

NOTES OF 8th MINISTRY OF DEFENCE SDP (Submarine Dismantling Project)
STEERING GROUP (SDP SG) HELD ON 2nd June 2009

Attendees:

Alasdair Stirling (AS)	Ministry of Defence (MOD) – Director In-Service Submarines (Chairman)
Michael Cushen (MC)	MOD – DISM – AD Programme and Change
Dr Janice Waters (JW)	MOD - Facilities Group & representing NBC Devonport
Peter Brazier (PB)	Nuclear Decommissioning Authority (NDA)
Steve Lewis (SL)	Nuclear Installations Inspectorate (NII)
Roger Jackson (RJ)	Consultant
Dr Paul Dorfman (PD)	ISOLUS Advisory Group / Warwick University
Bruce Cairns (BC)	DECC – Department of Energy and Climate Change
Nigel Parsons (NP)	MOD – DISM – SDP (Approvals)
Jon Mallon (JM)	MOD – DISM – ISOLUS2
Fred Barker (FB)	NuLeAF
Martin Murray (MM)	Environment Agency
Peter Lanyon (PL)	NSubForum (on behalf of NGOs)
Dr Sue Jordan (SJ)	Defence Estates
Les Netherton (LN)	IAG Chairman
Ewan Harris (EH)	MOD – Graduate
Andy Shaw (AS)	MOD - Graduate
Harry Hudson (HH)	Green Issues Communications
Nick Bohane (NB)	Green Issues Communications
Emma Webster (EW)	Green Issues Communications

Apologies:

Apologies had been received from:

Elizabeth Gray	Scottish Government
Phil Davies	Nuclear Decommissioning Authority (NDA)
Steve Firth	Represented by Dr Janice Waters

1. Welcome by Chairman

Alasdair Stirling (AS) welcomed everyone to the 8th MISG. He advised members that the focus of the meeting was to bring people up to date with what had been happening since the last meeting and to discuss the programme for the next year, particularly the SEA and Public Consultation programmes, and that there would be presentations on both of these areas later in the meeting.

The Chairman asked those present to introduce themselves and give a summary of their current positions for the benefit of the new attendees. AS asked if the members present were aware of any AOB they would like to raise later. None was raised.

(a) Formal Name Change

AS confirmed that further to the discussion at 7th MISG departmental approval to change the name to Submarine Dismantling Project had been formally given.

2. Notes of last meeting

Roger Jackson (RJ) commented that he gave the Industry Update at the last MISG, not Robbie Gray (RG). This point was noted.

AS stated that with no further comments the notes taken were a true reflection of the meeting.

3. Review of Actions

- **Action 5.8:** Chris Hargraves to issue ISOLUS Environmental Strategy. – Ongoing 80% covered in the SEA, 20% to be covered in the Sustainability Development Strategy as it requires re-writing in-line with the MOD's Sustainable Development Report and Action Plan (SDRAP). **Paper to be produced end July 2009.**
- **Action 6.2:** Maggie Taylor and Les Netherton to produce paper detailing how "Preview" will work (and interface) at MISG and IAG level. – **Action Complete. To be discussed at the next IAG meeting.**
- **Action 6.3:** DISM to recommend to MOD Centre that a Ministerial Statement is required covering the transition from Lord Bach's Statement in February 2005 to date, and to outline the way ahead.

Peter Lanyon suggested that it would be more helpful to take it from CIOP in late 2002/early 2003.

AS agreed to take it back to CIOP. It was also agreed that the inclusion of text in the public consultation regarding what has happened since CIOP should be referred to the IAG for their comment, as a number of members were involved in the process.

