

Geological Disposal

Disposability Assessment Process - Report on Customer Feedback January to December 2014

December 2015



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Disposability Assessment Process

Report on Customer Feedback - January to December 2014

1 Introduction

Since 2001, an annual survey has been conducted by consultation with users of the Letter of Compliance (LoC) disposability assessment service in order to gauge the users' perceptions and overall satisfaction. Feedback has been sought by use of a questionnaire, circulated at the end of the year.

This report covers feedback received on our performance for the calendar year January to December 2014. The feedback provided will be used by us to make improvements to the way in which we interact with waste packagers, the customers of the LoC disposability assessment process.

2 Questionnaire

The questionnaire requests feedback against a number of key service indicators. The first five questions are scored against a 10-point scale from unacceptable to excellent, whereas open format written feedback is requested for the final section of the questionnaire.

The current questions are reproduced below:

1. How would you describe the **quality** of the Assessment Reports you have received during the past year (e.g. technical understanding, comprehensive response, etc.)?
2. Considering the **content** of the Assessment Reports:
 - How useful are the 'Assessment of Disposability' sections, for example, in helping you in building Radioactive Waste Management Cases (RWMC) for Regulators?
 - How useful are the 'Review of technical issues and Action Points' sections, for example, in focusing future work?
3. Considering engagement with Radioactive Waste Management (RWM) during the Disposability Assessment **process**:
 - How well has the Packaging Assessment Team communicated with you and your organisation in attendance at option studies, review of issue resolution strategies / roadmaps etc. before submission of your packaging proposals?
 - How well has the Packaging Assessment Team communicated with you and your organisation during assessment of your packaging proposals (e.g. early communication of potentially significant issues)?
 - How well has the Packaging Assessment Team communicated with you and your organisation following assessment of your packaging proposals (e.g. providing any requested clarification of the findings of the assessment)?
4. To what extent has the Disposability Assessment service **added value** to your waste management planning (e.g. providing knowledge of other relevant waste management practices)?
5. How well do you think RWM has listened to, and responded to the questions, issues or concerns that you have raised?
6. What are the **best** aspects of the Disposability Assessment service?
7. What could be **improved** or **added**?

3 Circulation

The 2014 questionnaire was circulated to project managers and other key interfaces within 16 organisations that have used the LoC assessment service in the period. These were:

- AWE
- Sellafield Ltd
- Energy Solutions
- British Energy/EdF Energy
- Dounreay Site Restoration Limited (DSRL)
- GE Healthcare
- Magnox Limited
- GNS
- MoD (Devonport-Babcock)
- Research Sites Restoration Ltd
- CCFE (JET)
- EDF
- Siempelkamp
- Horizon/HGNE
- Croft Ltd
- NDA Corporate

The questionnaire was issued to 48 contacts in individual projects and responses were received from 21¹, resulting in a 44% response rate.

For comparison purposes, the number of responses in 2012 and 2013 were 29 (51%) and 28 (56%) respectively.

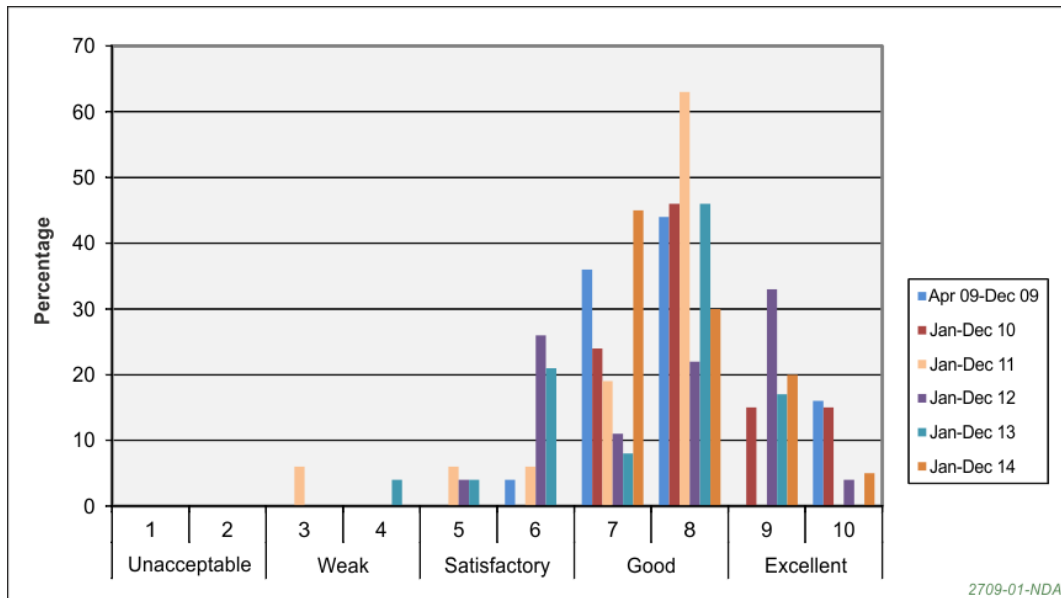
4 Results

This section contains a summary of the scores and written responses that were received. Where scorings have been provided (and not all respondents did), these are shown in the form of histograms. Most of the questions used for this year's survey are the same as those posed during previous years. Previous scorings are also provided for these questions to allow comparisons and identify trends. The histograms therefore provide a ready means of gauging year-on-year changes in customer satisfaction. This does not apply to question 5, which is a new question this year. The response to this question forms the baseline for future questionnaires and comparisons.

