, the majority answered the consultation questions, whilst also providing a general response. These answers and responses were considered in developing the Strategy submitted for approval.

This document considers the stakeholder representations made during the public consultation and aims to summarise the respondents' general responses against each of the five strategic themes and the individual Critical Enabler topic strategies, and the responses to the consultation questions. In responding to the consultation feedback, we have only considered strategic issues relevant to the NDA. Where feedback provided is relevant to the tactical delivery of our Strategy on our sites we will make this known to the relevant SLC, and where the feedback is associated with policy, it will be forwarded to BEIS and Scottish Government, respectively.

In reporting the general response to the strategic themes, the following terms were used:

- 'majority' indicates the clear view of more than 50% of those who provided a response to that theme;
- 'minority' indicates less than 50%.

The following terms have been used in summarising the responses to consultation questions and additional points raised for the strategic themes and topics in the responses:

- ‘many’ respondents indicate more than 70% of those addressing a particular theme or topic;
- ‘a few’ respondents means fewer than 30%; and
- ‘some’ respondents refers to the range between 30% and 70%.

## 2 Public Consultation Responses

For each of the 25 individual topic strategies the NDA has a nominated person to act as the Strategic Authority for that subject. The relevant Strategic Authority considered all the responses received against their strategic area of expertise and assessed the likely impact on our Strategy.

General and overview responses and theme and topic specific responses received during the public consultation are considered in the General Feedback section of this document and the responses to the consultation questions are considered in Responses to Consultation Questions in section 4. Where comments have been considered too detailed to be included in the high-level Strategy, they will be considered as part of the development of the underpinning strategy and delivery documents.

## 3 General Feedback

The majority of respondents who provided general feedback were broadly supportive of our strategic themes and considered the approach to strategy development to be appropriate. As such, any changes made to the final Strategy document have mainly involved providing additional detail or language clarification to help understanding and inform our stakeholders.

### 3.1 Site Decommissioning and Remediation

The majority of respondents expressed broad support for all the topic strategies within the Site Decommissioning and Remediation (SD&R) theme, and for the principles of optimisation and proportionality.

All of the strategic statements were supported by the majority of respondents, especially when qualified by the need for stakeholder engagement and a case-specific assessment of the benefits and detriments of each strategy as it plays out on the ground.

Many responses were flavoured with a desire to look beyond the commercial benefits of decommissioning and remediation to consider impacts on other factors such as society and the supply chain.

The majority of respondents also expressed support for the change in Magnox reactor decommissioning strategy with the request from some to determine site-specific strategies.

### **NDA Response**

We welcome the feedback received on the theme and we aim to undertake further engagement with stakeholders on some of the suggestions and points raised.

We have made a number of small amendments to the SD&R theme in response to the feedback received. We have:

- strengthened the links between the SD&R and the Integrated Waste Management (IWM) themes
- considered the definition of remediation and have articulated it differently within the document in order to avoid implying that it always involves physical action
- checked the narrative for the appropriate use of the term 'waste' in relation to uncontaminated demolition arisings
- removed reference to the term 'next planned use' in the introductory section and have replaced this with beneficial reuse
- ensured the concept of end state components (and potential for partial release) is captured
- reduced use of phrase 'care and maintenance'.

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## **3.2 Spent Fuels**

The majority of respondents supported our approach to spent fuel management which would see Magnox fuel reprocessing finished and all remaining spent fuels put into safe and secure interim storing pending a decision to classify them as waste for disposal. On the whole, there was good support for the strategy of consolidation of spent fuels at Sellafield from other UK sites and emphasis we placed on the importance of safe and secure interim storage for the period until a Geological Disposal Facility (GDF) is available.

Some respondents expressed frustration about the lack of decision on whether to declare our spent fuel inventories as waste or an asset. Some concerns were also raised about the schedule of a GDF and safe management of our fuels until a GDF becomes available.

A minority challenged the justification for continuation of Magnox reprocessing in line with the Magnox Operating Programme (MOP) because of the environmental impacts of

reprocessing and supported placing all fuels currently destined for reprocessing in interim storage. On the other hand, some respondents felt that spent fuel should not be classified as waste and should be managed as an asset.

Some respondents raised views about links between the UK nuclear new build programme, management of fuels at Sellafield and the GDF programme, and saw this as a possible income opportunity for the NDA.

## **NDA Response**

We welcome the range of views regarding the management options of our spent fuels, reprocessing operations for spent Magnox and whether spent fuel should be reprocessed or disposed of in a GDF.

The options for management of spent Magnox fuel have been considered, and reprocessing reduces the long-term risk of managing this fuel and remains the safest and the most environmentally responsible way of managing the remaining Magnox fuel inventory. Reprocessing the remaining amount of spent Magnox fuel is in line with the UK strategy for radioactive discharges and with the Oslo and Paris Conventions (OSPAR). It is also considered Best Available Technique (BAT) and As Low As Reasonably Practicable (ALARP) by the UK regulators. However, finishing Magnox reprocessing is a complex issue. A decision when to stop reprocessing will need to take into account the amount of fuel that is left, our confidence in the alternative option of dry storage, the cost of continuing reprocessing, production of separated plutonium, and the condition and availability of the reprocessing plant. As recognised in Draft Strategy, we consider ensuring the availability of a contingency option essential, and we are working with Sellafield to develop a dry storage option for spent Magnox fuel.

We will continue to undertake research to support the development of spent fuel management options. By having options available we will ensure the continued safe, secure and cost-effective management of remaining fuels.

In line with the UK government 2014 White Paper on geological disposal (Implementing Geological Disposal) our spent fuel strategies assume that, if it was to be classified as a waste, spent fuel can be disposed of in a GDF. We have clarified that our plans for interim storage of our spent fuels do not foreclose options in case a future management route is identified that could bring the same benefits in terms of safety and security while being more cost effective.

