

**Notes and actions from 14<sup>th</sup> Submarine Dismantling Project Advisory Group 30<sup>th</sup> May 2013,  
Chartered Institute of Housing, Edinburgh**

**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
Robin Carton (RC)	Plymouth City Council
Shelly Mobbs (SMob)	Eden Nuclear and Environment
Stephen Haraldsen (SH)	Nuclear Institute
David Griffiths (DG)	Environment Agency
Sean Morris (SMor)	NFLA
David Collier (DC)	MOD - SDP Project Team Customer Friend
Dr Sue Jordan (SJ)	MOD Defence Infrastructure Organisation
Gareth Rowlands (GR)	MOD - DE&S Secretariat
John Davis (JD)	MOD - SDP Programme Manager
Simon Tinling (ST)	MOD - SDP Asst Head Approvals
Chris Hargraves (CH)	MOD - SDP Project Team
Jim Cochrane (JC)	Scottish Environment Protection Agency (SEPA)
Emma Webster (EW)	Green Issues Communiqué
Harry Hudson (HJH)	Green Issues Communiqué
Roy Stewart (RS)	Fife Council
Dr Paul Dorfman (PD)	Energy Institute, UCL
Nigel Parsons (NP)	MOD – SUSM, Devonport
Ian Bramwell (IB)	Office for Nuclear Regulation
Ben Hughes (BH)	Office for Nuclear Regulation
Claire Dodd (CD)	Scottish Government
George Hunter (GH)	Independent Environmental consultant

**Presenting to the Advisory Group**

Harry Farmer (HF)	Babcock Rosyth
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**Apologies**

Cllr Gavin Yates (GY)	Fife Council
Cllr Sandy Taylor (STa)	SCORRS

**Member of the Public**

Richard Burdett

## 1. Welcome, Apologies and Introduction

LN welcomed members of the SDP Advisory Group to Edinburgh. He informed the group of the sad death of Baillie (Councillor) George Regan, a former member of the Advisory Group and acknowledged his contribution to the project

LN introduced two new members to the group: Stephen Haraldsen (SH) representing the Nuclear Institute, he succeeds Tub Aves and Dave Whitworth; George Hunter (Independent environmental consultant)

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 of the 13<sup>th</sup> SDP AG

No issues were raised.

*Post meeting note:* Subsequent to the meeting ST requested that the following correction should be recorded: p9 paragraph 5 lines 5 and 7, should be micro-sieverts not milli-sieverts.

## 3. Actions from 13<sup>th</sup> SDP Advisory Group

Action Number	Description	Actionee	Status
13.1	ST to speak to SMob to seek guidance regarding the language used relating to discharges	ST	Complete.
13.2	DB to create a combined weighting profile and circulate with raw charts along with notes once the inputs have all been double-checked.  To circulate this to AG members for comment before wider publication and circulate with a "health warning" explaining that the workshops were a quick process and did not factor in OCF data.	DB	Complete. The output paper from the alternative weightings workshop was circulated for comment before being incorporated in MOD's Operational Analysis Support Paper that has now been published.
13.3	GIC to circulate information relating to the art projects received from Ele Carpenter	EW	Complete.
13.4	DC to circulate Fred Barker's evaluation paper to the AG	DC	Complete.
13.5	SDP to define what skill-base and experience they need on any future sub group and circulate to AG members	SM	Complete. Sub group was established in

for a response the following fortnight

January 2013.

13.6	Current members of the sub group to confirm if they are happy to remain on the sub group within a fortnight of MOD discharging action 13.5	All	Complete. Sub group was established in January 2013.
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LN outlined the three areas that the MOD should address in their presentations. He also provided an update on the Nuclear Culture Symposium based on the note circulated by Ele Carpenter. SMob, DC and GR provided a brief comment based on their experiences over the weekend. SMob said it had been an interesting experience over the two days with a mixture of workshops and round table discussions. DC commented that Dr Ele Carpenter had made sure that everyone felt able to contribute. GR said there was a broad discussion that took place and it wasn't just focused on SDP but looked at civil nuclear as well.

#### 4. Project Update

JD took the AG through the key milestones for the project, the key activities that had been completed since the last meeting and gave a recap of the key decisions. IA asked how the defuelling of laid up submarines was going. NP said that the current planning assumption is for the first defuelling to take place in 2018.

