

NOTES OF 3rd MINISTRY OF DEFENCE ISOLUS STEERING GROUP (MISG)
HELD ON 20th OCTOBER 2006

Attendees:

Howard Mathers	Ministry of Defence (MOD) – Submarine Integrated Project Team Leader (Chairman)
Capt. Steve Firth	MOD - Representing Naval Base Commander Devonport
Christine Bruce	MOD - Representing Naval Base Commander Clyde
Richard Grant	Head of Waste Pollution & Reduction Division, Scottish Executive (SE)
Dr Ian Hall	Radioactive Waste Team, Environment Group, SE
Kerrie Campbell	Radioactive Waste Team, Environment Group, SE
Paul Hamer	Managing Director, British Nuclear Group Project Services Limited
Stewart Kemp	Local Government Associations Nuclear Legacy Advisory Forum (NuLeAF)
George Regan	Convention of Scottish Local Authorities (CoSLA)
Robert Gray	Nuclear Installations Inspectorate
David Gatehouse	Nuclear Decommissioning Authority
Dr Jane Hunt	Lancaster University Centre for the Study of Environmental Change
Peter Lanyon	Consultant
Roger Jackson	Consultant
Murray King	MOD - Private Finance Unit (Observer)
Maggie Taylor	MOD - Assistant Director (AD) ISOLUS (Interim Storage of Laid-Up Submarines) (Secretary)
Antony Lokier	MOD - ISOLUS2 (Secretary Support)

Apologies:

Elizabeth Gray	Head Radioactive Waste Team, Environment Group, Scottish Executive
Andrew Layton	Director Nuclear Liabilities, Department of Trade and Industry
Peter Brazier	Nuclear Decommissioning Authority
Dr Robert Jackson	Head Policy Development Unit, Radioactive Substances Division, Department for Environment Food and Rural Affairs
Fred Barker	Local Government Associations Nuclear Legacy Advisory Forum (NuLeAF)

1. Welcome by Chairman

- The chairman welcomed everyone to the meeting. All those present gave a summary of their current positions for the benefit of the new attendees.

2. Notes of last meeting

- The notes of the last meeting were accepted.
- Those present agreed that the future notes would be ratified outside of the meeting to accelerate publishing onto the ISOLUS Website.

3. Review of Actions

- "Action 1.1: MT to discuss role of the IAC with LU" - Action OBE - This was discussed under Agenda Item 5 c.
- " Action 2.1: MT to redraft and circulate constitution paragraph 5 " - Action complete. - This was discussed under Agenda Item 4.

- **"Action 2.2: MT to set up IAC workshop" - Action Ongoing** - This was discussed under Agenda Item 5 c.
- **"Action 2.3: MT to clarify the term "intrusive" - Action Complete** - The term 'intrusive' is used by ISOLUS to describe work requiring the breaching of primary circuit containment, and will be undertaken in order to quantify contamination levels within the primary circuit. Breaching of the primary circuit is routinely and safely undertaken on fuelled submarines, and will present no particular problems for a defuelled submarine. Primary circuit containment will be re-established on completion of the work.
- **"Action 2.4: MoD to write to the NDA" - Action Complete** - MoD has written to the NDA to explore the opportunities for working together and the first meeting has been held.

4. MISG Constitution

- Paragraph 5 of the MISG constitution ("Purpose") had been redrafted and circulated (Action 2.1), and further revised in the light of comments received (as shown at Annex A). The meeting agreed that this paragraph need not include details of all waste stream activities as it would be too lengthy, and not including these details would allow the benefit of broad discussions in the future.
- MoD presented a revised paragraph 6 regarding the formation of an advisory group to support the MISG, as it was thought that previous details pertaining to an ISOLUS Advisory Committee (IAC) were too prescriptive. This revision which was accepted with a small amendment regarding the inclusion of "scrutiny" in its scope.
- The meeting accepted these revisions and some minor editorial amendments to the draft. The agreed constitution is at Annex B.

