

# DUNGENESS A SITE AND B POWER STATION

## DUNGENESS SITE STAKEHOLDER GROUP

The Old School New Romney

Thursday 4 October 2012

09.30 for 10.00am

### Attendance:

Mr T Allmark	-	ONR (Dun B)
Ms K Anderson	-	NDA
Mrs L Barton	-	Lydd Airport Action Group
Cllr M Burgess	-	Ashford Borough Council
Cllr Mrs V Dawson	-	Lydd Town Council
Ms J Dear	-	Natural England
Dr L Franks	-	Minute Taker
Dr L Harrison	-	Kent County Council
Dr P Hayes	-	ONR (Dun A)
Mr S Henry	-	EDF Energy
Cllr A Clifton-Holt	-	Shepway District Council
Mr D Illsley	-	Shepway District Council
Mr R Jepps	-	Dungeness A Site
Mr R Lavender	-	Kent Invicta Chamber of Commerce
Cllr D Lawton	-	New Romney Town Council
Mr O Leyshon	-	Romney Marsh Countryside Project
Cllr Mrs M Masters	-	Lydd Town Council
Ms J Moakes	-	Environment Agency
Mrs H Morris	-	Dungeness A Site
Dr S Nicholson	-	ONR (Dun A)
Mr K Palfrey	-	Dungeness A Site
Mr A Parry	-	Independent Vice Chairman
Mr M Pearson	-	Dungeness B Power Station
Cllr P Simmons	-	Shepway District Council
Col G Smythe	-	Independent Chairman
Cllr A Snoad	-	New Romney Town Council
Cllr S Souster	-	Rother District Council
Mr R Starbuck	-	Dungeness B Power Station
Cllr Mrs C Waters	-	Kent County Council
Mrs L Whenday	-	Dungeness Residents Association
Mr D Whitnall	-	Dungeness A Site
Mr D Williams	-	Dungeness A Site
Cllr J Wilson	-	Hastings Borough Council

### Guests:

Mr A Pynn	-	Environment Agency
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## **I INTRODUCTION**

2953 Col. Smythe welcomed members and guest to the 15<sup>th</sup> meeting of the Site Stakeholder Group (SSG) and encouraged them to ask questions.

## **II APOLOGIES FOR ABSENCE**

2954 The following apologies were received:

Mrs G Baker	-	NR, Lydd & Greatstone Res Asso
Mr D Clarke	-	ONR OCNS
Mr D Dicker	-	Dungeness A Site
Mr T Hills	-	New Romney Town Council
Mr G Holt	-	Health Protection Agency
Mr P Mullane	-	NHS Kent & Medway
Mr T Preston	-	Defend Our Coast
Mr R Price	-	Environment Agency
Cllr R Tillson	-	Shepway District Council
Mrs D Webb	-	Dungeness B Power Station

## **III MINUTES OF THE MEETINGS**

2955 The minutes of the 14<sup>th</sup> SSG meeting held on 24.05.12 were agreed as an accurate record.

## **IV CORRESPONDENCE**

2956 A list of correspondence distributed to SSG members was made available to attendees. Chairman advised that this list includes all points raised via email, encouraging attendees to request hard copies of information as required.

## **V MATTERS ARISING FROM THE 14<sup>th</sup> MEETING**

2957 No matters were arising.

## **VI DUNGENESS A SITE DIRECTOR'S REPORT**

2958 Ray Jepps, Site Director, drew attention to the Site Director's Report previously circulated and commented particularly on the following aspects:

- *Safety Performance*: no significant first aid events, lost time accidents, nuclear or environmental events since the last SSG.
- *Audit of the Environmental Impact Assessment Decommissioning Regulations (EIADR) to assess the site's compliance with was undertaken by the ONR on 23 August.. No corrective actions were raised. Fuel-free Status Verified*: led to release of staff under management of change scheme with 45 under severance and 73 transitioning to new roles.
- *NDA Funding*: an additional £3.6million of funding has been made available for delagging of turbine hall and reactor steam bays, enabling progress with a key hazard reduction programme of the south side of the site. Final stages of approval for the entire south side of site clearance programme are still required. Submission of the detailed plan is anticipated during January.
- *Emergency Preparedness*: Level 1 formal demonstration our new post defuelling emergency arrangement for ONR combined counter terrorism and

conventional emergency exercise to test both security and safety were judged to be adequate.