JD explained to the AG the rationale for the strategic decisions announced (see slide pack page 6), including the strategic intent that the RPV will be stored whole for future size reduction (if necessary) at a later date.

PD asked if there was a timeframe in mind for the size reduction of the Reactor Pressure Vessel (RPV). ST explained that this is dependent on when the GDF is available to receive SDP wastes; current planning assumptions are some time after 2040.

JD then explained the rationale for the initial dismantling sites chosen (see slide pack page 7) and the revised approach to ILW storage site selection. SMob asked if it was true to say that the change of approach to ILW storage site selection was due to the response from public consultation. ST confirmed that it was partly due to the response from public consultation and partly because MOD's own analysis into the generic site options had proved inconclusive without considering specific sites.

IA asked whether just one ILW storage site would be used or more than one. ST confirmed that if a new store had to be built then the assumption would be for one site only as it would be economically disproportionate to build two new stores for SDP. If existing storage facilities were available, however, then there might be a possibility of using more than one site.

JD then outlined two project opportunities that had arisen since the last meeting: early removal of Low Level Waste and Parallel Dismantling at both Rosyth and Devonport (see slide pack pages 11 and 12).

JD outlined what the opportunity relating to early removal of Low Level Waste would entail and the potential benefits it would offer. He confirmed that no ILW would be removed until an ILW storage site had been agreed.

JT stressed the importance of how this would be communicated to the public. She said that during public consultation people were told that there would be no dismantling until an ILW storage site had been found and this might seem like a move away from that. ST acknowledged the need to explain the opportunity carefully and to maintain the assurances that the initial dismantling sites would not become ILW storage sites 'by default'. There was a discussion of regulatory regimes affecting this opportunity.

DG reinforced the need to make sure that effective communication takes place and that the MOD is clear about when dismantling activity actually starts. IB confirmed that this would also be the case from ONR's perspective and that they would need to see the EIADR and safety case were in place before any LLW removal started.

GH noted that the LLW would be removed during maintenance periods. He asked what routine maintenance actually meant? NP explained the annual maintenance process, the deeper process that takes place every six years and the full re-preservation package every 12 years.

JD took the AG through the indicative timeline.

JD explained the post-announcement stakeholder engagement that has taken place (see slide pack page 14) including: 22 March – Announcement: Written Ministerial Statement laid in Parliament, reports placed on website, letters sent to MPs, MSPs and project stakeholders, briefings to local/regional stakeholders, local press coverage.

JD also explained the changes to the website (see slide pack page 15) from it previously being a mod.uk web pages to the new gov.uk website. JT said that the new website is terrible and that it was far too difficult to link back to earlier documents. This was undermining the openness and accessibility of public information about the project. JD acknowledged that there were some difficulties but that the SDP team was trying to improve matters before the next round of Public and Stakeholder Engagement (PSE).

***Action 14.1: MOD to index previous documents that are available on the website.***

LN recapped the issues raised:

- The opportunity for early removal of the LLW will need very careful communication that upholds MOD's commitments around ILW removal and storage.
- Greater clarity on timescales would be helpful – 10 years wouldn't be classified as soon and early in the eyes of the public.
- Regulatory regime including the EIADR process and safety case.
- Clarification on whether, if LLW is removed, the submarines can then retain their existing classification (and regulatory arrangements) as laid up submarines.

**5. Initial Dismantling (including outline of EIADR regulatory process)**

NP then introduced the initial dismantling activity. He emphasised the purpose of the demonstration of initial dismantling was to optimise processes, understand costs and inform

commercial approach. It is not to demonstrate safety which must be done through safety cases and regulatory applications, before any work starts (see slide pack page 17).

NP then spoke about Swiftsure being used as the demonstration boat. LN asked how the boat to be used is selected. NP said that Swiftsure isn't the 'dirtiest' or the 'cleanest' boat, but that it is one of the more representative SSNs. HF confirmed that they did a condition report on the seven submarines stored at Rosyth. Swiftsure is also the boat that needs to come into dock for routine maintenance at the same time that LLW removal might occur, if that opportunity were pursued. ST pointed out that from point of view of radioactive decay, all the boats at Rosyth are sufficiently old to enable for initial dismantling with worker dose rates that can be shown to be 'As Low As Reasonably Practicable' (ALARP).