5. ISOLUS Update

(a) CoRWM

- Maggie Taylor gave a brief on impact of the CoRWM on the ISOLUS Project, summary report at Annex A.
- A discussion took place regarding the development of a siting strategy. Where possible, recommendations from the previous consultations should provide the basis for the development of siting criteria. Where those recommendations have been overtaken by events, the views of the MISG and the advisory group should be sought. Views from potential sites could be gained however there was concern that this could cause unnecessary alarm. Finally, the project should gain the views of the public in areas that will not be affected, in order to gain a wide range of inputs on the criteria.
- Howard Mathers raised the issue of the future direction of the MoD and the Civil sector post-CoRWM, in order to determine the extent to which MoD manages future technical, siting and consultation issues for project ISOLUS. The meeting considered it better to discuss this after the Government's Response as this will set out the government policy and a framework within which project ISOLUS will have to fit. Kerrie Campbell offered to give a joint presentation with DEFRA at the next MISG on the Government Response, which was accepted. The ISOLUS project team would be given the opportunity to receive the presentation earlier in order for the project to produce a strategy for discussion at the next meeting.

Action 3.1 SE/DEFRA to give presentations.

Action 3.2 MT to produce a strategy for discussion.

(b) Technical and other studies

- Maggie Taylor gave a brief on the current studies being undertaken by the project, summary report in Annex A.
- MoD agreed to compile a full list of the Technical reports to date for the website.

Action 3.3: MT to produce list of Technical Reports for the ISOLUS website.

- MoD agreed to expand website facts and figures to provide a user-friendly guide and inventory of the submarine wastes in the light of findings from the technical studies.

(c) ISOLUS advisory group

- Maggie Taylor gave a brief on the development of an advisory group to support the MISG, summary report at Annex A. Action 1.1 of the first MISG (a discussion with Lancaster University on the role of the IAC) had not proved possible, and was overtaken by Action 2.2 from the second meeting. Action 2.2 involved Maggie Taylor setting up a workshop with Stewart Kemp and progress is detailed in Annex A.
- There was concern among group members that the advisory group was not yet available to be involved in the current ongoing technical studies and decision making. MoD emphasised that these studies are currently focused on the collation of information rather than making decisions.
- Dr Jane Hunt explained that there are 3 main consultation groups - Non Government Organisations (NGOs); Stakeholders; and the general public; and that MoD needs to consider how to involve these in the advisory group. MoD should also consider how it can resource the advisory group to conduct independent assessment, and how to obtain specialist advice that will gain public confidence.

Action 3.4: MT to raise these issues at the workshop.

- There was some concern that RC cut-up was now being considered. Peter Lanyon reminded the meeting of the recommendations in the CIOP in favour of cutting out and against cutting up. Dr Jane Hunt quoted the relevant CIOP Recommendation, No 34 in full - "RCs (Reactor Compartments) are stored intact for an extended period. Cutting up of RCs is only 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 early cut up." Recommendations 35, 36 and 37 are also relevant. Peter Lanyon and Dr Jane Hunt both stressed the need for candour and openness if there were to be any move away from the public's recommendations and warned of a grave public relations problem ahead unless this was appreciated and appropriately addressed. MoD emphasised that all the options were being studied at this stage in order to determine the best technical baseline, which would be critically examined by all relevant parties. It would be beneficial to have an agreed evidence base that was subject to peer review

6. Industry Update

- Paul Hamer gave an update on behalf of the industry alliances. He expressed their continued concerns regarding the lack of visibility of a forward programme for ISOLUS and the securing of funding in light of competition from other high profile MoD projects.
- He explained work was being undertaken by the alliance as part of the technical studies to gather information to inform future decisions on the optimal technical baseline. Various elements of Reactor Compartment Cut-Out were being investigated to establish an initial technical baseline to allow comparison with the 'remain and store intact' option which has firm baseline and is already being undertaken internationally.
- Paul Hamer expressed what he considered to be the 3 main areas of the challenge to the ISOLUS Project.
 - **Managing the Politics:** the politics for siting criteria are very sensitive and needed to be carefully handled so as not raise unnecessary alarm.
 - **Transparency and Openness:** continued Stakeholder engagement was crucial to help develop trust.
 - **Safety:** the need to demonstrate inherent safety.

7. Civil Nuclear Update

(a) CoRWM

- The impact of CoRWM on ISOLUS and issues relating to the Government Response had been discussed earlier. The Chairman restated that the joint response from Government and the Devolved Administrations would be issued shortly.

(b) Low Level Waste (LLW) Review

- Dr Ian Hall provided an update on the status of the LLW policy review, which had been delayed until the end of the year/early next year due to the large number of comments received, some of which went beyond the scope of the review questions. A policy of openness & transparency had been adopted, and where comments have not been accepted reasons will be given why. Dr Hall's offer to give a joint presentation with DEFRA on the review to the next MISG was accepted. The ISOLUS project team would be given the opportunity to receive the presentation earlier.