- *Investors in People Award*: Magnox has been awarded the Gold standard with Dungeness site was a key contributor to the audit and held as the company model.
- *Socio-economic funding*: £30,000 sanctioned, list of recipients in report. Bids for support encouraged.
- *Exceptional Staff*: fundraising activities mentioned.
- *NDA Competition to run Magnox and RSRL*.
- Sale of Energy Solutions Europe not completed and remains part of consortium in current bidding process. No impact on current stewardship of Magnox sites.

2959 Q. How many of the staff have been made redundant?

A. No compulsory redundancies. All those accepting severance have volunteered to do so. Some staff have joined other sites. Current staffing levels is 279 with reviews to be undertaken in December 2012 and June 2013 lead to further staff reductions of around 15 to 20 as a result of fine tuning the site organisation.

2960 Q. When is the National Geological Disposal Facility expected to become available, given the recent 'NO' vote to host this in Kent?

A. Noted as not part of site remit.

2961 Q. Is the quantity of fuel element debris (FED) to be processed on site escalating?

A. No, FED programme remains at 16 tonnes from Bradwell after which a similar quantity of FED would be taken from Trawsfynydd. Latter arrangements are under review and entire planned tonnage may be taken from Bradwell alone but this is not yet decided.

Q. How is FED transported?

A. Via standard lorry that has additional locking and mechanical enhancement inside the ISO container.

2962 Q. When is the next significant building reduction expected?

A. If our final plans are approved, the south side of the site from shoreline to centre line between turbine hall and reactors will be cleared and levelled to agreed requirement , likely to be by 2015.

2963 Q. Outcome of recent supplier event?

A. Combined Dungeness A & B supplier event that was well attended and well received. Not sure how many direct contract placements have resulted as fleet wide there is an agreement with major framework Tier 2 suppliers who are encouraged to draw on the local supply chain to support their activities at Tier 3.

2964 Q. Will EnergySolutions remain the parent body organisation for the Magnox fleet?

A. EnergySolutions will remain the parent body organisation until the outcomes of the competition for the contract is known. If EnergySolutions are successful in their bid, they will remain in place with their consortium partners Bechtel and URS. If unsuccessful, a different parent body will be appointed. Magnox will remain a wholly owned subsidiary of the parent body, whoever is successful. There will be no impact on Magnox employees.

## VII OFFICE for NUCLEAR REGULATION (ONR) REPORT FOR DUNGENESS A.

2965 Dr Nicholson introduced himself as the Site Inspector for Dungeness A, having taken over from Mr Urquhart. He explained that now that the hazard on site had

been considerably reduced, that the ONR would proportionately reduce their attention accordingly. He stressed that the ONR were not complacent and do recognise that some risks remain on site. Routine Inspections will continue, with the assistance of Dr Hayes, with a focus on control and containment of radioactive materials and maintenance of infrastructure pertaining to this.

- 2966 Dr Hayes introduced himself as a Site Inspector within the ONR and part of their decommissioning, fuel and waste programme. He drew attention to the report previously circulated, dated 01.04.12. to 30.06.12. and in particular the work undertaken to verify Dungeness as a fuel free site.
- 2967 Dr Hayes advised that since July 2012 the ONR had commenced a programme of compliance inspections and provided additional details about the emergency and counter-terrorism exercise, explaining that as these aspects fell under different areas of legislation the ONR inspected only the safety element.
- 2968 Mr Parry sought clarification of the term 'all that is reasonably possible' as applied to the fuel free verification. Mr Hayes responded by saying that the ONR had looked to ascertain if the site had missed any aspect of investigating whether the site was fuel free by sampling the work undertaken and not repeating the work pattern of the site.
- 2969 Q. Is there nuclear waste still on site?  
A. Yes, there is. The principal risk (99%) was from the spent fuel but other items have become contaminated and this has left a number of nuclear wastes. Dr Nicholson added that much of this waste was low level, with intermediate level in the reactor core, and that much of this was contained within the residual sludges and resins. Mr Jepps clarified that there was no longer any potential for significant release beyond the site boundaries. Chairman asked Mr Jepps to clarify what waste was likely to be stored on site long term and heard that from 2023 until 2090's any residual waste in the physical structures remaining upon entering care and maintenance would remain on site and be remotely monitored.

