

## **SERCO**

### **CONSULTATION**

It is acknowledged that the initial consultation process has been completed and reported in the Project ISOLUS Front End Consultation Final Report produced by Lancaster University. The report presents the findings of a thorough public consultation exercise that has resulted in 65 recommendations. We have reviewed the MoD response to Lancaster University's Final Report and note that 62 of the recommendations have been accepted by the MoD. The following presents an appropriate demonstration as to how each of the recommendations have been met by the proposal put forward in the ISOLUS PQQ.

#### **RECOMMENDATION 1**

*Consultation findings, which fall outside the remit of Project ISOLUS, should be passed to the relevant bodies.*

Public consultation will form part of the public relations and public involvement strategy as outlined in Section 5 'Public Consultation' of the PQQ. Further more specific issues regarding public consultation are addressed in Section 4 'Technical Proposal' and supporting Appendices of the PQQ (i.e. Appendix H – Environmental Issues, Appendix I – Planning Issues). Results from other consultation exercises will be wound in to the Public Relations Programme for the project.

#### **RECOMMENDATION 2**

*The ways in which public concerns relate to the practices and motivations of other stakeholders need to be taken into account. Stakeholder practices should be developed in ways that demonstrably address public concerns.*

See response to Recommendation 1 above.

#### **RECOMMENDATION 3**

*The appropriate bodies should be informed of the strength of feeling against building further nuclear powered submarines, especially in relation to the absence of a final disposal route for the radioactive wastes.*

This recommendation has been considered during the development of the proposal put forward in the ISOLUS PQQ. We regard it as important for the success of ISOLUS that issues to do with the decommissioning of submarines are clearly differentiated from other stakeholder issues such as the existence of nuclear weapons as part of the UK national programme.

#### **RECOMMENDATION 4**

*Further action and decisions need to be clearly justified in terms of their ethical premises and principles, with cost being subsidiary to this.*

See response to Recommendation 1 above. Openness, transparency, full stakeholder engagement and public participation will be a key aspect of the project as outlined in section 5 of the PQQ, and their management must include the ethical perspective.

## **RECOMMENDATION 5**

*Relevant bodies should be informed of the strength of feeling regarding the need for international collaboration, and public information on the collaboration, which is taking place, should be available.*

International collaboration has not been specifically mentioned in the PQQ as the proposal considers the safe storage of decommissioned submarines from the Royal Navy's fleet which is a matter for the United Kingdom Government to resolve. However, assurance on best practice will be an issue. The Consortium has been involved in decommissioning collaboration work for the DTI and EC and others; this experience combined with our other international contacts in the nuclear industry will allow us readily to demonstrate that all best practice has been utilised. (There may incidentally also be opportunities to apply expertise and equipment for similar problems in other countries).

## **RECOMMENDATION 6**

*Project ISOLUS should establish and maintain relationships with government bodies involved in the development of radioactive waste policy, closely monitor the development of this policy and assess its relevance for Project ISOLUS.*

Informal discussions with regulatory authorities have already taken place and it is anticipated that further consultation will take place as the project develops. Further details of issues associated with radioactive waste management are discussed in Appendices E and H of the PQQ and in Section 4 'Technical Proposal'. There will be continued involvement with all regulatory authorities during the life of the project.

Currently the Nuclear Decommissioning Authority is emerging as the custodian of the UK civil nuclear legacy and we would intend to continue our existing contact and dialogue with the NDA, incorporating discussions on ISOLUS and its place in the national strategy.

## **RECOMMENDATION 7**

*A clear statement on whether the BRDL proposal will proceed or not should be made at the earliest possibility.*

HMS Renown will be decommissioned in the same manner as the other submarines considered in this proposal when authorised. The preferred solution i.e. Option 2 of the proposal would therefore be suitable for decommissioning HMS Renown.

## **RECOMMENDATION 8**

*Openness and trust should be pursued by the MOD.*

See response to Recommendation 4 above.

## **RECOMMENDATION 9**

*Understanding public views and respecting their legitimacy should be encouraged at all levels; decisions should clearly demonstrate this respect and those public concerns have been addressed.*

See response to Recommendation 1 above.

## **RECOMMENDATION 10**

*It is recommended that the MOD recognise that consultation of itself can engender more positive relationships.*

It is acknowledged that self consultation can engender more positive relationships and it is our experience (for example at AWE) that it can. See response to Recommendation 4 above.

## **RECOMMENDATION 11**

*Bodies who are widely seen to be acting in the interests of people and the environment should be enabled to provide authority to information through their review and verification of that information (see also Recommendation 19 and Recommendation 50).*

Yes, for legitimate stakeholders. Those of extreme views with no genuine technical credibility need to be differentiated from objector groups who have credibility and need to be involved as part of the strategy. See response to Recommendation 1 above.