Later in the report we set out the written feedback received and use this to make recommendations for improvements which we would propose to implement within the 2015/16 work plan. For information we also revisit the recommendations made following the 2013 review and provide an update on progress made.

¹ Where individuals provided a joint response, the numbers were increased accordingly.

Q1. How would you describe the quality of the Assessment Reports you have received during the past year (e.g. technical understanding, comprehensive response etc.)?

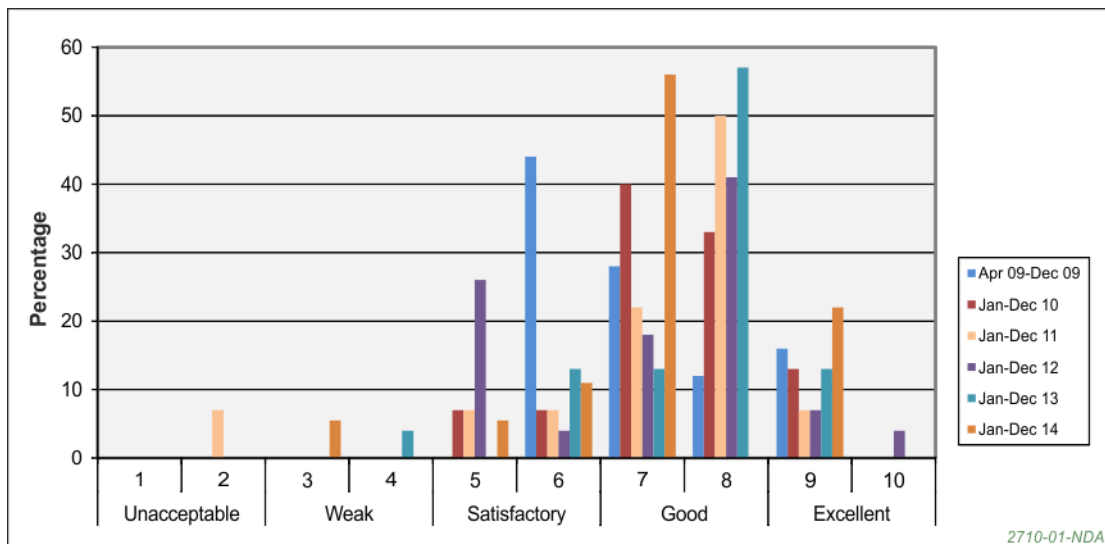


Overview

There is a positive indication of improvement in this area, with 100% of respondents marking as good (75%), or excellent (25%). Further comments relating to this area can be found against Q6 and Q7 below.

Q2a. Considering the content of the Assessment Reports:

- How useful are the ‘Assessment of Disposability’ sections, for example, in helping you in building Radioactive Waste Management Cases for Regulators?

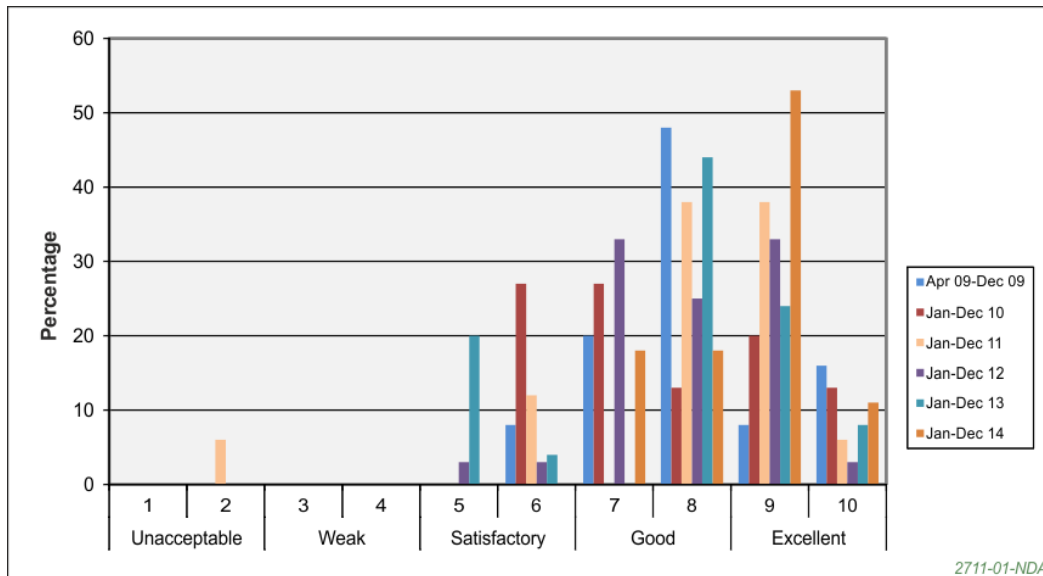


Overview

A total of 78% marked this as good or excellent, marginally lower than the previous year (83%), so there remains areas for improvement. Further comments relating to this area can be found against Q6 and Q7 below.

Q2b. Considering the content of the Assessment Reports:

- How useful are the 'Review of technical issues and Action Points, for example, in focusing future work?

