

HUNTERSTON SITE STAKEHOLDER GROUP

The twenty fourth meeting of the Hunterston Site Stakeholder Group will take place on Thursday 2 June 2011 in The Seamill Hydro Hotel, Seamill at 1.30pm. (1pm for lunch)

AGENDA

13.00 Lunch and information gathering

13.30 Chairman's opening remarks

Chair and Vice Chair updates and correspondence

13.50 Approval of previous minutes

14.00 Hunterston B Station Reports

Colin Weir, Hunterston B

Keith Hammond, SEPA

NII – Report Only

14.30 CORWM update

Rita Holmes and John Lamb

14.45 Socio-economic subgroup update

15.00 Tea & Coffee

15.15 Hunterston A Site Reports

Peter Roach, Site Director, Hunterston A Site

David Rushton, Programme Manager, NDA

Ian Robertson, SEPA

Chris Kemp, NII

16.45 Round up public Q&A

Future Meetings:

Thursday 8 September 2011 at 1.30pm, Lauriston Hotel, Ardrossan

Thursday 8 December 2011 at 1.30pm, Brisbane House Hotel, Largs

17.00 Close

Hunterston Site Stakeholder Group

**THE TWENTY THIRD HUNTERSTON SITE STAKEHOLDER GROUP MEETING
HELD ON THURSDAY 3 MARCH 2011 IN THE LAURISTON HOTEL, ARDROSSAN**

Present:

Magnox Ltd

Mr Peter Roach
Mr Reuben Phillips
Mrs Kerry McMillan (Secretariat)
Mr Tony Bale (Chair)

Community Councillors

Mr John Lamb - West Kilbride
Mrs Rita Holmes – Fairlie (Vice Chair)
Mr Peter MacFarlane – Largs
Mr Ian Frame - Cumbrae

Hunterston Estate

Mr Angus Cochran-Patrick
Mr Ralston Ryder

NII

Mark Tyrer

North Ayrshire Council

Mr Hugh McGhee

In Attendance

Mrs Shelagh Milligan, Magnox Ltd
Mr Derek Rooney, Magnox Ltd
Mr Allan McRae, CNC
Ms Claire Cook, British Energy
Mrs Anne De Koning, British Energy
Mr Andy Taylor, British Energy

British Energy

Mr John Morrison

Community Member

Mr John Robertson

Councillors

Cllr Robert Barr
Cllr Alex Gallagher
Cllr John Reid
Cllr Elisabeth Marshall
Cllr Elizabeth McLardy

NDA

Mr David Rushton
Mr Bill Hamilton

SEPA

Mr Ian Robertson

Mrs Elizabeth Gray, Scottish Government
Mr Stuart Hudson, Scottish Government
Ms Claire Dodd, Scottish Government
Mr Neil Murchison, Scottish Government
Mr Michael Piri, Scottish Government

A representative from the local press and several members of the public were also in attendance

Apologies:

Mr Keith Hammond, Mr Chris Kemp, Ms Annie Perrott, Mr Willie Jack, Mr Stuart McGhie.



1. CHAIRMAN'S OPENING REMARKS

Chairman Tony Bale welcomed everyone to the 23rd meeting of the Hunterston Site Stakeholder Group (SSG).

2. CHAIR AND VICE CHAIR UPDATES/CORRESPONDENCE

Mr Bale announced that there had been a change of membership due to Mr Kenny MacDougall resigning from his position on the Ardrossan Community Council. Mr Bale wished to thank Mr MacDougall for all his input into the SSG over the years and stated that confirmation was still to be received as to who Ardrossan Community Council's new SSG representative would be.

Mrs Kerry McMillan confirmed she had received apologies from Mr Keith Hammond, SEPA, Mr Chris Kemp, NII, Ms Annie Perrott, Scottish Government, Mr Willie Jack, NFU and Mr Stuart McGhie, British Energy.

Mr Bale explained that an SSG sub-group meeting was held on Monday 24 January 2011 in order to agree a joint response to the NDA draft business plan. A response on behalf of the Hunterston SSG was submitted to the NDA as a result.

3. APPROVAL OF PREVIOUS MINUTES

Mrs Kerry McMillan highlighted that an action had been placed upon her to make amendments to the minutes of 16 September 2010. Both Mr MacDougall and Mrs Rita Holmes had felt that more dialogue was required regarding contaminated land and the Graphite Pathfinder Project. Mrs McMillan explained that these amendments have been made which Mr MacDougall and Mrs Holmes are happy with, and the minutes of 16 September 2010 were approved.

Mrs McMillan added that, further to a request from Cllr Alex Gallagher, an action had been placed on Mr Reuben Phillips to explain the safety levels of radiation in further detail. A detailed explanation on this subject was provided to the members in the form of an information sheet.

The minutes of 16 December 2010 were approved.

4. SCOTLAND'S HIGHER ACTIVITY RADIOACTIVE WASTE POLICY 2011

Mrs Elizabeth Gray, Head of the Radioactive Waste for the Scottish Government, gave a presentation to the group on Scotland's Higher Activity Radioactive Waste Policy 2011.

Mrs Gray thanked everyone involved in the development of the policy which started in 2007 and was published in January 2010. Mrs Gray highlighted the following key points from her presentation:

- The policy remains as it was in 2007 with the long term management in near surface facilities;
- The policy is a framework which allows decisions to be made on how to best manage waste;
- The next stage in the process is to implement a strategy which looks in more detail at Scotland's waste and what technical options may exist;
- The development of this strategy will be engaged with stakeholders, regulators and made open in public.



The NDA Draft Strategy is approved jointly by the Secretary of State for Energy and Climate Change in the UK Government, and the Scottish Ministers as regards Scotland. This strategy is under the ministerial approval process at the moment and is due for approval by end of March 2011. Scottish Government and Scottish Ministers also have the approval of the NDA's Annual Business Plan. These documents relate directly to the Scottish Government policy.

Mrs Gray informed the group that she would be leaving her position within the Scottish Government at the end of March 2011, and introduced her successor, Mr Stuart Hudson, who will take over the leadership of the Radioactive Waste team.

Mr Hudson wished to draw the group's attention to the fact that on Wednesday 2 March 2011, the Scottish Parliament's Rural Affairs and Environment Committee agreed to the Radioactive Substances Act (1993) Amendment Regulations 2011 which were laid before Scottish Parliament. These regulations amend what is defined as radioactive waste and radioactive material, defining what natural materials come into the definition of radioactive waste. This will come into effect on 1 October 2011 and was part of the review of the exemption orders and the radioactive substances act. This should receive approval by 31 March 2011.

Cllr Alex Gallagher thought that the definition of radioactive waste would have already been agreed to a certain international or scientific standard. Cllr Gallagher wondered how the Scottish Parliament could reach a decision on this matter. Mr Hudson stated that this was the result of a four and a half year process involving stakeholder engagement and public consultation. It is a project which spans the whole of the UK and the definitions, having existed since 1960, are in need of modernisation, so this will in effect make the UK's regulatory system clearer in terms of meeting the guidance issued by the European commission. Mrs Gray added that one of the key beneficiaries of this is hospitals and universities. It's merely the technical definition being amended.

On behalf of the Hunterston SSG, Mr Bale wished to thank Mrs Gray for her help and assistance over the past few years.

5.A HUNTERSTON B STATION REPORT

Mr John Morrison, Technical & Safety Support Manager, deputising for Mr Colin Weir, Station Director, took the B Station report as read. He stated that the station was about to complete a 30 day planned outage inspection of Reactor three core, a requirement undertaken on a regular basis to ensure that everything is as it should be. The inspections were completed successfully and the station was now looking forward to bringing the reactor back to service in the following few days. Reactor four had a stable period of operation during the period. There were no noteworthy events on safety or nuclear significant nature.

Mr Bale asked where the station was currently and where they would like to go with regard to extension to generation. Mr Morrison responded the current extension was to 2016 and the station was currently preparing a safety case to extend that to 2021.

Mr Bale said, from his point of view, this would be good news if a further five years of good quality "blue chip" jobs could remain in North Ayrshire, an area with among the highest unemployment in Scotland. Mr Robertson added his support to Mr Bale's statement. Mr Bale also congratulated B Station on their continued recruitment across the board, in particular their recruitment of apprentices



5.B NII REPORT

Mr Mark Tyrer took his report as read. He stated that it had been a quiet period for the NII as Reactor three had been on an interim outage, with Reactor four operating steadily. He endorsed Mr Morrison's statement that they were just coming to the end of an extremely well planned and well executed outage. In addition to the report he stated that three weeks' previously the Government made an announcement on the future of the NII who were being formed as an agency under the Health & Safety Executive on 1 April 2011 until such time as the Government could lay the necessary statute to register them as an independent regulatory body. The NII are preparing a statement which will be included in the next report

Mrs Holmes asked Mr Tyrer what his personal feelings were with regard to the transformation of the NII to a statutory body. Mr Tyrer responded that personally he felt it would be an extremely positive move as the NII will be required to give everybody concerned a lot more information and be much more transparent e.g. that week he had issued a licence instrument to Hunterston B approving amendments to their Emergency Plan, to justify issuing this instrument the NII has to prepare a report which goes through an authorisation route. For the past two or three years the NII had published the executive summary of these reports on the internet, in future, as a positive move, the entire report will be published. He felt that transparency would develop further e.g. every time he visits the station he is required to give a site report which at present is an internal report, he could see a time in the near future when that report will be published on the intranet.

Mr Bale asked, with the changes to the agency, would they be losing jobs or recruiting jobs. Mr Tyrer advised that no-one in the nuclear side of the civil service was being allowed to leave on voluntary redundancy. NII is recruiting aggressively within Division one, which deals with power reactors. There is currently a requirement for more than 70 inspectors, which meant a doubling in size, in order to regulate the eight new build power stations.