## **RECOMMENDATION 12**

*The MOD should review approaches to information provision being developed in other agencies, and considers ways of providing more publicly accessible information.*

See response to Recommendation 4 above particularly regarding openness and transparency.

## **RECOMMENDATION 13**

*The MOD should specifically consider the ways in which the local media can be utilised in relation to consultation at specific sites, and seek out other local information channels for similar use.*

The media, national and local, should be seen as part of the public relations strategy. See response to Recommendation 1 above, and Section 5 of the PQQ.

## **RECOMMENDATION 14**

*Serious consideration should be given to ways in which further details of the submarines, relevant to all aspects of the interim storage of the radioactive wastes, can be made public or made available for independent expert scrutiny. MOD compliance with Radiation Preparedness and Public Information Regulations (REPPIR) should be publicly stated. Where information cannot be made available, the reasons should be clearly and publicly explained.*

It is recognised that MoD compliance with REPPIR is an issue appropriate to the development of this Project and is identified as such in Section 5 'Public Consultation' of the PQQ. It has also been identified as an issue in Appendix F 'Statutory/Regulatory Requirements'. We are also aware of the National Inventory of Radioactive Waste and have won a contract in the past for associated work in this field. This experience will be applied to the project as it develops.

## **RECOMMENDATION 15**

*The consideration of intergenerational equity lends some weight to the preference for leaving reactor compartments intact and this should be taken into account.*

The option for leaving the Reactor Compartment intact has been discussed as Option 1 in Section 4 of the PQQ. Advantages and disadvantages of this option are considered in the decision making process. Intergenerational equity is not the only issue and may not dominate public views.

## **RECOMMENDATION 16**

*Although assessed as relatively low, the risks associated with submarine wastes should not be presented as insignificant; this is likely to be counterproductive in terms of generating public acceptability.*

We agree totally. Full consideration of waste segregation and minimisation has been taken into account when reviewing the options proposed in the PQQ. It is considered that Option 2 discussed in Section 4 of the PQQ meets this requirement as this minimises waste volumes and associated risks at the earliest opportunity.

## **RECOMMENDATION 17**

*Public acceptability will be enhanced the more 'best possible' practice is utilised (rather than best practicable means), and thus best possible practice should be pursued and not be constrained by cost, unless a robust case for doing otherwise can be publicly justified.*

See response to Recommendation 16 above.

## **RECOMMENDATION 18**

*Residual risks and uncertainties should be acknowledged in communication activities, and judgements about them debated and justified.*

See response to Recommendation 1 above. Also, Graeme Hammond who would lead our public relations activity has considerable experience in doing just this.

## **RECOMMENDATION 19**

*Recording and record keeping practices in relation to worker exposure to radiation should be independently reviewed (see also Recommendation 30).*

Specific regulations require these activities to be carried out. All regulations applicable to the ISOLUS Project are discussed in Appendix F 'Statutory/Regulatory Requirements' of the PQQ. However, this Recommendation has been rejected by the MoD and as such is not considered further with regards to the PQQ.

## **RECOMMENDATION 20**

*Doses to the public and workers should be minimised and avoided where at all possible. Records of doses should be in the public domain.*

Dose minimisation will be minimised by complying with the safety management system that will be implemented for the project – See Appendix G of the PQQ. Dose records would be maintained as part of the QA procedures. The most suitable means of making this information will be explored as the project develops. ALARP - not just dose limits - is the key operational part of best practice radiological protection.

#### **RECOMMENDATION 21**

*Where options and choices that have implications for the management of the toxic substances within the submarines are considered, similar principles to those raised in relation to radioactive wastes should be applied. Information on the toxic substances contained in the submarines should be publicly accessible, especially at sites proposed for dismantling the submarines.*

Current legislation regarding toxic substances will be complied with. Issues regarding the provision of Environmental Impact Statements which cover such issues are discussed in Appendix H ‘Environmental Issues’ of the PQQ.

#### **RECOMMENDATION 22**

*Metals contaminated with very low levels of radiation should not enter the scrap metal market; a policy of 'dilute and disperse' is not acceptable.*

The waste management strategy is discussed in Appendix E ‘Technical Proposal’ and Appendix H ‘Environmental Issues’ of the PQQ. Specific issues associated with radioactive waste generated by the MoD is also discussed in Appendix I ‘Planning Issues’ of the PQQ. However, this Recommendation has been rejected by the MoD and as such is not considered further with regards to the PQQ.

