



West Cumbria Sites Stakeholder Group

Decommissioning Sub Committee

Present

Mr Ron Hargreaves, Vice Chairman
Mrs Claire Tandy, Meeting Secretary

Mrs Alyson Armett
Cllr Peter Connolly
Mr Phil Hallington
Mr Chris Halliwell
Mr Peter Mann
Mr Russ Mellor
Mr Stephen Tandy
Mr Rob Waters

Apologies

Mr Joe Clark
Mr Norman Clarkson, Chairman
Mr Paul Foster
Mr Joe Murdock
Mrs Fee Wilson

Observers

Ali McKibbin

1. Chairman's Welcome and Opening Remarks

The Chairman opened the meeting by welcoming the members. He advised that Mr Clarkson was unable to attend this meeting so he, Mr Hargreaves would be chairing the meeting.

The Chairman thanked the members who had submitted reports to the meeting and reconfirmed the importance of submitting reports in a timely manner to allow members to read the reports prior to the meeting.

Changes to the Terms of Reference (TORs) for the meeting have also been proposed as the TORs were originally drafted when the committee was established. These will be amended and issued to the meeting members for comment.

Mr Tandy said that it would be useful for the TORs to be placed on the website for future reference.

Meeting 6/Action 1: Mrs Tandy to arrange for the updated TORs to be added to the website.

2. Review of Previous Minutes and Outstanding Actions

The previous minutes were agreed as a true record.

The actions were also reviewed and the action table has been amended to reflect the updates.

3. Decommissioning Directorate Report

Mr Mellor reported that the Decommissioning Directorate report was submitted at the end of Period 4 and provided an update on the business statistics on the position at the end of Period 5. The Cost Performance Index (CPI) and Scheduled Performance Index (SPI) remains the same as reported at the end of period 4. The Lost Time Accident (LTA) figures have increased slightly whereas the Reportable Incident Rate (RIR) has reduced slightly.

With regards to Performance Based Incentives, some are showing as at risk of failure to meet the deadline however, many of these deadlines are not due to be completed until the end of the financial year so there is still time to recover the programme.

Mr Mellor reported that since the report was submitted, there had been two events take place in the Magnox Swarf Storage Silo (MSSS). In one event, a trip switch on the Mark V cooler was disconnected during a period of maintenance without appropriate paperwork being completed. This event happened because people did not give enough consideration to maintenance and bringing machinery out of maintenance. Fortunately, other monitoring processes were in place in the facility so any anomalies in plant conditions would have been noticed. A Board of Enquiry has been established. The more recent event relates to hydrogen analysers. One analyser was being worked on and the other was out of service undergoing maintenance and so was out of service. One of the analysers wasn't connected appropriately and as a result, there was no monitoring of hydrogen in that particular compartment. Other mechanisms in place would have identified any anomalies but the event has been provisionally categorised as an INES Level 1 event which is classed as an anomaly. All activities have been stood down in the MSSS and these will restart in a phased manner.

Mr Tandy asked if there were any discernable environmental impacts as a result of the recent events to which Mr Mellor responded that there were no upset plant conditions and therefore no environmental impacts.

The Chairman asked if the scaling down of operations at Windscale would have an effect on the Pile Chimney decommissioning. Mr Mellor responded that the Pile Chimney is an active facility and decommissioning will be able to progress when the new Separation Area Ventilation facility comes on line. Decommissioning of the chimney will then commence with the priority being given to the removal of the filter galleries. Mr Tandy added that the Environment Agency (EA) is keen to see a Best Practicable Environmental Option (BPEO)

study in relation to the decommissioning of the Pile Chimney. There needs to be a clear audit trail of decision making processes and stakeholders should be given the opportunity to comment and provide input.