- **Action 6.6:** ISOLUS team to consider the ISOLUS requirement in the filling schedule for the geological waste disposal facility and to inform the NDA accordingly. **Action – Complete.**
- **Action 7.1:** Jon Mallon to liaise and seek guidance and advice from Elizabeth Atherton on the NDA Stakeholder Engagement Programme. **Action – Complete** discussed with Elizabeth Atherton on 18th December 2008.
- **Action 7.2:** Jon Mallon to develop a consultation programme to enable IAG to provide informed advice. **Action – complete** – consultation sub group established, meetings due to take place before IAG 8.
- **Action 7.3:** Jon Mallon to liaise with Peter Brazier and John Clarke to seek guidance and advice on the NDA Supply Chain. **Action – Complete.**
- **Action 7.4:** MISG Members to provide advice on the desired membership from the IAG enabling constructive challenge, credible and reliable attendance. **Action – Complete.**
- **Action 7.5:** MISG Members to review the MISG Constitution, providing comments to the secretary. **Action – Complete, no comments received.**
- **Action 7.6:** The Secretary to revise MISG Constitution in line with comments received from MISG members. **Action – Complete, no comments received.**

4. SDP Update

(a) Programme Logic

Mike Cushen (MC) presented the revised programme which now contains 6 phases (attached).

SL enquired whether the logic included EIA DR. JW commented that this could not be determined at this stage until we move into phase 3 and have agreed dismantling site. SL raised concerns about the amount of time it might take to do this, as there are no direct comparisons that can be made and that some civil sites took up to two years.

MC presented the update from the IAB.

PL requested, as had been requested previously, for papers to be sent out prior to the meeting so that members can have a chance to comment. AS agreed, that packs should be circulated a week before the meeting.

Action 8.1: Copies of the slides to be circulated with the minutes from the meeting.

Action 8.2: Papers and presentations for the meetings to be circulated a week in advance of the meeting.

SL enquired whether the Programme timing is driven by the consultation process. AS confirmed that it is. SL questioned what would happen if the process got caught up in the General Election. AS responded that the key is that there is rigid adherence to process, policy and the law in regards to this process and that this is what we will be doing throughout. SL highlighted the importance of the process having effective engagement as soon as possible. AS agreed that this was important generally and specifically the interface with regulators. MM enquired whether discussions had started with possible sites that would store ILW. AS confirmed that some optioneering work had been undertaken and that we now need to engage with each location so that they understand what it is they are being considered for. AS confirmed that we are now at the point where we would be looking to go out to sites and statutory bodies before wider engagement takes place. MM enquired as to the indicative timescales for the discussions with stakeholders and sites. AS advised that it would be within the next three months. AS noted that it was important to make sure that the to stakeholders should be managed so that they are all aware of proposed programmes and timescales.

BC enquired whether there are NDA sites on the list suggested and that the timings need to be well worked out if this is the case. PB confirmed that appropriate interfaces exist between the MOD and NDA so that the programme will be met.

SEA

MC then introduced Dr Sue Jordan (SJ) to explain to members the scope of the SEA. SJ explained that the SEA covers the SDP programme as a whole and that the main groups of variables that have to go to assessment are:

- Processing site options
- Storage site options for ILW
- (Transport options)
- (Processing of non-RA components)

SJ spoke about the generic assessment of sites, which includes looking at the pros and cons of each option, including brownfield and greenfield options. The process will then examine the pros

and cons of existing licensed and authorised sites. There are relatively few sites in scope in that category.

SJ then explained the aspirational programme that is being worked to:

- Stage 'A' Scoping report
- Stage 'B' Assessment complete
- Stage 'C' Env. Report complete
- Public consultation

The purpose of the consultation will be to explain the process and to demonstrate the rationale behind each of the options that is being put forward. SL asked whether the public consultation will be site specific. SJ confirmed that the public consultation will have to give an indication of site and that the information will be fed into the EIA DR for site approval post review note 2. SL commented that the SEA can't be used to determine the decision. SJ confirmed that this will not determine the decision but give the pros and cons of each option so that an overall decision can be made. This will then inform the preferred options moving forward. PD enquired as to who commissions the report. SJ confirmed that it was the MOD which has procured consultant support. SL enquired whether consultants have experience with SEAs in a nuclear environment. SJ confirmed that they had previously done work for the NDA before. PB confirmed that it was important that lessons that have been learnt across government are incorporated into the processes.

