

Notes of 4th ISOLUS (Interim Storage Of Laid-Up Submarines) Advisory Group (IAG)
held on 4th April 2008 at Lancaster House Hotel, Lancaster

Attendees:

Les Netherton	Environmental Health Advisory Services Ltd (Chairman)
Tub Aves	British Nuclear Energy Society (BNES)
Dr Louise Brown	Scottish Environment Protection Agency
David Collier	Faulkland Associates
Emma Cooke	Scottish Government
Dr Paul Dorfman	University of Warwick
Chris Hargraves	MOD - ISOLUS Deputy Project Manager
Kate Ingram	MOD – Defence Equipment & Support (DE&S) Secretariat
Peter Lanyon	Nuclear Submarine Forum
Dr David Littlewood	The Centre for Professional Ethics, University of Central Lancashire
Di McDonald	Nuclear Information Service
Paul Naylor	Environment Agency (EA)
Bob Pirret	Rosyth Local Liaison Committee
David Senior	Health & Safety Executive (HSE) - Nuclear Installations Inspectorate (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	Nuclear Submarine Forum
Maggie Taylor	MOD - Assistant Director (AD) ISOLUS
Dr William Thompson	Lancaster University
Lt Steve Woodley	MOD - ISOLUS team
Antony Lokier	MOD - ISOLUS Team (Secretary)

1. Welcome & Introductions

Les Netherton (LN) welcomed all those present and asked everybody to introduce themselves as there were some new members. LN thanked all those who gave presentations at the workshop on the 3rd April 2008.

2. Apologies

The following apologies had been received:

Ian Avent	Community Awareness Nuclear Storage And Radiation (CANSAR)
Rajnika Patel	CIRIA
Dr Jane Hunt	Lancaster University
David Warner	Nuclear Decommissioning Authority
David Whitworth	Institution of Nuclear Engineers (INucE)

LN stated that John Shepherd had retired since the last meeting and wished him all the best in his retirement.

3. Notes of the 3rd IAG – 10th January 2008

Paul Dorfman (PD) considered that the notes of the 3rd IAG did not fully reflect points he had made on the following topics:

- Section 2 Risk Presentation
- Section 4a Technical Summary Reports
- Section 5 Peer Review and Preview
- Section 6 Update on International Practice for Submarine Disposal

This was noted by the meeting.

A short discussion followed about what was meant by “disposal” as there were differing interpretations.

4. IAG Action Grid

“Action 1.2: John Shepherd to liaise with the Devonport Local Liaison Committee (LLC) to determine if they wish to be represented on the IAG.” – Complete. Peter Stacey stated the Devonport LLC did not wish to be represented on the IAG at this stage. Peter Lanyon (PL) asked if there were NGOs on the LLC. LN stated that when he was a member NGOs were not nominated representatives but the Terms of Reference had been amended to allow them to ask questions at a meeting. It was noted that Ian Avent, CANSAR is a member of the LLC.

“Action 1.6: Di MacDonald to provide a point of contact for Environmental Justice.” - Action ongoing. Di MacDonald (DM) stated that she was in contact with Janet Fenton but there had been no response to the newsletter article yet.

“Action 2.2: The ISOLUS team to start a short regular newsletter.” – Action ongoing. The secretary stated that the Lancaster University contract had been amended to provide support to the distribution of a newsletter on a quarterly basis initially.

“Action 2.4: PL to provide points of contact for Greenpeace and Friends of the Earth.”, **“Action 2.5: Secretary to write to the identified points of contacts in Greenpeace and Friends of the Earth.”** and **“Action 3.13: IAG Secretary to invite Greenpeace and Friends of the Earth again.”** – Actions complete. It was agreed to close these actions as no response had been received to the invitation. PL would continue to represent these organisations.

“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 2.11: ISOLUS Team to produce an overview of the decision process.” – Action complete. CH stated that a draft Decision Tree logic has been prepared and would be circulated for comment. Any comments by e-mail back to CH would be welcomed and it will be discussed at the next IAG.

“Action 2.12: ISOLUS Team to produce overview of the links and differences with the civil process.” – Action complete. CH stated that he had produced a comparison which would be circulated and discussed at the next IAG.

Action 4.1: Secretary to formally circulate electronic copies of the Decision Tree and comparison with the civil sector.