#### **RECOMMENDATION 23**

*Afloat storage should be discontinued.*

This discontinuation is part of the proposal put forward in support of the PQQ.

#### **RECOMMENDATION 24**

*Contingency plans for dealing with delays and limitations of access to necessary facilities need to be considered, so those situations such as that pertaining to the Valiant do not arise.*

The proposed solution in the PQQ i.e. Option 2 assumes the decommissioning and processing of the radioactive contents of one submarine per year. This will allow adequate time for contingency plans to be activated.

#### **RECOMMENDATION 25**

*Project ISOLUS should proceed with developing interim storage on land.*

See response to Recommendation 23 above.

## **RECOMMENDATION 26**

*Continuous monitoring of the stored wastes should be undertaken.*

This is an issue that will be brought out during the development of the Safety Case for the facility and will be a safety management requirement. The extent of 'continuous' monitoring will also be defined by the requirements of the Safety Case. Safety Case issues are discussed in Appendix F and G 'Statutory/Regulatory Requirements' and 'Safety Strategy' respectively.

## **RECOMMENDATION 27**

*Plans for responding to problems, including the flexibility to respond to unanticipated problems should be developed.*

Potential problems and/or fault scenarios associated with the facility will be considered within the requirements of the Safety Case and appropriate protective and mitigating measures put in place.

## **RECOMMENDATION 28**

*The store itself should provide a level of containment, and be capable of being temporarily sealed in the event of leakage to provide environmental isolation within the building.*

These are fundamental issues that will be taken into account in the design of the facility and considered for adequacy during the development of the Safety Case for the facility.

## **RECOMMENDATION 29**

*Provision should be made for local publication of all monitoring results at waste storage sites and at sites where submarines are dismantled.*

See response to Recommendation 1 above. Local publication of results of monitoring is best practice and we would intend to do this. The means will probably be through a combination of Local Liaison Committee and direct publication but all the information will be pro-actively offered.

## **RECOMMENDATION 30**

*Consideration should be given to additional means for providing independent monitoring, and/or independent peer review of monitoring.*

We intend to make our information trusted by the public. Independent confirmation may well be a part of this. See response to Recommendation 1 above.

## **RECOMMENDATION 31**

*Consideration should be given to means of independent auditing of management and security procedures and practices.*

This will be a normal part of the QA system in place, and more specifically in terms of the Safety Case an independent review will take place (Peer Review).

The regulatory authorities, in particular NII, will also be reviewing the safety management arrangements in particular as part of nuclear site licensing.

### **RECOMMENDATION 32**

*A site with existing, relatively large scale, nuclear activity should be used, unless there are strong and clearly justified reasons otherwise.*

The requirements of the most appropriate site are discussed in Appendix E 'Technical Proposal' of the PQQ. These requirements will be taken into account during an ongoing review of the most suitable locations.

### **RECOMMENDATION 33**

Geological stability and the implications of climate change need to be assessed in relation to the site(s) used for storing the wastes.

See response to Recommendation 32 above.

### **RECOMMENDATION 34**

*The wastes should be stored in a site where unauthorised access is prevented.*

See response to Recommendation 32 above.

### **RECOMMENDATION 35**

*The possibility of storing the wastes at more than one site should not be discounted.*

See response to Recommendation 32 above. In particular, the recommended option, i.e. Option 2 considers the early size reduction and subsequent waste segregation that would allow wastes to be stored at more than one site with the potential to make use of existing facilities at BNFL Sellafield.

### **RECOMMENDATION 36**

*The MOD should be explicit about the potential for expansion of storage beyond the existing 27 submarines, and should clarify, as far as possible, what this potential could imply for the storage site(s).*

Appendix E 'Technical Proposal' of the PQQ discusses the potential for decommissioning more than the 27 submarines currently identified.

### **RECOMMENDATION 37**

*The MOD should be explicit about the responsibility, location and management of the waste beyond the initial 30 year period, and clarify, as far as possible, the implications for the storage of site(s).*

We intend to be with this project throughout its life and our commercial record shows this as credible. See response to Recommendation 22 above. It should be noted that the

recommended option i.e. Option 2 ensures that the optimum waste minimisation and segregation strategy is employed at the earliest opportunity in the Project.

There are no long term implications as the project will have decommissioning of the plant and stores and return to green field conditions as part of the design and planning.

### **RECOMMENDATION 38**

*Transportation of the wastes should be minimised; and should avoid centres of population, subject to other considerations, unless there are strong and publicly acceptable reasons otherwise.*

Indeed. The Environmental Impact Assessment will specifically consider transport in detail and potential impacts. Our preferred solution necessarily involves some transport but the volume and routes will be designed to minimise impact. Transportation issues are discussed in Section 5 ‘Public Consultation’ of the PQQ.