5.C SEPA REPORT

Mr Hammond was unavailable to review his report and it was taken as read. Cllr Barr asked Mr Hammond's colleague Mr Robertson, SEPA Inspector for Hunterston A Site, if SEPA received full cooperation from B Station. Mr Robertson confirmed this was so. Mr Andy Taylor, B Station Environmental Safety Group Head, also confirmed full cooperation was always provided to SEPA without hesitation.

Mr Lamb requested elaboration of the statements in paragraph three where B Station had effectively asked for variation to its RSA authorisation. Mr Taylor said the application was for a small change in the definition of what constitutes disposal or final disposal. Low Level Waste Repository (LLWR) receives waste from operators across the UK and is dealing with the final disposal of those wastes in a number of different ways, the one you may be most familiar is burial at Drigg. It is also developing other process e.g. smelting and other waste volume reduction techniques in order to minimise the amount of material being buried. The authorisation variation will enable use to be made of new waste handling processes by LLWR prior to disposal.

Mr MacFarlane requested an elaboration on the definition of RADS SAFE and NAIR as stated in paragraph three of the report. Mr Taylor explained that the RADS SAFE scheme supports the transportation of certain nuclear materials and enables safe collection and storage of waste in the event of unforeseen circumstances or delay, prior to onward disposal. As part of the scheme, Hunterston and other operators in the area are licensed to receive that waste for safekeeping.

A good example of a NAIR (National Arrangements for Incidents involving Radioactivity) event would be a legacy industrial site or factory owner finding some material which may be radioactive and requires safe storage for instance luminescent dials or paint materials. The arrangements in place are for safe custody and protection for the environment and public, pending safe onward disposal.

6. SOCIO-ECONOMIC/HALL AITKEN UPDATE

Recent reports in the local press have suggested that Hunterston A Site has a £10 million sum of money intended for socio-economic purposes, referred to as the “Magnox millions”. Mr Roach began his update by emphasising that, contrary to reports, this money did not exist. Mr Roach explained that these reports were detracting from what is a very important matter for the SSG, and it is essential that consideration is given to the socio-economic impacts of decommissioning Hunterston A Site. There are approx 400 jobs which currently operate out of Hunterston A on a daily basis, and there is an obligation on the NDA to ensure that when these jobs come to an end, plans are in place to mitigate the impact of job losses.

Mr Roach added that there are opportunities for local charities, clubs and organisations to benefit from Hunterston A Site funding, which has been the case for a number of years. Occasionally, requests are received for larger sums of money, and the Site have been looking at the best process to ensure these requests are maximised to their full potential. Traditionally, a SSG socio-economic subgroup existed to discuss and consider any proposals put forward. This subgroup decided from its early stages that it would never prevent any of the proposals from being passed onto the NDA. Mr Roach explained that he did not think this particular method added a great deal of value and that, as a group, it was essential to find a way of sharing any properly proportioned socio-economic funding to this area which enables priorities to be met and people to profit from it. Mr Roach finished by issuing a challenge to the SSG to find a better way forward for the area.

Cllr Elizabeth McLardy stated that she believed one of the main problems was that all the various communities are looking for something which will only benefit their respective community. Cllr McLardy added that she had previously suggested that a motion be put forward to identify an area within the Hunterston locality, currently identified in the National Planning Framework as heavy industry, for tourism. She explained that there have been industrial sites lying unused for over 20 years which there may be a possibility of regenerating, thus creating employment. Cllr McLardy confirmed that North Ayrshire Council are currently looking at including this in the new local plan, and discussions will be taking place with the Scottish Executive and various other organisations to find out its feasibility.

Mr John Robertson commented that he was part of the original socio-economic subgroup, and to his recollection, Hunterston A Site were to acquire a manager to the subgroup. He felt that without a professional manager, the subgroup was never going anywhere. Mr Robertson added that the subgroup needed someone who can offer professional expertise and advice in order to benefit the Hunterston peninsula.

Cllr John Reid highlighted that five North Ayrshire Councillors had visited colleagues from Dumfries and Galloway to gain an understanding of how these matters were operated at Chapelcross. Cllr Reid explained that valuable knowledge was learned from the visit, and hopefully the Councillors could take this knowledge forward with the rest of the socio-economic subgroup to address the employment issues. Cllr Reid proposed a subgroup meeting be held in the interim with findings reported back at the next main SSG meeting in

June 2011. Cllr Gallagher agreed that the visit to Dumfries was very informative, and stated that the focus should be on job losses. Cllr Barr added that the best way forward is to involve a number of agencies in order to gain their expertise.

Mr Roach was heartened by the Councillors visit to Dumfries and Galloway, and stated that a key factor to a successful subgroup would be learning from others. He went on to explain that socio-economic subgroups play a part in the success other sites have, and gave his backing to the formation of a similar subgroup at Hunterston.

Mrs Holmes said that when the earliest constitution was written up, it stated that everyone on the SSG would be able to attend subgroup meeting. If a socio-economic subgroup was to be set up, Mrs Holmes asked if all members would be able to attend. Cllr Reid stated that whilst he has no problems with anyone attending the meeting to listen to discussions, it was his recommendation that a tight knit working group be set up in terms of voting.

Cllr Gallagher suggested that the group move quickly to set up such a subgroup and welcomed any input from Scottish Enterprise and other organisations. He did however make it clear that the more people involved, the slower the process would be. Mr Roach offered to provide an administrative service to the subgroup.

Cllr Reid proposed that the subgroup be set up now, with the authority given to the Chair and Vice Chair to come up with the required numbers that would provide a balance. Mr Bale stated he would be happy to take this role on.

Mr Bill Hamilton stressed that the group take heed of what was learned from the Councillors visit to Dumfries and Galloway. He recommended involving democratically elected partners, enterprise and regeneration partners and key experts who can all help formulate proposals clearly linked to the socio-economic regeneration following the eventual closure of Hunterston A. Mr Hamilton added that there was no fund or pot of money available, as the NDA do not get money from the Government to support socio-economic regeneration. Funding is all generated through efficiency savings.

Mr Bale concluded that work would now progress in terms of taking this piece of work forward quickly. Mr Bale wished to note that it was unfortunate no representative from B Station was present at this time to witness the discussions as they will be facing the same problems as Hunterston A Site in the future.

7.A HUNTERSTON A SITE REPORT

Mr Roach presented the Hunterston A Site report and explained that on 12 January 2011 Magnox North and Magnox South remerged into a single licence entity called Magnox Limited. He added that there would be some overall reductions made, largely in centralised functions, and as a result, there was likely to be a modest impact at Hunterston A at worst.

Mr Roach also confirmed that the forward funding profile for Hunterston A has been supported by the NDA and it was hoped that the Site can continue to secure their ongoing support in subsequent years.

Mr John Robertson asked if the training programme to enhance skills for the rigging and slinging of loads was a new course. Mr Roach explained that the course was merely an update, as the Site never stops learning with best practises being shared. This is merely a refresher course for those who require the training.



Mr Hugh McGhee referred back to the December 2010 meeting where it was asked of Dr. Adam Meehan if graphite material was thermally stable. As a result of being told that yes, it was stable and difficult to burn, Mr McGhee had carried out some research on this, which showed that graphite presents problems with the sudden release of Wigner heat energy together with carbon dioxide and methane. Mr McGhee asked if this had been taken into consideration in the safety case. Mr Roach confirmed that his answer could not be more of an emphatic yes. He went on to explain that the Wigner energy was attributed ultimately to the cause of the wind scale fire in 1957. This recognised that a significant burst of energy could occur within the graphite core and, if not monitored properly, could propagate a fire. After 1957 and some profitable learning from experience, the view was taken that the fuel elements would be put into graphite sleeves. It is these graphite sleeves today which are being spoken about with regards the opportunity to bury in the ground. Mr Roach added that the burning in the ground being referred to in Mr McGhee's question was another method of treating or disposing of the material which is not favoured in the UK. Mr Roach confirmed that graphite is a very stable material, and stated that Wigner energy is a reactor physics issue.

Mrs Holmes asked if the Wigner energy would still play a part should work to dismantle the reactors start at this point in time. Mr Roach explained that there has been no fuel in the reactor core since 1995, and fuel would be required for the Wigner energy to cause a problem.

Mr Ian Frame asked for clarity on whether the weather barrier at Hunterston A was still secure following the winter months. Mr Roach confirmed that the barrier has gone through full testing and is perfectly engineered.

Mrs Holmes referred to recent flooding and asked if higher activity levels had been found anywhere other than the catchment pits. Mr Roach explained that Mrs Holmes was referring to the issues which happened during September 2010 with the high rise floods, and confirmed that there had been no repeat of these events. He added that the Site's mitigation, which occurs every week, involves a working party of around four or five digging out silt and gravel from a confined space, therefore preventing it from being washed down. Results have shown very little contamination, however if these mitigation activities are not carried out there is the threat of a repeat event, and SEPA have been made aware of these mitigation activities.

Mrs Holmes asked if there was an alternative to people digging this material out of the catchpits. Mr Roach explained that there is an optioneering study underway which highlights several alternatives. As a result, the Site are running an engineering study which will offer recommendations for SEPA and other interested parties to decide the best way forward. Mr Roach highlighted that there is also an affordability issue, given that there is approximately 8000 cubic metres of soil representing a price tag of several millions of pounds when in actual fact, the soil is of no hazardous significance to the environment or the public.

Cllr Barr wished to congratulate the Hunterston A workforce on maintaining its excellent safety record throughout the months of inclement weather.