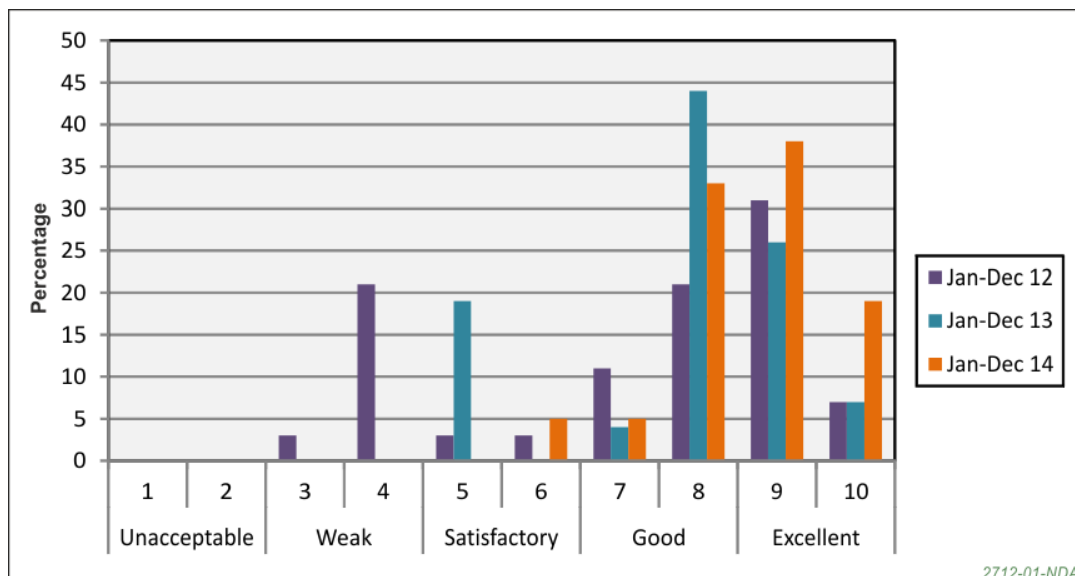


Overview

There is a high level of satisfaction in this area, with 100% responding with good (36%) or excellent (64%). As evidenced by the histogram, this is an area of continuing improvement.

Q3a. Considering engagement with RWM during the Disposability Assessment process:

- How well has the Packaging Assessment Team communicated with you and your organisation in attendance at option studies, review of issue resolution strategies/roadmaps etc. before submission of your packaging proposals?

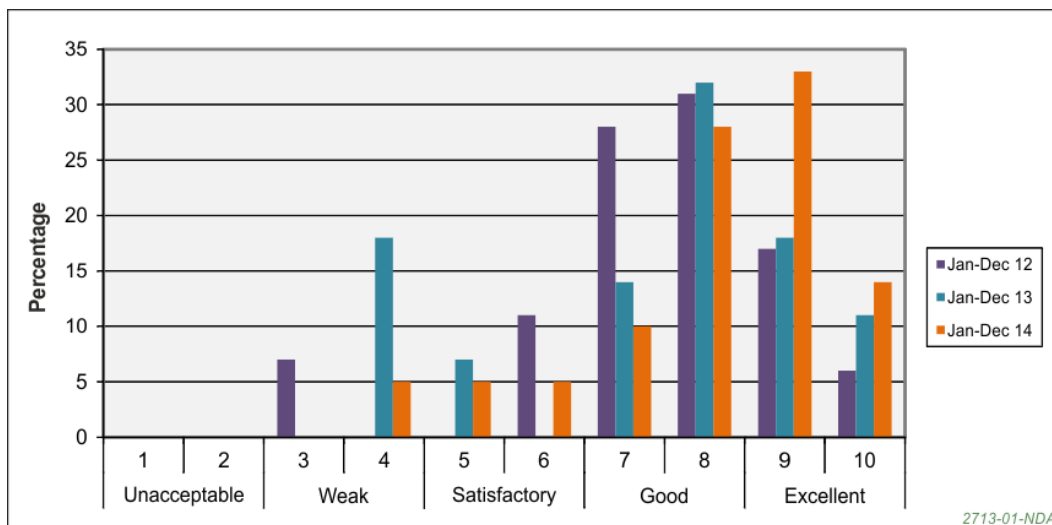


Overview

The responses show continuing improvement in this area, with a total of 95% of respondents scoring the level of communication prior to submission as good (38%) or excellent (57%).

Q3b. Considering engagement with RWM during the Disposability Assessment process:

- How well has the Packaging Assessment Team communicated with you and your organisation during assessment of your packaging proposals (e.g. early communication of potentially significant issues)?

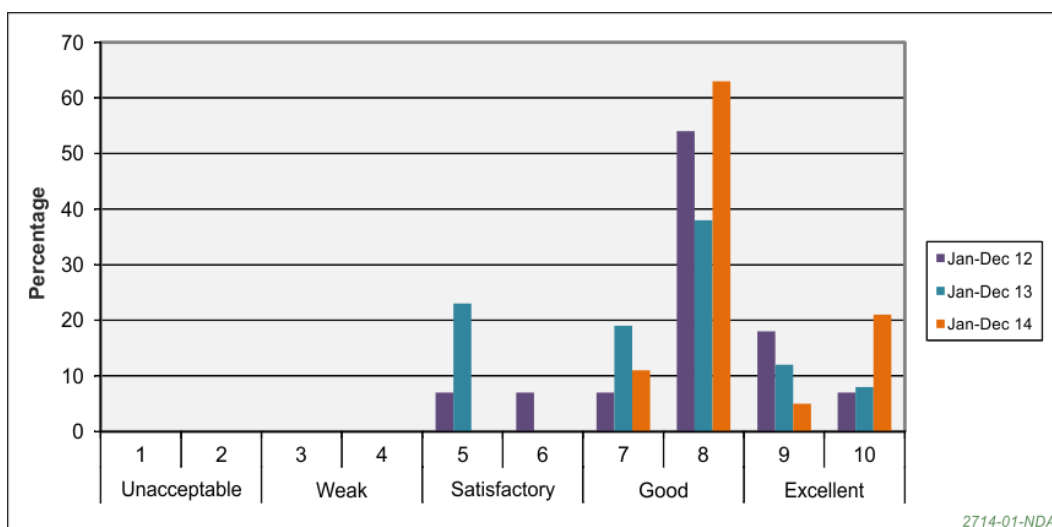


Overview

Communication during assessment shows general improvement overall, with 47% of respondents marking this as excellent (a rise from 29% last year). As evidenced above, there are still areas for improvement. Further comments relating to this area can be found against Q6 and Q7 below.