## VIII DUNGENESS B POWER STATION SITE DIRECTOR'S REPORT

- 2970 Martin Pearson, Station Director of Dungeness B drew attention to the Station Director's Report, two letters (dated 17.08.12. and 13.09.12.) and the environmental report previously circulated, and in particular highlighted the following:
- *Safety*: One year milestone achieved without a top tier zero harm event (includes nuclear safety, environmental safety and lost time injuries).
  - *Olympics/Paralympics*: EDF Energy provided all electricity for these events, many games-makers. Four members of Dungeness B staff were chosen as Olympic torch-bearers and another member of staff (Lee Pullen) was a prominent coach for the GB boxing team.
  - *Issues*:
    - Main boiler feed pump fire lasted 20 seconds and was subject of letter dated 17.08.12.
    - Steam safety valve lifted creating a noise issue, as described in the letter dated 13.09.12. This caused complaints from local residents which were followed up, two complainants remain dissatisfied and will be visited by the Station Director. Mr Pearson apologised for the disturbance caused.
  - *Emergency Arrangements*: level 1 exercise judged as adequate.
  - *Generation*: fuel route working at full capacity.
  - *Fire Safety week*: undertaken recently to enhance safety provision.

- *Work Experience and Apprentice Scheme*: details, including photo's in report.
- *Environmental Report*: bird hide replaced on shingle beach; trapped seal safely rescued and released following a charitable donation.

2971 Q. When is the next outage and how long will this last?  
A. Planned refuelling outage from 03.11.12. and likely to last three to four weeks.

## **IX OFFICE for NUCLEAR REGULATION (ONR) REPORT FOR DUNGENESS B POWER STATION**

2972 Tim Allmark, Dungeness B Site Inspector since 1 April 2012, introduced himself, drew attention to the quarterly report (01.04.12. to 30.06.12.) and commented on the following:

- Consent to restart Reactor 22 was granted during May following the outage.
- Inspections occur monthly as a mixture of plant inspections, to ensure licence conditions, and following up on activities undertaken after unexpected events.
- Level 1 emergency exercise deemed adequate. Noted as a testing exercise.
- Management of flammable oil leaks has been investigated and areas for improvement identified.
- Post Fukushima, all licensees have been required to develop action plans for respective sites and the ONR are beginning to engage with the station regarding future modifications and improvements.

2973 No questions were forthcoming.

## **X ENVIRONMENTAL UPDATE FOR DUNGENESS B.**

2974 Jo Moakes introduced herself as the Site Inspector for Dungeness B, in post since January 2012 and drew attention to the previously circulated Environment Agency Nuclear Regulation Report. The following points were noted:

- Inspection visits undertaken during May, July, August and October.
- Routine discharges and disposals all well within permit limits and quarterly notification levels.
- Site is expected to undertake environmental sampling as part of permit requirements and report any statistically significant increases in levels detected. Check monitoring is undertaken independently and reported in the Radioactivity in Food and the Environment (RIFE) report. Four occasions have been reported where levels were slightly higher than normal and monitoring techniques have been reviewed. The EA have no concerns about these results.
- Outcome of investigation into an active drain being connected to the foul sewage system concludes that it is very unlikely that any radioactive material entered the sewage system.
- Waste consignment paperwork investigation identified three missing radionuclides at very low levels, however, these had no impact on the incinerator permit. EA have issued a warning letter to the site.
- Investigation into the gas circulator oil spill reported at the previous SSG concluded that there was no discharge into the sea, however, remedial actions have been identified and will be enforced.
- Changes in legislation regarding the definition of radioactive waste are now in force.