Mrs Holmes stated that she was pleased to see a future presentation would be given to the group on multimedia and discharge authorisation and asked if this was something which would be in the near future. Mr Roach stated that he did not think this would be presented in the near future.



Mrs Holmes enquired about what funding had been made available for decommissioning the cartridge cooling pond. Mr Roach stated that there has been significant progress made and the Site has secured funding to deal with this particular issue for the next 18 months. Mrs Holmes wished to state that when Fairlie Community Council was detailing their response to the NDA Draft Business Plan, they had supported the Site's request for additional funding.

7.B NUCLEAR DECOMMISSIONING AUTHORITY

Mr Dave Rushton presented the NDA report before welcoming any questions from the group.

Mr Rushton stated that the number one priority across all industries, especially nuclear, was safety. He thanked Magnox for the efforts being taken to continually improve upon its safety record.

Mr Rushton was pleased to note that Hunterston A was looking towards a good year end in terms of project performance and was on target to meet the various efficiency challenges set by the NDA.

With regards the NDA Draft Business Plan, Mr Rushton explained that this was due to be published towards the end of March 2011, but stated it does require approval from both the Scottish and UK Governments, as does the NDA Draft Strategy.

Finally, with regards to the NDA Draft Business Plan, Mr Rushton wished to note that it is not the NDA's policy to respond to every response they receive, however all comments are taken into consideration.

7.C SEPA REPORT

Mr Ian Robertson took the SEPA report as read, but wished to comment that SEPA are taking a close interest in the long term measures being considered for a satisfactory solution to the contamination in the Site's CP7 compound area.

In reference to an earlier question regarding Hunterston A Site's co-operation with SEPA, Mr Robertson confirmed that SEPA is entirely satisfied with the co-operation received from personnel.

7.D NII REPORT

In the absence of Mr Chris Kemp, to the report was taken as read without any questions.

8. AOCB

Mr Bale explained that an application had been received from Saltcats Community Council to have a representative on the SSG. Following discussions at the annual housekeeping meeting, it was agreed in principal that there were no objections to this request. However, the constitution would have to be amended accordingly to allow for this.

9. DATE & VENUE OF NEXT MEETING

The date and venue of the next meeting was confirmed as Thursday 2 June 2011 at 1.30pm in the Seamill Hydro, West Kilbride.

Mr Tony Bale
SSG Chairman

SSG Socio-Economic Subgroup Update

During the previous Site Stakeholder Group meeting on Thursday 3 March 2011, an agreement was recorded that the above sub group should be a small but balanced panel. The sub group will deal with socio-economic matters directly before reporting back to the main SSG as and when required.

Those invited to represent the socio-economic sub group are as follows:

<u>Name</u>	<u>Representing</u>
Mr Douglas MacFarlane	Largs Community Council
Mr John Lamb	West Kilbride Community Council
Mrs Rita Homes	Fairlie Community Council
Councillor Elizabeth McLardy	North Ayrshire Council
Councillor Alex Gallagher	North Ayrshire Council
Councillor Robert Barr	North Ayrshire Council
Mr Mark Cullinane	Magnox Ltd, Hunterston A
Mr Stuart McGhie	British Energy, Hunterston B
Mr Tony Bale	Chair

The subgroup held their first meeting on Monday 9 May 2011, at Hunterston A Site. The following discussions took place:

It was agreed that the remit of the group was to focus on having North Ayrshire recognised by the NDA as a high priority area within their Socio-Economic Policy. This is based around the final Hall Aitken Feasibility Study Report (to be finalised using current data such as current unemployment figures) being submitted to the NDA as a form of evidence. **ACTION: M. CULLINANE**

In order to achieve NDA funding, it was agreed that a unified approach must be taken which meets the local authority's economic strategy. It is a criteria of the NDA's socio-economic strategy that a partnership must be formalised with local authorities and Enterprise Networks in Scotland.

An action was placed to arrange a further meeting within the given timescale of six weeks. Invitations will be extended to the following bodies for further discussions:

NDA
Scottish Government
Scottish Enterprise
North Ayrshire Council
Irvine Bay Urban Regeneration Company
ACTION: D. ROONEY

Three requests for funding applications had been received for consideration by the subgroup. These were subsequently endorsed and submitted to NDA for consideration.

- Refurbishment of the West Kilbride Community Centre
- University Marine Biology Station, Millport
- Set-up of Trust to support youngsters throughout North Ayrshire gain skills



HUNTERSTON A STAKEHOLDER REPORT JUNE 2011

**HUNTERSTON A
SITE DIRECTOR'S REPORT TO THE SITE STAKEHOLDER GROUP
2 JUNE 2011**

Hunterston A has continued to make good progress on our programme of work and the Site remains very busy. We continue to be well supported by the NDA and committed to addressing the nuclear liabilities at Hunterston A in a safe, secure manner with care for the environment.

1 SAFETY, SECURITY and ENVIRONMENTAL OVERVIEW

1.1 Safety Performance

Site safety performance continues to improve with the site now having achieved 14 months with no injuries requiring more than basic first aid and 2 years since the last lost time accident. The 12 month rolling Day Away Case Rate and Total Recordable Incidence Rate therefore remain at zero. With almost 800000 man hours worked during 2010/11 this is a significant achievement.

The Site was again delighted to have been recognised for its excellent safety performance by the Royal Society for the Prevention of Accidents who awarded Hunterston A with a Gold Medal Award in recognition of the Site having achieved six consecutive Gold Achievement Awards.

1.2 Learning and Improvement

With construction work being the main work activity on site, it is not perhaps surprising that the management of work at height remains the site's major challenge with regards health and safety. As a consequence the site have produced and delivered a training module to all persons who have duties for organisation and planning, supervision of work at height activities and persons who carryout work at height. Feedback from trainees has been very positive.

The Site's Safety & Learning Drop-in Centre, introduced as a Safety and Environmental Enhancement Plant target, has proved a valuable asset to the site and has been considered as an example of "best practise" within the industry by numerous visitors and inspectors.

Targeting continuous improvement in safety by further embedment of the Human Performance Error Avoidance Tools continues. The routine application of the tools by the workforce has been a major contributory factor to the continuous improvement in safety performance. However, with a migratory contractual workforce, it is recognised that continual reinforcement of the benefits from applying the tools will be an ongoing process.

2 DECOMMISSIONING PROGRESS

2.1 Pond

The pond decommissioning team have completed the bulk desludging, recovery and disposal of a range of small components and some larger plant items from the pond. The team are now progressing with preparations to commence the pond dewatering activities. During dewatering the pond walls will be decontaminated and sealed. The installation of the equipment to do the decontamination and sealing is progressing well.

2.2 Land Quality Management

There are two main elements of work currently being undertaken by the Land Quality Management Project:

- 1) Remediation of the CP7 compound
- 2) Restoration of the Very Low Level Waste (VLLW) pits

Remediation of the CP7 compound

Whilst monitoring, sampling and weekly clean out of contaminated silts from catchpits is ongoing, the project has focussed on the development of long term options for the remediation of the CP7 contamination issue. A preliminary options study has been completed and a short list of two options is being developed further. The options are;

- 1). A complete excavation of all known contamination, including removal and replacement of existing drainage.
- 2). An in-situ remediation involving the immobilisation and isolation of activity, including the grouting and replacement of existing drainage.

SEPA has been briefed on the initial options and we continue to work with them in developing a solution to this issue.

Restoration of the VLLW Pits

After an extensive options study which involved consultation with the SSG and, in particular, the Land Quality subgroup, the restoration of the VLLW pits at Hunterston A has now been completed. The restoration was designed to:

- Provide an enhanced barrier for the VLLW Pits in order to prevent intrusion by burrowing animals.
- Improve safe movement across the area by staff and members of the public.
- Improve the visual appearance of the area whilst maintaining the local ecology in keeping with the Site Biodiversity Action Plan.

Restoration was completed during March 2011.

2.3 Solid ILW Retrieval

The final stages of plant installation on site are well underway with the building substantially complete, all the equipment on-site and the majority in their final position. The building incorporates a number of independent systems that facilitate the retrieval, handling and placement of the waste form in the standard waste packages. A number of these systems have been powered-up to allow static and function checks to commence. The work is being undertaken in a progressive phased manner and over the next two months the objective is to complete energising all systems and the functional testing. This will allow completion of the inactive commissioning phase and subsequent demonstration that the facility can retrieve the waste and package it at the specified rate.

In parallel, completion of the cross-site transporter vehicle for the movement of the filled waste packages is nearing completion. The cross-site transporter vehicle comprises of a tractor unit, similar to that seen at airports, with a trailer that carries a shielded overpack in which the filled package is placed. The trailer unit is able to be operated using a fully automatic guidance system which has been demonstrated during the setting to work phase of the project. Minor modifications to the trailer are ongoing to enhance operability and reliability with an anticipated delivery date to Hunterston A Site of June.

2.4 Wet ILW

Since the last SSG meeting, construction work on the project has continued with a number of contractors working together to complete the construction phase of the project. There is still a fair amount of work to do; however, we anticipate that the construction phase will be complete by early summer.

As the construction phase nears its end, preparations for the commissioning phase of the project are starting to gather momentum. Over the next couple of months, we will be working with our contractors to ensure that the commissioning of the facility is planned out correctly. One of the key pieces of documentation to support this next phase is the commissioning safety case that will be sent for Independent Nuclear Safety Assessment (INSA).

An OJEU notice has recently been placed for the operational drums that will be used to contain the ILW that will be recovered from the site and over the next period, we will be identifying suppliers for the consumables that the facility will require to operate.

