

## **Reasoning behind the re-structure of the West Cumbria Sites Stakeholder Group working groups.**

### **Background:**

The West Cumbria Sites Stakeholder Group is currently undergoing a review at the request of the Nuclear Decommissioning Authority – (this is a five yearly requirement for all site stakeholder groups).

Phase one of the review involved the services of an independent consultant, David Collier. This phase resulted in a critique of the WCSSG and highlighted areas for further discussion, which were presented at the April 2011 WCSSG meeting.

Phase two of the review consisted of further workshops to discuss in greater detail the areas highlighted. In September 2011 a workshop was held to look at the various areas and resulted in a suggested terms of reference and future operation of the WCSSG. These outcomes were sent to all members for feedback.

A further workshop was held in December 2011 which focused the re-structure of the WCSSG sub committees – (now named working groups), resulting in a preferred option being put forward to members for comment:

- High Hazard & Nuclear Materials
- Spent Fuel Management & Waste Management
- Decommissioning and End States

### **Stakeholder feedback:**

Three sets of feedback were received as follows:

#### **Cumbrians Opposed to a Radioactive Environment:**

The combinations of *High Hazard and Nuclear Materials* and *Spent Fuel Management & Waste Management* do not seem logical.

CORE's counter proposal is to combine *High Hazard Materials* (waste) with *Waste Management* and *Nuclear Materials* with *Spent Fuel Management*, assuming separated Plutonium is classed as a nuclear material.

#### **Office of Nuclear Regulation:**

The three new working groups as proposed, which were chosen to reflect the structure of the performance plan, include more than one operational directorate. ONR feel they would not be an effective or efficient way of overseeing the work of SL:

- *High Hazard and Nuclear Materials* covers both the Decommissioning directorate and part of the Waste and Effluent Disposition directorate (HAL workstream) and part of the Spent Fuel Management directorate.
- *Spent Fuel Management & Waste Management* covers the SFM directorate and the WEDD directorate.
- *Decommissioning and End States* covers the Decommissioning directorate again.

A counter proposal is that the working groups should reflect the current directorate structure, ie:

- *Decommissioning* – this would cover Risk and Hazard Reduction (minus HAL workstream) and Decommissioning.
- *Spent Fuel Management* – this would cover Spent Fuel Management and Plutonium
- *Waste and Effluent Management* – this would cover Waste Management and the HAL workstream.

#### **Environment Agency:**

They considered that the following working groups would better align to the Sellafield Plan and also the way in which Sellafield Ltd is organised:

- *Spent Fuel and Nuclear Materials*
- *High Hazard, Decommissioning and End States*
- *Waste Management and Infrastructure*

As can be seen, there were three alternative and mutually exclusive proposals. A meeting was convened with the Chairman, Vice Chairman (who was unable to attend and fed views in prior to the meeting), NDA and Secretariat to discuss the feedback and the following comments were added:

- The structure of the new working groups needs to align with the Nuclear Decommissioning Authority strategy, taking into account the likely changes within the next 20 years.
- NDA's priority is high hazard and risk reduction and as retrievals start from legacy materials it will generate new waste management facilities.
- Therefore logically *Risk and Hazard Reduction & Nuclear Materials* and *Waste Management* sit together.

- Sellafield Ltd's key area of expertise is the management of nuclear materials. This may lead to further movement of nuclear materials to and from the site.
- Therefore logically *Spent Fuel Management and Nuclear Materials* would sit together.
- Moving further into the future it will be necessary to establish an agreed end state and create the infrastructure required to achieve that goal.
- Therefore logically *Decommissioning and End States* would sit together.

**Final proposal:**

The proposed structure of working groups will be:

- *Risk & Hazard Reduction and Waste Management*
- *Spent Fuel Management and Nuclear Materials*
- *Decommissioning and End States*

This proposal will be submitted for ratification at the 7<sup>th</sup> February meeting.