“Action 3.1: David Collier (DC) to identify the CoRWM documents covering risk.” – Action Closed. This action was closed as DC stated that he had been unable to identify the specific document. DC suggested that if anybody was interested then it was best to look at the CoRWM Final report and follow the references for the key documents supporting the report. PD suggested an alternative was to look at the Low Level radiation work. DC supported this and offered to provide references on a number of technical reports.

Action 4.2: David Collier (DC) to provide references from the joint work on the Low Level Radiation Campaign.

“Action 3.2: ISOLUS team to produce a risk glossary by the 22nd February 2008.” – Action Complete. Steve Woodley (SW) had produced a glossary that had been issued for comment. LN commented that it needs to be made clear that the reactor fuel has been removed from the submarines going into ISOLUS. PD raised the following comments:

CoRWM – “....radioactive waste.” should be “....radioactive legacy waste.”.

HLW - “This is radioactive waste with higher levels of radioactivity than low level waste which produces heat...” should be “This is radioactive waste with high radioactivity which produces heat...”.

In discussion it was noted that the definition of HLW had been raised under CoRWM. CH said that the used nuclear submarine fuel that has been removed is classed as an asset.

PFI – The question was asked why this was included, CH stated that this was still a theoretical way forward in the Procurement Strategy.

PQQ – “Per-” should be “Pre-“.

Risk – Concern was raised regarding the definitions proposed.

In the ensuing discussion SW said his aim was to produce definitions which would be comprehensible for the public. Tub Aves (TA) raised a concern that the official definitions have to be adopted by law by operators and that we should be careful about moving away from them, this was supported by David Senior (DS). PL stated that there had been a lot of creative tension between the definitions produced by various institutions. LN stated that there were two levels to this work, the first to gain a level of understanding of risk and the second to put it into context. PD drew attention to guidance in HM Government Guidelines on Scientific Analysis, 2005. He was concerned about putting risk into context in the table and felt that it would be unhelpful, and offered to produce some other definitions. TA acknowledged that a public perception of risk was very important but we are not in a position to argue the origins of these definitions and the operator will have to meet the legal requirements. LN summarised that we need to explain the concepts of ISOLUS and there are other arenas we can reference such as the revamped CoRWM website. DM raised a concern that there was contradiction in the risk examples, SW stated that this was error and would correct it. LN ask SW to liaise with PD, David Senior and David Littlewood (DL) to review this glossary for a discussion at the next meeting. Any other comments are to be sent by e-mail to SW.

Action 4.3: SW to liaise with PD, DS and DL regards editing of the Risk Glossary

“Action 3.3: DC to give a BPEO presentation at the next IAG.” – Action Complete. DC gave a presentation at 3rd April Workshop.

“Action 3.4: IAG Secretary to re-issue Advantage report.” – Action Complete. The Secretary had re-issued the Advantage Report.

“Action 3.5: LN to ask Jane Hunt (JH) to see if she would give a presentation on Public Risk Perception.” – Action Complete. LN stated that JH had agreed to give a presentation on “Public Risk Understanding” (rather than “Perception”).

Action 4.4: JH to give a ‘Public Risk Understanding’ presentation at the next IAG.

“Action 3.6: All to comment on the presentation by 22nd February 2008.” And **“Action 3.7: IAG Secretary to collate comments and circulate to members by 7th March 2008.”** – Actions completed. Only one set of comments had been received from AS and this had been circulated to the members by the secretary.

“Action 3.8: All to provide offers of presentations and/or topics required by 15th February 2008 to the IAG Chairman.” – Action complete. Workshop held on 3rd April 2008.

“Action 3.9: PD to provide re-imbursement guidance.” – Action Complete. This was added as a post meeting note to the 3rd IAG notes and actions.

“Action 3.10: DC/JH/PD to produce some consultation bullet points by 22nd February 2008.” – Action Complete. This was produced and will be discussed under Agenda Item 6 b.

“Action 3.11: MT to respond to JH e-mail dated 8th January 2008.” – Action complete. MT had responded on 14th January 2008 and copied all the IAG members.

“Action 3.12: Les Netherton (LN) to determine if substitution at the MISG was possible.” – Action ongoing. LN stated that he would raise this at the forthcoming MISG on 7th May 2008.

5. Technical Summary Reports Update

SW stated that the summary of the technical reports was going through the DE&S secretariat branch to gain a Plain English crystal mark. On the existing reports he would indicate where information had been removed for security or commercial reasons. New reports were coming in from current studies and these would be distributed once they have been declassified. SW warned that one particular report contained a lot of detailed classified information, so he would issue a declassified summary.