As stated in the Strategy document, with the agreement of the UK government we, together with our subsidiaries, will, if requested, continue to supply advice and information to third parties involved in the UK's nuclear new build programme and developers of new reactor technologies.

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### 3.3 Nuclear Materials

A key issue for the NDA is the management of the UK's plutonium inventory, both ensuring its ongoing safety and security during storage and working with UK government to find a long-term solution. Some respondents supported both the increased investment in ensuring safe storage for the future and also recommended that a reuse approach is adopted in the longer term where civil plutonium is turned into Mixed Oxide Fuel (MOX) and irradiated. Some respondents presented opposing views highlighting the costs and associated risks of safe storage and recommended an immobilisation approach is adopted to manage the civil plutonium inventory or the material be declared as a waste.

Only three responses were received in relation to the safe and secure storage of our uranium. The majority of respondents expressed support for the focus on safe and secure storage including the conditioning of materials to achieve this e.g. Uranium Hexafluoride Tails (HEX) cylinders. Some respondents suggested the development of interim performance measures. Some suggested that the possibility of reuse of uranium should be abandoned and that it should be declared as waste.

#### **NDA Response**

We welcome the range of views received regarding safe and secure storage of our nuclear materials.

We are aware of the varying perspectives of different stakeholders in relation to the management of the UK's plutonium inventory. Currently, we consider that the most technically credible disposition option is reuse of plutonium as MOX fuel, but this requires access to reactors. Recognising the relative immaturity of the immobilisation options we are focussing our research and development efforts in this direction to allow balanced decisions to be taken by UK government in due course.

In relation to the safe and secure storage of our uranium, interim performance measures will be developed once we have a deliverable programme in place.

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### 3.4 Integrated Waste Management





The majority of the feedback received focussed on the Radioactive Waste topic strategy.

The majority of respondents expressed broad support for the risk-informed approach, the Integrated Waste Management (IWM) principles, investment in technology development and the creation of an NDA IWM Programme.

Some respondents would like more details on the definition of 'risk-informed' and more information on near-surface disposal in relation to public acceptability and community consent where both of the areas are being addressed to a large extent via the forthcoming government policy consultation on 'A review of UK policy for radioactive substances and nuclear decommissioning'.

Only a few responses received were in relation to the Liquid and Gaseous Discharges topic strategy, but the majority that were received supported the adoption of the UK Liquid and Gaseous Discharges Strategy as the right approach for the NDA.

Similarly, there were few responses on the Non-Radioactive Waste topic strategy. The majority of responses supported our strategic approach. Some responses questioned the strength of our stated position on non-radioactive waste topic strategy; however, they were very supportive of the NDA committing to further work in the area of non-radioactive waste management.

## **NDA Response**

The NDA welcomes respondents' feedback on the IWM theme, and we consider them to generally align with our proposed approach and consequently no significant changes to the theme are necessary.

It should be noted that this mainly positive response may be due to the extensive consultation undertaken as part of the development of our Radioactive Waste Strategy that was published in September 2019.

In line with the comments received, minor amendments have been made in each of the topic strategies and lifecycle stages for points of clarification.

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## **3.5 Critical Enablers**

### **Health, Safety, Sustainability, Environment and Wellbeing**

Very few general responses were received on the Health, Safety, Sustainability, Environment and Wellbeing (HSSEW) topic strategy with most respondents choosing to

answer the consultation question. Of those received, the majority focussed their responses on sustainability and carbon reduction aspects with it being suggested that this should be a standalone topic strategy. The importance of mental health and wellbeing were acknowledged by the majority. Stakeholders requested more information on the environmental strand to be included within the topic strategy.

### **NDA Response**

We welcome the positive feedback received on the HSSEW topic strategy. In response to the feedback received we have removed the sustainability strand from the HSSEW strategy and created a standalone Critical Enabler topic strategy.

We welcome the recognition of the importance of wellbeing amongst stakeholders and cohere with this feedback.

We have updated the resulting Health, Safety, Environment and Wellbeing (HSEW) topic strategy to incorporate aspects of the developing environmental strategy and will be developing a detailed plan for its delivery.

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### **Security and Resilience**

General responses were mixed with the responses to the consultation question for the Security and Resilience (SAR) topic strategy. Of those received, the majority expressed support for the strategy and for the delivery of proportionate risk-based SAR solutions across the NDA group in order to reflect a site's requirements. This was not universal with one respondent being unconvinced that flexibility and pragmatism should be at the heart of the SAR strategy and requested further clarification on this matter. Benchmarking and alignment against other government departments to ensure consistent approaches was also suggested by the minority as well as the use of a single operating system across the estate.

### **NDA Response**

The NDA welcomes the largely positive feedback received and acknowledges the majority of respondents' views that the NDA should take more of a strategically leading role. Under existing legislation and regulation our SLCs and other duty-holders are individually accountable for their own security and resilience arrangements. Within these legal frameworks and benchmarked against other government policy requirements, the NDA will continue to work across the group (under the One NDA way of working) to simplify and standardise arrangements wherever possible to optimise the use of taxpayer's money.

Projects are underway to seek solutions to allow cross system compatibility and integration. A longer-term goal is to move to a single system at the next point of system obsolescence/replacement/upgrade anticipated no later than 10-15 years.

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## **Cyber Security**

Very few general responses were received for the Cyber Security topic strategy with most respondents choosing to answer the consultation question. Of those received, the majority expressed broad support for the strategy. Some respondents encouraged the NDA to benchmark itself against others to ensure the group businesses all aspire to a 'gold standard' whilst adopting an integrated security approach and continuous learning. A few respondents suggested that the NDA group should adopt and work to standardised processes and procedures.

