

Notes of 5th ISOLUS (Interim Storage Of Laid-Up Submarines) Advisory Group (IAG)
held on 18th June 2008 at Surgeon's Hall Complex, Edinburgh

Attendees:

Carly Amos	MOD – Defence Equipment & Support (DE&S) Secretariat
Tub Aves	British Nuclear Energy Society (BNES)
David Collier	Independent Specialist
Andy Daniel	VT Nuclear Services
Dr Paul Dorfman	University of Warwick
Peter Entwistle	Frazer Nash (Technical Options Study Contractor)
Chris Hargraves	MOD - ISOLUS Deputy Project Manager
Dr Jane Hunt	Lancaster University
Sandra Jack	Scottish Government
Peter Lanyon	Nuclear Submarine Forum (NSubF)
Steve Lewis	Health & Safety Executive (HSE) - Nuclear Installations Inspectorate (NII)
Dr David Littlewood	The Centre for Professional Ethics, University of Central Lancashire
Antony Lokier	MOD - ISOLUS Team (Secretary)
Les Netherton	Environmental Health Advisory Services Ltd (Chairman)
Di McDonald	Nuclear Information Service
Shelly Mobbs	Health Protection Agency
Bob Pirret	Rosyth Local Liaison Committee
Rajnika Patel	CIRIA
David Senior	HSE - NII
Peter Stacey	MOD - Representing Naval Base Commander Devonport
Andy Stevenson	MOD - Representing Naval Base Commander Clyde
Son Mon Sutcliffe	Member of Public
Jane Tallents	NSubF
Maggie Taylor	MOD - Assistant Director (AD) ISOLUS Project
Dr William Thompson	Lancaster University
Mark Toner	Scottish Environment Protection Agency
Ian Watson	Frazer Nash (Technical Options Study Contractor)
David Whitworth	Institution of Nuclear Engineers (INucE)
Lt Steve Woodley	MOD - ISOLUS team

1. Welcome, Introductions & Apologies

Les Netherton (LN) welcomed all those present and asked everybody to introduce themselves as there were some new members. The following apologies had been received:

Ian Avent	Community Awareness Nuclear Storage And Radiation (CANSAR)
Paul Naylor	Environment Agency
Peter Brazier	Nuclear Decommissioning Authority

In response to a recent press article in the Sunday Herald, Bob Pirret (BP) read out the following statement:

“Many European nuclear sites including English nuclear sites send certain Low Level Wastes (LLW) to Studsvik in Sweden for decontamination and smelting. Babcock at Rosyth made an application on 17 October 2006 to SEPA for authorisation to permit sending LLW 165 cubic metres per 12 month period to Studsvik for disposal. This is the first Scottish application relating to use of the Studsvik facility. The application conforms with Government Policy to permit the transfer of LLW overseas for treatment, where no such facilities exist in the UK. This application also conforms with the Nuclear Decommissioning Authority’s Policy to minimise the volume of waste disposals to the Low Level Waste Repository, which is owned by the NDA. After treatment by Studsvik, the radioactive component of the waste will be returned to Rosyth for onward disposal to the LLWR at Drigg under an existing waste disposal authorisation.

The application is being processed by SEPA and has undergone both public and statutory consultation. The application is now with the Scottish Government for approval.

Assuming the application is approved then the contaminated internals of 2 MoD owned redundant Used Transport Packages will be processed through this route. The shipment’s volume is about 60 cubic metres and weighs about 35 tonnes. Babcock expects that up to 95% of this waste by volume is non-radioactive and can be recycled by Studsvik”.

Dr Jane Hunt (JH) asked if there were any plans for recycling any parts of the submarine through this process. BP stated that there are not any plans at present. David Senior (DS) confirmed that this application process is associated with the decommissioning of the licensed site and does not cover the Laid-up submarines at Rosyth.

JH asked if the metal being produced was going to be for free release. BP confirmed that some of the resulting metal would be free release. JH asked if she could have assurance that the future metal released from the ISOLUS programme would only be used in the nuclear industry. CH stated that for ISOLUS there would be some surface contaminated steel and there is a requirement to do the appropriate studies to determine what will happen to this material and this would be open for discussion in the future. Paul Dorfman (PD) stated that it was a SD:SPUR (**S**ite **D**ecommissioning: **S**ustainable **P**ractices in the **U**se of **R**esources - <http://www.sdspur.com>) recommendation that the steel should be re-used in the nuclear industry. SL stated that with the increasing future world demand for steel to be utilised in the nuclear industry this should be possible. LN summarised that whilst this current SEPA application was outside of the ISOLUS programme it did have future implications as brought out in the discussion.

[PMN Please see Annex C for further comments on Notes]

2. Action Grid

“Action 1.6: Di MacDonald to provide a point of contact for Environmental Justice.” - Action ongoing. Di MacDonald (DM) stated that this was still ongoing. Paul Dorfman offered to provide contact details of a colleague at Lancaster University.

