



Site Stakeholder Group

**DS177**

10th November

**Ms Kelly Jackson  
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7<sup>th</sup> November 2005

Your Ref:  
Our Ref: 004/05/APRS

Dear Ms Jackson,

**HUNTERSTON SSG COMMENTS FROM THE MEMBERS - NDA DRAFT STRATEGY/  
ENVIRONMENTAL REPORTS**

I am writing to you on behalf of the Hunterston Site Stakeholder Group with our comments on the NDA Draft Strategy and Environmental Reports.

I would like to take this opportunity to express our thanks to have had this opportunity to set out our thoughts on the challenges that lie ahead and to help the NDA find a way forward. We hope our views will genuinely help shape the Strategy, which will be presented to the Government at the end of the year.

It would be appreciated if you could confirm your receipt of this letter by contacting Alyson Russell-Stevenson (SSG Secretariat) on 01294 824242 so that she is able to report back to the group that their comments have been received.

Yours sincerely

**Richard Wilkinson  
Hunterston SSG Chairman**

Enc.

Below is an extract from the minutes of the Special Hunterston SSG held on 25<sup>th</sup> October 2005 on the NDA Draft Strategy:

### **CONSIDERATION OF NDA DRAFT STRATEGY**

Councillor Wilkinson asked the members to consider the documents section by section. He explained that all views would be taken forward to the NDA and that the members did not require a consensus in any area or on any point.

Points to be taken forward by section:

#### **1. Decommissioning And Cleaning Up Our Sites**

- Having read the Draft Strategy cover to cover it is good to know that the NDA recognise Sellafield as a problem and that it is quite appropriate for it to be the No 1 priority in clean-up (consensus)
- There is a need to ensure that the technical resource and financial resource is available to decommission and that a reasonable timescale is completely appropriate in support of the main part of the Strategy.
- The NDA Strategy will keep the workforce in a job and the socio-economic stability in the community which is a very good thing
- Safety first, no one wants the Strategy if the workforce will be at any risk to higher dose rates. This would only be acceptable if the risk was balanced - no undesirable effect to the workforce (consensus)
- The SSG members or the community at large would not be able to consult on an end state for the site without firm details on the outcome from CoRWM on a National Repository. When this becomes apparent the SSG members would be happy to consult/notify wider but only when all options could be rationally discussed with all the information. (consensus)

#### **2. Waste Management**

- The members did not agree with the wording in the section on dose rates to the public. In a number of paragraphs in this section it is written that "the impact on the local inhabitants would not be *'much more'* that the current rate". This was seen as wholly unacceptable by the members. The members would only accept the wording from the NDA of 'no greater' risk than presently as acceptable. It was stated that if they were going to increase the dose to the workforce and the public - why do it in the first place? (consensus)

#### **3. Commercial Operations and Assets**

- Not applicable to Hunterston A

#### **4. Management Of Nuclear Materials**

- Is it waste or strategic stock? - If waste is an asset when will the asset be realised. This has to be taken into account in the Strategy.

## **5. Competition And Contracting**

- The tender process should **be** based on safety. All contractors must have an excellent safety record (one really worth having) before they would be allowed into the tender process

## **6. Innovation: Skills, R & D And Good Practice**

- Noted - no comments from the group

## **7. Financial Requirements For Decommissioning And Clean Up**

- Noted - no comments from the group

## **8. Socio-Economic Development and Stakeholder Relations**

- If this is the only way (via SSG and the Strategy documents) that the NDA 'engage' then it is flawed. This is a limited engagement process and far too short a timescale for members to consult to the wider/local populous.
- In addition to the SSG why do the NDA not use: royal mail mass leafleting to inform stakeholders, a simple fit for purpose tick box survey on the end state, an end state options booklet printed up for each site by the NDA, forward planning (a slot on local TV) (consensus)
- Should each 'bundle' have it's own 'NSG'. This would allow best practice and sharing across one bundle and a 'one way' approach to stakeholder engagement.

## **9. Nuclear Safety**

- Hunterston A SSG members would like information on the 'prioritisation' working group of the NDA

## **10. The NDA's Health Safety, Security and Environment (HSSE) Policy**

- Noted and agreed as a **minimum** standard acceptable not a 'goal'

## **11. General Points on the Strategy/Environmental Report**

- Why did the NDA agree bundles before consultation? If we (the Stakeholders) are meant to shape the strategy why are the NDA and not local stakeholders agreeing such fundamental issues
- Full approval of the fact that the NDA has been formed (consensus)
- It is stated that the NDA would have <sup>to</sup> mitigate against the effects of coastal erosion in areas of Special Scientific Interest. The members felt that this priority should actually be given on a site by site basis. i.e this might not be the only driving factor as to why they would remediate land at a site. At Hunterston there are VLLW pits near the foreshore, which are of a priority to the local stakeholders to have remediated. This may not currently be in the plan but must be done to allay stakeholders' fears and there should be NDA money available to do this and not just because it is designated as a Site of Special Scientific Interest (SSSI).

The members agreed that the 'Site End State' was not a matter for this time and that it would need much more discussion by the members and other local stakeholders and far more information on a National Repository and waste management. Councillor Wilkinson and the members present agreed to discuss the way forward on the End State at a future meeting and only then would these points be submitted to the NDA