The Chairman said that if the Windscale operations are scaled down, it is important to capture the skills and knowledge of the staff. Also, we need to be able to guarantee that we will be able to read plant records in the future. Mr Mellor agreed that this was important in relation to all records on the Sellafield and Windscale sites. The Operational Safety Case (OSC) has proved the stability of the pile core and this stability is something which will continue to be monitored during surveillance operations. A lot of important work has been carried out in relation the Pile facilities and the knowledge gained will be recorded and documented.

The Chairman noted that the report also referred to some important statements in relation to the MSSS and the Liquor Activity Reduction (LAR) milestone. He also asked as a point of clarification - Page 4 of the report, Site Remediation and Decommissioning Projects, the first bullet point referred to the NII License Instrument Specification for the continued safe operation of their facilities – The Chairman asked if this was the continued safe operation of a Sellafield Ltd facility rather than an NII facility which was implied by the report. Mr Mellor confirmed that the facility in question belonged to Sellafield Ltd.

4. Sellafield Site Performance Report

Mr Hallington reported that the Sellafield Site report had been circulated to meeting members and could be taken as read. The following areas of the report were highlighted:

The Site's safety performance has been good with the site recently achieving well over 2 million hours without a lost time accident. This is a good achievement and it is believed that by strong commitment from our workforce and working closely with our contracting organisations, this good safety record was achieved.

Mr Hallington drew the members' attention to the section in the report which referred to the bags of waste which were sent off site to a waste facility at Lillyhall. The bags had elevated radiation levels after being cleared as potentially exempt. Mr Hallington confirmed that embargoes had been applied to waste routes on the site and these will be lifted when the site is satisfied that suitable control mechanisms are in place.

In relation to Spent Fuel Management (SFM) operations, work is progressing well and both the Magnox and Thorp programmes programme of work are well underway.

In relation to the Sellafield Mox Plant, the customer has invested in the plant and this has been very positive for the site and the workforce. Mr Hallington reported that the NDA has played a vitally important role along with International Nuclear Services (INS) in bringing all of the essential parties together to attract the investment.

The Vitrified Residue Returns (VRR) programme has also seen the return of High Level Waste (HLW) to Holland. A returns programme for HLW to Japan will continue in the coming years. The customers have invested in two new ships for the returns which demonstrates a commitment to the proper management of the return of HLW and transport of radioactive materials to high standards.

The commissioning of the Sellafield Product Residue Store (SPRS) has also seen a major investment on the site in the storage of plutonium, consolidated from other plants on site.

In relation to the Evaporator D project, preparations on the beach are well under way and some of the barge procedures have been tested, for the delivery of large modules towards the end of this current financial year.

The Life Time Plan (LTP) was delivered to the regulators and NDA on the 24th May. It is expected that the NDA should be able to sign off the plan by the end of September. During the intervening period, a number of issues are being addressed. The dates in this LTP are contract baseline dates and the dates are underpinned and deliverable. There is some concern that the delivery dates on some projects have moved out, however, the dates recorded in the plan are realistic. The preparation of the plan has been well supported by the NDA and the Regulators. It is recognised that the site needs to continue to try to make efficiencies where possible and the Integrated Change Programme (ICP) is the way the site is addressing this by trying to improve the mobility of the workforce, improve asset care etc. The ICP will be the site's way of delivering efficiencies now and in the future to meet the Annual Site Funding Limit (ASFL). Mr Hallington added that in some cases, work is being prioritised and deferred to meet the challenges of the ASFL.

Mr Hallington updated the meeting members that the Voluntary Severance Programme (VSP) consultation period ended on the 12th August. Those people who are not classed as being part of the "nuclear baseline" have now been given some certainty as to their future and work is being carried out to ensure that the retention of skills and knowledge of those leaving is captured. For people classed as being part of the "nuclear baseline", input from the NII will determine if these people can be released. Input from the NII is expected by the end of next week which will allow communications with those people in the "nuclear baseline" who have applied for VSP.

Mr Hallington added that following the recent change in Government, the Secretary of State for Energy and the Energy Minister have visited Sellafield and they both see the work being carried out here as a priority. The Site Remediation Forum which was started by the former Government and which is a ministerial meeting will continue to be supported.