“Action 2.2: The ISOLUS team to start a short regular newsletter.” – Action ongoing. The secretary stated that the compilation of a distribution list was currently in-hand. It was agreed to invite suggestions from members of the IAG for the content of the newsletter and to present a draft newsletter to the IAG at the September meeting.

Action 5.1: IAG members to provide any suggestions for the newsletter to the Secretary by 27th July 2008

Action 5.2: Secretary to present draft newsletter to the IAG at the next meeting.

“Action 2.7: The secretary to provide an updated paper with a section on roles for comment.” – Action ongoing. The governance paper was in hand and would be available for the next meeting.

“Action 4.1: Secretary to formally circulate electronic copies of the Decision Tree and comparison with the civil sector.” – Action complete. This was issued on the 7th April 2008.

“Action 4.2: David Collier (DC) to provide references from the joint work on the Low Level Radiation Campaign.” – Action complete. This was issued on the 16th June 2008

“Action 4.3: Lt Steve Woodley (SW) to liaise with PD, DS and David Littlewood (DL) regards editing of the Risk Glossary.” – Action ongoing. This was discussed under agenda item 4.

“Action 4.4: JH to give a ‘Public Risk Understanding’ presentation at the next IAG.” – Action In-hand. It had been agreed to defer this to the September meeting.

“Action 4.5: SW to distribute declassified versions of recently received reports to IAG members.” – Action ongoing. This was discussed under agenda item 3.

“Action 4.6: CH to circulate proposals for independent peer review of the Technical Options Study.” – Action complete. This was discussed under agenda item 5.

“Action 4.7: CH to notify IAG of contractor’s proposals for the Technical Options Study.” – Action completed. This was discussed under agenda item 5.

“Action 4.8: LN to recommend to the MISG that a Ministerial statement is made on ISOLUS.” – Action complete. This was discussed under Agenda Item 7.

“Action 4.9: DC to add a diagram to his Stakeholder Review of Technical Option Studies.” – Action complete. This was included in the Technical Options Study Brief, Annex A.

“Action 4.10: LN to liaise with Dr William Thompson regards placing IAG agendas on the ISOLUS website.” – Action complete. WT confirmed that the agenda is now available on the ISOLUS website.

“Action 4.11: Maggie Taylor to develop the ISOLUS Look Ahead Chart.” – Action ongoing. This was discussed under Agenda Item 6.

“Action 4.12: Peter Lanyon to provide the Secretary with a contact for CND.” & “Action 4.13: Secretary to invite CND to the IAG.” – Actions closed. Peter Lanyon stated that the bigger NGO’s preferred that the NSubF kept them informed at present.

Action 4.14: DS to provide WT with the HSE database for stakeholders for New Build Nuclear Power Stations.” – Action complete.

Action 4.15: WT to issue request for details for the stakeholder contact list.” – Action complete. Request issued by WT on 20th May 2007

3. Technical Summary Reports Update

SW stated that the current asbestos surveys are nearly all complete but there had been a delay due to Revenge’s docking. Two technical studies are due to start shortly; the first was a radiation scan of the Reactor Compartment and the second was to check if any of the systems are contaminated. Work was in hand to obtain quotes for surveys to cover the other non-nuclear hazards and the Disposal Services Agency had been contacted with regard to ex-HMS Intrepid and Fearless as they were from the same era and had similar secondary systems. The business case for submitting the summaries to the Plain English Campaign was in hand to obtain the clarity mark. A scope of work is currently being

generated for a Feasibility Study for the dismantling of the submarine which will be made available to the IAG for preview.

[PMN Please see Annex C for further comments on Notes]

LN informed the group that he and Maggie Taylor (MT) had an action from the MoD ISOLUS Steering Group (MISG) to produce a paper detailing how “Preview” will work and interface at MISG and IAG Level. It was agreed that the forward work plan programme would be the basis for the IAG to decide what work they would wish to have sight of in the future, members would also be able to raise omissions from the plan as well as inclusions. PL warned that some NGO’s had concerns about ICRP (International Commission on Radiological Protection) regulations. Shelly Mobbs stated in response that uncertainties in risk assessments are an issue and that whilst she believed the ICRP regulations are about right she appreciated there are different views which are being debated in bigger forums.

LN stated that there had been correspondence outside the meeting regarding the concern that there is a lack of understanding in the public arena as to where we are today, what has been going on in the last few years and why things have changed. PL expressed that for a long time he has been raising his deep concerns regarding the hiatus surrounding the Outline Proposals and why Industry was even looking at Cut-up of reactor compartments. He also stated that he was worried that only the recent statement from MoD was included in the information pack provided, in isolation to the preceding correspondence. MT stated that no decisions had been made on any of the technical options and that was why we are having the Technical Options Study.

Action 5.3: Maggie Taylor agreed to issue a revised statement covering this period.