2975 Q. Will the legislation enable increased waste disposal into the sea.

A. No as the legislation covers solid waste and considers the risk posed by very low level waste.

2976 Q. Do you have any concerns about the environmental impact of the changes in legislation?

A. No as safety standards will remain in place. It will enable better characterization and appropriate disposal of very low level waste streams.

## **XI ENVIRONMENTAL UPDATE FOR DUNGENESS A.**

2977 Chairman drew attention to the previously circulated Environment Agency Nuclear Regulation Report and advised that Rob Price was unable to attend today. Attendees were encouraged to pass any questions via the secretariat.

## **XII UPDATE ON THE KENT MINERALS AND WASTE PLAN**

2978 Dr Lillian Harrison introduced herself as the Minerals and Waste Planning Policy Manager and advised that her team were charged with preparing the long term strategic plans for minerals and waste in Kent for the next 18 years until the end of 2030. The Minerals and Waste Development Framework will encompass all waste streams and all mineral provision in Kent. Each plan must be consulted upon three times before examination in public. The current suite of plans, used for determining planning applications, were adopted in 1986 for brickearth, 1993 for construction aggregates and 1998 for waste.

2979 The Mineral Sites Preferred Options Plan and the equivalent for wastes have been written and initially consulted upon. The Minerals and Waste Local Plan when adopted will consist of three main planning documents; the two sites plans and the core strategy, an overarching policies document. The core strategy and policy directions were consulted upon in May 2011 and included in that was a draft policy regarding nuclear waste in Kent. National policy for minerals and waste requires that Kent remains net self sufficient meaning that provision must be made for all of the waste streams generated in Kent and minerals sites need to be identified to serve Kent's needs.

2980 Dr Harrison quoted from the core strategy document regarding nuclear waste: "Facilities for the storage or management of Low Level and Very Low Level radioactive waste generated at Dungeness will be acceptable within the Nuclear Licensed area at Dungeness where:

- a) This is consistent with the national strategy for managing Low Level and Very Low Level radioactive waste and discharges.
- b) The outcome of environmental assessments justify it being managed on site.
- c) Facilities are located and designed in order to minimise adverse impacts on the environment.

Such facilities will not be acceptable outside the Nuclear Licensed Site at Dungeness.

Only Low Level and Very Low Level radioactive waste generated at Dungeness shall be treated or stored in such facilities. There shall be no landfill or landraise activities (of any waste type) at the site."

2981 Dr Harrison explained that very few responses were received with the following concerns raised:

- Natural England – check whether Special Areas of Conservation are within the Licensed area and if so, to specifically state that development will avoid these areas.
  - Kent Wildlife Trust – concerns regarding there being no requirement to protect the Natura 2000 and Ramsar sites that may be impacted by the operations.
- 2982 Dr Harrison encouraged the SSG to feedback their views and later provided the following contact details:  
[Lillian.harrison@kent.gov.uk](mailto:Lillian.harrison@kent.gov.uk), 01-622-221602 or [mwdf@kent.gov.uk](mailto:mwdf@kent.gov.uk)  
 and website address: [www.kent.gov.uk/mwdf](http://www.kent.gov.uk/mwdf)  
[http://www.kent.gov.uk/environment\\_and\\_planning/planning\\_in\\_kent/minerals\\_and\\_waste/minerals\\_waste\\_core\\_strategy/strategy\\_and\\_policy\\_directions.aspx](http://www.kent.gov.uk/environment_and_planning/planning_in_kent/minerals_and_waste/minerals_waste_core_strategy/strategy_and_policy_directions.aspx)  
[http://www.kent.gov.uk/environment\\_and\\_planning/planning\\_in\\_kent/minerals\\_and\\_waste/evidence\\_base/strategy\\_and\\_policy\\_directions.aspx](http://www.kent.gov.uk/environment_and_planning/planning_in_kent/minerals_and_waste/evidence_base/strategy_and_policy_directions.aspx)
- 2983 Chairman asked whether Dr Harrison received and commented upon the documents circulated by the NDA and heard that her team were involved in NuLeAF, the Nuclear Legacy Advisory Forum, and that the basis of the policy was drawn from this. Chairman expressed concern that Kent County Council do not comment on NDA communications.
- 2984 Ms Anderson asked if the NDA had been sent the proposed core strategy and heard that they would have if they were on the mailing list. There ensued a debate about who was responsible for ensuring that consultation was undertaken with all stakeholders and Dr Harrison advised that statutory key stakeholders were consulted with and that anyone else was welcome to become part of the consultation, adding that currently there were approximately 3000 consultees.
- 2985 Concern was expressed that the draft policy would prevent the current ingress of FED from other sites and Dr Harrison clarified that the policy would pertain to any new facilities requiring planning permission and not existing facilities, stressing that this was planning and not permitting.
- 2986 Concern was expressed that this policy would prevent any future Dungeness C from interacting with sister sites within the UK. Dr Harrison agreed to take this point back to her team.
- 2987 Mr Jepps expressed his concern that Kent County Council had not had a proactive dialogue with the NDA, explaining that ultimately the NDA would be dealing with waste streams generated by Dungeness B. Ms Anderson added that the NDA would not want to foreclose on future options and agreed to bring this matter to the attention of her waste colleagues within the NDA.
- 2988 Ms Anderson asked what the policy was regarding intermediate level waste (ILW) and heard that Kent County Council had not been advised of any future requirements for planning solutions for ILW.
- 2989 In response to an enquiry from the Chairman, Dr Harrison explained that an evidence base was created for plan making based on research of what is in the public domain. Dr Harrison encouraged input into the plan making. On request she agreed to check whether the NDA were amongst the consultees on the database. Later this matter was raised again and it was agreed that the SSG should be commenting on these policies.