Mr Hallington concluded that acceleration plans are being developed. Accelerated hazard and risk reduction is at the forefront of these plans. The outcome of the Comprehensive Spending Review (CSR) is expected in the autumn and it is hoped that Sellafield will remain a priority.

The Chairman commented that the Safety Walkrounds which are referred to in the report are very important and are an excellent way to communicate with the teams out on plant.

The Chairman also asked if the Multi Element Bottles (MEBs) which are referred to in the report could be decontaminated and reused. Mr Hallington responded that those which could be decontaminated would be but the design of some MEBs means that it is not always possible to decontaminate. Some of these have been sent to Sweden for melting. It is essential to make some room available to allow future operations to continue. Dr Waters added that this was an issue that the NII were pursuing.

The Chairman then added that the production of MOX fuel, although not decommissioning, does reduce plutonium stocks and Mr Hallington added that we can look forward to wider consultation on plutonium.

Mr Tandy made an observation in relation to the LLW bags incident. He advised that the EA and the NII are undertaking a joint inspection at Sellafield on solid waste and this comprises four elements which are Plutonium Contaminated Material (PCM), Low Level Waste (LLW), Intermediate Level Waste (ILW) and Strategic Governance. The inspection of ILW was scheduled to be carried out in July, however as a result of the bag incident; the LLW inspection which was scheduled for November was brought forward to July to allow the regulators to satisfy themselves that the arrangements for LLW were fit for purpose.

5. Nuclear Decommissioning Authority (NDA) Report

Mrs Armett apologised for the lack of a written report but agreed to send this out to members when available.

Mrs Armett then reported that in relation to safety at Sellafield, the NDA were pleased to see the improving trends and are pleased with the site's proactive approach to safety. The introduction of Disciplined Operations and the Peer to Peer observations process could be contributing to the improvements in safety and the performance is encouraging.

The NDA has 12 Department Strategic Objectives which they have to deliver. Some of these objectives translate to areas of work at Sellafield. Two targets were due to be delivered at the site and three were actually achieved. Some of the targets don't come into effect until the end of the financial year and the NDA is pleased with the site's performance.

With regards to the LAR transfers, this milestone was due to be achieved at the end of the last financial year. Although this was delivered late, the NDA was pleased to see it delivered in July this year.

The Annual Site Funding Limit (ASFL) for Sellafield for 2010/11 has been agreed at £1500m. The priority is on high hazard and risk reduction and the site team is working to see how work can be reprioritised.

The contract baseline document for the site should hopefully be agreed by the end of September 2010 after seeking resolution on some 88 issues. Performance plans are being developed with the priority being in high hazard areas. We are expecting these to be in place by March 2011.

There are a number of organisational changes currently taking place in the NDA where staff numbers will be reduced by approximately a third. The consultation process has concluded. It is expected that there could be a reduction of approx. 60 jobs in Cumbria. The new structure should be in place by the next meeting.

Mrs Armett advised that the NDA's Strategy II is out for comment. There will be a stakeholder event held as part of the WCSSG in October 2010. The NDA's National Stakeholder Group meeting will also be held on 21st and 22nd September.

The Chairman commented that with regards to the Life Time Plan, it is good to have a document where the targets and milestones are achievable rather than just having an aspirational plan. It is encouraging to see the various organisations (NDA, Site License Company and Regulators) all working well together to achieve the same ends and to develop a justified, underpinned plan. Hopefully as targets are met, funding should be forthcoming. It is reassuring to see a coordinated approach to the plans. Mrs Armett confirmed that a lot of work had gone into developing the LTP. Mr Hallington added that this was a significant demonstration of effective engagement of regulators who provided good quality regulatory advice. It is vital going forward that we look at ways of accelerating. Enormous benefits have come out of this process and it is an excellent investment for the future. Mr Hallington also noted that discussions between the NDA and NMP are ongoing regarding what meaningful public documentation can be produced which appropriately describes the plans. The Chairman concluded by noting that although the regulators need to be independent, he is pleased to see how this process has been working.