PL enquired whether there would be a list of possible sites that would be discussed during public consultation. SJ confirmed that there would be information provided for the consultation that included the identification of specific sites. AS also confirmed that the SEA would not make the final decision but that evidence from the SEA, public consultation, etc. will be collated and advice will be given to the Minister. AS confirmed that both the MISG and IAG would have a role in this.

Consultation and IAG Sub Groups

MC then introduced Emma Webster(EW) from Green Issues Communications. EW outlined the communications strategy. She explained why consultation would be undertaken, the methods that would be used, the timeline, the means of ensuring the appropriate communities were engaged with and what success would look like.

BC said that he was confused and asked what would be consulted on: would it be the high-level SEA or a list of sites?

EW said that it would be both. There would be an over-arching national project and a low-level local programme. BC asked what types of questions would be asked. He asked if people would be consulted on site selection, or told what the MOD thought and asked for their comments. He said that this could present a real difficulty if people were given a list that had been worked up in a 'dark room'. AS said that some sites could not be included and asked if there was a problem with that. BC said that this looked like the Nirex approach of Decide-Announce-Defend. If so, there would be a lot of opposition. AS said that it would not be like that. No decision would be made until after the public consultation. There would be a preference as a result of the SEA which would be consulted on.

BC asked what would happen if sites did not want to be included on the list. AS said that the alternative was continued storage afloat. SL said that it was necessary to achieve a passive safe state and it would not be possible to end up with a no-site option.

PL put on record that NGOs had been asked to be involved in finding a solution and CIOP had failed due to lack of data. NB said that the Communications Sub-Group would editorialise the data

for public consumption. EW said that lessons would be learned from the CIOP experience. PL referred to a reference on the website to the 'third and last' consultation and asked where it had previously been stated that there was a limitation on consultation on the SDP project. MC said that he was planning on a successful consultation but it was agreed that the website would be made clearer.

FB said that there needed to be clear objectives for the consultation so that people knew what they were entering into and how it related to MoD decision-making. The type of siting process being used should be made clear. He also asked if there would be a consultation document. NB said that there would be a pre-consultation document which outlined the process and the rationale. FB said that early contact should be made with planning officers as some existing stores had conditions attached to restrict wastes to those arising at the sites.

PL commented that they had got to put the submarines somewhere but were they relying on this consultation to come forward with a solution.

EW said that the Consultation Sub-Group would need to be provided with answers to questions that would be raised to deliver the outcome of an effective consultation and engagement

PL said that the NGOs wanted to help but they were worried about the way Green Issues presented itself on its website, as assisting clients in obtaining planning permission. NGOs were aware of problems with previous nuclear public consultations which were deterministic, and Green Issues aimed to reach an end point which was getting what the client wanted. He said that AS wanted a robust process with the NGOs included, but he risked losing the confidence of fellow NGOs. PL said that if the NGOs were to stay on board, they needed reassurance that the consultation was not like the NGO's perception of other government consultations, and the Green Issues website did not help in this respect. AS asked for details. PL said that it would be helpful if Green Issues altered the impression that they were trying to get something the government wanted. AS said he would discuss this with Green Issues. PL said he was happy with that.

Action EW to discuss the of Green Issues Communication Corporate website with her Directors.

SL said that a clear statement of the end product was necessary and assistance in getting to that was acceptable. PL said that the IAG was never involved in any of the planning or remit for the Stakeholder Convenor contractors. MC said that a competition had been held following departmental rules. PL said that it was not convincing. JM said that the contract had been advertised in European Journal and the necessary procedure had been followed. PL said that the point was that IAG would like to have been involved in the preview of the contract. JM confirmed that government guidelines were followed, but now understood the concerns expressed at the 7th IAG. This was acknowledged by AS.

PL said that there had been a four-month silence and they could not advise if they were excluded from the public consultation exercise. MC said that IAG had been deferred until February as there had not been much to share with it. However, the reasons for the deferment could have been better explained. AS asked how this could be ensured in future. MC said that IAG would be engaged going forward and the Communications Sub-Group was a positive move in this direction.