GH asked how far through the process does the EIADR cover? NP confirmed it is all the way through to the ship recycler – from cradle to grave.

**Action 14.2: MOD to compile a short paper outlining what regulatory approvals are required, from whom and when.**

HF then explained how initial dismantling will be undertaken and introduced the conceptual requirements for infrastructure and equipment to deliver initial dismantling.

JC stressed the importance of the language being used to inform the public about this stage of work, that it needs to be translated from regulatory and MOD speak into plain English. He said that the waste characterisation is also really important and shouldn't be underestimated. The sampling programme will be very important for public confidence.

DMc asked if the results of the monitoring work undertaken by ONR will be published? BH confirmed that one of the conditions of the EIADR consent was that annual reporting takes place into the public domain.

SMob spoke about the importance of using correct terminology in describing radiological and radioactive waste management processes and conditions. She recommended that MOD should refer to the relevant industry codes of practice to ensure that its terminology is consistent, for example in the use of the word "clean". JC also asked that the phrase 'radiological implicated waste' is avoided as it is not accepted terminology.

BH from ONR then presented the regulatory perspective on EIADR. He outlined the process for an application for consent, who the statutory consultees would be, the conditions for consent and the need for an Environmental Management Plan.

The contact details for ONR regarding SDP are as follows:

- ONR EIADR website: <http://www.hse.gov.uk/nuclea/eiadr.htm>
- General EIADR enquiries: [eia.team@hse.gsi.gov.uk](mailto:eia.team@hse.gsi.gov.uk)
- Rosyth specific questions for SDP: [EIADR-SDP-ROSYTH@hse.gsi.gov.uk](mailto:EIADR-SDP-ROSYTH@hse.gsi.gov.uk)
- Devonport specific questions for SDP: [EIADR-SDP-DEVONPORT@hse.gsi.gov.uk](mailto:EIADR-SDP-DEVONPORT@hse.gsi.gov.uk)

## **6. ILW Storage Site Selection Process and Public and Stakeholder Engagement.**

ST introduced this section, firstly taking the AG through the conceptual design for the RPV store (see slide pack page 26). JC asked what the design life of the store will be. ST confirmed that it was 100 years minimum inline with Government's response to the CoRWM recommendations. JC also asked where SDP waste stood in the queue for GDF. ST responded that the project have assumed 10 to 20 years after GDF commissioning but that no formal commitment has been received from NDA. Accordingly, options analysis on SDP has allowed for uncertainty running to several decades.

DC then outlined the PSE process, explaining that a key part of PSE1 is to pre-engage with stakeholders about what the PSE2 process should be and the types of questions that should be asked.

SMob pointed out that PSE4 is not on the diagram.

### ***Action 14.3: DC to add PSE4 to the diagram.***

PD said that it was important for the MOD to realise that they need to engage more widely at a local level than just the site stakeholder groups. ST said that this was acknowledged but that the shortlist of sites will include MOD, NDA and potentially commercial sites and the project will need to pay proper regard to the pre-established processes of engagement at the different sites.

These processes should not be circumvented as the respective organisations have to maintain their relationships with their stakeholders and Local Authority long after the SDP assessment may have moved on.

LN asked for a commitment from the MOD that if additional measures need to be put into place for wider community engagement that they will be. The following recommendation was made to the MOD:

### ***AG asked MOD for a commitment that if additional measures above and beyond the SSGs/LLCs needs to be established at a proposed ILW storage site that this is done to maximise community engagement and participation.***

JT said that she wasn't sure that LLCs are fit for purpose. DMc asked whether it was reasonable to expect existing LLCs to add this to their work programme? Would it make more sense to have a representative from such a group on a smaller SDP specific group?

DMc had at the previous meeting raised the issue of public interest compensation and LN asked her to comment further. DMc commented that if you ask a community to take on the nuclear waste from submarines then people need to feel that they will get something more than Town and Country Planning gain, for example a reduction in discharges. If the MOD has something on offer from the beginning, then this may reduce the likelihood of challenge.

SH said that this was not something that he had come across as an issue before. He asked if there was any evidence to demonstrate that there was such a need.