Q3c. Considering engagement with RWM during the Disposability Assessment process:

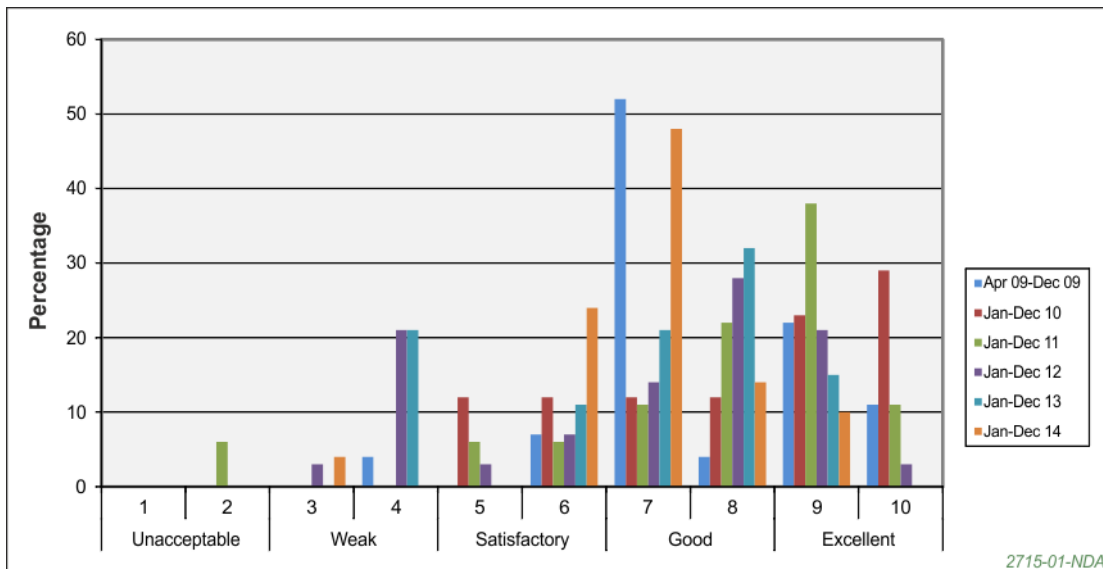
- How well has the Packaging Assessment Team communicated with you and your organisation following assessment of your packaging proposals (e.g. providing any requested clarification of the findings of the assessment?)



Overview

This is another area showing continual improvement with high levels of satisfaction. A total of 100% marked post-assessment communications as good or excellent. Further comments relating to this area can be found against Q6 and Q7 below.

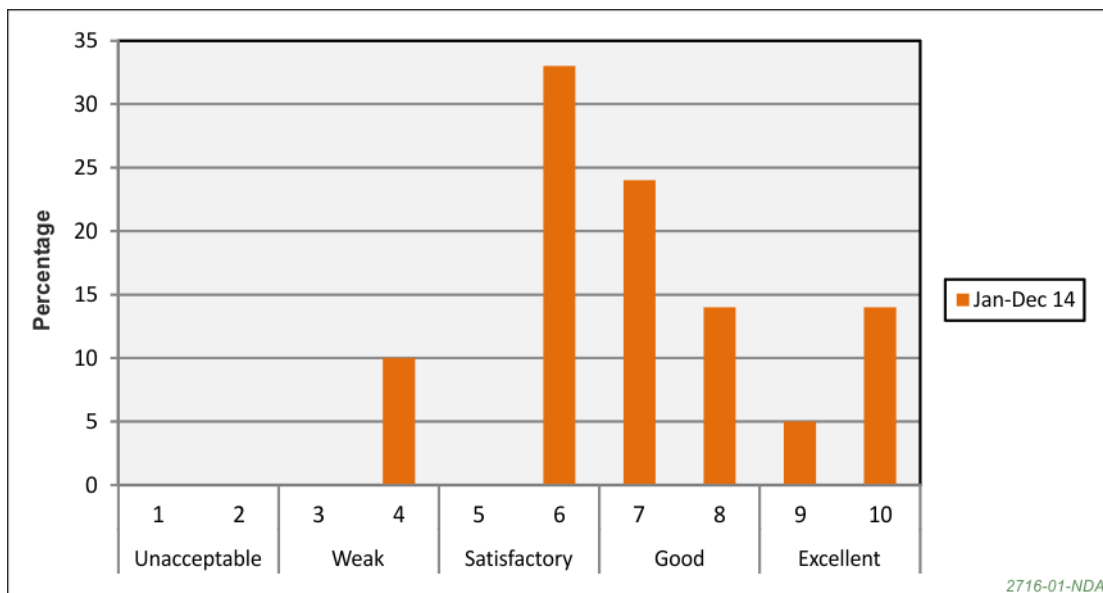
Q4. To what extent has the Disability Assessment service added value to your waste management planning (e.g. providing knowledge of other relevant waste management practices)?