[PMN Please see Annex C for further comments on Notes]

JH expressed her concern that studies were being undertaken whilst the consultation was ongoing. She clarified the meaning of the Recommendation 34¹ that the RC’s should be stored intact for an extended period and that any move away from this would have to be justified. She believed that the main problem was that we don’t know what we don’t know. PD suggested that we needed to produce an “Agree to Disagree” statement. David Littlewood expressed his concern on how we got from FEC to CIOP and that some of the MoD response to CIOP talked about the subject and not the issue. David Whitworth (DW) stated that we needed to put together an honest appraisal on what happened so that firstly we do not lack credibility and secondly we do not make the same mistakes again. JH believed that the MoD should have given more emphasis to Industry to consider the Front End Consultation recommendations. MT suggested that filling the gap could be part of the first newsletter. JH suggested that there should be a paper on what went wrong and learning the lessons. Jane Tallents (JT) stated that there was a concern from some of the public about why are we looking at the Technical Options Study. LN stated that he was part of the Consultation Group and at the time he also had a concern on the lack of hard based facts for the CIOP. PL stated that the minister had recently made a statement in a recent adjournment debate that the IAG is “to provide independent scrutiny of the project”. Therefore in addition to the IAG’s current process guardian role, more information is needed on the process to date, in order to scrutinise it.

LN summarised that there had been a lot of strong feelings on different perceptions on what the issues are and had identified some key issues. He requested that it would be very useful for members to send their views to the MoD with evidence and suggestions as to what the issues are, what went wrong and why. These could be used for a discussion on the learning points at the next meeting to ensure we do not make the same mistakes.

¹ *CIOP Recommendation 34 – RCs are stored intact for an extended period. Cutting up of the RCs should only be countenanced as an option if it can be clearly demonstrated and agreed that there will be no additional exposure to workers or discharges to the environment or other risks above those involved in intact storage of the RCs, or if there are overwhelming and publicly accepted reasons for cut up.*

Action 5.4: All to suggest views for a discussion on learning points by 8th August 2008.

4. Development of a glossary: update

SW stated that the glossary was still ongoing and that it would be available for the next meeting. David Senior stated that he would be providing published definitions within the Safety Assessment Principles.

5. Technical Options Study

Chris Hargraves (CH) stated that a paper showing progress to date paper had been issued as part of the briefing pack, Annex A and highlighted the main points within it. PD suggested it would be better to have 2 IAG members to monitor the peer review. DC stated it would be important for the members to be able to understand the issues. Ian Watson (IW), Frazier Nash, the contractor selected to undertake the Technical Options Study gave a presentation, Annex C, on how they planned to undertake the study.

JH asked when the outputs from FEC & CIOP would be inputted. IW stated that they are feeding into the early work and more importantly would feed the criteria workshop. DC asked how they are going to deal with the answer that would come out. IW stated that they would do a sensitivity analysis after the 2nd workshop to explore the effect of uncertainty and investigate its influence on the answer. Peter Entwistle (PE) stated that it would be unlikely that there would be an answer and that more information could be needed for certainty.

A discussion took place regarding weighting and whether you do it before or after you have knowledge of the scores. PE stated that he was happy to be guided by the IAG as there are different and strong polarised views. JH stated swing weighting was tried by CoRWM but it was not a universally accepted approach and requested that this criticism be noted. She also stated that it would be difficult for the public to understand. SL stated that weighting was different to normalising. PE stated that there are techniques that do not include weightings but they are too coarse a filter. JH stated that the process can be used as a mechanism for exploring but not for an answer. Shelly Mobbs supported this view that it should be used as a decision aiding technique not for making a decision. PL suggested a way forward would be to normalise the criteria before marking, then consider weightings later. He expressed a concern that this process was taking place during the holiday period which could limit the opportunity to comment. CH stated that the study would not be driven by an end date if it affected quality.

A question was asked about the role of IAG and Peer review in process. PE stated that clearly IAG members that take part in the workshop cannot take part in the peer review process. In addition the IAG will have opportunity to see all documents produced. CH stated that he had incorporated the comments he had received from the IAG regarding having a small team with a technical member and somebody from a non-nuclear company. Frazer Nash had offered 2 alternative proposals which covered the options, so it was proposed to run both. In addition he proposed that one member of the IAG act as a monitor to observe the peer review process on behalf of the IAG. PD suggested it would be better to have 2 IAG members as monitors and following a discussion this was agreed by the group. DC & PD volunteered for these positions of monitoring and not contributing to the Technical Options process. IW stated that Frazer Nash had proposed Tony Coverdale an ex Naval Commander to be the technical consultant and somebody from CATALYZE to cover the process aspects. PD suggested John Large as an alternative for Tony Coverdale. Following a wide discussion the group was unable to reach agreement on any these proposals for peer review. However after further reflection and discussion, JH proposed Prof Malcolm Joyce, Professor of Nuclear Engineering at Lancaster University, who was fully supported by the group.

