

Stakeholder Issues Document

Any and all issues raised by participants in advance of the NSG meeting in March 2010 are included in the table below, along with the NDA response.

Comment	NDA Response
<p>Why has Hunterston 'A' been selected as a trial site for SLC only governance for three months with no NDA representation on site, to explore if efficiencies can be made. What is the effect on the site as a result of this trial and the remaining sites in the Magnox fleet?</p>	<p>After a close and fruitful partnership with the Magnox North operations team at Hunterston over the past few years, the NDA feels that the SLC's maturity enables it to take on increased responsibility for the day-to-day delivery of the Lifetime Plan for Hunterston. This is in line with development of market-focused business operating models across the estate.</p>
<p>Why has NDA allowed PBO to self police at Hunterston A when at last NSG9 NDA were looking at graphite reduction which now looks like will not be going ahead. Why was stakeholders not given this information but had to find then push from site the relevant information. Where was stakeholder engagement? NDA has an obligation yet by doing this and removal of site team has changed the rules that they themselves are bound by. This has implications across NDA estates.</p>	<p>The NDA's Hunterston Site Programme Manager has withdrawn from the day-to-day programme role in order to focus on wider strategic issues related to Hunterston and key NDA business issues. These include the Hunterston graphite project which remains an important area of work for the NDA. Key site stakeholders were contacted personally about the trial by the site director and SPM, who will continue to support the SSG and engage in open dialogue with all stakeholders.</p> <p>Delivery management will be the sole responsibility of the SLC Magnox North, in line with their contract. Ongoing dialogue and the appropriate governance will continue with the NDA Site Programme Manager and other NDA personnel through Magnox North rather than directly with Hunterston site on day-to-day issues.</p> <p>The situation is being reviewed in March with a view to introducing a similar arrangement at other sites.</p>

Comment	NDA Response
<p>Funding Business plan update</p> <p>Funding for SLCs</p>	<p>On 3 February, a letter was sent to all NSG participants providing an update on the Public Value Programme work. A further update will be provided at the start of the NSG meeting on 17th March. We will also update NSG participants on progress with our next Business Plan which will be published towards the end of March.</p>
<p>Now that NDA have forced themselves into the ESPS trustee group what is their strategy to repair the deficit and protect the members of this scheme</p>	<p>The NDA has consistently demonstrated its commitment to the provision of high quality, secure pensions for those who work within the NDA estate. Evidence of that is our rigorous enforcement of the provisions of the 2004 Energy Act, the establishment of the Combined Nuclear Pension Plan and the injection of £88 million to date into the Magnox Group of the ESPS to repair past and current deficits.</p> <p>A plan is in place, agreed between the Magnox SLC employers and the Magnox Group Trustee, and funded by NDA, to make further payments totalling £84m between 2011 and 2014 to repair the remainder of the current deficit. The funding level of the pension scheme is reviewed every three years by the Trustee, and if there are any future deficits then new repair plans will be put in place to deal with them.</p>
<p>Why is the NDA taking part in new nuclear build conferences, like the one 26/01/2010 at Charing Cross?</p>	<p>Invitations to conferences received by the NDA are considered on a case-by-case basis by our Events Committee. On this occasion, the Committee turned down the invitation and no NDA people took part.</p>
<p>Details of collaborative agreements between NDA and international organisations.</p>	<p>This can be found on our website via the following link - http://www.nda.gov.uk/aboutus/international-relations.cfm</p>

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<p>What is being done to avoid workforce drain and training collapse in wake of EDF problems in France?</p>	<p>The issues faced by EDF as referred to in the question appear to relate to matters within the company and on their own should not impact on the UK nuclear decommissioning workforce.</p> <p>However as previously reported to the NSG building a world class sustainable workforce is a key priority for the NDA and our many partners. The Skills and Capability Strategy, launched in November 2008, is now being implemented and a comprehensive update of progress will be published in the Spring.</p> <p>The strategy itself not only aims to retain current expertise but also attract new people into the industry, both to bring fresh insights and to benefit from existing skill transfer. Indeed the update will highlight the success of graduate recruitment and the growth in apprenticeships.</p> <p>That strategy is now being broadened to develop a NDA estate wide People Plan, again using a strategic approach to ensure we attract and recruit people with the right skills, retain and reward employees appropriately and ultimately build that world class workforce to meet the many challenges that lay ahead.</p>