PL said that IAG had in fact been postponed until March. MISG had decided in November on renaming ISOLUS SDP but IAG had not been told until March. IAG could not be the ethical guardian of the project if it was only asked for advice when it was wanted. It was difficult if they could not see material in advance of MISG meetings and this undermined their confidence that NGOs provide benefit to influence the project and the NGOs did not want him to remain in the project. It would be an uphill journey to keep NGOs involved. They needed IAG to be effective and communication was the key issue.

PB said that the NDA were involved in a great deal of consultation on waste and would be able to advise. LN mentioned the new national consultation on radioactive waste (OND Engagement Group).

SL asked if MOD wanted IAG to be the ethical guardian of the project. There needed to be clarity in what was required. PD said that it was a two-way process. LN said that IAG had specific terms of reference. They should be united in wanting to deliver the project. AS said that the submarines had to be dismantled. He asked if communications were improving. MC said that they were. LN said that they were improving but that it was complex because of the nature of IAG. JM said that communications would be proactive through the lifetime of the project.

AS advised that the Demonstrator was there to assist in the development of the Main Gate Business Case and was to be used to fully dismantle a submarine providing information on the timescales and costs that should fit within the current programme.

PD raised issues over the sequential/parallel running of the Demonstrator and the Public Consultation process, reminding the MISG of how long formal consultation takes. JW advised that the Demonstrator planning was generic planning and not site specific and would subsequently take in the recommendations of the consultation.

Roger Jackson (RG) reminded the group that Submarine Disposal is not starting from square 1 for public consultation but has been developing over a number of years with the Steering Group, Advisory Group, and the Front End Consultation documents; however, it was duly noted that we should not be skimping on public consultation.

Action 8.9: EW to alter on website reference to final consultation

(c) Demonstrator

AS asked Dr Janice Waters(JW) to give the meeting an update on the demonstrator project.

JW outlined the three stages of the project and confirmed that a lot had been done with the technical studies. A small Babcock Marine team is taking forward the non site specific concept development work including the disposal of the submarine and the non radioactive components.

JW took the meeting through the timescales and explained that once we were through review note three , dismantling could commence. JW demonstrated the fact that there were break points within the plan that provided the opportunity to respond to any emerging situations.

JW explained that in April 2010, once a site has been chosen and the project were aware of what facilities and design are required, the desire is to take apart at least one submarine.

JW confirmed that the project would look to reuse what can be reused and recycle all that can be recycled. JW stressed the importance of learning lessons from others. PD asked for clarification as to what would happen with different waste streams (his interest came from his position as Sustainable Development Spur Co-Chair). JW confirmed that each waste stream has to be treated and the SD Spur best practice has been taken on board already. PD asked if there were any views on the fundamental uncertainties between radioactive and non-radioactive materials. AS confirmed that there were no thoughts as yet. At the moment the primary thoughts are about the non radioactive.

5. ISOLUS Advisory Group Update

LN spoke on behalf of IAG as its Chairman. LN raised a number of business items on behalf of IAG.

First, there has been a lot of discussion within the IAG regarding communications between the MOD and IAG members, for example the Reactor Pressure Vessel Head issue. LN acknowledged that MC had put a lot of effort into improving this area. LN raised the concerns from a number of members who felt that the MOD doesn't always think something might be relevant to the IAG members when they feel it is. LN mentioned that coming from Plymouth he is able to see first hand some of the severe disruption that can be caused.

IAG needs to be aware of issues that might be deemed as being outside of ISOLUS but still have an impact on it.

Regarding the scope of the project, some of the NGOs have a generic issue that it is only the 27 submarines that should be included, not future build. MC confirmed that the scope of the project had been agreed and would be placed on the website.

Action JM to place SDP Scope on Website

Due to the speed of the project some members are concerned about the preview role of IAG in regards to the public consultation component. LN said that there were concerns about the sub group but that if it meets before the next IAG that can be fed back to IAG.

LN referred to the technical options paper that had been considered and peer reviewed. LN said that a key learning point from the peer review was that constructive comments had come forward and that peer reviewing generally of technical information would help to feed into the wider process.

LN commented that the demonstrator project could be perceived as both an advantage and disadvantage to the public. LN asked MC where they were in terms of peer reviewing the technology.