2.5 Graphite Pathfinder Project

All investigative and environmental reports are now complete and the first phase of the feasibility study has reached completion. No safety, technical or environmental issues have been identified within the Pathfinder Project thus far which would preclude near site, near surface disposal of Higher Active Waste (intermediate level waste). Further NDA funding is currently being sought for 2011/2012 for the continued development of the Graphite Pathfinder Project.

A lesson's learned workshop was undertaken during February 2011. This workshop included attendance by key regulatory stakeholders, the NDA and key members of the supply chain. The output of this workshop was used as the basis for an Interactive Planning Session for the project going forward.

The output of the Interactive Planning Session assisted with the production of a business case, forward programme of works, scoping documentation and underpinning basis of estimate for the next twelve months of work within the Graphite Pathfinder Project.

The project is currently awaiting feedback from SEPA with respect to the Environmental Safety Case. Feedback/comments will be incorporated into a further draft of the Environmental Safety Case (ESC) using a Process by Agreement with the regulator.

The next steps are to:

- Secure funding for the next phase of the Graphite Pathfinder Project.
- Incorporate comments from regulators into the ESC and supporting documentation.
- To investigate/provide further underpinning to support near site, near surface disposal in line with the Scottish Government Higher Activity Waste policy and the regulatory guidance.

The Project continues to engage with a wide range of stakeholders and approximately 300 individuals have now visited Hunterston A Site, receiving an overview of the Graphite Pathfinder Project feasibility study and a range of Site wide activities. A Graphite Pathfinder Project email address and phone number are available to encourage dialogue with all stakeholders. Please email: graphitepathfinder@magnoxnorthsites.com or alternatively telephone **01294 824125**.

3 PEOPLE

3.1 Employee Relations

Sickness absence at Hunterston A is averaging 4.36 days lost over the past rolling 12 month period (2.22 days short term sick and 2.13 days long term sick) compared to the Company target of 6.25 days.

Recruitment activity at present continues to focus on the Engineering department with interviews for internal positions taking place this month.

Health Promotions: During the period Occupational Health gave a promotion on opportunities for healthy eating including physical fitness within corporate membership schemes with a local provider.

A team co-ordinated by Occupational Health have presented their evidence for the 'Health Working Lives' Award to Ayrshire & Arran Health Board and have achieved a Bronze Award. Work now begins towards attaining the Silver Award status next year.

Work continues to manage the 2 into 1 Transition. Feedback following 'best fit' for support functions has now been completed. The Projects department have completed their Aspirational counselling one to ones with 'best fit' sessions beginning in May.

3.2 Learning and Development

As part of the Magnox Limited commitment to maintain and continuously build on the skills and knowledge of all that work at Site, the following provides examples of the learning interventions currently in progress at Hunterston A.

In support of the ethos of continuous improvement, Working at Height workshops have been developed in support of the Construction Design and Management regulations training programme. Key members of staff who are involved in this type of work are actively participating in the workshops which have received very favourable responses. Further workshops are being developed to further support this programme to ensure that a high level of competency is maintained.

The Hunterston A lifting specialists have now completed the training programme mentioned in the previous report. This has resulted in formal recognition through the Construction Plant Competence Scheme.

The Leadership Development Programme for current and potential line managers continues with four having successfully completed all of the required elements awaiting graduation in July. A further eleven delegates remain on the programme, and once they have completed all of their written work and projects will be joining the four summer graduates as they continue to ensure that Magnox Limited has competent and effective leadership within the business.

4 ENVIRONMENT

4.1 Radioactive Discharges

Solid

Low Level Waste (LLW) discharges to the Low Level Waste Repository (LLWR) continue. Discharges over the 12 month period from April 2010 to March 2011 equate to 100.6m³, representing 17% of our authorised disposal limit. Radioactive nuclide content of this waste was well below authorised limits. The main contributions to the waste consignments were from decommissioning projects such as SAWBR and wet ILW ground-works and pond cleanup operations.

Liquid

Liquid radioactive discharges during the period April 2010 to March 2011 were made at levels that represent less than 2.2% for total beta, 0.03% for Plutonium-241, 0.03% for Tritium and 0.92% for total alpha, of the Site's authorised discharge limit. The main contributions to the discharges were from miscellaneous sources on the Site, predominantly plant wash-down activities and filter backwashes.

Gaseous

Gaseous radioactive discharges during the period April 2010 to March 2011 were made at levels that represent 4.6% for Tritium, 4.5% for Carbon-14 and 0.83% for Beta particulate of the Site's authorised discharge limit. The main contributions to the discharges were from ventilation systems operating in contamination controlled areas and reactor vessel 'breathing'.

High Volume Very Low Level Waste (HVLLW)

The Site has received a varied Radioactive Substances Act (RSA) authorisation to allow disposal of HVLLW. It is likely that this waste will start to be consigned to the LLWR later in the year.

New Authorisation Application

The Site has submitted to SEPA an application for a new 'multimedia' authorisation for radioactive discharges. This authorisation (when granted by SEPA) will replace the Site's three current authorisations (solid, liquid and gaseous). This 'multimedia' authorisation will require substantial changes to the management systems and procedures involved on the Hunterston A Site.

As part of this work the Site will be preparing a presentation to the SSG on the details of the application, to be held at a future date.

The Site has been preparing to revise liquid discharge procedures ahead of receiving a new liquid discharge authorisation from SEPA which will include limits on conventional pollutants. This is part of an exercise to bring existing Radioactive Substances Act liquid discharge authorisations into line with Controlled Activities Regulations authorisations.

4.2 Non-radiological Environmental update

Environmental protection activities have included surveillance of the sewage treatment plant, including the analysis of discharge samples, sampling and analysis of effluent discharges relating to the liquid and gaseous discharge systems, monitoring electricity and water usage, examination of recycling opportunities and undertaking actions specified in its Biodiversity Action Plan.

The Site Environmental Committee continues to meet every three months and continues to review ways of promoting environmental awareness.

4.3 Environmental Events

There were no environmental events in the period February 2011 to April 2011.

5 RADIOLOGICAL SAFETY

Explanatory note: The maximum permissible dose to a radiation worker in the UK is 20mSv (milliSieverts) in a calendar year. The average annual radiation dose to the UK population from all sources is 2.6mSv. Collective dose is usually measured in man.milliSieverts. For example, if ten people were each to receive 0.1milliSieverts during a particular task, then the collective dose for the task would be 10 people x 0.1mSv each = 1 man.milliSievert.

Doses for the calendar year 2011 (up to 31 March 2011) are as follows;

- Employees received a collective dose of 3.618 man.mSv;
- Contractors received a collective dose of 10.380 man.mSv;
- The highest individual dose received by an employee was 0.411 mSv;
- The highest individual dose received by a contractor was 0.930 mSv.

The majority of dose accrued in 2011 has been from a combination of the Cartridge Cooling Pond decommissioning projects and other Site projects. All doses in these projects have been prior-assessed, planned and are tracked throughout the project duration to ensure that no limits are exceeded.

5.1 Radiological Events

There were no radiological events in the period from 28th February 2011 to 6th May 2011.

6 EMERGENCY PREPAREDNESS

Hunterston A has been building up to its annual level one demonstration, held on Thursday 19 May. The duty teams have been exercising continuously and recently took part in a Peer Assist exercise on 21 April to company observers who deemed the exercise an adequate test of the site's emergency arrangements.

Following completion of a proving exercise, a new Emergency Controller has now taken up position within the Emergency Control team and another Emergency Controller is currently in training. An Administration Officer and an Assistant Access Controller have also completed training and join their colleagues in the emergency teams.

7 NATIONAL MATTERS THAT LINK TO HUNTERSTON A

NDA Strategy to deliver clean-up mission approved by Government

The UK Government and the Scottish Ministers have approved the NDA's new Strategy. This statutory document sets the direction for delivering the nuclear clean-up programme.

Lord Marland, Parliamentary under Secretary of State in the Department for Energy and Climate Change, said: "Tackling the nuclear legacy is an absolute priority. I am keen to see it dealt with vigorously. It is fundamental that we tackle this legacy rather than leave it to future generations. As such I thoroughly endorse this Strategy and the work being done by the NDA."

Tony Fountain, NDA Chief Executive, said: "Our Strategy provides us with a clear view of our 10 to 20 year priorities and the scope of work across our 19 sites. The NDA is a small strategic authority; key to our success is translating strategy into clear plans and selecting the right delivery partners to execute them efficiently. We are seeing the best international contractors competing for UK business and in so doing building UK supply chain capability for the future."

"Hazard reduction is our absolute priority and that is why we are prioritising our resources to tackle our most challenging facilities. I believe we are well placed to deliver real success over the next 10 to 20 years by when we will have made significant inroads at Sellafield and Dounreay, delivered all Magnox reactors into their 'Care and Maintenance' phase, completed the decommissioning of the Harwell and Winfrith sites and be well on the way towards developing a geological disposal facility."

The approval of the Strategy follows an extensive period of engagement with stakeholders during 2009 and 2010, including a formal consultation exercise undertaken between September and November 2010. The Strategy has been approved by the Secretary of State for Energy and Climate Change, jointly with the Scottish Ministers as required by the Energy Act 2004.

2010 Radioactive Waste Inventory published

The latest United Kingdom Radioactive Waste Inventory was published on 22 March 2011.

The UK Radioactive Waste Inventory, currently updated every three years, is provided by the NDA and Department of Energy and Climate Change (DECC). The information, like that from previous Inventories, is being made publicly available.

The inventory describes the stocks of radioactive waste and radioactive materials held in the UK at 1 April 2010. It also predicts wastes and materials that could arise from the operation and decommissioning of current facilities in the future.