Comment	NDA Response
<p>One NSG participant raised a number of very detailed questions and these are listed below.</p> <p>1. Given that since 2006 the LLRC has raised concerns about the potential for a shift in the scientific assessment of radiation risk to affect NDA's commercial operations and those of its contractors; and given that the NDA Integrated Risk & Opportunity Register contains an entry (Risk 364) which identifies the risk that "developing research on the effect of radioactivity on people or other species identifies impacts greater than those expected based on current scientific understanding or identifies significantly greater uncertainty in such impacts resulting in change to national requirements and/or advice on radiation protection standards" leading to "constraint of decommissioning and waste management options or site end states result[ing] in significant changes to site Lifetime Plans and NDA liabilities", will NDA explain why its original Strategy included issues such as waste management, co-ordinating R&D on decommissioning and clean-up and encouraging SLCs to share good practice, coastal erosion, climate change, ensuring a consistent approach to social and economic impacts, assessing unknown factors associated with contaminated land and seeking information from NDA contractors on future discharges, while NDA's statements on radiation risk reveal that it is seen as an operational matter rather than strategic? Will the revised Strategy address the potential for change in accepted methods of determining the health impact of radioactivity?</p>	<p>Due to the detailed nature of these questions, the NDA treated it as a FoI request and a summary of our response is below:</p> <p>1. We note the risk but do not judge it to be significant at this time. Such matters are regularly assessed by international expert groups (e.g. ICRP) and by the Health Protection Agency (established by statute to advise UK government on such matters). They are the expert bodies in this area and we and our estate must defer to and be bound by statutory dose limits and the statutory obligation to abide by the ALARP principle. The framework for radiological protection is based on the accepted expert analysis of radiological risk, and has a high international provenance.</p> <p>The NDA is currently working on Strategy II and you have been invited to the NSG in March 2010 where there will be further opportunities to discuss the content of the proposed draft.</p> <p>Under Freedom of Information Act 2000 (FOIA) & Environmental Information Regulations 2004 (EIR) – the authority i.e. NDA is required to supply information we hold on request (unless exemptions are applicable and it is not in the public interest to release said information).</p> <p>The questions you are posing cannot be answered by “information we hold” they require discussion and preparation of bespoke answers to your queries (which we are not required to do under either FOIA or EIR). The NDA has offered to meet with you and has invited you to events i.e. National Stakeholder Group (NSG), at the NDA expense, where you have been offered opportunities to discuss these matters. You have chosen to reject these approaches.</p>
<p>2. With reference to the version of document "Risk 364" obtained under an FoI request in 2009, which of LLRC's submissions prompted its revision and amendment?</p>	<p>2. NDA cannot supply this information. The risk register entry mentions the review was prompted by LLRC correspondence, but we have no record of which item it refers to. I can however supply the amendment history of risk 364 (this was sent to the enquirer).</p>

Comment	NDA Response
3. What did it say before revision?	3. See answer to question 2.
4. What sources of advice and information did NDA access during the revision? What stakeholders were involved in the revision?	4. See answer to question 2. The NDA would neither expect to seek sources of advice nor to engage with stakeholders on this. This is an internal risk monitoring tool.
5. On what technical grounds were the various assessments and mitigating actions decided upon? What stakeholders were involved in these decisions?	5. See answer to question 2. The NDA is not attempting to engage on this issue, as we are not aware of any clear compelling scientific consensus that suggests any likely change to the national and international understanding of the radiation risks from low level radiation exposure. Hence our only mitigating actions are to monitor for changes, as all relevant organisations would, within the limits of our capability and expertise.
6. With reference to "Monitor[ing] developments on radiobiology with Westlakes and Centre for Ecology and Hydrology" (a "Mitigating Action" in Risk 364) what developments are being or will be monitored? What technical expertise will NDA deploy in assessing developments in radiobiology? What stakeholders will be involved in these assessments?	6. They are conducting various research activities, and as a funder of some of this work, we take an interest in its findings. As we have indicated in previous communications, NDA is not a technical authority in this area and we, as others equally must do, are reliant on expert bodies and government to keep such risks under continuous expert review.
7. With reference to the ongoing "Monitor[ing] ... information on human health impacts of radiation communicated through the National Dose Assessment Working Group" (a "Mitigating Action" in Risk 364) what information on human health impacts is being or will be monitored? What stakeholders are or will be involved in the monitoring? In determining that this Mitigating Action would rely on the NDAWG, what account was taken of existing challenges to the concept of radiation "dose" following the CERRIE report?	7. Again, the NDAWG is a body we may have access to, but this is in reality an ongoing monitoring activity rather than technical participation, and is not a mitigating action as such. NDA as a body does not monitor human health impacts, although we are supportive of expert bodies (e.g. Westlakes Scientific Consulting, NDAWG, COMARE, HPA etc) that do so. As regards the CERRIE report, as a non expert body in this field, NDA does not have an opinion on this.
8. Will NDA provide Risk 1393 on risks associated with exposure to Tritium?	8. A copy of Risk 1393 was sent to the enquirer.

Comment	NDA Response
<p>9. Is it reasonable to assume that NDA did not publish the "Update on Radiation Risk" paper (NSG 97) in the Stakeholder Issues Document at the November 2009 NSG because it revealed that the majority of those surveyed by the Convenor had supported collaborative talks on the issue of low level radiation?</p>	<p>9. The NDA did circulate NSG97 to all 132 NSG delegates (so it was to all intensive purposes published); therefore your assumption is not reasonable. An advance copy of NSG97 was also sent to you by Richard Griffin on 13/11/09.</p> <p>As a participant in the interviews carried out by our Convenor, you are in a position to assess the conclusions of that study yourself. The study sought to explore whether there was any appetite to explore ways in which collaborative talks on the issue of low level radiation could be undertaken. It was not a scoping exercise for a joint fact finding investigation. While the majority of those surveyed did support some form of meeting or process to discuss this issue, there were several concerns raised about who would attend, what the agenda would be and how it would differ from other processes that had looked at the issue. Nothing in the Report changed the NDA's position and we do not believe that it would be a good use of NDA resources to initiate a process to discuss an issue on which we do not have the lead responsibility for or technical expertise to conduct.</p>