## **NDA Response**

The NDA is very grateful for the feedback received. We recognise the importance of benchmarking ourselves against others within the Civil Nuclear Sector and Critical National Infrastructure more widely and are grateful for the comments that encourage the NDA to adopt the highest standards for this important topic.

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## **Research, Development and Innovation (RD&I)**

The majority of feedback received was positive and supportive of the Research, Development and Innovation (RD&I) topic strategy being proposed and the more ambitious strategic objective described. Many responses recognised, and agreed with, the proposal to expand the scope of Research and Development (R&D) beyond traditional Science Technology Engineering and Maths (STEM) subjects as part of a balanced portfolio. This was felt to be particularly relevant to ongoing discussions relating to GDF-siting options and wider site decommissioning plans.

A few respondents indicated that the NDA should do more to ensure RD&I facilitates regional social and economic development. In connection with this, a few respondents urged the NDA to explore and adopt less traditional, more novel, commercial arrangements.

The majority of responses felt the increased prominence and role of innovation in delivering the NDA mission was a positive attribute for which they were supportive and encouraging. A few respondents suggested that innovation forms just a part of a whole RD&I pipeline

and needs to be applied appropriately, support factors such as safety, cost and timeliness and not at the cost of proven technologies.

Overall, many of the respondents viewed innovation as a key enabler to accelerated mission delivery. The ongoing need for culture change was also widely recognised and the support for collaborative programmes described in the case studies was overwhelmingly welcome.

## **NDA Response**

The NDA welcomes, and is grateful for, the engagement provided by the respondents. On the RD&I topic strategy, and the two consultation questions presented, the level of feedback was significant, informative and useful.

The majority of responses collated were supportive of the RD&I strategy and the vision for the future presented. We are pleased that the inclusion of additional non-STEM R&D was well received. We take on-board the comments about RD&I needing to be clearly focussed on delivery of the mission. We will strive to continue to maintain a balanced portfolio of work across the NDA group to manage risks and develop opportunities. We will continue to make use of independent Research Boards, technical communities, regulators, cross-sector collaborations plus the supply chain to offer advice, guidance and expertise in order to shape the approaches (commercial and technical) we adopt and the plans we make.

Going forwards, the NDA believes the group-wide culture within our businesses needs to evolve. Accordingly, we welcome the positive feedback received on the case studies and the activities supporting culture change already underway, and those planned for the future. The need for innovation to be focussed and clear is recognised by the NDA and was a consistent topic of feedback. The NDA is committed to the intelligent application of technology and innovation - plus the R&D being undertaken to support the mission - and will continue to work collaboratively with others to deliver additional benefit in terms of safety, cost, and time in ways that protect people and the environment.

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## **People**

The majority of the feedback received was broadly supportive of the People topic strategy and reinforced the intent and content of the strategy.

Some respondents identified the inter-dependency of the People topic strategy with both the socio-economics and supply chain strategies.

Some of the responses supported and reinforced the continued focus on diversity and inclusion, early careers, development of our people and our continued collaboration with our trade unions and wider stakeholders.

Some of the feedback received refers to the implementation of the People topic strategy when we will develop the programmes of activity relating to the people section.

### **NDA Response**

The NDA welcomes the feedback received on the People topic strategy. This reinforces our intent to develop the programmes of activity collaboratively across the NDA group and with our wider stakeholders. We are very conscious of the links highlighted to both the socio-economic and supply chain strategies and although these don't require any material changes to the content of the topic strategy, they will influence and help shape the way we work in the future.

For responses relating to implementation of the strategy, we will ensure they help us shape our plans and inform the programme of activities.

We have referred to the NDA group Leadership Standard in the People topic strategy and have now included a graphic of the standard within the document.

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### **Asset Management**

Few general consultation responses were received for the Asset Management topic strategy. The majority of those received supported the approach to the strategy and its ongoing development. The majority also particularly supported adoption of ISO 55000 asset management standard suite.

A few respondents commented on support that was being provided by the supply chain in implementing asset management.

One comment suggested the aspiration to be and to enable transitioning towards our ambition of becoming "...world leaders in nuclear decommissioning..." should be part of the overall strategy.

### **NDA Response**

The NDA welcomes the generally positive feedback received about our approach to asset management. We appreciate the support being provided by the supply chain and look forward to continuing as an essential part of bringing good practice to our group.

In responding to the comment on being world leaders we have explained in our response that adoption of ISO55000 is specific to the Asset Management Strategy reinforcing the international stature of the guidance provided therein.

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### **Supply Chain**

The responses received for the supply chain were mainly in relation consultation question with three main themes emerging including sustainability, Small and Medium Enterprises (SMEs) and local supply chain. More information is provided in the consultation question response.

### **NDA Response**

We are grateful for all the feedback received and endeavour to focus on these areas through engagement with the supply chain.

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### **Information Governance**

The majority of respondents agreed that information governance is important for the NDA mission, with many respondents identifying the requirement to have accurate records and effective knowledge management practices in place as a priority and for the very long term.

### **NDA Response**

The NDA welcomes the positive feedback received about the Information Governance topic strategy. We acknowledge that the primary focus of the strategy remains as ensuring that current knowhow is passed on effectively to others within the industry and that any information required for delivery of the mission will be managed appropriately in accordance with legislation and to meet the needs of all stakeholders.

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### **Socio-Economics**

Many of the responses provided specifically on the Socio-Economic topic strategy and approach aligned with the NDA's strategy of utilising funding to deliver transformational projects aligned to local priorities then a series of smaller interventions.

Some of the responses stressed the need for continued dialogue and engagement on the development of the strategy especially in light of the increased social and economic challenges created by the COVID-19 pandemic in communities.

### **NDA Response**



The NDA greatly values all of the feedback received on the Socio-Economics topic strategy.