Action 3.5 SE/DEFRA to give LLW policy review presentations.

(c) Nuclear Decommissioning Authority

- David Gatehouse gave a brief on the current NDA issues including comments on strategy documents, the ongoing strategic enabling projects and the state aid impact on revenue. He re-emphasised that engagement is a critical path to gain buy-in to the best site options.

8. **AOB**

- Dr Jane Hunt stated Ruth Love in the Department of Sociology at Lancaster University was now the point of contact for Travel and Subsistence Claims.
- Howard Mathers thanked Stewart Kemp for his long-standing support to the ISOLUS Project, this being Stewart's last meeting as NuLeAF MISG representative.

9. **DONM**

- Date of next meeting was to be confirmed outside of the meeting.
- Howard Mathers thanked those who had attended.

ANNEX A - AD(ISOLUS) REPORT

3. Review of actions

"Action 2.3: MT to clarify the term "intrusive" - The term 'intrusive' is used by ISOLUS to describe work requiring the breaching of primary circuit containment, and will be undertaken in order to quantify contamination levels within the primary circuit. Breaching of the primary circuit is routinely and safely undertaken on fuelled submarines, and will present no particular problems for a defuelled submarine. Primary circuit containment will be re-established on completion of the work.

4. MISG Constitution

Previous Constitution paragraphs 5, 6 & 7: -

5. The principal purpose of the MISG is to contribute to the timely development of a solution for the dismantling of the UK's defuelled nuclear powered submarines, including processing and interim storage of the arising radioactive material, and disposal or recycling of non-nuclear material, which inspires public confidence, is safe, environmentally responsible, secure and cost effective. The MISG may through its chairman influence the planning and implementation of the solution in the light of effective future public consultation and national decisions on radioactive waste management.

6. In support of the purpose of the MISG, an ISOLUS Advisory committee (IAC) shall be instituted. The IAC will provide a vehicle for conducting independent assessment of initiatives and outcomes, and it will furnish a conduit for advice and counsel to the MISG aimed at facilitating the ISOLUS programme.

7. The IAC will be formally established and its constitution ratified by the MISG. The Chair of the IAC shall be a member of the MISG. IAC membership will be drawn from, but would not necessarily be confined to, individuals who served on the CSG.

5. ISOLUS Update

(a) CoRWM

The key recommendation of the CoRWM report which is of most relevance to Project ISOLUS is that a programme of robust, safe and secure long term interim storage of ILW is required until the geological disposal facility is established. This aligns with the ISOLUS requirement for long term interim storage of ILW, pending development of a final disposal solution.

This important development opens the way for the ISOLUS project team to develop its siting strategy for the processing of waste from submarines, and the interim storage of the arising ILW (noting that these are separate activities which do not necessarily take place at the same site). This work will be conducted over the coming months, in consultation with relevant stakeholders. In parallel, we will be continuing the programme of technical and environmental studies, which will inform our future decision making in relation to the technical baseline for the project.

In conducting this work, we will draw heavily on the recommendations from the FEC and CIOP public consultations.

(b) Technical and other studies

The following studies are being undertaken:

- Non-intrusive radiological surveying external to RC to support Monitoring Protocol: Detailed radiological surveys of the areas and systems outside the Reactor Compartment identified in last years studies.
- Non-Nuclear Hazardous Material Assessments: Identification and categorisation of potential non-nuclear hazardous material within the whole submarine.
- Reactor Pressure Vessel (RPV) Removal Options: The review will consider the methodologies that are deemed practicable for removing the RPV, and the technology and the risks associated with such options.
- Work in accordance with the MoD's internal requirement for an Environmental Impact Assessment continues.

(c) ISOLUS advisory group

Following discussion at the last meeting, Maggie Taylor took an action to set up a workshop with Stewart Kemp to take forward the formation of an ISOLUS Advisory Committee (IAC).

We worked on this over the Summer, holding discussions with suitable consultants who had experience of stakeholder engagement work in nuclear-related matters, and who would be prepared to facilitate a workshop with stakeholders. We have now selected a consultant, Richard Harris of 3KQ Ltd, whom we are confident will be able to give us the support we require.

The purpose of the workshop will be to seek views from a range of stakeholders on establishing a vehicle for ongoing stakeholder dialogue, which can act as a sounding board for reviewing progress, prior to the next formal public consultation. In doing this, we will build upon past ISOLUS work and experience from the Consultation Steering Group. We plan to select invitees who will be able to participate in a constructive way and have some knowledge of the issues, and welcome your thoughts on this.