Overview

A total of 72% of respondents marked ‘added value’ as good or excellent. Further comments relating to this area can be found against Q6 and Q7 below..

Q5. How well do you think RWM have listened to, and responded to the questions, issues or concerns that you have raised?



Overview

This is a new question for this year, with just over half the respondents (57%) viewing this area as good or excellent. As seen from the above chart, there is scope for improvement, and further comments relating to this area can be found against Q6 and Q7 below.

Q6 What are the best aspects of the Disposability Assessment service?

Overview

Respondents have flagged a wide range of positive views. These are reported directly from the questionnaires, as non-attributed comments.

Written Responses

- *Quality of Assessment Reports:* High quality to meet RWM needs; too comprehensive for our needs.
Communication before submission: Good support throughout. Helpful in strategy evolution but could this position/advice been achieved sooner?
Communication during assessment: Generally good, particularly at the Packaging Assessment Manager (PAM) level.
Communication following assessment: Generally good. Weekly telecons have been very welcome and a positive way of managing delivery and changing position.
How well have RWM listened and responded: Generally ok.
Now much more open to innovative proposals.
Effective regular communications, through waste management project.
Competent and experienced staff.
Support during project specific regulator meetings.
Seeking to get cross organisation beneficial approaches.
Clear assessment actions, and a process to close them out.
Move towards pragmatic audit.
Recognition that different approaches are acceptable across the UK nuclear industry (e.g. records).
Willingness to consider process enhancements, to simplify and improve efficiency – albeit in response to NDA resource/cost challenge.
Improved awareness of non-NDA estate needs, but not consistent across RWM.
- Communication of issues in a timely manner is excellent.
Proactive nature of current waste package manager is excellent.
- It forces a degree of rigour and depth to consideration of submissions and in doing so provides opportunity to enter into a dialogue. It provides a robust and referenceable record at a point in time. Compliance gap analysis can be useful in judging the residual risk gap and hence informing further action.
- Detailed knowledge of the individuals involved with assessments.
Willingness to communicate, regularly and openly.
Attendance and support to Site Licence Company (SLC) at Level 4 Programme meetings with Regulators.
Enthusiasm of Upstream Optioneering team.
- Good working relationship with RWM representative.
Comprehensive assessment report.

Verbal / written support in absence of iLoC endorsement.

- *Quality of Assessment Reports:* Quality of the reports is generally very good.
- *How useful are the 'Assessment of Disposability' sections:* Disposability assessments are referenced in the RWMC, rather than used as a data source. However, it is useful to see how close particular streams are to the margins of the safety case.

Communication before submission: Attendance at meetings has been good, and the appointment of RWM staff at Westlakes office has improved access to RWM staff.

Communication following assessment: Very good in general.

Has the service added value: Useful to see assessments of proposals from other SLCs – time will tell whether this results in added value.

RWM staff expertise in disposability of packaged waste.

Opportunity to factor that understanding into decisions on waste treatment.

- Very responsive and clear guidance offered.
- Easy to contact and response times to queries are excellent.
- Q2 & Q4 not particularly applicable as ours was for container only assessments. The assessment did provide useful guidance as to issues that would affect container design issues. The advice from RWM was feed back into the design process.
- The service records in detail RWM's view of a particular proposal. The Assessment of Disposability is an essential generic document for any waste stream since it demonstrates RWM's satisfaction with a particular proposal. Any action points are clearly presented and easy to understand.
- DSRL enjoy an open communication with the Responsible Senior Packaging Assessment Manager and his team that ensures that issues are discussed early and clearly communicated.

Always willing to advise.

- Highly knowledgeable and experienced personnel.
Readily accessible and willing to participate in discussions when requested.
- Accessibility to PAM and Senior Packaging Assessment Manager (SPAM) and the support received in answering questions and providing guidance.
- Assessment is aimed at resolving issues not creating obstacles. This has led to a good working relationship focussed on delivery.

Q7 What could be improved or added?

Overview

Respondents have flagged a wide range of suggestions to improve or add to the process. These are reported directly from the questionnaires, as non-attributed comments.

Written Responses

- Our RWMCs could be produced with less comprehensive 'Assessment of Disposability' reports, especially as the approach is to signpost to relevant documentation.

How useful are the 'Review of technical issues and Action Points': The sections are helpful to allow us to negotiate a way through the LoC process, but do not have any impact on other work streams. On occasions these sections have not aligned with the actual work required (being greater) due to the impact of other site licensee assessments.

Communication during assessment: There is sometimes a degree of ambiguity (perhaps arising from a changing position at RWM) and there is still scope for more pragmatism.

Communication following assessment: Some promised feedback not delivered or within timescales indicated.

Has the service added value: Limited added value. We have engaged RWM at a pre-optioneering stage, but not using the formal Disposability Assessment process. Further, as non-NDA estate, EDF has not received various tools developed within the Upstream Optioneering process; therefore the added value would be limited.

How well has RWM listened and responded: Sometimes very slow.

Failure to adhere to programme dates.

Resources stretched across competing assessments.

It has taken far too long not to get an fLoC for an internationally proven waste management system.

Are all departments of RWM always aligned – there seem to be differences between the GDA engineering, Safety Case and Assessment areas (staff).

It is not always clear who is leading in RWM on specific issues (e.g. PSSR).

RWM could have a stronger solution facing role to eliminate the need for different organisations to tackle the same issue (e.g. the UK tax payer is going to pay GNS & Energy Solutions twice for the same vent design, an issue arising from NDA RWM: RWM could have owned the solution and delivered it at lower cost).