Action 4.5: SW to distribute declassified versions of recently received reports to IAG members.

LN asked if any of these reports would influence current discussions and would need to be prioritised. SW stated these reports confirm current assumptions and would not materially influence discussions. TA suggested that the security classifications under the current rules may need to be contested, and CH stated he had action in hand to do this. Jane Tallents (JT) asked for an explanation to be given where information had been removed from the reports. SW confirmed that there would be an explanation and a justification. DS suggested using the framework used under the Freedom of Information Act. PD asked if it was possible to get a second opinion as it was very interesting and important to have Independent Peer Review of the studies. Maggie Taylor (MT) stated we would be having peer review, but the question as to who needs should carry out this would need to be debated. PD asked to have that debate now. LN stated that this would be covered under the technical options study item of the agenda.

6. Technical Options Study

a. Update Position

CH stated that the scope of work for the study had been issued to contractors and a briefing would be held in the next two weeks. This would include consideration of proposals for independent peer review, which would involve the IAG. Son Mon Sutcliffe (SMS) asked how the companies had been selected.

CH explained that MoD has a list of companies with agreed commercial terms and conditions for technical work and a database of their capabilities. A search of these capabilities had identified 12 suitable companies, one of which was excluded as it had previously expressed an interest in ISOLUS and would be unable to demonstrate its independence for this study. LN asked CH to remind the IAG of what arrangements are in place for their involvement. CH stated that there is a requirement to involve the IAG in the process for the study and in proposals for peer review. PL referred to an e-mail discussion between CH and JH regarding preview for this process. CH stated that his understanding was that the discussions to date constituted preview and future discussions with the contractor for their proposals for peer review were also preview.

Action 4.6: CH to circulate proposals for independent peer review of the Technical Options Study.

Action 4.7: CH to notify IAG of contractor's proposals for the Technical Options Study.

DS asked how long this study was expected to take. CH stated the scope of work requires completion within 16 weeks, but this is to be agreed with the chosen contractor. DM asked how the contractor would be selected. CH said this would be on the basis of their understanding of the general requirement; their experience in the fields of PR and consultation; technical; environmental and optioneering experience; individual CVs; independence from previous ISOLUS expressions of interest; and general compliance. MoD would make an assessment of value for money, not cost. The deliverables would be the Technical Option Study itself, a data report and a summary for the public. PL was concerned that some contractors had upset NGOs in the past. LN raised the question whether a workshop was needed to endorse the final selection. MT suggested that we would use written correspondence in the first instance but would call a workshop if necessary; this was agreed by the group.

SMS asked when siting would be addressed. CH stated that there will be another process for site selection.

b. Stakeholder Review of Technical/Option studies

DC presented a paper on the Stakeholder Review of Technical/Option studies, copy at Annex A, to the meeting. He emphasised that where there are significant decision making points, full scale stakeholder engagement is required, but where you are assembling evidence it is important that people know what work is going on, there is transparency about it and that they can access the information. The evidence should be put on the web site with opportunity to comment, but a formal 3 month consultation process was not appropriate at this point. This is the current best practice set by CoRWM. DC stated that contractors may ask stakeholders for views on priorities to derive weightings but this is not considered public consultation. With regards to the proposed technical options study it is important that the website is set up ready to accept the documents with a mailing list to notify interested stakeholders. The following comments were made:

- TA emphasised that detail needs to be taken forward not the wool that had been presented in the past with the Consultation on ISOLUS Outline Proposals (CIOP).
- Bob Pirrett (BP) supported this view that we needed answers before the next consultation.
- PD stated that we need confidence in the level of uncertainty.
- LN raised a concern from JH that the outline for engagement on deciding Cut-Up, Cut-Out excluded the public. Her view was that this decision required public input via a citizens panel or a set of discussion groups. It is considered good practice to involve the public in the weighting of a Multi Criteria Decision Analysis (MCDA). DC that this was true if you are dealing with the issues with a political or social dimension to them such as sites but citizens panel are not necessary for technical options analysis. CoRWM only did it because they were combining technical issues with social and ethical and deliberative strands of work for the MCDA.

