

Meeting:	NuLeAF Steering Group, 20 th July 2012
Agenda item:	5
Subject:	Submarine Dismantling Project
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Purpose:	To report on the recent (20-21 st June) meeting of the Submarine Dismantling Project (SDP) Independent Advisory Group (IAG) and plans for the development of this project, particularly regarding engagement around interim storage sites.

Introduction

This report covers:

- Report of the SDP IAG meeting held in Bristol on the 20th and 21st June
- Review of the Public Consultation Exercise
- Review of the Strategic Environmental Assessment
- Note of an Options analysis workshop
- Review of the group and future NuLeAF involvement

Recommendations

That NuLeAF maintains engagement with the current IAG, and in particular ensures that the local authority voice is heard in discussions around ILW storage.

That NuLeAF contributes to the proposed future Stakeholder Group that will advise the SDP post-2013.

Contribution to Strategic Objectives

This work links with Strategic Objectives 15-17 for 2012, namely:

15: Encourage any member authority that may be affected by the management of the radioactive wastes from laid up nuclear submarines to participate in consultation on the proposed way forward

16: Encourage MOD to adopt clear objectives and good practices in the consultation on options for managing radioactive wastes from the SDP

17: Seek to ensure that the approach taken to the implementation of the SDP is consistent with developments in the civil nuclear industry

1. Report on the SDP Independent Advisory Group meeting

The SDP Independent Advisory Group met in Bristol on the 20th and 21st June. The meeting was based around reviews of:

- The public consultation exercise (which NuLeAF responded to)
- The Strategic Environmental Assessment (SEA) of disposal options
- The MOD's option analysis process
- The history of the IAG and its predecessor ISOLUS, and discussion on how effective engagement could be maintained as the project enters a new phase.

The review of process and consideration of next steps is seen as important as two key decisions are due in 2013 which will require an increased focus on engagement.

Firstly the MOD will take a decision on site(s) for initial dismantling activity. Essentially only two sites are in the running, Devonport and Rosyth. Both are owned by the same company, Babcock, and it is almost certain that the work will be split between the two. Sharing the work between the two is viewed as being preferable in practical terms and politically desirable.

Secondly, a short list of candidate sites (still to be identified but drawn from existing nuclear sites in the UK) will be identified as storage facilities for Intermediate Level Waste (ILW).

2. Public consultation exercise

The consultation was launched by the MoD on 28th October 2011 and ended on 17th February 2012 and centred on three questions:

- How radioactive material should be removed from laid-up nuclear submarines
- Where the radioactive waste should be removed
- Which type of site should be used to store the resultant ILW

MOD has identified 2 sites where radioactive waste could be removed – Rosyth and Devonport, and three options for the removal of radioactive materials (Reactor Compartment (RC) separation, Reactor Pressure Vessel (RPV) removal or Packaged Waste (PW)). Interim storage options identified are MOD sites or those owned by the nuclear industry or NDA. Long term the intention is for ILW to be disposed of at the Geological Disposal Facility (GDF) as and when a site for that is agreed.

NuLeAF made a submission to the consultation which broadly agreed with the MOD's approach but which stressed the need for the SDP to be *achievable and deliverable* and *capable of inspiring public confidence*.

Over 400 written responses to the consultation were received. In addition, over 1,200 people attended consultation events, consisting of 2 national workshops and 8 local exhibitions.

The Post Consultation Report has not been finalised but the draft report concludes that:

- Most respondents supported the aim of dismantling out-of-service submarines as soon as practical, though some did argue for long term storage at dockyards until the GDF is available.
- The option to remove the Reactor Pressure Vessel was the most popular as it was felt that this gave the greatest flexibility over storage and transport while also taking advantage of radioactive decay.
- Dismantling on both sites was seen by some as desirable, though others felt this option was being driven by political pressures rather than environmental factors. There was a clear message that the sites involved should receive significant economic benefits for hosting the work.
- In terms of ILW storage a mix of views was expressed, with some supporting the use of NDA sites while others arguing it was the MOD's responsibility to use its own land. Commercial site storage was not popular. Regardless of the storage sites selected there was strong support for stakeholder engagement.
- A number of respondents argued that MOD should better engage stakeholders in options analysis for the next phase; others questioned the weighting given to various factors by MOD – an issue which led on to the review of the options analysis process being undertaken during the IAG meeting (see below).

3. Strategic Environmental Assessment (SEA)

In parallel to the consultation, an SEA of proposals was undertaken, with the SEA Environmental Report and Non-Technical Summary published.

The issues involved are extremely complex and difficult to assess. The SEA was however viewed by many respondents and by the Environment Agency as thorough and of high quality. No reason was given as to the decision to undertake an SEA rather than a wider Sustainability Appraisal (SA), but the SEA did include a proper assessment of population and health issues as is required.

The key outcomes were:

- The RPV option emerged as marginally better than the Packaged Waste option and definitely better than Reactor Compartment option
- Using an existing nuclear licensed facility for initial dismantling or interim ILW storage has the lowest environmental impact overall
- Rosyth performs marginally better as a dismantling site than Devonport, based on the greater proximity of Devonport to significant human population

No attempt was made to name candidate sites for ILW storage.

4. Options analysis workshop

Significant questions have been raised, including by NuLeAF in our consultation response, as to the weightings given by MOD in assessing options. In response the stakeholders present at the IAG provided their own weighting on all the critical factors (e.g. local economic impact, environmental factors, health and safety etc) identified by MOD as being important in decision making. Stakeholders were grouped by sector – NuLeAF participated in a local authority group, with other groups representing business, regulator, and community/NGO interests.

The exercise proved a useful means of exploring perceptions of relative importance. In general all stakeholder groups placed a similar weight on each criteria/factor. There was general agreement between the stakeholders and the MOD on the weightings of most factors – the significant divergence being on the impact of the project on wider naval operations. Unsurprisingly this was a priority for MOD but not for others.

5. Review of the group and future role for NuLeAF

The SDP project is nearing its first major decision point. It was therefore felt opportune to review how the IAG has worked up to now and what might be appropriate engagement options for the future.

The MOD view the IAG as being beneficial to the project in terms of advice, scrutiny/challenge and ensuring that progress is adequately monitored. Stakeholders present were in general also positive about how the MOD had managed this group.

Looking forward, MOD wish to continue to engage both with the members of the IAG and the other fora around the SDP, namely the:

- Other Government Departments (OGD) meeting – with DECC, NDA etc
- Regulatory Interface Forum (RIF) – with EA, SEPA, ONR and DSNR
- Local Liaison Committees (LLCs) – for Devonport and Rosyth

The proposal is that the current IAG will hold one last meeting which will bring together the project team, stakeholders and 'independent advisors' with a focus on the site selection process for ILW storage.

Following this, stakeholder and advisory arrangements will be taken forward through:

- **Local Liaison Committees/SSGs** for 'candidate sites' – covering both the two likely dismantling sites and the ILW storage sites.
- **'Independent' Advisors** – consisting of a small group of specialist advisors – it is not clear as yet who these will be - who would provide a 'sounding board' and source of advice to the project team in designing and implementing a site selection process for ILW. The advisors would report to the Stakeholder Group.
- **Stakeholder Group** – representing an approximate replacement for the current IAG. However the Stakeholder Group will focus on broad strategic issues such as collective negotiation with site stakeholders over selection and community benefits etc.

In discussion with MOD and the IAG Chair it was made clear that the SDP views local authorities and NuLeAF as having a central role to play in the Stakeholder Group. NuLeAF is seen as assisting in any collective negotiation and in assisting in the designing of an effective site selection process.