### **RECOMMENDATION 39**

*The Minister should be informed of the strength of feeling against privatisation, and the problems of trust and confidence in contractors, and serious consideration is given to ways of organising Project ISOLUS that maximise the control, responsibility and accountability of the MOD.*

We have experience of managing PPP and PFI funded operations in a climate of initial distrust. We have confidence that if a PPP route is chosen, we can manage perceptions positively.

### **RECOMMENDATION 40**

*When assessing proposals, consideration should be given to the availability of suitable expertise in both the geographical area and the relevant areas of knowledge and experience, and for how this expertise will be maintained over time.*

It is the intention wherever possible to use the local workforce as outlined in Section 5 ‘Public Consultation’ of the PQQ. The PQQ also discusses the merits of the recommended option (Option 2) in making use of personnel that are available with specific experience of submarine and decommissioning experience who will not be available at later date.

### **RECOMMENDATION 41**

*An audit of the skills and knowledge bases required over the first 30 years of storage, and beyond; should be conducted and used to develop plans for the maintenance of such skills and knowledge bases.*

The ongoing management of the facility by the Facilities Management organisation will ensure that the required skills and knowledge base is maintained.

### **RECOMMENDATION 42**

*Provision of whistle blowing should be made within the management plan.*

This is something we would intend to consider as part of the ISOLUS activity. But it will be important to do this in discussion with MoD to ensure that MoD's wishes and interests are not compromised in other areas by such an arrangement in ISOLUS.

#### **RECOMMENDATION 43**

*The principles and practices of regulation should be made more publicly accessible, especially around potential sites. The responsibilities of different bodies need to be made clear. Regulators should seek to engage in two-way communication, especially with affected populations. The responsibilities of various regulatory bodies need to be reviewed to assess duplication or lack of contiguity in regulatory responsibilities for nuclear submarines.*

See response to Recommendation 1 above. Specific issues regarding regulatory issues are discussed in Section 5 'Public Consultation' of the PQQ.

#### **RECOMMENDATION 44**

*Serious consideration is given to supporting the case for civil regulation of waste stores specifically, and with other MOD nuclear activities more generally.*

This Recommendation has been rejected by the MoD for its operational activities. For ISOLUS it is entirely possible that the operations will be under civil regulation and we would welcome that. If the final site is a MoD one however, we recognise that Crown Immunity will apply and we would expect to operate at equivalent standards under the Authorisation of CNNRP.

#### **RECOMMENDATION 45**

*Further phases of consultation should aim to include anyone who wishes to be included, as far as this can be made possible.*

Yes, in principle. See response to Recommendation 1 above.

#### **RECOMMENDATION 46**

*The consultation design should enable those who may not feel they can speak freely to contribute.*

We would aim to provide a platform or route for all to express opinion. See response to Recommendation 1 above.

#### **RECOMMENDATIONS 47**

*Counter experts should be included in future phases of consultation (see also Recommendation 50).*

Yes, but the exercise must not degenerate into a trial of strength between experts. That way lies loss of balance, perspective, and control. We must provide the environment for this to take place constructively. See response to recommendation 1 above.

#### **RECOMMENDATION 48**

*The Steering Group in future stages of consultation should be reconvened to include a lay person, a national ENGO, and representation of relevant international experience. Once sites are identified, people from sites under consideration should also be represented in the Steering Group(s). It may be necessary to fund individuals to enable them to serve on the Steering Group.*

The future of the Steering Group is a MoD issue strictly speaking, but we would welcome the opportunity to incorporate any possible future Group into the Public Relations interactions.

#### **RECOMMENDATION 49**

*A Steering Group for future consultation should continue to be convened and serviced by an independent third party. How the Steering Group might provide a greater degree of accountability for the consultation process, especially in terms of ensuring findings are taken into account, should be given further consideration.*

See above. We would like to see a Local Liaison Committee take over some of the potential functions of the Steering Group, in particular being a focus for real discussion and development of local stakeholder issues.

#### **RECOMMENDATION 50**

*Consideration is given to establishing an independent advisory group to provide input to Project ISOLUS. Consideration should also be given to convening a technical advisory group, which should include counter expertise (see also Recommendation 47).*

It is our view that as stated this recommendation may constitute over-supervision for a project of the character of ISOLUS. We would be prepared to work with such groups if MoD considers our approach incomplete. Independent experts are likely to feature in any reasonable and open approach.

#### **RECOMMENDATION 51**

*The public preference for independent oversight of radioactive waste management should be communicated to the relevant bodies (see also Recommendation 1).*

Recognised. See also response to Recommendation 1 above.