The assessment process demands a lot of information – is it all really necessary or does it work on a "just in case" basis?

Assessment methods remain overly conservative in some areas – inconsistency with other regulatory regime requirements (e.g. MOSAIK fire safety ok for transport but becomes a problem on receipt at Geological Disposal Facility (GDF)).

Is it really necessary to have detailed (large) assessment reports? Who will use them? Waste producer needs to be informed, GDF operator needs to be the Subject Matter Expert (SME).

Opportunity to make better use of "generic" or "fleet" assessments.

Are there some simple, benign wastes that do not need assessment or a LoC?

EDF prepared to work with RWM to improve the process efficiency.

Understanding of customer position.

Understanding of how changes to positively affect one licensee can negatively impact others resulting in business risk.

- Process can and does take months.

Process can seem incomprehensible at times. Some training/ briefing over a period of ½ to 1 day describing the disposability assessment/ LoC process would be very welcome.

Not all waste package managers have been as proactive however comms have always been very good.

- Cumbersome and arguably not fit for purpose at all stages. Hence it does not always hit the right balance of cost vs benefit as well as being costly and time consuming to both produce submissions and assessment.

Suggest full disposability assessment should only be deployed when required and potentially when consideration of the issues have reached a suitable level of maturity. Earlier assessment stages would provide more value focusing on providing advice only and condense such advice to record key findings. Levels of interaction can vary from excellent to non-existent, hence more focus on structured interaction would add more value than voluminous written assessment.

- Time taken for Assessments to reach a conclusion is still painfully slow.

Warning of delay to promised delivery dates is often late and sometimes non-existent.

An improvement would be a categorisation of assessments so that precious RWM resources are focussed on the projects where there is the highest risk to disposability; the current system does not seem to prioritise RWM resources where they are best used. For lower risk submissions there should not be a need for RWM scrutiny at all.

In some areas there is an overreliance on the Supply Chain for assessment and subsequently there is a risk that Action Points are raised based on disagreements of approach rather than a real issue with the proposal.

- Lower cost.

Shorter timescale (increased from 3 / 4 months in 2006 to 9 months in 2014).

RWM complete their action point to reduce conservatism in operational safety case assessments (action in 2008 Assessment & 2014 assessment).

iLoC endorsement of products – instead of late emerging additional issues.

Start work without Purchase Order or funding to reduce assessment time by 6-8 weeks or more.

Early engagement with RWM Technical Governance arrangements (e.g. Nuclear Safety & Environmental Committee (NSEC)) to shorten assessment time & avoid late surprises or requests for additional work.

- *Quality of Assessment Reports*: the assumptions behind the assessments can sometimes be over-cautious.

How well have RWM listened and responded: Variable from good to not so good. Not sure how objective the RWM concerns are, or whether they relate to the concerns of specific individuals.

A more flexible process which takes account of the relative risks of continued storage, treatment and disposability. Movement away from a one-size fits all approach for low hazard wastes. There should be less concern with issues which have little bearing on disposability.

- Maybe a clearer definition of who does what as we only seem to have a couple of names to contact for all issues.
- Some RWM guidance is a bit vague in terms of what is actually required. For example, the GDF accident conditions performance requirements are stated as DBA requirements. As it is suspected there are only a very few variables, such as release fractions it would be helpful to know what these are, maybe for the radionuclide's of interest to RWM. Also in the matter of GDF accident conditions understanding exactly what is required (e.g. Ductile Cast Iron Container (DCIC) performance) and what is acceptable has been a bit difficult to understand and obtain clarification on.
- References to relevant alternative proposals that have been approved by RWM, may help with closing out Action Points.
- Discussions are already underway on potential improvements to the LoC Process and production of Disposability assessments.

RWM need to be in a position to provide regular monthly reporting and invoicing against contracts that have been placed. And consider how measurable such contracts are.

- As ever, RWM can massively aid waste producers by helping them to eliminate waste processing options that are unlikely to result in production of an acceptable final waste package. It is my personal experience that there is often reluctance to rule things out on the basis that they 'may' be feasible. A more direct and authoritative line from RWM could help waste producers to avoid spending time and money in pursuing poor options. I feel that this is potentially an area for improvement.
- Earlier (before report finalisation) notification of potential issues and additional work requirements. This would allow discussion and planning of the work required and reduce delays to delivery.

5 Key Issues and areas for improvement

This section contains our analysis of the issues and suggestions raised by the customer questionnaire, and provides recommendations for the ongoing improvement of the LoC assessment service.

RWM Analysis			
Area	Customer Approvals	Customer Requests	Recommendations for 2015
Assessment programme	<ul style="list-style-type: none"> • Support during project specific regulator meetings. • Now much more open to innovative proposals. • Open communication with the Responsible Senior Packaging Assessment Manager and his team that ensures that issues are discussed early and clearly communicated. 	<ul style="list-style-type: none"> • Failure to adhere to programme dates. • Resources stretched across competing assessments. • Time taken for Assessments to reach a conclusion is still painfully slow – shorter timescales. • Warning of delay to promised delivery dates is often late and sometimes non-existent. Earlier reporting of potential issues. • Lower cost. • Start work without Purchase Order to reduce time. • It has taken far too long not to get an fLoC for an internationally proven waste management system. • Process can and does take months. • Cumbersome and arguably not fit for purpose at all stages. Hence it does not always hit the right balance of cost Vs benefit as well as being costly and time consuming to both produce submissions and assessment. • Early engagement with RWM Technical Governance arrangements (e.g. NSEC) to shorten assessment time & avoid late surprises 	<p>During 2015 RWM expect to:</p> <ul style="list-style-type: none"> • Implement dedicated Programme Office. • Actively manage programme dates/costs. • Anticipate NSEC needs and prepare the ground with waste owners.