- LN expressed the need to make the general public aware of the whole process. A Ministerial announcement was suggested as a public route to explain why there has been such a long public gap in the ISOLUS project. PL supported this suggestion and said the announcement should show how the project has got from the hiatus caused by the outline proposals to where it is now.
- DM stated that the object of our work is for the public to accept having nuclear waste from submarines stored somewhere. The site is the difficult part and in order to let the public feel that they have a say in it, it was important that all options are kept open for discussion.
- SMS stated that it is important that the public are given information that they can understand regarding all the options.
- TA stated that it is also important to look at the developments on the international scene as they have moved forward significantly over the last few years, particularly in Russia.
- BP suggested it would be better to wait for the outcome of the technical options study. MT supported this view as ISOLUS is an iterative process that needs to consider the changing world as it goes along. PD supported this as a lot of research and development was required to determine the reality on the way ahead for the national facility.
- LN asked if the IAG supported the recommendation to the MISG that a Ministerial statement is made on ISOLUS; this was supported.

Action 4.8: LN to recommend to the MISG that a Ministerial statement is made on ISOLUS

LN asked if the IAG was content with the stakeholder review paper and supported the way ahead. William Thompson (WT) suggested that it would be a good idea to combine the efforts to obtain a list of interested stakeholders with that of the newsletter distribution list. DC suggested that it would be beneficial to add a diagram to the paper to show the types of inputs to make it clearer. It was agreed that this paper would be used and that the diagram could be discussed at the next IAG.

Action 4.9: DC to add a diagram to his Stakeholder Review of Technical Option Studies

7. IAG Forward Work plan for the Year

LN reported JH's suggestion for a forward work plan which would enable the public to know future topics the meetings would be discussing. MT stated that a chart, Annex B, had been produced for the next 12 months covering the expected meeting dates, together with a shortlist of various topics that will be discussed during this period. MT also proposed to include the agenda on the website. LN supported this idea and agreed to liaise with WT regards the placement of the information.

Action 4.10: LN to liaise with WT regards placing IAG agendas on the ISOLUS website.

MT explained that there were 2 topics on the short list that needed to be started now. The first is a Feasibility Study which will look at what can be done in practical terms for submarine dismantling. The second is looking at generic dismantling sites in terms of an investment appraisal considering Greenfield, Brownfield and existing licenced sites. More details on this work would be available by the next meeting.

Action 4.11: Maggie Taylor to develop the ISOLUS Look Ahead Chart.

8. Parked Issues/IAG Membership

"A timeline of future decisions for the project" and "More detail on different stages of indicative programme" are ongoing issues.

"Babcock Marine" is still a parked issue as the impact on the Procurement strategy is still being assessed by the MOD.

The Secretary stated that Rajnika Patel had taken over from Mark Bentley at CIRIA and would be attending in the future. Peter Lanyon suggested that CND should be invited and agreed to provide a contact.

Action 4.12: Peter Lanyon to provide the Secretary with a contact for CND

Action 4.13: Secretary to invite CND to the IAG

DC stated that the EA and HSE had compiled a new database of stakeholders concerning new build nuclear power stations that may be useful. David Senior agreed to provide a copy to WT.

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

9. AOB

LN stated that the 20th Low Level Radiation Conference was being held on the 6-8th June at the University of Cumbria.

AS stated that a Rosyth Visit covering the site facilities was possible on the 17th June.

Kate Ingram reminded the group that the Freedom of information system was available for obtaining information from the MoD - www.mod.uk/DefenceInternet/FreedomOfInformation

WT asked if he could have details of any contacts for the stakeholders list, he would issue a e-mail as a reminder.

Action 4.15: WT to issue request for details for the stakeholder contact list

LN gave an update on Radioactive Waste Management. Firstly whilst the new CoRWM has the same name and 3 original members it does have a different mission and way of working. The original mission was to make recommendations on what to do with radioactive waste in UK, whereas the reconstituted committee has a scrutiny role. The main difference is that in the future the Government and the Nuclear Decommissioning Authority will be conducting public and stakeholder engagement, not CoRWM. The CoRWM website is being updated in May to make it more user friendly.

10. Date of next meeting

The next meeting will be held in the Surgeon's Hall Complex, Nicolson Street, Edinburgh on 18th June 2008 at 09:00. There will be an opportunity for the IAG members to visit Rosyth dockyard the afternoon of the 17th June 2008.

The following future dates and venues were proposed:-

11th September 2008 - Warwick Conference Centre. - **PMN** changed to the IBIS hotel Birmingham.

3rd December 2008 – Manchester.

11. Public Questions

One member of the public observed the meeting and commented that Public and Stakeholder engagement is difficult but it is important, so please keep it up.

Annex A – Wider Stakeholder Review of Technical / Option Studies

- 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 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.

Annex B – ISOLUS Look Ahead