Cllr Connelly commented that this is a time of change and there are a lot of changes happening at the same time. There are reductions in numbers of staff at organisations and this is a concern for the local economy. Government office structures in the North of England and locally are also changing and it is a time of uncertainty.

6. Nuclear Installations Inspectorate (NII) Update Report

Dr Waters reported to the meeting that previously he had reported the potential for organisational changes within the Health and Safety Executive (HSE). A decision from Government on any potential change in organisational structure is pending.

With regards to the LTP, the NII has some concerns about the dates that have been declared in the document. The deferrals in some places are too long and this is why the performance acceleration plans are extremely important. The NII does not believe that all of the deferrals are fully justified.

The NII recognises that the ASFL has constrained acceleration within some high hazard areas but some dates for completion of work which have been declared are later than in previous plans and there is a lot of dialogue between the site operators and regulators on this issue.

The ICP is the process providing facilitation for improved performance at Sellafield Ltd. Dr Waters expressed disappointment with the progress to date and the underpinned justifications as to how the improvements will be delivered. If there is no improvement in this area, the NII may consider future action in line with their enforcement policies.

A framework is being established with regards to arrangements for LC35 (License Condition 35 – Decommissioning Arrangements). Discussions with the Site License Company will continue.

In relation to License Condition 36 (Management of Change), funding at the site is less than requested and as a result, there has been a reduction in numbers at the site in Agency Supplied Workers and staff through the Voluntary Severance Programme. The NII is involved in reviewing documentation to ensure that nuclear safety isn't compromised.

Regarding the events which have happened recently on the MSSS facility, the NII are investigating and will consider enforcement when the investigation is concluded.

A lot of work is ongoing relating to retrievals in the legacy ponds and silos projects. There have been some delays with project implementation in some areas. This has been raised with Sellafield Ltd. The NII is also keen to minimise any delays from a regulatory perspective and are looking to make improvements to cut out any unnecessary delays in relation to paperwork approvals. Some improvements have already been made and better interaction is improving.

In B30, a specification is in place requiring 90% of the sludge to be placed in modern containment by March 2010. This target was not met and the NII is trying to determine if Sellafield Ltd has done everything they could to meet the date. The NII will consider if any enforcement is necessary in line with the enforcement policy.

The license specification in the Site Remediation and Decommissioning Projects area was met before the due date of 1st August 2010. The NII are very pleased at the work which was carried out to meet the specification.

Meeting 6/Action 2: Mr Halliwell to provide the storyboard and pictures on the work carried out on B243 to Mrs Tandy for circulation to the meeting members.

Dr Waters said that a letter had been sent to Sellafield Ltd requesting justifications for the deferral of decommissioning at Windscale. Pile 1 is an important decommissioning project and it is important that the deferral is fully justified.

The NII and EA also continue to engage with Sellafield Ltd on the progress of the land and groundwater management programme. The NII has also asked for justification as to why there will be no further characterisation of the trenches. The trenches are not defined stores and it is important that the NII can be assured that there will not be leakage or escapes from the trenches.

Dr Waters concluded that the borehole programme which includes the renovation of the boreholes is progressing well and the NII are pleased with the progress to date. The work which is ongoing on the Separation Area Ventilation project is also progressing well and this is a key project to worker safety.

The Chairman Agreed that it is important that decisions relating to deferrals of projects are fully justified but in the case of the Pile project, it has probably been a victim of its own success. A lot of the work which has been carried out to assure that another fire cannot take place or to confirm that there can not be a criticality, has demonstrated that the core is in a stable position and as a result is not of the same priority in relation to hazard and risk reduction. The Chairman expressed regret that work will be deferred but the site has to cut its

cloth to suit its means and as long as the justifications are based on rational technical reasons then difficult decisions have to be made.