RWM Analysis			
Area	Customer Approvals	Customer Requests	Recommendations for 2015
		<p>or requests for additional work.</p> <ul style="list-style-type: none"> • A more flexible process which takes account of the relative risks of continued storage, treatment and disposability. Movement away from a one-size fits all approach for low hazard wastes. There should be less concern with issues which have little bearing on disposability. 	
Assessment reporting	<ul style="list-style-type: none"> • Assessments are comprehensive and generally very good quality. • Clear assessment actions and a process to close them out. • The service records in detail RWM's view of a particular proposal. The Assessment of Disposability is an essential generic document for any waste stream since it demonstrates RWM's satisfaction with a particular proposal. Any action points are clearly presented and easy to understand. • Assessment is aimed at resolving issues not creating obstacles. This has led to a good working relationship focussed on delivery. • Verbal / written support in absence of iLoC endorsement. 	<ul style="list-style-type: none"> • The assumptions behind the assessments can sometimes be over-cautious. • The assessment process demands a lot of information – is it all really necessary or does it work on a "just in case" basis? • Is it really necessary to have detailed (large) assessment reports? Who will use them? Waste producer needs to be informed, GDF operator needs to be the SME. • In some areas there is an overreliance on the Supply Chain for assessment and subsequently there is a risk that Action Points are raised based on disagreements of approach rather than a real issue with the proposal. 	<p>RWM expect to:</p> <ul style="list-style-type: none"> • Develop reduced scope Assessment Reports. • Be in a position to provide regular monthly reporting and invoicing against contracts that have been placed, and consider how measurable such contracts are.
Resourcing	<ul style="list-style-type: none"> • Enthusiasm of Upstream Optioneering team. • Competent and experienced staff, good working relationships, readily accessible and willing to participate. • Willingness to communicate regularly and 	<ul style="list-style-type: none"> • Are all departments of RWM always aligned – there seem to be differences between the GDA engineering, Safety Case and Assessment areas (staff). • It is not always clear who is leading in RWM on specific issues (e.g. PSSR). 	<p>RWM expect to:</p> <ul style="list-style-type: none"> • Demonstrate RWM alignment between Departments. • Define roles in a more transparent manner.

RWM Analysis			
Area	Customer Approvals	Customer Requests	Recommendations for 2015
	<p>openly.</p> <ul style="list-style-type: none"> Proactive nature of current waste package manager is excellent. Attendance at meetings has been good, and the appointment of RWMD staff at Westlakes office has improved access to RWM staff. 	<ul style="list-style-type: none"> Not all waste package managers have been as proactive however comms have always been very good. Maybe a clearer definition of who does what as we only seem to have a couple of names to contact for all issues. Categorisation of assessments so that precious RWM resources are focussed on the projects where there is the highest risk to disposability; the current system does not seem to prioritise RWM resources where they are best used. For lower risk submissions there should not be a need for RWM scrutiny at all. 	<ul style="list-style-type: none"> Define and introduce a categorisation process for packaging proposals.
General service	<ul style="list-style-type: none"> Communication of issues in a timely manner is excellent. Move towards pragmatic audit. Recognition that different approaches are acceptable across the UK nuclear industry (e.g. records). Very responsive and clear guidance offered. Always willing to advise. 	<ul style="list-style-type: none"> There is sometimes a degree of ambiguity (perhaps arising from a changing position at RWM) and there is still scope for more pragmatism. Some promised feedback not delivered or within timescales indicated. Response is sometimes very slow. RWM could have a stronger solution facing role to eliminate the need for different organisations to tackle the same issue. Understanding of customer position. Understanding of how changes to positively affect one licensee can negatively impact others resulting in business risk. Process can seem incomprehensible at times. Some training/ briefing over a period of ½ to 1 day describing the disposability assessment/ LoC process would be very welcome. 	<p>RWM expect to:</p> <ul style="list-style-type: none"> Extend the supply chain to ensure competent delivery is not resource constrained. Hold 4-off Waste Packager Liaison Meeting (WPLM) meetings/year to ensure good communications. Assign Senior Waste Management Specialist (SWMS) to Customers to acquire improved understanding of programmes.

RWM Analysis			
Area	Customer Approvals	Customer Requests	Recommendations for 2015
		<ul style="list-style-type: none"> • References to relevant alternative proposals that have been approved by RWM, may help with closing out Action Points. • As ever, RWM can massively aid waste producers by helping them to eliminate waste processing options that are unlikely to result in production of an acceptable final waste package. It is my personal experience that there is often reluctance to rule things out on the basis that they 'may' be feasible. A more direct and authoritative line from RWM could help waste producers to avoid spending time and money in pursuing poor options. I feel that this is potentially an area for improvement. • Suggest full disposability assessment should only be deployed when required and potentially when consideration of the issues have reached a suitable level of maturity. Earlier assessment stages would provide more value focusing on providing advice only and condense such advice to record key findings. Levels of interaction can vary from excellent to non-existent, hence more focus on structured interaction would add more value than voluminous written assessment. 	

6 Progress on Key Issues raised in 2013

This section identifies recommendations generated from our previous customer questionnaire, and provides an update on our progress to date.