The documents are available to view online by visiting **www.nda.gov.uk/ukinventory**

Hard copies will be lodged with the British Library for general access. Other organisations and individuals can obtain hard copies of the reports from NDA.

NDA Publishes New Business Plan

The NDA 2011/12 Business Plan sets out planned annual expenditure of £2.9 billion as part of a four year total of approximately £12 billion in line with the UK Government's spending review announced last October. This represents a strong and sustained investment in the UK nuclear clean-up programme.

The Business Plan supports the taking forward of an optimised approach within the Magnox fleet, identifying Trawsfynydd and Bradwell as lead sites for accelerated decommissioning. Further progress will be made in defueling at Chapelcross, Sizewell A and Dungeness A with generation continuing at Oldbury and Wylfa. Annual expenditure across the Magnox sites is planned at £0.65 billion. Continued progress will be made in decommissioning at Dounreay with construction commencing on the new Low Level Waste repository; within an annual site funding of around £150 million.

For more information and to download the new Business Plan, please visit **www.nda.gov.uk/news/business-plan2011-2014.cfm**

8 PA/PR ACTIVITIES/CHARITABLE DONATIONS

Hunterston A is delighted to continue supporting the local community by funding worthwhile groups and organisations. The following highlights groups which have been allocated funding by Hunterston A since March 2011:

<i>Soc-Ec & Charity Donations:</i>	£
Ardeer Primary School	2,500
Largs Viking Festival	2,000
Mayfield Primary School	1,500
Saltcoats Victoria Football Club	1,500
Ardrossan Castle Rovers AFC	1,500
Ardrossan Winton Community Sports Club	1,500
West Kilbride Village Hall	1,500
West Kilbride Out of School Care	1,000
The Butterfly Club	1,000

North Ayrshire Amateur Swimming Club	950
MacMillan Cancer Support	500
KCFC Garnock Valley Youth	500
West Kilbride Scarecrow Festival	500
FE-FE's School of Dance	500
Chernobyl Children Life Line	400
Fairlie Gala Committee	250
Zephyr Blast Dance Academy	250
St.Mary's Parent Council	250
Largs Academy	150
Total	£18,250

9 SITE VISITS

Hunterston A Site continues to attract the right kind of interest through our excellent performance. A selection of visitors during the period included:-

3 March 2011	Elizabeth Gray, Scottish Government, visit to Site
5 & 6 March 2011	Public Tours of ILW Store and Project Exhibition
24 March 2011	Hunterston A hosting Parent Body Organisation Board Meeting
31 March 2011	Elected Council Members visit to Site
4 April 2011	Gary Voorheis, Chief Operating Officer for Decommissioning Sites, Magnox Ltd, visit to Site
9 & 10 April 2011	Public Tours of ILW Store and Project Exhibition
12 April 2011	Dr Brian Burnett and Mike Calloway, NDA, visit to Site
16 & 17 April 2011	Public Tours of ILW Store and Project Exhibition
11 May 2011	Ian Bretherton and Bruce Archer, NII, visit to Site
20 May 2011	Scottish MP's visit to Site

NDA Monthly Update

April 2011

Summary

- The latest Business Plan has now been published
- The 2010 Radioactive Waste Inventory is now available on the website
- UK Government and Scottish Ministers have approved Strategy II
- Safety documents produced for Geological Disposal Facility
- Revised plutonium options paper published.
- The latest edition of the [NDA's Insight](#) magazine is now available.
- Work has started on construction of a new £20 million nuclear research facility in Cumbria.
- Magnox North and Magnox South have completed their reintegration into Magnox Ltd.

Diary Dates

- | | |
|---|--------------------|
| • National Engagement Plan published | 7 April |
| • Sellafield Plan finalised | End of May |
| • SSG Chairs' Forum | Late June |
| • Annual Report and Accounts laid before Parliament | July (provisional) |

NDA Monthly Update – March 2011

Business Plan 2011/2012 published

The NDA 2011/12 Business Plan sets out planned annual expenditure of £2.9 billion as part of a four-year total of approximately £12 billion, in line with the UK Government's spending review announced last October. This represents a strong and sustained investment in the UK nuclear clean-up programme.

The priority continues to be tackling the highest hazards, with an accelerated programme of risk and hazard reduction underway at Sellafield as well as challenging targets set for reprocessing and vitrification of highly active liquors. Annual expenditure at Sellafield is planned at £1.55 billion and includes the continued construction of Evaporator D, currently the largest single project in the UK nuclear estate.

[NDA Business Plan 2011 - 2014](#)

Latest Radioactive Waste Inventory published

The latest UK Radioactive Waste Inventory has been published. Provided by the NDA and Department of Energy and Climate Change (DECC) and currently updated every three years, the 2010 Inventory describes the stocks of radioactive waste and radioactive materials held in the UK at 1 April 2010. It also predicts wastes and materials that could arise from the operation and decommissioning of current facilities in the future. Existing stocks and future estimates change over time as waste is treated and packaged, regulations are amended, technology and plans change and forecasts are refined.

[UK Radioactive Waste Inventory \(as at 1 April 2010\) Website](#)

Updated Strategy approved

The UK Government and the Scottish Ministers have approved the NDA's new Strategy which sets the direction for delivering the nuclear clean-up programme. The approval of the Strategy follows an extensive period of engagement with stakeholders during 2009 and 2010, including a formal consultation exercise undertaken between September and November 2010. The Strategy has been approved by the Secretary of State for Energy and Climate Change, jointly with the Scottish Ministers as required by the Energy Act 2004.

[Strategy - Effective from April 2011 \(full colour version\)](#)

Reports outline safety factors for geological disposal

Safeguards for the public, the workforce and the environment against exposure to radiation through a multi-barrier approach are vital to the safe disposal of the UK's higher activity radioactive waste. These are the major considerations for the NDA's Radioactive Waste Management Directorate's (RWMD) scientists and engineers who are working on plans to safely and securely build a deep underground disposal facility which will keep the radioactive materials isolated from the environment for hundreds of thousands of

NDA Monthly Update – March 2011

years. RWMD has now published a suite of scientific and technical reports, known as the Disposal System Safety Case, which explain all the safety factors that need to be considered when an application is submitted to the nuclear regulators for permission to operate such a facility.

[More information on the generic Disposal System Safety Case \(DSSC\) for geological disposal of radioactive waste](#)

Plutonium options paper published

The NDA has published an updated version of the Plutonium Credible Options Analysis which takes account of a number of new developments since the original paper published in January 2009. In particular, a further option has been added, of reuse of plutonium as MOX fuel in UK new nuclear power stations for consideration. This updated report has been forwarded to Government with the aim of informing its consideration of the future policy framework which will facilitate decision-making in this area. To this end the Government has also launched a public consultation.

[NDA Plutonium Strategy - Current Position January 2011](#)

[Plutonium Credible Options Analysis 2010 \(redacted\)](#)

Newsletter available

The latest edition of the NDA's stakeholder magazine Insight is now published, available on the website or as hard copy.

[Insight into Nuclear Decommissioning - Newsletter Edition 5](#)

Work starts on research facility

Construction work has started on the foundations for a new £20 million nuclear research centre in West Cumbria. The Dalton Cumbrian Facility (DCF) is being constructed on the Westlakes Science and Technology Park, near Whitehaven, and is scheduled to open in September 2011. DCF will be a new research base for The University of Manchester's Dalton Nuclear Institute and is the result of joint investment by the University and the Nuclear Decommissioning Authority (NDA). DCF is designed to expand the nuclear research and education capability of the UK's university sector and has the overall aim of delivering world-class nuclear research and transferring knowledge to industry.

[Dalton Cumbrian Facility Brochure](#)

Magnox reintegration

Magnox North and Magnox South have completed their reintegration into a single legal entity, named Magnox Ltd. In the short term, the Magnox South and Magnox North groups will become separate business groups of Magnox Ltd. In the longer term, they will transition to three groups that better fit with their plans to take forward operations and decommissioning.

Draft NDA Business Plan 2011-14

Response to Consultation

March 2011

INTRODUCTION

During our consultation period we received 15 responses. The responses we received were from a broad range of stakeholders including Regulators, Site Stakeholder Groups, Local Authorities and Site Licence Company employees as well as members of the public. The consultation on last year's plan generated 30 responses from a similar cross-section of stakeholders.