It was explained that it was proposed to cap the attendance at the workshop to 20 based on experience as to the optimal balance. It also was stated that the areas of expertise would be proposed to the IAG for agreement and population over the forthcoming weeks. SM asked why it was planned to

have the same people attending both workshops. It was explained that from a practical point it needed to be the same people. JH was concerned that the public was not involved. CH stated that he anticipated that the FEC, CIOP and IAG would give us sufficient input. JH proposed that a bit of social research would be useful. SM suggested that the research would need information first. JH stated that it was important for upstream consultation as it shapes the problem and suggested that it was important to ensure that 3 people feed in the consultation recommendations. LN summarised that the concerns on early public input need to be understood and that we pull out learning issues.

6. IAG Work plan for the Year

MT stated that it was intended to flesh out a work plan before the September meeting with a project plan and dates. LN suggested it would be good to have the decision tree items on a timeline. BP suggested that it would be very useful to have a shared area to view the documents. The ISOLUS team agreed to investigate the options available, for example extending the use of the website.

Action 5.5: ISOLUS team to investigate options for a shared area.

CH stated that there was a scope of work that was being considered for cutting up the non-nuclear sections of the submarine, which the IAG will have visibility of.

7. Ministry of Defence ISOLUS Steering Group feedback

The Chairman had provided a brief prior to the meeting, Annex B, but this was not discussed due to time constraints.

8. IAG Remit

This item was not discussed due to time constraints.

9. Keeping IAG informed

This item was not discussed due to time constraints.

10. IAG Membership

This item was not discussed due to time constraints.

11. Review of Parked Issues

This item was not discussed due to time constraints.

12. AOB

JH requested that page numbers be included in the minutes in the future.

Action 5.6: Secretary to include page numbers on correspondence.

JH asked what was the status of the options information issued prior to the meeting and suggested that it should be an agenda item for the next meeting. MT stated that siting was the next topic to be looked at and the information issued was meant to be a preview of the MoD's first thoughts and would welcome any comments. MT also stated that the overarching strategy paper issued was meant to set the context. It was agreed that the information would be re-issued with a covering explanation and members would comment by the 8th August 2008.

Action 5.7: MT to issue the options paper for preview.

Action 5.8: IAG to provide comment on options paper by 8th August 2008

[PMN Please see Annex C for further comments on Notes]

Jane Tallents stated that comments had been made regarding the Astute Class during the visit to Rosyth and stated that some members were only attending the IAG on the condition that ISOLUS was only dealing with the 27 submarines that have been either been decommissioned or are currently in service and not any new submarines. She asked if the position had changed so that they could consider the consequences. MT stated that she understood her point and stated that project ISOLUS had always been concerned with the 27 submarines from current and past classes. She believed in 1999 when the project was established that little thought had been given to future classes and as time has passed we now have the Astute class coming into service and the successor programme was now under way. Whilst ISOLUS is funded and programmed for 27 submarines, the statement now being made is that ISOLUS will be future submarine capable, which means that the facilities would be able to handle them in the future if needed. SM made a distinction in that the project was looking for a solution for these 27 and at some stage in the future there will be a separate decision on what to do with the future classes and that ISOLUS is not precluding future classes. CH added that by the time the future classes come out of service there should be no need for interim storage as the national repository should be available, so the “son of ISOLUS” would be very different. JH stated that she may also have to consider her position. PL stated that both the FEC² and CIOP³ made it clear that the principle of new build has been opposed by the public and the basis of that principle is that until you know what you are going to do with the submarines we should not have new build. JT re-emphasised that she was not happy with new-build and that was causing problems for NGO’s in supporting the ISOLUS process. LN suggested that if there are any more points for clarification could they be put to the ISOLUS team.

LN thanked DS for his support as this was his last meeting

LN requested that the timings of meetings be reviewed to accommodate the work load and agreed to discuss this with the ISOLUS team.

Action 5.9: LN/ISOLUS team to review meeting timings.

PL requested that venues be checked for their compliance with the disability laws as he had found this venue very unacceptable.

Action 5.10: ISOLUS team to review venue facilities.

13. Future Meetings:

The next meeting will be held in the, IBIS Hotel, 11 Ladywell Walk, Birmingham on 11th September 2008.

The following are the future dates and venues:-

3rd December 2008 – Manchester.

March 2009 - TBA

² FEC 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”

³ CIOP Recommendation 30 – “No new nuclear submarines should be ordered or commissioned until a final disposal route for radioactive wastes exists. The current nuclear submarine programme should be reviewed.”