We are conscious that the social and economic challenges presented by the COVID-19 pandemic gives an even sharper focus to our work on socio-economics and based on the feedback received we will continue to be flexible and adaptive to meet the needs of our local communities and the fast changing circumstances; but broadly will continue to support locally led initiatives and transformational projects, where we can work in partnership with others to increase the impact of our funding, that align with the strategic objectives of the local area.

The continued engagement and support of our local communities is critical for us in delivering this and we welcome the opportunity to develop further our collective efforts. In addition, the emergence of social value, i.e. maximising the positive social, economic and environmental impact achieved as a result of procurement, employment and investment activity, has begun to transform the way businesses in the UK and globally operate. This presents new ideas and opportunities for how we do business and to meet the legislative imperative in Section 7 of the Energy Act (2004) to support socio-economic development in the communities where it operates.

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## **Public and Stakeholder Engagement**

Very few general comments were received on the Public and Stakeholder Engagement topic strategy as most respondents answered the consultation question.

Of those received, the majority of stakeholders expressed broad support of our strategic approach. It was suggested by the majority that we should enhance our use of social and digital media and make better use of virtual events and meetings. The majority also encouraged us to review how we operate in our local communities so that we are reaching out to as many underrepresented groups as possible.

## **NDA Response**

We welcome the feedback and support given to the Public and Stakeholder Engagement topic strategy. As a result of the feedback received, we have strengthened our references to social and digital media, the use of virtual meetings and made specific reference to working with industry bodies and the estate workforce.

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## **Transport and Logistics**



The majority of respondents welcomed the move to create a single transport division to provide an integrated service across the NDA group and were pleased with the commitment that this presented an opportunity to look at increasing sustainability and reducing the carbon footprint of our transport activities.

A few respondents suggested that there needs to be a joined-up approach from the nuclear industry, local authorities and government to ensure that transport infrastructure can meet the demands of the nuclear industry.

A few respondents also highlighted that it was disappointing that the preference for rail over road had not been carried over from our previous Strategy (2016).

Some of the respondents suggested that we should publish an NDA group transport strategy, covering both materials and people, with local stakeholders engaged in the production.

Some respondents suggested that the NDA should consider maximising the use of transport assets at the Trawsfynydd site by re-opening the rail connection located there.

## **NDA Response**

The NDA welcomes the feedback supporting the move to create a single transport division.

We are pleased that respondents also welcomed our commitment to identify and implement opportunities to reduce our carbon footprint, and to look for opportunities to reduce the environmental, economic and social impacts of our transport activities, and we now believe that this is a more sophisticated approach than the simplistic 'rail over road' commitment made in our previous Strategy (2016).

The NDA recognises that transport infrastructure and engagement with stakeholders is essential. We are already strongly involved in some transport infrastructure improvement projects and we are keen to understand the case for other projects which were raised by some of the respondents.

We agree that there is an opportunity to expand travel plans which have been created for a single site, to include other NDA group businesses that are located in the same area.

The feedback received during the consultation has been used to make improvements throughout the Transport and Logistics topic strategy. The descriptions of activities relating to Low Level Waste have been amended in response to comments suggesting changes to increase their accuracy.



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## International Relations

The majority of responses to the International Relations topic strategy were positive, giving support to the proposed approach and for the expansion of the NDA's capability in this area.

Some responses reinforced the importance of the NDA utilising its experience to help shape international standards and guidance, while others showed support for the identification of the NDA's priority countries in developing its collaborative programme.

All respondents answered the consultation question, with the majority offering support for the NDA utilising its capabilities to support broader UK objectives and offering perspectives on how this would best work.

A minority of respondents highlighted potential opportunities for joint working with the NDA on areas of common interest.

## NDA Response

The NDA welcomes the positive feedback from stakeholders on our international relations strategy, and particularly the support for the aspiration to be a world leader in international collaboration. It is pleasing that the key role we play in contributing to international standards and guidance is recognised, likewise that the NDA's priority countries were understood by stakeholders.

As we look to build on the success, we have had in support of broader UK objectives, we will continue to work closely with stakeholders to align our approach while ensuring that our businesses remain focussed on our UK mission. The expansion of our International Relations team is a key development in providing this with the resource and coordination necessary, while minimising the ask on our businesses.

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## 4 Responses to the Consultation Questions

The remainder of this document provides a high-level summary of the public consultation responses and the NDA's response to these, organised under each question.

**Question 1: We are currently developing our sustainability strategy. How ambitious should we be in supporting UK government and the devolved administrations' sustainability targets, including their commitment on carbon reduction?**

Many respondents expressed the view we should be very ambitious in supporting UK government and the devolved administrations' sustainability targets. A few mentioned we should use the United Nations Sustainable Development Goals (UN SDG) as the framework for our sustainability strategy and the ultimate objectives to address. There appeared to be a very good level of understanding of the spread and complexity of sustainability: green jobs, skills and capabilities, waste management, traffic and impact on local communities, the environment in general, social and economic impacts were all mentioned as key issues to consider. Nevertheless, government carbon net zero commitments and challenge was by far the most mentioned sustainability issue where the NDA should take the lead. Consultation and collaboration with the local communities and local governments is paramount and at the top of the agenda of many respondents.

## **NDA Response**

The NDA recognises the importance of sustainability in the delivery of its own mission and has now defined it as a new Critical Enabler topic strategy following review of the consultation feedback received. The UN SDG will be the preferred framework of the strategy development and implementation.

It is the NDA's intention to embed sustainability in everything we do, from our strategy to our operations, in our culture and behaviours. Our ambition is not only to seek sustainable outcomes from our mission, but also to deliver our mission sustainably.