1. GENERAL

	COMMENTS	ACTIONS
1.1	I support the move to reduce support costs in the SLC where possible. I trust that sensible definitions are used to avoid unreasonable pressure on the SLC. Thus, for example, there is little in the short term that the SLC can do about CNC costs, which are a significant cost on some sites.	Noted
1.2	I am pleased to see that the Magnox sites seem to be funded at a level which will allow some key projects to continue such as recovery of wastes from the Berkeley vaults which are not a satisfactory long term storage facility. The work at Bradwell and Trawsfynydd appears to be directed to getting the sites into earlier care and maintenance which is an important step.	Noted
1.3	I was VERY pleased to see that RSRL will be developing plans for transfers of fuel and ILW from the Harwell site. This has been an aspiration for many years and has the potential to reduce total costs to the NDA significantly. The work will require significant input from other SLC's and I trust that the NDA will facilitate the interactions. This is a very good example of where the NDA can add value by facilitating cross SLC activities.	Noted. With the recent organisation re-structure this will be coordinated through our new National Programmes team.
1.4	The style, of the section on the LLWR is quite detailed. A pity that more detail could not have been supplied for Sellafeld.	Noted
1.5	I note that DRS is covered in appendix 6. I continue to be surprised that the NDA owns DRS. Indeed the strategy appears to be to develop DRS as a general rail freight business. This might be a precursor to sale of the business but is this really what NDA should be doing.	DRS play an important role in the delivery of the MOP Programme. Where possible NDA utilises assets to offset public funding requirements.
1.6	On Page 15 of the document, the 6 SLCs are named and details given. Can you ensure that in both NMP and UKNWM "URS Washington Division" is changed simply to "URS". Our American parent body removed "Washington Division" from its title a few months ago.	Washington removed as requested.
1.7	Although its title suggests that it covers the next three years (to 2014), nowhere within it is there any detail of the budgets for any year other than the current one (2011-2012).	The publication of our draft Business Plan is determined by timescales fixed by Government and the latest version has come hard on the heels of a major consultation exercise around our new draft Strategy and the Government's announcement of the funding settlement for the next four years. See updated table in Appendix 5.
1.8	If this document is evidence of the lack of care given to planning and financial control within NDA, then it is no wonder that so little progress has been (and probably will continue to be) made.	Noted. The Business Plan is a high level view of activities across the estate, not a detailed project plan.
1.9	As stated in our comments on the draft strategy, we consider it appropriate to consolidate interim storage at a reduced number of sites, as long as this is supported by the relevant local authorities in the light of the overall balance of benefits and disadvantages. It will therefore, be necessary to engage with the relevant local authorities before reaching site specific decisions about consolidation. The relevant authorities will wish to consider a range of factors, including whether planning permission is	Comments noted, NDA recognises the need to engage with communities affected by all waste management activities.

1.10	<p>required, consistency with Local development Frameworks, and local socio-economic impacts.</p> <p>There is some inconsistency in the way that DFR breeder is described in various parts of the document. For example:</p> <p>Page 11 - Spent Fuels: "Site Export capability completed for out of reactor breeder fuel transfers to Sellafield"</p> <p>Page 12 - Nuclear Materials: "Start removal of out of reactor DFR breeder material"</p> <p>Page 17 - Sellafield Limited SLC Summary - Spent Fuels: "Progress capability to receive and reprocess DFR Fuel at Sellafield"</p> <p>Page 18 - Sellafield Limited SLC Summary - Spent Fuels: "Complete the capability to transfer DFR Fuel to Sellafield"</p> <p>Page 32 - DSRL SLC Summary, Spent Fuels 2011-12: The statement "Site export capability completed for out of reactor breeder fuel transfer to Sellafield" seems to align with the Sellafield summary. However, the Nuclear Materials section on the same page says "Start removal of out of reactor breeder material which seems to be misaligned with the spent fuels statement for Sellafield."</p> <p>Page 33 - DSRL SLC Summary - This refers to the "out of reactor breeder flask shipments to Sellafield" being completed. This looks odd as the Sellafield capability to receive the material is only completed in this timescale.</p> <p>In order to ensure clarity we suggest that consistent terminology is used for the breeder (i.e. either refer to it as "breeder material" or "breeder fuel") and that it is categorised under the heading of "Spent Fuel" throughout the document. We further suggest that a check is made to ensure that the detailed programmed for despatch and receipt of breeder material/ fuel at Dounreay /Sellafield are fully aligned.</p> <p>In summary we support NDA's Business Plan strategic objectives and mission statement. Would like to see the important aspect of NDA's contribution in enabling potential new nuclear stations in the future.</p>	Text updated.
1.11		As a Decommissioning Authority we have no specific role in the new build programme other than support to Government when required.
1.12	As with the previous business plan this document is focussed upon what the NDA's priorities are, however, we believe that it lacks in providing the information of how these will be achieved, which we believe is fundamental to delivering a successful business plan.	Noted. The Business Plan is a high level view of activities across the estate, not a detailed project plan.
1.13	I would like to thank NDA, Energy Solutions and Magnox Ltd in seeking to develop the long term sustainability of the area and would hope the NDA continues this work and to pursue options regarding extending the possibility of continued electricity generation until 2014. Such work is important to ensure that the Wylfa workforce is retained on the island in the period leading up to the completion of new nuclear build.	Noted
1.14	A minor point is that on page 14 of the draft business plan (Appendix 1 – NDA Sites Location Map) the location of Dounreay and Forss has been reversed and are therefore shown in the wrong location.	Map amended
1.15	The overall size of the programme is encouraging given the pressures on public spending.	Noted
1.16	Reconsider future of National Nuclear Archives: We have raised concerns about the progress of this project in the past and are disappointed at the recent announcements about lack of funding at this time. Members will continue to take an active interest in this project and look forward to seeing the National Nuclear Archive built in Caithness in the future.	Noted
1.17	We welcome the way the draft business plan is structured to reflect strategic themes, but would welcome clarification of how the new strategy, once adopted in Spring 2011, will begin to influence the	Our Business Plan is the vehicle through which detailed milestones and outcomes are set out for a three year period. We will consider

	business planning process and when we might expect to start to see its impact reflected in subsequent business plans.	whether we can include a medium term picture of milestones and outcomes in next year's Business Plan to enable stakeholders to gain a better understanding of intended progress beyond the three year plan. The Strategy Management System and engagement in its development will impact future business plans as preferred options are matured and adopted.
1.18	Combined development of skills and people strategy: We believe that this is a sensible way forward and request that NDA provide information on this, as part of the NDA's commitment to engage, at the appropriate time.	Noted
1.19	Review delivery of NDA's socio economic obligations: We would welcome early engagement on NDA's current thinking on the delivery of NDA's obligations for socio economics.	Noted. We now have a business led engagement model to be published on the NDA website 1 April 2011.
1.20	Embed new ways of working in the NDA and estate following the organisational review: We believe that this needs to be carried out as soon as possible to avoid misunderstandings or duplication of effort. If NDA are taking a more 'hands-off' approach this must be done right across the estate and clear guidelines on 'NDA's new ways of working' is now urgent to allow sites to deliver the decommissioning of their sites.	The organisational effectiveness review is nearing completion and will be effective from 01/04/2011. SLCs are, and will continue to be, involved with the development of the new model.
1.21	Development of plans for disposal of VLLW - we would expect to see this activity listed in the planned activities for most other sites, but note that currently it is not. We assume that this is an oversight, as such plans will need to be developed at various sites (and this should be done in liaison with the relevant local authorities).	Noted

2. FUNDING/ BUDGET

	COMMENTS	ACTIONS
2.1	In the appendix 5 there is mention of R and D expenditure which is grouped with other items. I suspect that some of this spend is for work carried out by the NNL. I would have liked to see some specific mention of the objectives etc of the work.	NNL is not reliant solely on NDA for funding therefore we would not publish their activities in our business plan.
2.2	In appendix 5 I notice that some asset sales are expected to contribute £157M in 2011/12. This appears to be a very volatile market and I would hope that the SLC are protected in some way from cuts if the asset sales fall short of the predictions.	Noted
2.3	Whilst future budgets might be open to uncertainty, the report should at least have been able to talk in "ball-park" terms (for example, to the nearest £0.1m). Page 8 suggests that Government funding has been secured for the next four years (to 2015) - what is this funding, and what are NDA's expected incomes from commercial activities during this time.	See updated table in Appendix 5. We are now able to give you forecast figures for the next four years both for government funding and the NDA's expected incomes from commercial activities. Please note that forecast NDA commercial income is reliant on ageing operating plant and support infrastructure, and so is subject to change.
2.4	We welcome that the funding commitment to socio-economic, skills, knowledge management and R&D remains consistent, as reflected in Appendix 5. However, it would be beneficial, as in 2010/11, to breakdown these categories independently.	Noted
2.5	We welcome the positive outcome that has been secured from the Governments Spending Review (SR) and the high-level explanation in the CEO's Foreword and the statement about 'Our Funding'.	We have included a table showing the 4 year Spending Review outcome. Our Business Plan is the vehicle through which detailed