- 2990 Cllr Clifton-Holt raised concern that until the deep geological disposal facility was available that higher level radioactive waste was being stored on the nuclear power station sites but that this policy would preclude this in the future. Ms Moakes added concern that there were national strategies for the management of nuclear waste and that these should be taken into consideration in the county policy.
- 2991 Mrs Morris sought clarification of what waste facilities were included and heard that this was minerals and waste developments that required planning permission.
- 2992 Chairman asked whether Government legislation guided Kent policy and heard that this was the case. Mr Jepps added his concern that a connective strategy encompassing national policies was essential and Dr Harrison concurred.
- 2993 Cllr Waters suggested holding a separate meeting with this topic as the single item to enable a thorough consideration of future waste planning to enable a Dungeness C in the future. Mrs Morris suggested a steering committee made up of SSG members and this was agreed. Ms Anderson later added that representatives from the NDA would be happy to attend this meeting.
- 2994 Q. Do you reply to comments made about these planning documents?  
A. Not individually, a consultation report is prepared.
- 2995 Dr Harrison closed this section with an apology for not having printed material to provide to attendees and agreed to send the presentation she had prepared to the secretariat for inclusion in these minutes (received, incorporated above and reproduced in full in appendix 1).

### **XIII NDA UPDATE**

- 2996 Ms Anderson introduced herself as the Stakeholder Engagement Manager and drew attention to the NDA Monthly briefing dated October 2012, available in hard copy at this meeting. The following additional points were noted:
- *ILW storage options*: credible options are being considered in terms of regional hubs, commencing with central and southern Scotland. Magnox will now consider all credible options for nuclear waste storage for sites in England. This was noted to include EDF Energy sites and will have a broad pioneering scope.
  - *Magnox & RSRL competition*: launched in July 2012 and the deadline for the prequalification questionnaire extended to 12 October. This will determine viable bidders.
  - *National Stakeholder Event*: to be held 29/30 October.
  - *Geological Disposal Facility*: next stage has been postponed until early 2013
- 2997 Chairman invited questions and none were forthcoming. He commented that he had attended the launch of the Magnox and RSRL competition and that all the issues raised were about socio-economic provision. Ms Anderson clarified that if the Government changed during the next election would waste management policy was unlikely to change.

### **XIV SOCIO-ECONOMIC UPDATE**

- 2998 Chairman provided a brief recap of events regarding socio-economic funding advising that 18months ago funding was provided to carry out research into an action plan for Shepway and surrounding area and that this led to formation of a

committee to determine the parameters for progressing applications. The next step will be to employ a coordinator to manage effective bids and the committee intends approach the NDA to match funding to support this employment. Some successful bids have been approved, however, no large bids have been received.