We plan to issue invitations in November, with a view to holding the workshop at MoD offices in Abbey Wood, Bristol, in February 2007. (The 1st and 8th have been proposed).

ANNEX B - MISG CONSTITUTION

Preamble

1. The Team Leader of the Submarine Support Integrated Project Team (SUBIPT TL) is the MOD's responsible officer for Project ISOLUS (Interim Storage of Laid Up Submarines). As the budget holder, the Team Leader is accountable through Director General Nuclear and Chief of Defence Logistics to Ministers for the ISOLUS programme and carries the delegated authority to deliver it.
2. Within the SUBIPT the Assistant Director ISOLUS (AD ISOLUS) has day-to-day responsibility for project managing the programme.
3. The Lancaster University ISOLUS Consultation Steering Group (CSG) was established in March 2001 to oversee the two rounds of Project ISOLUS public consultation that were conducted in 2001 and 2003. The CSG held its last meeting in July 2005, having completed its formally mandated task.
4. The MOD ISOLUS Steering Group (MISG) has been instituted as an element of the corporate governance of Project ISOLUS. The MISG is chaired by the SUBIPT TL and its Secretariat is provided by the ISOLUS Project team.

Purpose

5. The principal purpose of the MISG is to contribute to the timely development of a solution for the dismantling of the UK's defuelled nuclear powered submarines which inspires public confidence, is safe, environmentally responsible, secure and cost effective. The MISG may through its chairman influence the planning and implementation of the solution in the light of effective future public consultation and national decisions on radioactive waste management.
6. In support of the purpose of the MISG, an advisory group will be created to provide a vehicle for conducting independent assessment of initiatives and outcomes, and to furnish a conduit for providing scrutiny advice and counsel to the MISG aimed at facilitating the ISOLUS programme.

Conduct of Business

7. The MISG shall meet as necessary but no more frequently than two or three times a year. In general:
 - Discussion is to be kept at a high level to review the programme and to identify and seek to resolve major issues and impediments to progress. Actions may be placed on members of the MISG as agreed;
 - No formal MISG minutes would be produced, but the Secretary will issue notes of meetings and collate reports which may be produced from time to time. After ratification by members, notes of meetings will be published on the ISOLUS website. The website will be maintained by the Lancaster University Centre for the Study of Environmental Change;
 - Reports produced for the MISG may be used to support the purposes of the MOD ISOLUS Project team as directed by SUBIPT Team Leader;
 - Business will be transacted in an open and transparent manner. Appropriate restraint will inform the handling of security and commercial sensitivities, where these may arise.
 - Business may be conducted by correspondence where appropriate.

Membership

8. Membership of the MISG is through personal invitation of the Chairman. From within the MOD, the Devonport and Clyde Naval Base Commanders are members of the MISG. Relevant other Government departments, the DTI, Defra and the Scottish Executive, are also included to reflect their views.

9. Outside central Government, membership on the MISG includes NGO and local authority practitioners, together with representatives covering the various interests of public consultation, industry, nuclear regulators and advisers on radioactive waste management.

10. Over time, the constitution and the composition of the MISG will evolve to reflect the focus and priorities of the Project as it develops, particularly in respect of any Ministerial decisions following consideration of the recommendations of the Committee on Radioactive Waste Management (CoRWM) and the Low Level Waste Policy Review.

11. The members of the MISG are as follows:

- Howard Mathers – SUBIPT TL (Chairman)
- Commodore Simon Lister – Naval Base Commander Devonport
- Commodore Carolyn Stait – Naval Base Commander Clyde
- Andrew Layton – Director Nuclear Liabilities, DTI
- Dr Robert Jackson – Head Policy Development Unit, Radiological Substances Division, DEFRA
- Elizabeth Gray – Head Radioactive Waste Team, Environmental Group, Scottish Executive
- Paul Hamer – Managing Director, BNG Project Services Limited
- Robert Gray – Nuclear Installations Inspectorate
- Fred Barker – Local Government Associations Nuclear Legacy Advisory Forum
- Peter Lanyon – Consultant
- Roger Jackson - Consultant
- Dr Jane Hunt – Lancaster University Centre for the Study of Environmental Change
- Peter Brazier - Nuclear Decommissioning Authority
- George Regan - Convention of Scottish Local Authorities
- Maggie Taylor – AD ISOLUS (Secretary)