	<p>We think that there would be value in providing further clarification of how the PVP and SR outcomes have been translated into the proposals in the draft Business Plan. We understand that the planned expenditure for 2011-12 is firm but further analysis is needed to confirm or amend planned key activities in 2012-14. The CEO's Foreword refers to this need and points to the likely deferral of some scope of work, but there is no clear explanation in the draft plan of what the further analysis will entail and what scope might include.</p>	<p>milestones and outcomes are set out for a three year period. We will consider whether we can include a medium term picture of milestones and outcomes in next year's Business Plan to enable stakeholders to gain a better understanding of intended progress beyond the three year plan.</p>
2.6	<p>It is imperative that predictability of funding is given to each site to allow them to build robust lifetime plans. Continuity of funding also allows sites to reach its interim states with retention of the skills required to complete the mission. The impact of site closure, the lifetime plan dates, should also be taken into account when it comes to allocating appropriate funding.</p>	<p>Noted</p>
2.7	<p>The projects would appear to be in keeping with the NDA's prioritisation and allocation of funding (page 8) where priority will be focussed on 'the highest hazards and risks'.</p>	<p>Noted</p>
2.8	<p>Appendix 5 – 2011-2012 Planned Income and Expenditure Summary, page 42 Finally, we would expect to see an amendment to the cost of decommissioning and clean up for Hunterston A as indicated in Appendix 5 page 42, to show additional funding for other projects.</p>	<p>The SLC will determine the funding which is rolled into the Magnox Optimised Decommissioning Programme (MODP) proposal that the NDA have accepted. The funding where applicable is included in the figure on page 40. (Funding future projects will be balanced against other site priorities.)</p>
2.9	<p>We welcome publication of the table, but would find it helpful if footnotes were included to explain the reasons where expenditure at specific sites for 2011-12 will be significantly different to expenditure in 2010-11.</p>	<p>Noted</p>
2.10	<p>We note on page 20 of the Draft Business Plan the NDA comment that "There are 10 Magnox sites, each at different points in their lifecycles: two are still generating, and extensions are actively being sought to maximise commercial income". However, when looking at Appendix 5, Table 1 '2011/2012 Planned Income and Expenditure Summary' lists the operating costs of Oldbury as £74M and Wyifa as £81M, totalling £155M in operating costs for these generating reactors, Table 3 '2011/2012 Breakdown of Income by Category' lists the income from electricity generation as £141M. This appears to be a net loss from electricity generation of £14M. SEPA would appreciate clarification on this issue.</p>	<p>Table 1 shows the costs of running Wyifa and Oldbury and table 3 shows the income from these two sites. Oldbury is due to stop generating in June 11, therefore the costs don't go down in the same proportion when generation stops. We have an aspiration to continue Reactor 1 at Oldbury beyond June 2011 for a short period and to continue running both Wyifa Reactors for a short period beyond 2012. This is dependant on regulator approval.</p>
2.11	<p>We welcome the maintenance of on site expenditure on socio economic support, skills development, knowledge management and R&D at £21M. However, we note that this funding in the next FY is not disaggregated. We understand that it is proposed to invite external organisations nationally to bid for the £21M and NDA will award funding on the basis of strongest bids. Ring-fencing appears to have been removed from socio economic funding and it is not clear whether the four areas across the UK that have been prioritised by NDA for socio economic support will continue to be prioritised. We would welcome clarification about how the NDA intends to move forward, including how future non site funding is to be administered and the criteria that will be applied in the determination of funding applications.</p>	<p>Allocation of funding will depend on the quality of business case submissions received and approved in line with the Socio Economic Policy.</p>
2.12	<p>The NDA's socio-economic commitment has been significant to Anglesey and the wider North West Wales region in the past with funding secured to pursue socio-economic projects such as Ysgol y Mor and development of the Energy Island Programme and we believe that the period between 2011-2014 provides the NDA with a key opportunity to further contribute towards the quality of the areas future.</p>	<p>Noted</p>
2.13	<p>It is imperative that the NDA retains its socio-economic funding at a significant level. In particular it should continue to give priority in terms of allocation of funds to Anglesey and Meirionnydd and support the facilitation of the developing Energy island work programme and the longer term sustainability of</p>	<p>Noted</p>

	<p>Anglesey and Meirionnydd. Over the next 4 years there is a great opportunity for joined up working in north west Wales, NDA should seek to ensure that every opportunity is taken to continue to support the longer term sustainability of local skills development and local supply chain development as well as encouraging inward investment into the area. I would ask that the NDA ensures that there is a 'joined-up' planning between Wylfa and Trawsfynydd and Horizon's new build developments at Wylfa. This should ensure wins for all parties and ensure the longer term sustainability of the area.</p>	
--	---	--

3. STRATEGIC THEMES

	COMMENTS	ACTIONS
3.1	<p>We support the use of the Strategic Themes as outlined in the Draft Business Plan, and welcome the NDA taking a more holistic view of waste management across its estate. We agree that the use of the Strategic Themes provides clarity and consistency. We would however wish the NDA to review and implement an engagement model with us and other nuclear site regulators based on the strategic theme model, this would allow us to plan workload and allocate resource requirements.</p>	<p>We now have a business led engagement model to be published on the NDA website 1 April 2011.</p>
3.2	<p>As stated on page 10 of the Draft Business Plan, the NDA will use the strategic theme approach to understand the impact of different strategic scenarios, "e.g. deferral or acceleration of work in certain areas", we would wish the NDA to consider the nature and environmental implications of any deferrals or delays in the decommissioning and clean up work programme and plans and to have those strategic scenarios underpinned by a robust environmental safety case.</p>	<p>Decisions regarding deferral of decommissioning, in-situ and ex-situ disposal, and waste storage are site specific decisions, which have yet to be made. Site-by-Site decisions will be made at the appropriate time, considering all relevant factors, and our delivery plans will be published annually in our Business Plan. Stakeholder engagement will take place around these issues as appropriate.</p>
3.3	<p>Site Restoration: We are pleased to see NDA's commitment to taking Dounreay to its interim end state. However, we have seen how difficult this can be when funding is reduced and work has to be concentrated on re-aligning a lifetime plan. Predictability of funding to allow the lifetime plan to progress is essential.</p>	<p>Noted</p>
3.4	<p>Spent Fuel: We note that consideration is being given to transferring breeder fuel to Sellafield. We would expect to be fully consulted on this issue, in conjunction with Scottish Government, and taking into account the positive and/or negative potential socio economic impacts that this may have.</p>	<p>Noted</p>
3.5	<p>Nuclear Materials: As above, we would expect to be fully consulted on any transfer of materials to Sellafield.</p>	<p>Noted</p>
3.6	<p>ILW: We agree with this objective that wastes are managed in a manner that protects people and the environment. We note that DECC has recently published a consultation on low level waste within the non-nuclear industry and would like to understand NDA's position on accepting low level waste in current and/or future low level waste facilities.</p>	<p>NDA has the responsibility to deliver the UK nuclear industry LLW strategy and is required to make LLW facilities available to the non-nuclear industry under suitable commercial terms.</p>
3.7	<p>Critical Enablers: Clarity now needs to be provided as to how NDA moves forward with enabling activities. The NDA has indicated that they may look at different delivery mechanisms for such things as socio economics and it is essential to ensure that these mechanisms are clearly set out and engaged on, via the Site Stakeholder Groups.</p>	<p>Noted</p>
3.8	<p>Site Restoration - (Page 11) Continue programme of asset improvements to manage ageing infrastructure of plant and buildings at Sellafield. We support the NDA's general approach with its clear emphasis on safety and environmental protection. However, we wish to make the following observation. While safety and environmental protection must be assured NDA should also have regard to the importance of prioritising those</p>	<p>Noted</p>

	<p>aspects of its work that are important to delivering UK strategic energy objectives. As an example, EDF Energy's 7 Advanced Gas-cooled Reactor (AGR) stations depend on NDAs Sellafield facility for their ongoing operation, and their continued operation provides important major security of supply as well as environmental benefits. Their ongoing operation is also a source of significant income for the NDA through the contracts with EDF Energy covering AGR spent fuel services. Investment, where necessary, to safeguard these ongoing operations should therefore receive the appropriate priority and be explicitly reflected within the key deliverables of this Draft Business Plan.</p>	<p>Noted. The ongoing ability to receive AGR fuel from (BE/EDF) sites is a priority activity for NDA.</p>
3.9	<p>Page 11 - Spent Fuels We appreciate that only high level key deliverables are detailed. However, from our perspective the most significant issue is the impact that the Magnox Operating Programme (MOP) could have on AGR spent oxide fuel management. This demands careful consideration and it is vital that a joined-up approach continues to be applied within which the potential impacts on AGR operations are fully appreciated. This could be reflected under the objectives section. We suggest that a specific key deliverable be added under the "Spent Fuels" heading to identify the importance of the continued management of AGR fuel from British Energy (BE)/EDF Energy sites. This would reflect the significance this has both for continued low carbon electricity generation in the UK and for maintaining the income to NDA from EDF Energy for the provision of this service.</p>	<p>This is a 3 year plan with focus on activities in 2011/12. At this stage in the process the local authority in Cumbria are engaged with local communities before it's decided to move forward to the next stage. NDA does acknowledge the importance of maintaining progress on GDF development.</p>
3.10	<p>Page 12 - Integrated Waste Management Progress within RWMD towards delivering a long term Geological Disposal Facility appears as a critical enabler - but only on p.41 of the Plan. Given its significance we strongly believe that the GDF deliverables should also appear within the section of the Plan dealing with Integrated Waste Management. GDF progress is also critical to the future nuclear development programme that the government has said is needed and is an important part of enhancing the UK's status standing among the World's leading nuclear countries. The NDA needs to ensure that the value of its work in this area is fully understood as it develops its site clean-up and decommissioning plans. We suggest that the inclusion of a specific tangible deliverable associated with this longer term objective would be valuable.</p>	<p>Noted</p>
3.11	<p>Page 27 - Hunterston A "Graphite disposal facility feasibility study" The proposal within the draft business plan is to pursue a feasibility study of on site disposal of Higher Activity Waste (HAW) Graphite at Hunterston A and, subject to the results from this study, the implementation of this approach. As stated in our response to the consultations on the Scottish Government's HAW policy and on the NDA's strategy, EDF Energy does not support the final disposal of LLW and HAW radioactive waste on our existing British Energy / EDF Energy Power Station sites.</p>	<p>Noted</p>