IA said that it was something that community groups had asked him before.

DC made reference to the Community Impacts section in the MOD's Response to Consultation. Sections 8.3.13-8.3.15 considers Community Benefits and sections 8.3.16-8.3.18 consider 'Nuclear Offset.'

ST asked if NuLeAF had a view on community benefits. PM said that he was of the view that the MOD needed to go beyond the narrow definition of community benefits to understand what was important to a particular location.

#### **7. Plans for future Advisory and stakeholder groups**

LN introduced the item. He noted that if the Advisory Group is no longer in existence that the sub group becomes a group in its own right.

JT felt it was a bit premature to do away with the Advisory Group and that it would make more sense when the dismantling and storage sites had been confirmed. She asked if there were cut backs that meant the group couldn't be afforded anymore. DG agreed with JT, he felt it was premature and that there was a lot more to be offered by the group in the next 18 months.

SMor was of the view that the storage sites will be even more contentious, particularly when you say that waste is going to a particular location.

ST said that as the project moves into the next phase with the focus on ILW storage site selection there needed to be a clearer distinction between advisors who are impartial from any specific site interests and site stakeholders who are likely to have a preferred outcome in mind for their site. The difficulty with the current membership of the AG was that it was neither a stakeholder group representing all candidate storage sites nor an advisory body in which all members are impartial from specific candidate storage sites. At the same time, ST acknowledged how helpful the MOD has found the Advisory Group and the contributions from all members.

DMc said it was important for people who have been involved with the project over a long period of time to be able to continue to share their knowledge and expertise. Local groups may feel that they are being played off one against each other if there is no national group holding MOD to account.

ST spoke about the idea to hold national workshops in each stage of PSE for the site selection process and proposed these as a forum in which AG members could continue to attend and participate.

LN reiterated how helpful the Advisory Group had been and how much work it has undertaken since it was created. He suggested a potential way forward was to keep the Advisory Group but to only hold a meeting if there was a specific reason for doing so and that the MOD would proceed with the national workshops idea to which all members of the AG would be invited along with local stakeholders.

DMc emphasised the importance of the different groups from different sites having the chance to get to know each other and exchange perspectives.

JT said that it would be helpful for the AG to continue to get email updates about where the project is up to.

LN said that if people have any conflicts of interest it will be important for people to declare them.

LN proposed the following AG recommendation as the way ahead:

***For the duration of the ILW storage site selection process, the Advisory Group will only meet if there is a specific reason to do so and instead, AG members should be invited to national workshops that MOD will arrange as part of each stage of PSE within the ILW storage site selection process. The circumstances under which another AG meeting will be called should be defined and agreed between MOD and the AG. The sub-group will continue to be accountable to the AG in providing MOD with independent advice and challenge in the planning and execution of the site selection process.***

***Action 14.5: MOD to circulate a letter responding to this recommendation and proposing further details about the national workshops (to which AG members will be invited) and the circumstances under which another AG meeting will be called.***

***Action 14.6: Sub-group to review its Terms of Reference and propose changes for agreement by MOD and the AG.***

## **8. Final Reflections and Lessons Learnt**

LN spoke about the Office of Government Commerce (OGC) reviews that he had been asked to participate in through his role as Chairman and he commented on how impressed they were with the Advisory Group and the contributions that were made.

JD thanked all the members of the Advisory Group for their contributions over many years.

## **9. Any Other Business**

DC asked if there were any questions about the work of the sub-group. AG members said that LN's briefing note was incredibly helpful.

**Meeting closed: 15.55**



Action Number	Description	Actionee	Date to be completed by
14.1	MOD to index previous documents that are available on the website.	ST	29 Nov 13
14.2	MOD to compile a short paper outlining what regulatory approvals are required, from whom and when.	ST	13 Dec 13
14.3	DC to add PSE4 to the diagram.	DC	5 Jun 13
14.4	AG asked MOD for a commitment that if additional measures above and beyond the SSGs/LLCs needs to be established at a proposed ILW storage site that this is done to maximise community engagement and participation.	ST	23 Aug 13
14.5	MOD to <i>circulate a letter responding to the recommendations made in the Advisory Group.</i>	ST	13 Dec 13