Annex A –Technical Option Studies briefing pack

IAG MEETING – 18TH JUNE EDINBURGH

TECHNICAL OPTIONS STUDY BRIEFING

Selection of the Contractor

The mandated Defence Equipment and Support (DE&S) process for the competitive procurement of Technical Support is the Framework Agreement for Technical Support (FATS) system. This consists of a matrix of contractors and their technical capabilities, and an outline contract. ISOLUS examined the matrix for contractors with nuclear and Best Practicable Environmental Options analysis experience, which produced a list of eleven potential contractors. One was excluded as being one of the ISOLUS bidders, and hence not independent. The remaining ten were invited to bid against a scope of work which included the requirements agreed with the IAG at the December workshop, and deliverables agreed in our process preview discussions. Seven bids were received.

These bids were assessed against the following criteria –

- Understanding of the Requirement
- Company and Individuals experience
- Compliance with the Requirement
- Independence for the ISOLUS bidders
- Value for money

As a result of this process, Frazer Nash won the competition. It should be noted that they are wholly owned by Babcocks, but were able to demonstrate a significant degree of independence from the parent company.

Peer Review Proposals

Following selection of the bidder and receipt of IAG comments on the contractors' proposals, a scope for Peer Review was agreed with the contractor, as follows –

ISOLUS TECHNICAL OPTIONS STUDY

SCOPE OF WORK FOR INDEPENDENT PEER REVIEW

Requirement

A Peer Review Team, consisting of a technical expert with knowledge of the submarine and nuclear industries, and an Options Study expert with significant experience in the non-nuclear industries.

An ISOLUS Advisory Group member shall be part of the Peer Review process, acting as a monitor of the process. As such, they will attend any meetings of the Peer Review Team, and be included in all correspondence between the Contractor and the Team, between other members of the Team, and between the Team and the MoD.

The ISOLUS Advisory Group member will in the first instance raise issues of concern with the MoD. If following discussion there are still concerns, issues should be discussed within the IAG.

The IAG member will be reimbursed by the MoD in accordance with the agreed IAG rates, through the existing mechanisms.

The output of the Peer Review process will be communicated directly to the MoD, who will take forward issues with the Contractor. Final outputs of Peer Review will be made available to stakeholders.

Attendance

Team members are required to attend the following –

- *An initial briefing with the ISOLUS Project*
- *The Attributes Workshop*
- *The Scoring/Weighting Workshop*

The Contractor is to attend the IAG meeting in Edinburgh on the 18th June, to present their overall process to the attendees, and take part in any discussions on this Peer Review proposal.

Deliverables

The Peer Review Team is to review the –

- *Methodology Report*
- *Data Report*
- *Options Report*

Stakeholder Review of the Study

David Colliers note on Stakeholder Review is attached below for discussion.