4. SITES

COMMENTS	ACTIONS
BRADWELL	
4.1 Under Bradwell I was surprised to see receipt of an LoC from RWMD listed as a regulator matter. RWMD is not a regulator although the regulators do recognise the role of the LoC	Changed from Regulator to Site Restoration
CAPENHURST	
4.2 The plan, perhaps for good reason, does not say much about the arrangements for the NDA liabilities	Noted

	at Capenhurst. I worry that it may be difficult to achieve VFM if Westinghouse is effectively monopoly supplier		
CHAPELCROSS			
4.3	We suggest the brief overview of Chapelcross should refer to the Solway estuary and its designated protection levels, this would be consistent with the overviews given for other NDA sites.	References made as requested and document updated	
4.4	We consider the following as Key Activities that should be included within the NDA's Business Plan: * Decommissioning plan for the Chapelcross Processing Plant which has to be agreed with nuclear site regulators; * Chapelcross Processing Plant decommissioning commencement; * Pond 2 decommissioning strategy which has to be agreed with nuclear site regulators; * Pond 2 decommissioning commencement	Document changed to reflect: * Pond 2 decommissioning strategy agreed with nuclear site regulators; * Pond 2 decommissioning drain and seal pond.	
DOWNREAY			
4.5	The Downreay section has little mention of work on recovery of stored wastes and the provision of suitable storage capacity. In the past recovery of waste from the silo and other facilities was seen as quite high priority. Presumably there has been appropriate justification of the delay of this type of work.	Due to the revised funding structure put into place for DSRL it became necessary to re-schedule the major capital projects which were to deliver the retrieval and storage options. DSRL are currently looking at alternative options and methodologies which may deliver the same outcome within the revised funding but on an earlier time frame	
4.6	We note that the activity 'Complete the draining, decontaminations of 'hot spots' and sealing of the DFR Fuel Storage Ponds' is mentioned both as a 2011-2012 Key Activity under Site Restoration, and as a 2012-2014 Planned Key Activity under Spent Fuels. This needs clarity as to whether it is two separate tasks, and whether it should sit under the Site Restoration or Spent Fuels theme.	This is one task and should sit in Site Restoration - document amended	
4.7	We consider the following as Key Activities that should be included within the NDA's Business Plan: • Development work for dealing with raffinate waste • Development work for dealing with the shaft and silo waste • Development work for reactor decommissioning • Completion of landfill 42 restoration • Continued monitoring and recovery of irradiated nuclear fuel fragments on the sea bed and local beaches.	As the Business plan is a high level document it is impossible to state all activities going on at the sites.	
4.8	Key activities look reasonable and we look forward to hearing about the site's progress against these milestones in the future. However, we note that there are no key milestones for the clean-up of radioactive particles in the off-shore environment and believe that this should be highlighted. While we recognise that this is not seen as a 'high hazard' it is uncontrolled contamination and is essential to the community's image to ensure that this work continues to allow the clean-up to be completed.	As the Business plan is a high level document it is impossible to state all activities going on at the sites.	
4.9	Review business case for potential consolidations of nuclear materials: The NDA should ensure that there is a transparent consultation with site stakeholder groups on the transfer of nuclear materials. Continue development of effective stakeholder engagement: We wish to see clear proposals as to how NDA now proposes to engage on a national level. While we are aware of what the NDA do not want to do greater clarity is required in how engagement will take place in the future.	Noted	
4.10	We are pleased to see the dates in the NDA Draft Business Plan 2011-2014 are generally in alignment	Noted	

	with the revised Dounreay Lifetime Plan.	
HARWELL / WINFRITH		
4.11	In the "Strategic Themes" summary mention is made of taking Harwell and Winfrith to site closure which I assume means removing the stored waste and complete decommissioning of the remaining facilities. It appears to me that this is not much more than an aspiration as at £67M per year funding substantive progress would take many years. Would it be more realistic to sit that the strategy is to keep the remaining reactors in care ad maintenance, to progressively remove other redundant facilities and to reduce infrastructure costs by relocation stored fuels and certain ILW?	Extra part added to business plan to answer this, Page 9. The SLC has been asked to prepare plans that show a VFM argument for accredited decommissioning.
HUNTERSTON		
4.12	We attach great importance to all plans relating to the Hunterston A Site, be they business or otherwise. Having followed the development and responded to the draft Scottish Government's HAW policy, we recognise its significance to the NDA's Plan and to potential waste management options that could, if adopted, impact positively or negatively on our community.	Noted
4.13	We consider the following as Key Activities that should be included within the NDA's Business Plan: <ul style="list-style-type: none"> • Solid ILW disposal strategy • Permanent remediation of the contaminated ground at the CP7 Compound. 	This is in the plan, the direction we will go with it is still to be decided. It will either be the current strategy of putting it into the ILW store or change the plan and go down the graphite disposal strategy.
4.14	We note that key activities include the graphite disposal feasibility study. We would welcome discussion with NDA on any implications for the wider estate and the MRWS programme once the findings of the study are known.	Noted
4.15	Hunterston A: 2011-2012 Key Activities, page 27 We wish to include remediation of Compound 7 as part of the business plan for 2011-2014. This ongoing issue is as yet unresolved.	Effective remediation of Compound 7 – Since the recent event earlier this FY the site have stepped up their monitoring of this and other catch pits on the site. They already have in their LTP scope for the remediation of this area of the site and are looking into whether to accelerate it given the recent event. The priority that this is given will need to be balanced against the funding for the site and other site priorities.
4.16	We note that the Graphite Pathfinder Project is referred to under the Site Restoration theme for Hunterston A. We are of the opinion that the outcome of this project will impact on all Magnox sites, therefore we suggest including reference to it at the beginning of the section covering Magnox Ltd.	Added reference to Graphite project under the Magnox Section
MAGNOX PROGRAMME		
4.17	It is helpful to see a high level explanation of the new 'optimised' approach to the Magnox programme. However, we think it would be helpful to provide further explanation, or references to publicly valuable information for: <ul style="list-style-type: none"> - the reasons for choosing Bradwell and Trawsfynydd as the lead sites for accelerated decommissioning; and - how the Magnox programme 'now adopts a consistent programme approach to decommissioning including, consistent solutions, mobile specialist teams, consolidated supply chain solutions and optimal sequencing.....' Unlike the earlier sub-section on Sellafield Ltd, we note that the Magnox programme sub-section does not include a high level overview of '2011-12 Key Activities'. Perhaps this should be included for consistency.	There are 10 Magnox Sites at various stages of the lifecycle. Wyifa and Oldbury are still generating and hence not in a position to be decommissioned for C & M entry at this time. Chapelcross, Dungeness and Sizewell are currently defueling, this again does not enable them to act as lead sites towards C & M entry. For the remaining five sites Hinkley has many waste issues and as such benefits will be gained from the learning at other sites being fed into its future programme. Berkeley has already completed much of its decommissioning and the reactors are in safestore, the Active Waste Vault retrieval project will utilise mini stores and is being pursued in parallel with the Bradwell & Trawsfynydd programmes, however it does not provide the benefits to the lead site approach

			for a comprehensive C & M entry programme. Finally the focus at Hunterston is on the Solid Active Waste, with benefits from the learning at Bradwell and Trawsfynydd supporting its ongoing programme.
4.18	We welcome your commitment to continued generation at Wylfa until 2012, however, we believe that this Business Planning period would provide timely intervention to review the relationship between Wylfa and Trawsfynydd. Developing a strategic timeline between the completion of decommissioning in Trawsfynydd, and the beginning of decommissioning and new build at Wylfa would ensure that key skilled staff could be transferred ensuring they are retained in the local economy.		Business Plan updated
4.19	Whilst we have ongoing concerns about the various options for disposal / storage of HAW on site, we wish to state that: 1. We continue to support A radwaste remaining on site 2. We are appreciative of Magnox North keeping us informed about the Graphite Feasibility Study as this allows us to better consider the many implications that any future adoption of this option would / could have on our community 3. Although not mentioned as such, but nonetheless a priority for us, any waste management option in the business plan that, in the longer term, might directly or indirectly facilitate radioactive waste from out with the site being treated, stored or disposed of at Hunterston will be received negatively.		Noted
4.20	Magnox Limited: Magnox Programme, page 20 'Development options of disposal for Graphite' - we seek clarification on what the options are		Wording changed in document to Development of ILW management options including graphite pathfinder project
RSRL			
4.21	We note that planned activities for 2011-14 include: - developing a plan for the transfer of ILW away from the Winfrith and Harwell sites; and - development of plans for disposal of VLLW. The first activity illustrates a reason for asking how the new strategy, once adopted in spring 2011, will begin to influence the business planning process. More specifically, we would welcome clarification of when and how we might expect to see complementary activities at other sites relating to the development of plans for the receipt of ILW from Winfrith and Harwell.		Our Business Plan is the vehicle through which high level activities are set out for a three year period. Any potential re-location of materials is scope to be taken into consideration with other sites and stakeholders.
RWMD			
4.22	RWMD now have the responsibility for developing the disposal facility for ILW and a range of higher activity wastes such as spent fuel and high level waste. The state of development of the facility for disposal of the spent fuel and high level waste is well behind that of ILW in many ways. I would like to have seen some specific mention of the need to "catch up" on these wastes. The ability to dispose of spent fuel is closely linked to "new build" of reactors.		Noted - NDA has taken this into account with the recent re-organisation of its structure with new National Programmes team.
SELLAFIELD			
4.23	As slightly more than half of the money is spent at Sellafield it is disappointing that more is not said about the programme at Sellafield. The Magnox sites have quite a good introduction which gives a better flavour of what the NDA is trying to achieve on the Magnox sites.		Noted
4.24	One of the problems in commenting on the document is the very concise scope of work on some sites. This makes it difficult to see what work is not being done which perhaps should be being done! On one specific item there is no mention of the Windscale piles in the Sellafield section apart from a comment at the start of the Sellafield section which notes that the decommissioning of pile 1 is "a significant		Set against the priorities within the Sellafield Ltd Site Licence Company, decommissioning activities associated with the Windscale Piles has been deferred to later years. There is a robust safety case for the fuel to remain in situ for a longer period.

	challenge". Has the work been delayed?	
TRAWSFYNYDD		
4.25	Under Trawsfynydd Maentwrog is mentioned, at one time Maentwrog was managed by Wylfa but perhaps it has changed.	Resources are managed by Traws and Funding and portfolio work comes through Wylfa

Conclusion

We are grateful for the volume of carefully considered comments from a broad cross section of stakeholders. We thank all of those who have responded for their continued interest in our work and for supporting us in the development of this year's Business Plan.