Decarbonisation of our mission is one of our sustainability challenges. We are currently analysing how our carbon footprint will change as our mission progresses and setting science-based targets to help us achieve net zero by 2050 (or sooner). However, we will cover all aspects of sustainability in our strategy. Among others, providing inclusive social and economic value in what we do, working closely with local communities and administrations, creating highly skilled jobs and working on enabling the right skills and capabilities.

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**Question 2: Our approach to the development of this Strategy has been to engage collaboratively with key stakeholders. In your opinion, is there anything we should have done differently during this development phase?**

Some respondents were satisfied with the level of engagement undertaken during the development of the Strategy offering praise for making the best use of alternative methods during challenging circumstances. Some respondents expressed that more could have been done to engage a broader range of stakeholders, particularly the supply chain.

Earlier involvement in the process was also suggested by some. A few respondents suggested that a process for acknowledging how stakeholder feedback has been considered would be beneficial (closing the circle of feedback received). A few respondents also suggested that breaking the document down in to more accessible formats may attract wider audiences. A few respondents noted that strategy development is a continuous process and as such should go hand in hand with stakeholder engagement rather than being ramped up every 5 years when a Strategy document needs to be prepared. A continuous focus group was suggested as the mechanism for this.

### **NDA Response**

The NDA welcomes the valuable feedback received. A lessons learned activity will be undertaken and a number of the points raised will inform this, in particular:

- ideas to strengthen engagement on strategy development through focus groups and make this continuous throughout the five-year cycle
- initiating the engagement process earlier to work collaboratively with stakeholders before the development process for the Strategy starts in earnest
- engaging with more stakeholders including the supply chain
- consider changes to the consultation process to allow individual feedback.

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**Question 3: We are planning to update the document that describes the NDA Value Framework, which was originally developed with stakeholders over 10 years ago. In your opinion, does the Value Framework still capture the factors that should be considered in our decision making?**

Many respondents expressed overriding support for the factors in the NDA Value Framework and some expressed a desire to be engaged during review of the Value Framework document. Some respondents stressed the importance of certain sub-factors, e.g. the impact on the supply chain. Some respondents requested a clearer link between the Value Framework, sustainability and social value. Some respondents suggested including factors such as respect and openness.

### **NDA Response**

The NDA welcomes comments received on the Value Framework as they largely confirm that the factors it considers as part of decision making remain valid.

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The revised NDA Value Framework document will say more about the sub-factors, but it will not attempt to pre-empt the importance (weighting) of the factors because this will be specific to the decision in question.

The NDA has a set of values about how we conduct our business. These comprise respect, openness, collaboration, performance and creativity. These are separate to the Value Framework, which represent factors that people value about our mission rather than our behaviours.

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**Question 4: This section summarises our current strategic position. In your opinion, what are the key issues the NDA should address and are they adequately covered by this Strategy?**

A large number of responses were received to this consultation question with a broad range of suggestions provided.

A few respondents noted that the Strategy covers aspects that they would expect but most expressed a view that more detail would be appreciated in a number of areas.

A few respondents noted the importance of alignment NDA's strategy with government policy especially more information on the NDA's approach to supporting the UK's commitment to reducing greenhouse gas emissions to net zero. A few also highlighted the importance of alignment with Scottish waste policy.

A few respondents noted that while the Strategy discusses the Magnox Reactor Decommissioning Strategy, they would appreciate more engagement and information on issues such as timing, site selection and opportunities for the beneficial reuse of land.

A few respondents expressed a view that the GDF Programme should be discussed in more detail within the Strategy especially in relation to timing.

A few respondents noted the importance of the NDA's role in socio-economics, skills, the supply chain and knowledge transfer and also expressed a view that they would like to see more emphasis given to these important areas.

Some respondents expressed clear views that the NDA should take on more of a leadership role internationally and support for the UK nuclear industry and supply chains.

A few respondents noted that NDA should take a more active role in engaging locally as well as with other nuclear operators and the supply chain.

A few respondents were pleased to see the emphasis given to health and wellbeing, and equality, diversity and inclusion.

Individual suggestions were given for specific topic strategies and these have been considered in the relevant sections.

### **NDA Response**

The feedback received is pleasing as it reflects the Strategy covers many of the key areas highlighted. Where further detail on specific topics has been requested, we will take this into consideration when engaging with our stakeholders.

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**Question 5: The NDA is committed to reviewing the way in which we express the level of concern presented by a facility to help us prioritise our work and to track our progress in reducing the level of concern. What other aspects of progress would you like us to track? How would you like to be engaged in the development of this work?**

Many respondents welcomed the review of Safety and Environmental Detriment (SED) scores and development of ‘public-facing’ indicators for the level of concern (for radiological, chemical and conventional risk). Many also expressed a desire to support the development. Many respondents made numerous suggestions for other aspects to be tracked, e.g. social value, community value, economic impact, reuse of brownfield land, health of supply chain, capability of workforce, cost of asset management, environmental protection.

### **NDA Response**

The NDA welcomes the feedback to review SED scores and developing progress indicators. The NDA is grateful for the offers of support in this area and will engage with stakeholders as appropriate.

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**Question 6: Do you agree with our aspiration to re-use waste for a purpose on site (e.g. void filling and landscaping) where it represents a net benefit and allows the site end state to be achieved? What factors should we consider?**

Many respondents were supportive of our aspiration to re-use waste for a purpose on site (with robust, case-specific demonstration of safety and net benefit) and the approach was ‘applauded’ by a few. Some respondents highlighted the need for reuse of waste to be safe and some highlighted the importance of assessments facing public scrutiny. One respondent, while supportive, believes leaving waste on site should attract community benefit.

The following points were noted by a few respondents:

- experiences from the mining industry suggests that “effective end-to-end traceability and classification of material is key”
- request for operators to work with local authorities to develop masterplans for decommissioning
- suggestion to move material and waste between sites for reuse.