Area	Recommendations for 2014	Response	Progress to date
Assessment programme	<ul style="list-style-type: none"> • Changes in timescales on specific projects without notification. • The scheduling and completion of assessments could be improved. There is little clarity or understanding of the slot system and the relative prioritisation of waste producers submissions. • There is a perception that the internal RWMD processes move very slowly and are not responsive to customer timescales. • Reduce timescales. • A more scalable review period and or process for selected submissions, particularly those that have been through previous review would add value. A fast track approach for the final close out of LoC specific actions and or recommendations would be an added value benefit. • Communicate verbal queries in writing earlier. 	<p>During 2014 RWM expect to:</p> <ul style="list-style-type: none"> • Develop prioritised programmes for all of the NDA SLCs • Produce a revised 'template programme' • Quantify and manage the implications of sustained engagement 	<ul style="list-style-type: none"> • Full set of prioritised programmes was issued in February 2015, and will be updated each quarter. • The template programme recognises new produces (Expert View (EV) & Fleet Wide Approach (FWA)). • Regular engagement activities are now recognised and scheduled on the P6 programmes that drive the published prioritised schedule.
Assessment reporting	<ul style="list-style-type: none"> • Quality range from very good to occasions where RWMD seem to have missed the point. Greater interactions during assessments would assist here, as these have proved very helpful. 	<p>During 2014 RWM expect to:</p> <ul style="list-style-type: none"> • Consider how to implement new ways to 'add value' to assessments, including exploring the potential to produce Nature and Quantity assessments, in 	<ul style="list-style-type: none"> • New EV and FWA assessment tools defined in RWM management system and in general use. • Commercial Strategy approved by RWM Exec. New framework contract being

Area	Recommendations for 2014	Response	Progress to date
	<ul style="list-style-type: none"> • Technical issues and Action points: need to be backed up by detailed discussions with RWMD staff. • The Assessment reports are very comprehensive but consideration could be given to reducing the size of the reports perhaps based on the Stage of Submission. • Quality of assessments: The main concern is that the assessment report is somewhat a blunt instrument which seems to be applied, regardless of the question being asked. More work is needed on both sides to ensure that the reports are fulfilling SL needs. • The need to update the Contractual position needs to be addressed • Would like an earlier indication of the likely costs for assessments in order to help with internal planning. 	<p>collaboration with waste owners, as part of early engagement</p> <ul style="list-style-type: none"> • Approve and roll out the new Commercial Strategy, leading to a new framework contract for users of the service • Implement a reduced scope Assessment Report, to respond to specific technical queries 	<p>negotiated for DSRL.</p> <ul style="list-style-type: none"> • RWM now adopting flexible approach to reporting – formal reduced scope assessment report not yet defined.
Resourcing	<ul style="list-style-type: none"> • The level of service is dependent on the PAM allocated to the Assessment – need greater consistency. • Increase the number of Senior PAMs to cover PRMs. • Not enough resources to support volume of work from Magnox. • Concern whether RWMD possess enough SQEP internal expertise in areas such as Ductile Cast Iron. • Planning and resourcing between Magnox and RWMD is an area that 	<p>During 2014 RWM expect to:</p> <ul style="list-style-type: none"> • Develop a new structure for Waste Management Department • Appoint at least one additional Senior PAM • Appoint a Project Manager to oversee the disposability programme 	<ul style="list-style-type: none"> • A new structure has been defined and endorsed/approved as part of RWM organisation review. • Two new SWMS posts have been approved. Appointments have yet to be confirmed. • A Project Manager post has been approved and is currently filled by interim staff.

Area	Recommendations for 2014	Response	Progress to date
	<p>needs to be improved. Assessments do seem to go on longer than planned, be it production or indeed assessment.</p>		
<p>General service</p>	<ul style="list-style-type: none"> • The GDA generic safety case, and related assessment tools remain highly conservative. This can lead to “non-issues” being raised which then consume resource to resolve. • Publish Level 3 WPS. • Give more visibility to PRM and NSEC meetings • Improve clarity of requirements from the start. • Communicate scope of assessment to SLC to confirm that work carried out by contractor is focussed to cover the correct parameters. • Improve monitoring and management of contractor carrying out assessment. • Impact of NSEC in terms of timing of responses and linkage to the assessment process. Fundamental disposability issues should be able to be considered by NSEC separately or in parallel rather than in series with the disposability assessment process. 	<p>During 2014 RWM expect to:</p> <ul style="list-style-type: none"> • Define and implement a holistic Higher Activity Waste (HAW) strategy • Improve the visibility of concept change control activities • Sponsor key proposals through change control to support SLC plans 	<ul style="list-style-type: none"> • The HAW strategy remains under development in consultation with NDA. • The WPLM is being briefed on concept change control on a quarterly basis. • DCIC change control has been ‘sponsored’ by RWM with significant progress made.

7 Abbreviations and Acronyms

DCIC	Ductile Cast Iron Container
EV	Expert View
FWA	Fleet Wide Approach
GDF	Geological Disposal Facility
HAW	Higher Activity Waste
LoC	Letter of Compliance
NDA	Nuclear Decommissioning Authority
NSEC	Nuclear Safety & Environmental Committee
PAM	Packaging Assessment Manager
SME	Subject Matter Expert
SPAM	Senior Packaging Assessment Manager
SWMS	Senior Waste Management Specialist
RWMC	Radioactive Waste Management Cases
RWM	Radioactive Waste Management Limited
SLC	Site Licence Company
WMS	Waste Management Specialist
WPLM	Waste Packager Liaison Meeting



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