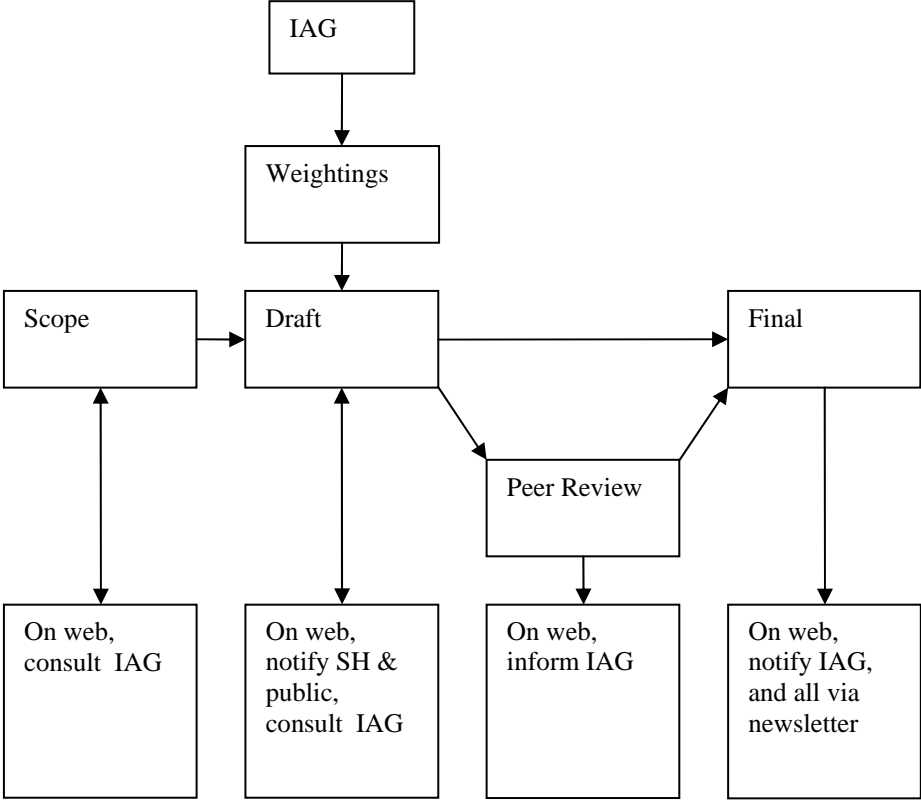
Chris Hargraves
ISOLUS1
13/06/2008

Wider Stakeholder Review of Technical / Option Studies V2

- At some stage, the MOD will draw together the outputs of the various work streams with direct stakeholder input in order to arrive at a conclusion. There must be a broad-based, proactive stakeholder engagement/consultation at this point. One might imagine something comparable in scope to the FEC etc.
- This is necessary, but not in itself enough to demonstrate transparency and consideration of stakeholder perspectives throughout, and it may be too late to take account of important and valid points in some areas.
- There must therefore also be an opportunity for those stakeholders interested in particular work streams to review reports before they are finalised and make their views known – including stakeholders not represented on the IAG.
- The IAG is one mechanism, and members of the public may attend and make a contribution. However, IAG has recommended - and MOD has accepted – the principle that the draft reports from each of the work streams (represented by the ‘many other inputs’ arrow on the technical option study flowchart) must be put in the public domain with an opportunity for comment before they are finalised.
- There must be a genuine opportunity to influence the work before the reports are finalised and all comments must be published with a response unless confidentiality is requested. This is separate from any peer or IAG review.
- Best practice in comparable radioactive waste option programmes is to place the following on the project website and to inform interested stakeholders: project scoping document; draft project report; key supporting reports; any peer review reports published up to this point. And, of course, an overview document that shows how everything links together should be available.
- The technical option assessment work stream includes sensitivity analysis using weighting sets representing different perspectives. This is NOT the same as eliciting stakeholder views on the relative weight that should put on the conclusions of the different work streams in making the final decision.
- The contractor will propose how it will derive weighting sets; it may involve talking to stakeholders but this is NOT a primary public consultation matter. It cannot be, as the public would not have access to sufficient information at this point and the results might be misused. However, given the weight of expertise in the IAG, that group should clearly be involved in this part of this process.
- Responses are usually requested within one month, but good practice is to consider any comments made on any document right up to the point at which the main consultation is concluded.
- There is usually no requirement or demand for workshops etc. on individual work streams, but MOD should be responsive to requests for meetings etc.
- MOD needs to start building a list of potentially interested stakeholders’ email addresses for this purpose asap.

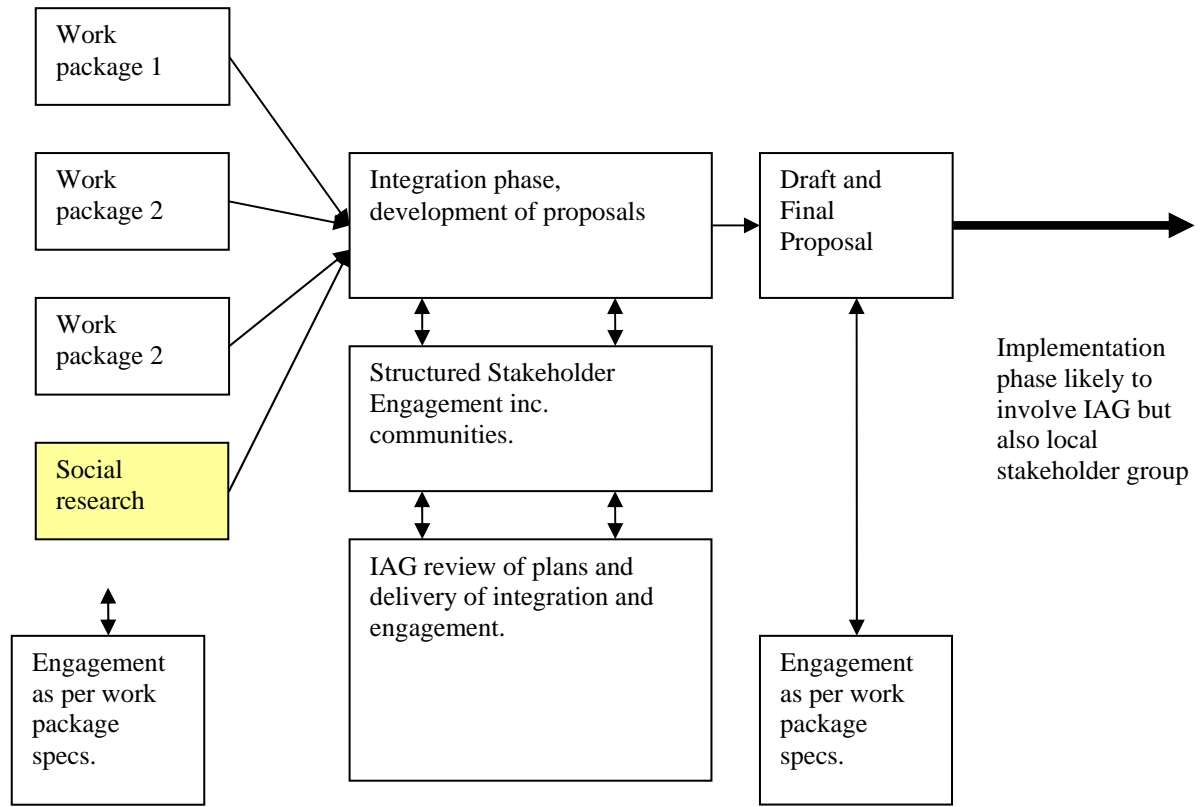
Text as per DC 10/1/08 + PD, Flowcharts added June 2008

Tech option study SH engagement
as an example for a work package



Ongoing advance consultation with IAG (and through IAG other stakeholders) on overall process and scope of individual work packages.