MC commented that the principles of peer review of Demonstrator would be considered for Review Note 2.

LN explained that the significant issue faced by the IAG was communication. There is a new MOD team on the project and some of the members of IAG have been involved since the CIOP stage. LN commented that the delay of IAG last year was difficult. He acknowledged that he had been consulted about the postponement of the meeting, but there are lessons to be learnt about what information can be sent round in the meantime. There have been examples where IAG would expect to have a preview role. MC acknowledged the lessons stated and is aiming at improving the communications.

SL enquired whether the IAG had clarity on what the MOD expected them to deliver. PD commented that the IAG has a specific remit, but that it must be a two-way process. LN confirmed that the IAG had very specific terms of reference and that his role as Chairman was to manage meetings to bring consensus agreement to move projects forward. AS agreed with the point made by LN.

LN confirmed that all the members of the IAG wanted to deliver the project.

PL urged that we should get on with it and that he was grateful that MC was taking the activity forward. PL agreed that the IAG is united in wanting to get a resolution, but he wanted members to know that it can be difficult for the NGOs.

LN continued by updating the MISG about the discussions that had taken place at the last IAG including the presentation about the RPV. LN asked for this kind of information to be distributed to the members of the IAG in advance. It was agreed that information that is relevant to SDP should be circulated. JM confirmed that this would be particularly important in the public consultation phase and was part of what EW referred to in her presentation with respect to the sustained media campaign. PB emphasised the importance of the communications plan as part of this whole process and the need to engage with other parties, e.g. the NDA, as we can all learn lessons from each other. AS confirmed that the MOD would also look at other announcements that are being made during the lead up to and during the consultation phase to make sure that members are aware of any announcements that could be seen to have an impact on the SDP project.

AS recapped what had been discussed and the key areas were: communications strategy, scenario planning, the chairing of the process and better planning for preview.

Action 8.3: Six Phase Project Plan to be circulated to members of IAG in advance of the next meeting

Action 8.4: MOD to circulate information regarding other projects that could be viewed to have an impact on SDP.

Action 8.5: Circulate appropriate media articles relating to SDP to IAG

6. Industry Update

In the absence of a formal industry representative the Chairman requested an update from RJ who advised that VT and Babcock's had been gathering technical risk reduction work at Rosyth. He also advised that VT had been working with the French company Areva Technicatome to develop international best practice radiological techniques for the dismantling of reactor compartments and packaged waste and that the two companies would be visiting Cherbourg.

RJ commented that gaining a detailed appreciation of the French operation and seeing it first hand would have significant potential in contributing towards risk reducing the UK programme.

RJ concluded by informing members that the French Navy and Areva TA (their contractor), are both keen to facilitate more co-operation with their UK counterparts.

BC enquired whether the French were involved in the process.

JW commented that this was very useful, particularly for the demonstrator project, as we were able to take lessons from others and gain useful information from them. PD asked whether this information could be shared for use in the SEA and particularly the public consultation. JW commented that it could be used so long as we had approval to use it in that way.

RJ confirmed that the French were now cutting up and that the US and Russians were not for specific reasons. Currently, the French are taking out the RC and then putting the submarine back together and back into the water.

PL asked whether the technical achievabilities are contained within the SEA. JW clarified that they were not but they will be used in the planning phase of the technical demonstrator.

Action 8.6: Clarify whether waste people are involved in the process.

7. Civil Nuclear Update

(a) CoRWM

LN gave the report on behalf of CoRWM. He informed members that the interim storage report has been submitted to Government for response and that the 2009-2010 work programme has been submitted to Government for approval. CoRWM are continuing the work relating to the GDF.

Work is being scoped relating to issues with new build waste, but CoRWM does not have a policy on this area.

LN advised members that they are working on the development of Scottish radioactive waste policy (which is the Scottish equivalent to the UK policy and SEA). CoRWM continued to review the NDA topic strategies.

LN informed members that CoRWM continued to perform their scrutiny role and are looking at the Government's Managing Radioactive Waste Safely (MRWS) programme. CoRWM are continuing to undertake public and stakeholder engagement. LN confirmed that the annual report will be submitted to sponsors at the end of the month.