Dr Waters commented that the NII need to ensure that deferrals are well defined and justified and the knowledge needs to be preserved.

The Chairman commented on Page 5 of the report, that it is important that a flexible approach can be taken whilst retaining the integrity of the process. Dr Waters confirmed that the approach is an attempt to reduce bureaucracy. The priority is to ensure hazard and risk reduction goes ahead. Work should not be held back because of unnecessary delays in paperwork. Mr Hallington confirmed that this was a major step forward.

7. Environment Agency Report (EA)

Mr Tandy updated the meeting that unfortunately he was unable to attend the last meet so he had endeavoured to provide a more detailed report for this meeting to update the members. The report was structured in line with the Sellafield Ltd organisational structure. The report could be taken as read but some areas would be highlighted.

One of the key areas of note is that the EA is working well with other regulators and Sellafield Ltd to streamline engagement. Flexible permissioning is very important to the delivery of programmes and it is an important part of better regulation.

Mr Tandy reported that the EA resources at Sellafield were limited to 6 regulators. It is important to focus regulation on the Legacy Ponds and Silos (LP&S) areas. Mr Tandy will be spending more time carrying out regulation in the Legacy Ponds and Silos areas and will be supporting Dr Matthew Emptage in the high hazard and risk reduction area. Mr Tandy said that he would be spending 60-70% of his time working in this area.

The Environment Agency supports the development of Performance Plans and that it is important to work together to deliver hazard reduction much earlier.

In relation to the Sellafield High Hazard and Risk Reduction Programme (SHHaRRP) report, Mr Tandy advised that the EA have reviewed the report and would like to see the acceleration of hazard and risk reduction within appropriate timescales. If an accelerated programme is not forthcoming, then the EA and NII may choose to commission an independent strategic technical review of the SHHaRRP report.

Mr Tandy raised the point that at previous meetings, there was some discussion about the production of a Decommissioning Strategy Document supported by a Best Practicable Environmental Option (BPEO). The EA believe that as well as a short term strategy, there is also a need for interim and longer term strategy linked to agreed endstates. The Decommissioning Strategy needs to be in place to allow the development of other strategies, e.g. the waste management strategy.

The development of the Performance Improvement Action Plans (PIAPs) is seen as a very important programme of work in setting out the means for acceleration and monitoring progress.

Mr Tandy highlighted that the EA agrees with the point raised earlier by the NII relating to the deferral of scope at Windscale. It is important that the deferral is justified and that there is no degradation of assets or loss of skills and knowledge.

Mr Tandy highlighted the work which is taking place in the MSSS and noted that the work relating to retrievals is extremely important, going forward.

The Chairman asked for clarification on section 3 of the report – Decommissioning Life Time Plan and Strategy and asked if the discrepancies in relation to declared dates in plans, were discrepancies of months or years. Mr Tandy confirmed that in some places the discrepancies ranged from years up to a decade,. Mr Hallington confirmed that the dates have changed significantly in some areas when comparing with LTP07 which was the last agreed LTP however, the Sellafield Team has tracked all of the dates which have been recorded in each LTP document. The LTP10 dates are probably the most realistic dates.

The Chairman noted in the report that the EA had taken a pragmatic approach in that in order to deliver hazard and risk reduction, it was sometimes important to accept a short term risk for the longer term gain and it is important that the community is engaged on these issues. Mr Mellor agreed that this was a good point which had been raised and this is something which is evident from the risk reduction indicators. Risks will go up as decommissioning progresses but the site will do all it can to mitigate the risks.

The Chairman also asked for clarification on section 4.4 of the report and what was meant by the phrase that the EA has challenged the need to deploy alternative technology. Mr Tandy clarified that the EA want to challenge that any equipment used is fit for purpose and represents the best available technology for the task..