Relationship of Tech option SH engagement to main SH engagement



Annex B - Feedback from MISG meeting 7th May 2008

- Attached is Maggie Taylors report to MISG for detailed information
- Accelerated programme: consideration is being given to an option to accelerate the programme by two years (see MISG report). This could impact on the timing of consultations being discussed by IAG.
- Les and Maggie are producing a short paper on how preview will work and interface at MISG and IAG level.
- Submarine Enterprise Collaboration Agreement: the MOD is considering entering into the above with industry to improve the way in which it procures, maintains and disposes of submarines. Due to competition laws consultation has taken place on the potential impact. www.mod.uk/DefenceInternet/AboutDefence/CorporatePublications/ConsultationsandCommunications/PublicConsultations/
- The above document mentions Devonport as a potential site. SECA is still being considered and the ISOLUS project will continue, however the potential impact in the future will need to be monitored. MISG accepted that due process would need to be followed before any decision on options or sites are progressed.
- MISG Chair asked IAG to advise on nominated substitutes for IAG representatives on MISG. (raised at last IAG meeting)
- Dismantling sites: MOD is conducting a generic assessment of sites as to greenfield, brownfield and existing licensed sites. This is for business case decisions. IAG will be involved.
- A Memorandum of Understanding has been signed between the MOD and Nuclear Decommissioning Authority. This is a high level document. It is not yet public.

Members may be aware that there has been debate at the Commons recently about ISOLUS, including a potential offer from Russia to decommission submarines.

L. Netherton. IAG Chair.

AD(ISOLUS) REPORT TO MISG 7 MAY 2008

General

Project ISOLUS activity is gaining momentum for a number of reasons:

- there is increasing recognition within MOD of the importance of nuclear decommissioning activity and willingness to do it
- the link between decommissioning/disposal of submarines and the future submarine programme is recognised
- pressure on berthing capacity at Devonport will increase as more submarines come out of service over the next few years.

The ISOLUS Programme Board, chaired by Alasdair Stirling, Director In-Service Submarines and Project Director, has been set up to progress the overall programme. The key elements of the ISOLUS programme are:

- stakeholder engagement and public consultation
- technical solution
- submarine dismantling site
- interim storage site for the resultant Intermediate Level Waste
- Procurement Strategy

All these elements are interdependent and inter-connected, and it is necessary to develop all of these elements in parallel. In conducting this work, we will draw on the recommendations from the previous public consultations. Progress is shown below.

Stakeholder engagement and public consultation

Two key stakeholder groups have been created to progress the project and to provide vehicles for ongoing stakeholder engagement:

- MOD ISOLUS Steering Group (MISG): this is the 6th MISG meeting.
- The ISOLUS Advisory Group (IAG): has held 4 meetings, plus 2 workshops on specific topics.

Technical solution

a. Technical Options Study

Following the ISOLUS Concept Phase, Ministerial approval was given in 2002 to the further investigation of three options for the interim land storage of Intermediate Level Waste from submarines prior to final disposal. The options are interim land storage of:

- the intact Reactor Compartment
- the Reactor Pressure Vessel, and other large items, or
- size-reduced Packaged Waste

A Technical Options Study will review these options, drawing on the available technical data gathered from previous studies and proposing additional data gathering as appropriate. The study will not address site specific or social issues, and will be subject to independent peer review. The process for conducting the study was developed in conjunction with the IAG, whose advice will be sought at key stages of the study. MOD is currently going through the process of contractor selection. The target completion date is 16 weeks from contract placement. The output from the study will inform future decision making and public consultation.

b. Presentation of technical information on the ISOLUS website.

Following review by the IAG, a format for presenting technical reports on the website has been agreed. A summary of technical reports completed to date has been prepared and is currently being reviewed to gain a Plain English crystal mark prior to being placed on the website. Where information cannot be released due to commercial or security considerations, an explanation is provided. This process will be followed for future reports.

c. Future technical and environmental studies

The programme of work for 2008/9 is currently under consideration and will include a Feasibility Study which will address the programme of work required to develop a concept design for a submarine dismantling facility. The IAG will have the opportunity to preview this and other proposed work.

Dismantling site

MOD is conducting a generic assessment of types of sites (Greenfield, Brownfield and existing licensed sites) which would be suitable for dismantling submarines and processing wastes. The IAG will be engaged during the course of this work.