SJ enquired what the timeframe is for the Scottish policy. LN confirmed that it was in a year. BC commented that there is a workshop taking place (25th June) and that it might be worthwhile for SJ to ascertain if there is a space.

PL commented that at a workshop he attended in February the old idea of undertaking best possible practice did not seem to be supported any longer. In both the FEC and CIOP best possible practice was followed and we have obligations to make sure that this continues.

LN commented that this is not a CoRWM's policy statement nor the view of CoRWM collectively (i.e. doing less than best possible practice). AS confirmed that we would look to be both expedient and follow best practice.

(b) Nuclear Decommissioning Authority (NDA)

PB gave an update on the developments in the NDA since the last meeting. He advised that the NDA is working on the next version of the strategy with the project team. He advised that of the 27 topic strategies (some of which are enabling and others leading) the MOD have representatives involved with seven. The NDA has issued the draft LLW strategy for comment. The non industry LLW strategy is to be issued by Government shortly.

PB informed members that Phil Davies is attending a workshop at Rosyth regarding resins and that the NDA is engaged with the Scottish Government on the highly active waste project in the same way as CoRWM.

PB advised members that the National Stakeholder Group meeting would be from the 17-18th June and will take place over two days in order to focus on waste management issues. Franz Pearson will be attending on behalf of MOD.

PB said that the Competition Board had asked whether Vulcan was part of SDP. MC clarified that it is not.

PB confirmed that the NDA is forming into integrated project teams and will look at enablers to the programme.

PB confirmed that members will see the NDA working closer with site licence operators., PB advised that the NDA is involved in the waste storage review which will have an impact across the nuclear industry as a whole.

PB confirmed that the NDA is continuing to attend the waste management steering group meetings chaired by BC.

PB confirmed that the NDA continues to be involved with SDP and that David Gatehouse is representing the NDA at a project level and that the NDA continues to look at potential options on NDA sites.

PD asked how the influence of low level waste transport and emissions is dealt with (e.g. Studsvik in Cumbria). PB confirmed that they are not licensed to smelt in the UK and metal is transported overseas for that part of the process. PD asked what engagement with communities was undertaken by the NDA relating to the topic strategies. PB confirmed that the topic strategies have stakeholder engagement plans and the national strategic group forum is also engaged. PD spoke about his role with the Nuclear Liaison Group and enquired how he could get involved with the NDA groups. PB suggested that he put his request in writing to him.

8. Other Issues Notified

No issues had been notified in advance of this meeting

9. MISG Membership

AS gave the background to the representation on MISG. Historically Jane Hunt and Peter Lanyon were invited to cover off particular areas, JH communications and PL the views of the NGOs. After the establishment of the IAG a place was allocated for the Chairman of the IAG to attend the MISG. AS confirmed that the key point was that there was robust strength and depth in the representation. AS proposed for there to be two representatives from IAG (one of which is the Chairman) plus a substitute based on the email he received from LN. PD commented that he felt this was an example of IAG being pushed into and excluded from things. NP highlighted the fact that it was actually an increase in membership from previous numbers. RJ commented that he was the only person that had been to every MISG meeting and that JH and PL were invited because of the Communication and NGO role rather than as members of IAG. LN confirmed that the only change was appointing a reserve. That having been clarified the meeting agreed AS's proposal of two representatives from IAG (one being the Chairman), a substitute and the separate roles of communications and NGO representation continuing.

10. AOB

FB asked for the calendar of dates to be circulated.

Action 8.7: Circulate the dates of meetings with the minutes.

PL asked what had happened to the technical options study paper. MC responded that it was in the process of being finished and will be released prior to the next IAG. AS suggested that it would be worthwhile for MC and PL to discuss this further outside the meeting.

Action 8.8: MC to circulate the technical options study paper prior to the IAG on the 7th July.

AS informed the meeting that this was Nigel Parsons' last meeting in his Acting Role and he thanked him for his contributions.

11. Date Of Next Meeting

The Chairman advised that the date of the next meeting is 5th November 2009.

The Chairman thanked those who had attended.

DRAFT