8. Safety, Security and Environmental Overview

Mr Hallington made a presentation to the meeting on the Safety, Security and Environmental Review which has been carried out at Sellafield. The review has been undertaken to ensure that all of the decisions which have been specified in LTP10 are justified from a safety, security and environmental perspective. The review has identified some areas where investment will be required on the site, the order of cost has not yet been fully determined. but it also satisfies the Sellafield Team that the LTP programme can stand with no detriment to nuclear safety, security or the environment. The assessment is a benchmark assessment and can be revisited at points in the future.

8. Any Other Business

Mr Mellor asked if it would be possible to add an agenda item to the next meeting agenda on risk reduction indicator curves. He would like to make a presentation to the meeting to discuss the risk curves which have been developed for each decommissioning facility. These curves are not a mathematical formulation but give a good indication of the risks over the lifetime of a project and demonstrate that through acceleration, hazards and risks can be reduced.

Meeting 6/Action 3: Mrs Tandy to include an agenda item to the next meeting on risk reduction indicators.

Chairman:

Mr Ron Hargreaves

Secretary:

Claire Tandy

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Action Reference	Action	Action Status
(M1)01	Claire Tandy to write to Bob Churchill/Ian Roxburgh of the NDA on behalf of the Decommissioning Sub Committee and ask for the name of the NDA representative who will attend future meetings. Also confirm the name of a nominated deputy.	Complete
(M1)02	Claire Tandy to include "Hazard Reduction Index" as an agenda item at the next Decommissioning Sub Committee meeting.	Complete
(M1)03	Chris Halliwell to arrange a visit to Sellafield Decommissioning Projects for members of the Decommissioning Sub Committee.	Complete
(M1)04	Chris Halliwell and Peter Mann to discuss reporting for the Sub Committee prior to the next meeting.	Complete
(M1)05	Claire Tandy to add agenda items to the next meetings agenda as appropriate.	Complete
(M2)01	Report to the WCSSG that it was disappointing that the NDA were unable to send a representative to the meeting to discuss the NDA Hazard Baseline agenda item and carry this agenda item on to the next meeting agenda.	Complete

(M3)01	Mrs Tandy to include the Hazard Baseline as an agenda item for the next Decommissioning Sub Committee Meeting.	Complete
(M3)02	Mr Halliwell to make the DVD on the Sellafeld Decommissioning Projects available to the Sub Committee Members. Comment: Restrictions remain in place for the DVD and it is not currently available for distribution. When it can be distributed, it will be made available.	Ongoing
(M4)01	M4 Action 1 – Claire Tandy to arrange a meeting with the Chairman, Vice Chairman and Paul Foster to discuss the performance report for the next sub committee meeting.	Complete
(M4)02	M4 Action 2 – Mrs Tandy to invite Mr Bob Jones or Mr Phil Hallington to the next meeting of the Decommissioning Sub Committee to present the Safety, Security and Environmental Review.	Complete
(M4)03	M4 Action 3 – Peter Mann to provide an update of the Active Handling Facility progress at the next Decommissioning Sub Committee meeting.	Complete
(M5)01	M5 Action 1 – Alyson Armett to send the SED mathematics to Claire Tandy for onward distribution to meeting members as required. Comment: A basic presentation was provided to the Chairman on the SED Scores but did not provide the mathematical details. Mr Mellor updated that this would be addressed to some extent in the	Ongoing .

	presentation which would be given on the risk indicators. Mrs Armett agreed to send out the full mathematical formulas on how the SED score is derived.	
(M5)02	M5 Action 2 - Mrs Tandy to circulate Mr Mellor's presentation to the meeting members.	Complete
(M6)01	Mrs Tandy to arrange for the updated TORs to be added to the website.	New Action
(M6)02	Mr Halliwell to provide the storyboard and pictures on the work carried out on B243 to Mrs Tandy for circulation to the meeting members.	New Action
(M6)03	Mrs Tandy to include an agenda item to the next meeting on risk reduction indicators.	New Action