Storage site

A Memorandum of Understanding has been signed between MOD and the Nuclear Decommissioning Authority. This provides a framework for dialogue on issues associated with interim storage of Intermediate Level Waste.

Procurement Strategy

The procurement strategy is being developed, building on the position from the previous contractor proposals.

Financial approval has been gained and sufficient funding obtained for the project for the next 3 years, until the main investment decision is taken

Way forward

An update on this work will be presented to MOD Centre in the Autumn.

Annex C – Comments on Draft IAG No 5 Notes from Peter Lanyon

Original comments by Peter Lanyon on the Draft IAG No 5 Notes and Actions in black, Secretaries response in Red and PL's reply in Blue:

Page 2 Para 6: I thought mention was made of FEC Recommendation 22 and CIOP Recommendation 23, both of which show that the public are strongly against free release. **I have checked the tape and these specific recommendations are not mentioned as such in the discussion on free release. My recollection is that the public's feelings against free release, as shown in recommendations in both consultations, were mentioned, I think by JH. The IAG is supposed to safeguard these recommendations, so I feel this merits a mention in the notes.**

Pages 3 and 4 Item 3 Technical Summary Reports Update: This seems not at all clear. Have the two technical studies mentioned been submitted for preview by us? And are they studies of the RCs of all the laid-up submarines, or only of Revenge's? Are the surveys that are to be obtained something we ought to have previewed? **I assume these are clarification questions that could be raised at the next meeting. I heard none of this at all clearly. If the acoustics were so terrible that NO ONE heard enough of what SW was saying to raise these questions at the time, then this part of the meeting was dysfunctional, for they ought certainly to have been raised. In fact, LN's information, given directly afterwards, shows that minds were indeed on Preview, including preview of the studies SW had mentioned, and the notes should indicate this more clearly.**

Page 4 para 3: I said that I had been arguing for a long time for there to be public statements to bridge the gaps in the history of the Project and to clear up anomalies. I regretted the evasion and blurring of these issues by the MOD, and in particular MT's proposed statement sent to us on the eve of this meeting, which failed to cover either the relevant periods or the existing anomalies. I did not hear of or agree to any Action 5.3 that MT should issue a revised statement. It is perfectly obvious from the next two paragraphs of the draft notes that there is a generally expressed need within the IAG for a scrutiny of the development of the Project's problems, and that at present a revised statement from the MOD (Action 5.3) would not answer the case. I also mentioned in this connection that the Minister had stressed in the HOC on 20 May this year that the IAG is "to provide independent scrutiny of the project". None of this is adequately represented in the draft notes. **I have made a number of changes to this section. Maggie did make the offer twice to revise the statement during this section of the meeting. All you have done so far is to put in my mention of the Minister's statement, whereas I made a formal complaint about the sustained obfuscation, as I have described above, and in particular I indicated that Maggie's role in it was regrettable. I might have said a lot more, but did not! I want what I did say recorded. Others have commented to me about what I said, so there is no doubt that I said it.**

{My subsequent constructive challenge on behalf of the IAG, and the issue of some lengthy documents under the FOI Act, make Action 5.4 inappropriate. [Copies of the notes on the (so-called "stand alone") MOD workshop long-promised to us have still not yet been released].

I suggest that the only appropriate action here now is for the whole matter - including what the Minister meant, what gaps need to be filled, whether FOI processes are the way to do that, how far the released documents fill the gaps, and how the public should be informed of all this - to be discussed as an agenda item at the next IAG meeting. It is evident that the MOD itself needs advice on this, and this is what we are for}.

I assume that you agree that subsequent events have rendered Action 5.4 ineffective, and that this will be noted at the next meeting.

Page 6 Item 12 AOB: I can find no “covering explanation”, as promised, that has been issued explaining the “options information” and the “overarching strategy paper” with enough clarity for them to form the basis of an adequate preview by the IAG. I cannot believe that such obscure papers, sent out at the start of the holiday period and buried by the ongoing technical options review, can amount to what we need in order to conduct effective preview of such wide-ranging proposals . I suggest we devote more time and clarity to examining whatever it is that the MOD want us to consider in this matter. **I assume this is for discussion at the next meeting . That's all very well, Tony, but this additional burying of Preview - coming on top of the burying of Preview issues in Item 3 above - suggest that either the MOD amazingly still do not understand what we mean by Preview, or that there is some intentional burying going on.**

Additionally: At some point I reminded the meeting that the IAG is the process or project guardian. The transcript of the meeting will show where this was, and it seems germane to include it in the notes. **We do not have a transcript of the whole meeting, so I have been unable to ascertain the correct point, but I have incorporated it into Page 4 Para 4 if that is acceptable to you. I cannot find any mention in your modified Page 4 Para 4, or anywhere else, of the IAG's role of guardian. Yet in essence, this is what most of my comments are about. That this too may be being buried is very worrying.**

Sorry there is so much here, but these notes are even more important than usual to remedy the imperfect audible record.

Peter