### **NDA Response**

The regulation of any waste disposals is subject to regulatory and associated standards.

Disposal of waste *in situ* or for a purpose have arisen as credible options because it has become clear that removing the waste for disposal elsewhere has potential to do more harm than good in some cases. It will only take place if it delivers a net benefit, considering all aspects of the NDA Value Framework, including the impact of future use of the land. As such, we do not anticipate that it will attract community benefit.

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**Question 7: As well as ensuring that remediation of our sites is safe, sustainable and publicly acceptable, we also aspire to enabling their beneficial reuse as early as possible. What are your views on using controls (e.g. land use restrictions) to protect people and the environment from residual hazards so that the site can be used in a restricted way until it is suitable for unrestricted use?**

The majority of respondents were supportive of this (with robust demonstration of net benefit and stakeholder engagement). A call for due consideration to be given to the credibility of managing long-term controls, and for responsibilities to be clear was made by some. A few respondents see limited options for reuse of sites. There was a recognition that commercial use is not the only beneficial use and a support shown for clean energy. A suggestion was made that Intermediate Level Waste is consolidated to enable site clearance earlier for other sites to be used.

### **NDA Response**

The NDA agrees that we need to highlight the benefits of reusing brownfield land to overcome developers' attraction to greenfield.

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**Question 8: Do you think it is appropriate for us to seek interim uses of our land and in your opinion, what should these include?**

Many respondents expressed support for the reuse of sites and on an interim basis specifically, so long as stakeholders are engaged, and decisions are supported by case-specific assessment of the benefits and detriments. In addition, the many suggested that the necessity and value of interim uses should be robustly demonstrated. Some respondents advised caution against short-term revenue generation at the expense of long-term reuse. Again, the recognition that commercial use is not the only beneficial reuse was made by some respondents highlighting the wider consideration of social value and natural capital. A few respondents advised that the NDA should not seek to define a list of interim uses to avoid constraining proposals. Many respondents made suggestions for interim uses (e.g. uses that are complementary to NDA's mission, green energy and waste management).

### **NDA Response**

The NDA agrees that interim use should not be a means for delaying decommissioning and should be mindful of the end state. In addition, the NDA agrees that interim uses should not foreclose valuable future uses.

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**Question 9: To support the development of a suitable range of treatment technologies we need to invest now in creative thinking and innovation to secure significant benefits in the long term. Do you believe the NDA should continue to adopt this approach recognising that there could be a short-term cost burden, as delivery of the next generation of treatment facilities will take time to implement?**

Many respondents provided significant support in response to this question and recognised the vital role that technology innovation can play in improving our ability to treat wastes, delivering greater value and other benefits such as volume reduction.

Many respondents expressed an acceptance of short-term cost burden and highlighted the important role that the supply chain can play.

### **NDA Response**

The NDA welcomes the supportive feedback received in this area. There have been no significant modifications to the treatment and storage sections as a result of stakeholder feedback.

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**Question 10: We implement the Waste Hierarchy and minimise the amount of waste we have to dispose of. However, to complete our mission we do need a range of**

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**disposal facilities to accommodate our diverse radiological and non-radiological waste inventory. Do you think our overall disposal vision is clearly articulated and do you support our key messages?**

Many of the responses received were supportive of our disposal vision.

Some responses raised specific issues that the NDA are aware of and are actively managing, for example the relationship between near-surface disposal and the GDF, and the manner in which both disposal concepts are communicated to our wide range of stakeholders and the respective stages they are at in their lifecycle.

Some responses are seeking more information or specific information about near-surface disposal, that is subject to policy development and not for the NDA to take a decision on.

### **NDA Response**

As we continue to develop work on our disposal vision, we aim to engage with all our stakeholders.

We will continue to work closely with our waste management organisations Low Level Waste Repository (LLWR) Limited and Radioactive Waste Management Limited (RWM), as well as across the wider NDA group.

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**Question 11: How should we develop our HSSEW strategy to better support NDA group operations?**

Many of the consultation responses received were concentrated on the topics of sustainability, carbon reduction and mental health and wellbeing.

Many suggested that the sustainability strand should be included within the Strategy as a standalone Critical Enabler topic strategy.

Many stakeholders responded to agree with the NDA on the importance of mental health with a few respondents expressing a view that it would be beneficial to work alongside the NDA on this very important strand.

All respondents agreed with the importance of safety and did not challenge the intent or direction of the proposed strategy.

### **NDA Response**

We welcome the responses received in relation to sustainability and the encouragement to be ambitious in this area. We have removed the sustainability strand from the HSSEW

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strategy and created a standalone Critical Enabler topic strategy and have subsequently received positive feedback on this move.

We welcome the recognition of the importance of wellbeing amongst stakeholders and cohere with this feedback.

We have updated the resulting HSEW topic strategy to incorporate aspects of the developing environmental strategy and will be developing a detailed plan for its delivery.

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**Question 12: SAR is a new topic strategy for the NDA. Does it cover everything that you would expect? Should more emphasis be placed on group resilience?**

Many of the respondents supported the approach adopted by the NDA to have SAR as a new topic strategy with some of the respondents suggesting that more strategic guidance should be provided on resilience with one suggesting that the resilience of transport networks should be considered. The commitment to work more closely with local resilience fora was welcomed. A few respondents said the strategy was too high-level and wanted more detail while acknowledging this would be in delivery plans. The impact of the COVID-19 pandemic in relation to resilience was queried by a few respondents.

**NDA Response**

The NDA is grateful for the feedback and acknowledges comments that it should take more of a strategically leading role in relation to resilience. Within the legal frameworks that place accountability for SAR arrangements on individual SLCs and other duty-holders, the NDA will continue to work across the group to improve strategic policy and guidance and in doing so seek to exploit opportunities for standardised arrangements. Recent operations utilising rail, road and shipping have allowed the group to fully test contingencies for our transport networks. The COVID-19 experience has also highlighted a number of NDA group resilience learning points and we will continue to address these points in order to improve our overall group resilience.