#### **RECOMMENDATION 52**

*The MOD's response to these recommendations should clearly indicate where consultation outcomes have been taken into account, and where not. The reasoning behind plans and decisions should be fully transparent. The response should be in the public domain and easily accessible (for example, on the website, in printed form available on request, and distributed to participants in the Front End Consultation).*

This is a MoD action to respond these recommendations and is therefore not strictly relevant to the PQQ. We would be prepared to work with MoD to manage expectations following this recommendation.

### **RECOMMENDATION 53**

*Further stages of consultation should undertake to publish all outputs, unless there are strong and clearly justified reasons otherwise.*

We would agree. See response to recommendation 1 above.

### **RECOMMENDATION 54**

*An independent third party or parties should conduct subsequent stages of consultation.*

This is a MoD issue again, but we would not consider independence of the organisation essential as long as public confidence can be gained and independent voices included. For example the Local Liaison Committee at Aldermaston is not run by an independent body but it has gained wide acceptance from local organisations, not all supporters but all of whom are involved.

### **RECOMMENDATION 55**

*A fund should be made available to which prospective participants can apply for funding, and clear guidelines developed regarding the provision of such funding.*

This is a MoD funding issue and is therefore not relevant to the PQQ.

### **RECOMMENDATION 56**

*Widespread publicity should be given to subsequent consultation activities to maximise awareness and to inform people who may wish to participate of their opportunity to do so.*

We would agree. How it is done should be managed in our view as part of the overall strategy for MoD and the Consortium.

### **RECOMMENDATION 57**

*As much information as possible should be publicly available, including all safety related information. Where information is not made publicly available, reasons should be given as to why this is the case.*

We would agree. See response to Recommendation 1 above.

### **RECOMMENDATION 58**

*Project ISOLUS should provide information, or indicate where such information can be found, on areas where the knowledge bases are disputed or uncertain, such as the health effects of low-level radiation, and notify relevant bodies of particular areas of concern raised by consultees.*

The Safety Case will demonstrate that the facility has sufficient protective or mitigating systems in place to minimise the potential for health effects to operators or members of the public from the commissioning or operation of the facility. Any areas of concern or uncertainty will result in a forward action item being raised to ensure that a suitable solution is found to rectify the area of concern.

It will probably not address areas of national standards such as recommended by NRPB on the basis of ICRP recommendations but we do not see that as part of this project.

#### **RECOMMENDATION 59**

*The consultation and decision processes should be laid out more lucidly, and be more accessible, with (in as far as is currently possible) a clear timetable of action. It should be clear from the outset of any activities what the objectives of the consultation are, its relationship with and timing within the decision-making process and linked processes, and how the consultation findings will be used.*

Yes. See response to recommendation 1 above.

#### **RECOMMENDATION 60**

*A broad range of the public and other stakeholders should be actively included in the next phase of consultation (see also Recommendation 45).*

Yes. See our response to Recommendation 1 above.

#### **RECOMMENDATION 61**

*Principles emerging from the Front End Consultation, as identified by the Front End Steering Group, should be used for the next stage of consultation. Reference should also be made to principles of best practice as identified by a range of other sources.*

The Principles need referring now to actual project activities, but in principle we agree with this. See also response to recommendation 1 above.

#### **RECOMMENDATION 62**

*People with local knowledge will need to be included in the consultation team (see also Recommendation 54).*

See response to Recommendation 1 above. Also, the Consortium would wish to be actively involved with local groups.

#### **RECOMMENDATION 63**

*The next stage of consultation should take place not later than the time at which the Outline Proposals are received. In the meantime, Chief Executives of Local Authorities, and other appropriate bodies, should be informed by the MOD of the decision-making and consultation process (including the process prior to Outline Proposals being received) and its projected timetable. The information should also be posted on the consultation web site and provided to those who participate in the Front end Consultation (see also Recommendation 59).*

See response to Recommendation 1 above. Currently, the action to notify Local Authorities and other appropriate bodies lies with the MoD. The Consortium would wish to manage or assist in this consultation process.

#### **RECOMMENDATION 64**

*Consideration is given to providing expert advice on consultation and public acceptability, and the means, by which this can be done, to potential contractors.*

This is presumably a MoD action to ensure that all bidders use the same independent organisation during any consultations to ensure a common approach. We would be prepared to work with any experts nominated by MoD.

#### **RECOMMENDATION 65**

*Once potential sites are identified, consultation techniques should include the provision for people from different sites to meet together to pursue more acceptable solutions.*

See response to Recommendation 1 above.