2999 Chairman encouraged bids and later provided a reminder of the criteria:

**Education/ Skills Development:** to support decommissioning, the diversification of skills into other sectors and projects that encourage young people to develop their Science, Technology, Engineering and Mathematics (STEM) skills.

**Social Infrastructure:** to sustain social relationships, local amenities or cultural heritage.

**Economic Infrastructure:** projects which make business activity possible, such as communication, transportation and distribution networks, and energy supply systems.

**Economic Diversification:** into other industries and sectors.

**Creating Sustainable Employment:** schemes and projects which will develop into sustainable employment for members of the local community

**Supporting the Local Supply Chain:** schemes which are aimed at developing and working with the local supply chain to stimulate the local economy.

3000 Mr Dave Illsley reminded attendees that this was a partnership that began between Magnox and Shepway District Council and that this was being extended to include other local councils. He described the bid for funding an incubator unit at Romney Resource Centre and added that there was a lot of work being undertaken currently with outcomes anticipated within the 3-6 months.

3001 Chairman commented that the committee were inviting speakers to advise how to successfully bid for money and Cllr Illsley added that help was available to put effective bids together and encouraged members to continue to raise awareness of this scheme.

## **XV ANY OTHER BUSINESS**

3002 None was forthcoming.

## **XVI NEXT MEETING**

3003 The 16<sup>th</sup> meeting of the Dungeness SSG will be an AGM to be held Wednesday 30 January 2013 at 18.30hrs at Dungeness B visitor centre.

Meeting closed at 11.50hrs

Appendix 1: Dr Harrison, Kent County Council presentation materials:

Minerals and Waste Local Plan – An Update to Dungeness SSG meeting October 2012  
Lillian Harrison, Minerals and Waste Planning Policy Manager

Minerals and Waste Local Plan

- Plan making for long term strategic plans for minerals and waste in Kent remains a 'County Matter'.
- Plan making has not been affected significantly by the Localism Act or by the National Planning Policy Framework
- There is still a need for Kent County Council to expedite the preparation of its long term plans

Kent Minerals and Waste Local Plan when adopted will consist of three main plan documents:-

- The Minerals and Waste Plan (formerly known as the Core Strategy);
- The Waste Sites Plan; and
- The Mineral Sites Plan

Minerals and Waste Core Strategy – Strategy and Policy Directions Consultation May 2011

- Each of our plans has to go through three consultation stages before it is examined by an independent planning inspector at an Examination in Public.
- The lead plan (the Core Strategy) contains the overarching policies and locational requirements for all types of minerals extracted in Kent and all types of waste generated in the County.
- It identifies the capacity gap for the waste facilities that are required in Kent and identifies how much of each mineral types for which we have to make provision, for the whole of the plan period.
- It sets the scene for the follow on site specific plans.  
It was consulted upon in May 2011 and contained a draft policy on nuclear waste. That policy was as follows:-

Draft Policy CSW15 - Nuclear Waste Treatment and Storage at Dungeness

Facilities for the storage or management of Low Level and Very Low Level radioactive waste generated at Dungeness will be acceptable within the Nuclear Licensed area at Dungeness where:

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- b) The outcome of environmental assessments justify it being managed on site; and
- c) Facilities are located and designed in order to minimise adverse impacts on the environment.

Such facilities will not be acceptable outside the Nuclear Licensed Site at Dungeness. Only Low Level and Very Low Level radioactive waste generated at Dungeness shall be treated or stored in such facilities. There shall be no landfill or landraise activities (of any waste type) at the site.

Policy CSW 15 -responses

- Natural England – It would be useful to check whether areas of SAC are within the licensed area and if so, to specifically state that development will avoid these areas.
- Kent Wildlife Trust – concerns regarding there being no requirement to protect the Natura 2000 and Ramsar sites that may be impacted by the operations.

Contact Details: [Lillian.harrison@kent.gov.uk](mailto:Lillian.harrison@kent.gov.uk) 01-622-221602 or mwdf@kent.gov.uk