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**Question 13: Cyber security is a new topic strategy for the NDA. What are your views on adopting this approach and what else should we be doing in this area?**

The majority of the responses received support the approach adopted by the NDA to have cyber security as a new topic with some urging expansion of the strategy to provide further detail that underpins the supporting plans.

**NDA Response**



The NDA is grateful for the positive feedback received on the creation of Cyber Security as a standalone topic strategy. We recognise the potential level of detail that could have been included in this topic strategy. Much of this detail e.g. the adoption of the National Institute of Standards and Technology (NIST) framework, monitoring of social media and the details that relate to our target operating model are covered in our governance, operational documents and programme plans.

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**Question 14: What are your thoughts about the scope of the RD&I strategy going beyond traditional STEM subject boundaries? What areas of research would maximise benefits to the NDA group?**

Most of the feedback received was supportive of the RD&I strategy and greater ambition presented in the strategic objective. Many responses recognised, and agreed with, the proposal to expand the scope of R&D beyond traditional STEM subjects, a few cautioned against too much non-STEM R&D and queried the value it might bring. A few expressed clearly that non-STEM would make strong contributions to discussions relating to GDF-site selection and other decommissioning strategies and plans.

A few respondents indicated that the NDA should do more to ensure RD&I facilitates regional social and economic development. In connection with this, a few respondents urged the NDA to explore and adopt less traditional, more novel, commercial arrangements.

In terms of research areas which would maximise benefit to the NDA group there were few direct responses. Of those, graphite management, asbestos, asset management, smart stores and smart boxes were named. A summary of non-STEM areas include: project management, social science, cultural change and, public attitudes to nuclear.

**NDA Response**

Most of the responses collated have been supportive of the RD&I strategy and the inclusion of additional non-STEM R&D. We understand the concern that all R&D needs to be clearly focussed and are cognisant that non-STEM R&D requires careful management in order to bring meaningful contributions, and not unwelcome distractions, to the mission. We will continue to maintain a balanced portfolio of R&D activities and look to our independent Research Boards, technical working groups, cross-industry links, regulatory bodies, plus the supply chain to provide help and expertise going forward.

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**Question 15: Do you think the encouragement of a culture which promotes innovation is an important topic for the NDA, and do you support the approach being taken?**

Most respondents indicated innovation had an essential role in delivering the NDA mission and was important. We are pleased that the focus on innovation was well received. Some respondents viewed innovation as a key enabler to accelerating delivery and that the activities proposed to effect culture change were positive. The case studies were a popular inclusion and with most respondents supported the approaches being implemented. A few respondents felt that, when it comes to being innovative, delivery models based upon collaboration work more effectively than models based upon competition.

A few responses highlighted the need to ensure innovative technologies and processes are applied to situations where benefit is certain and other factors such as safety, cost and timeliness are not compromised. In essence, apply innovation where really required and be wary of innovating for innovation's sake.

**NDA Response**

NDA welcomes the positive feedback received on the plans presented and activities underway, in support of innovation and effecting cultural change. Our desire is to create environments in which innovation can flourish and arrangements (commercial and others) that enable innovation to be delivered. We recognise that innovation needs to be intelligently applied and we will continue to push to develop solutions that bring real benefit and enable the group to deliver its mission.

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**Question 16: We are keen to have greater diversity in the NDA group workforce; what more should we be doing to achieve this?**

Many of responses received supported and reinforced the continued focus on achieving greater diversity in the NDA group workforce, with many suggestions for ways in which to do this with the majority focussing on appropriate skills development. Some stakeholders recognised the challenge that the geographical location of our sites presents in relation to achieving greater diversity and inclusion within our workforce. Many respondents highlighted the links and synergies to socio-economics and the supply chain. Some stakeholders expressed a view to working collaboratively with the NDA going forward to achieve greater diversity in the workforce. A few respondents noted that achieving greater

diversity should not compromise the requirement from selecting the best candidate for a role.

### **NDA Response**

The NDA is grateful for all of the suggestions received in relation to achieving greater diversity in the group workforce and the feedback received will be taken into consideration to inform the way we work in the future and any further discussions with our stakeholders. We are committed to creating the conditions in which our people can thrive and this includes those to ensure we support a diverse and inclusive workforce.

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### **Question 17: How far should we engage our supply chain in meeting any future sustainability targets?**

Many respondents recognised the importance the supply chain plays in delivering key objectives of the NDA such as sustainability, SME and regional support.

Many respondents advised and questioned what the NDA is currently doing and what it could do to enforce sustainability within its supply chain. One respondent recommended all Sellafield spend to be within Cumbria only as a measure to support environmental sustainability as well as local business and economic growth.

Many respondents expressed the importance of SME's and their role in the nuclear decommissioning process. Some respondents recommended that more contracts should be awarded to SME's and that the NDA put in place an SME bias to improve the chances of SME's winning more work. The impending exit from the European Union (EU) and the move away from EU public procurement legislation was also referenced as a factor that might allow this.

### **NDA Response**

In relation to sustainability in the supply chain, the NDA is developing a Carbon Reduction strategy to support government commitments on net zero greenhouse gas emissions (net zero by 2050, new clean air commitments). Within the Supply Chain at the NDA, we are connecting to environmental sustainability groups within the Site Licensed Companies, which will be intrinsically linked to the Carbon Net Zero project with "Scope 3" purchased goods and services.

At the NDA we always consider value for money, rather than purely cost, as part of our procurements. How value for money is defined depends upon the procurement in

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question, but will typically include a range of factors, such as quality, sustainability, safety, cost and employment opportunities.

In relation to SME and regional support, we recognise and support the value that the local supply chains deliver to our sites. We work to ensure that our tenders are accessible and well-advertised. As an example, LLWR Limited introduced a simplified electronic purchasing system known as the Business Services Marketplace, to particularly help local businesses and SMEs to pursue opportunities that may have previously been unavailable or too difficult to access due to the time and scale of framework opportunities.

We recognise and support the value that SMEs provide and acknowledge that this is a key priority within the government's procurement policy for generating UK growth and supporting sustainable local economies.

Maintaining and enhancing the diversity of our supply base, including SMEs, is a core part of our strategy. The SME Action Plan sets out in greater detail how we intend to implement that aspect of the strategy, for more information regarding our approach please see the SME Action Plan.

Notwithstanding the above, we are still required by law to award our contracts pursuant to the Public Contract Regulations 2015 meaning that each of our procurements must be run in a fair and transparent fashion, with no bias towards any bidding party regardless of the size of their organisation.

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**Question 18: We are developing our group-wide digital vision; in your opinion, how ambitious should we be?**

The majority of respondents welcomed the ambition of the NDA in seeking to establish a digital vision for the NDA group. Many respondents identified the critical relationship between mission delivery and the advantages that an effective transformation programme would bring.

**NDA Response**

The NDA welcomes the positive comments made in relation to our digital ambitions. We believe that it is critical that we understand the needs of the NDA group in how best to deploy and use analytical tools, modelling techniques and modern technologies and practices to determine what information and data is needed where, when, in what format and by whom.

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**Question 19: How should we reduce the barriers for entry into the supply chain for local SMEs?**

Many of the responses received provided valuable insight and a range of ideas around reducing the barriers to entry for local SMEs. There were a wide of range of ideas put forward from a number of different stakeholders including local authorities, suppliers both multi-national and SMEs and other interested parties.

A few of the responses questioned if this was the correct question for addressing socio-economics.

**NDA Response**

The NDA welcomes the feedback received. There has been a range of considered and supportive inputs on ways to reduce the barriers to entry however we must also be cognisant of the fact that we must consider range of factors as part of our procurement processes to take a balanced view of contract awards.

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**Question 20: How can we involve more people in our work and better coordinate our engagement activities?**

Two main themes emerged in response to the consultation question. Firstly, many respondents suggested that we should encourage more young people to become involved in our work by getting them actively participate in our stakeholder engagement activities. Secondly, many respondents expressed a view that we should review how we operate in our local communities so that we are reaching out to as many underrepresented groups as possible.

**NDA Response**

We are grateful for the suggestions on how we could improve our approach to public and stakeholder engagement and although this has not resulted in a direct change to our strategic approach, we have committed to an independent review of how we operate in the local communities around our sites. This review should address the comments we received about involving more young people and reaching out to hard to reach groups.

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**Question 21: We recognise the value of international engagement to our mission. Where our core mission allows, how best could we utilise the capabilities of the NDA group to progress broader UK interests?**

Many of responses received were supportive of the NDA utilising its capabilities and relationships to support broader UK interests. The main theme was the recognition of the importance of the NDA's role in supporting UK exports. There were a variety of suggestions on what our future approach should be. Some of the responses highlighted the opportunity to further explore how our international relationships can be used to the benefit of the communities around our sites. A few respondents emphasised explicit support for the principle that mission related international engagement will remain our main priority.

### **NDA response**

We welcome the support from stakeholders for the NDA pursuing appropriate opportunities to support broader UK interests, and acknowledge the range of views put forward on how the NDA might do this. The NDA has had significant success in leveraging its capability, intellectual property, and relationships to support UK business and we will continue to work with stakeholders and industry to build on this learning and establish the right long-term approach. We will also continue to investigate how our international relationships and engagements will support the communities around our sites and our socio-economic initiatives.

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## **5 Conclusion**

This document summarises the key and common responses received during the public consultation on our Draft Strategy, published 17<sup>th</sup> August 2020 and the specific responses to the consultation questions. It does not attempt to cover all points received from respondents.

All responses received have been considered by the NDA Strategic Authorities. The feedback was broadly supportive and therefore no significant or substantive changes have been made to our proposed strategic direction. Any changes have generally involved providing additional detail or clarification to help understanding and inform our stakeholder community. An additional commitment has been made within the Public and Stakeholder Engagement topic strategy to undertake a review of local engagement arrangements. The main change is the inclusion of a standalone Sustainability topic strategy in line with the feedback received. This will provide us with the opportunity to further develop the sustainability of our mission together with our stakeholders over the next Strategy period and beyond.

# Abbreviations

ALARP	As Low As Reasonably Practicable
BAT	Best Available Technique
BEIS	Department for Business, Energy and Industrial Strategy
EU	European Union
GDF	Geological Disposal Facility
HEX	Uranium Hexafluoride Tails
HSSEW	Health, Safety, Sustainability, Environment and Wellbeing
HSEW	Health, Safety, Environment and Wellbeing
IWM	Integrated Waste Management
LLWR	Low Level Waste Repository
MOP	Magnox Operating Programme
MOX	Mixed Oxide Fuel
NDA	Nuclear Decommissioning Authority
NIST	National Institute of Standards and Technology
OSPAR	Oslo and Paris Conventions
R&D	Research and Development
RD&I	Research, Development and Innovation
RWM	Radioactive Waste Management Limited
SAR	Security and Resilience
SD&R	Site Decommissioning and Remediation
SED	Safety and Environmental Detriment
SLC	Site Licence Company
SME	Small and Medium Enterprises
STEM	Science Technology Engineering and Maths
UN SDG	United Nations Sustainability Development Goals





Nuclear  
Decommissioning  
Authority