



UKAEA's RESPONSE TO ENTEC REPORT "ANAYLSIS OF THE 2007 CONSULTATION".

This document is in response to the recommendations made in the Entec report which was published in May 2007. *UKAEA's response to each recommendation is provided below.* For ease of reference the options discussed later are:

Combined option no	Onshore/offshore option numbers	Description
*1.	2 and 10	Onshore monitoring with recovery <i>plus</i> Offshore monitoring without recovery
2.	2 and 11	Onshore monitoring with recovery <i>plus</i> Offshore monitoring with recovery
3.	2 and 13	Onshore monitoring with recovery <i>plus</i> Offshore targeted recovery of detectable individual particles.
4.	2 and 15	Onshore monitoring with recovery <i>plus</i> Recovering offshore particles by the targeted bulk removal of marine sediments.
5.	3 and 11	Onshore recover all individual particles at all depths <i>plus</i> Offshore monitoring with recovery
6.	3 and 13	Onshore recover all individual particles at all depths <i>plus</i> Targeted recovery of detectable individual particles offshore
7.	3 and 15	Onshore recover all individual particles at all depths <i>plus</i> Recovering offshore particles by the targeted bulk removal of marine sediments
8.	4 and 13	Onshore bulk removal of individual particle at all depths <i>plus</i> Targeted recovery of detectable individual particles offshore
9.	4 and 15	Onshore bulk removal of beach sediments <i>plus</i> Recovering offshore particles by the targeted bulk removal of marine sediments
10.	7 and 13	Onshore restrict public access <i>plus</i> Targeted recovery of detectable individual particles offshore
11.	7 and 15	Onshore restrict public access <i>plus</i> Recovering offshore particles by the targeted bulk removal of marine sediments.

* *current management strategy.*

Recommendations

In determining the criteria weights, UKAEA should:

- Take full cognisance of stakeholder criteria weights.
- Recognise the generally high weighting placed on the environmental and social and economic criteria groups together with the interdependency that many stakeholders see between option performance in these criteria groups.
- Recognise that with regard to health and safety criteria, that weighting for different stakeholder groups varies and hence scenarios using alternative weights for this criteria

group should be used and the effects on overall option performance reported on.

- Recognise that stakeholders placed a moderate weight on technical performance when compared to other criteria groups.
- Recognise that, although cost is generally weighted the lowest of criteria groups, stakeholders consider that there are thresholds above which they may not wish to proceed with regard to funding the management of particles and furthermore, that a proportionate cost to the benefit accrued from any implemented option must be demonstrable.
- Reflect on the overall objectives and required outcomes of a management strategy and identify for whom the outcomes need to best perform in the long-term.

UKAEA welcomes the feedback from 2007 consultation process. The information received has been extremely valuable in understanding the relative importance of the assessment criteria. UKAEA do not intend to carry out a further weighting exercise – we will use the consistent feedback from the workshops and questionnaires to arrive at a suitable way forward to formulate a long term strategy which is both environmentally and publicly acceptable.

In carrying out analysis for the particles BPEO, UKAEA should:

- Recognise that stakeholders, almost without exception and regardless of their view on the level of risk presented by particles, consider that monitoring without recovery offshore is not acceptable.
- Recognise that in general, stakeholders consider Options 2 and 3 as both the preferred and most acceptable options.
- Recognise that in general, Options 7, 9, 10 and 11 are least preferred by stakeholders due to either high environmental impacts, low social and economic benefits or both.
- Recognise that a combination of options may provide the best overall strategy rather than a one size fits all and hence the management strategy may be a composite BPEO.

UKAEA is undertaking a revision of the preliminary BPEO and will provide explanations throughout the document as to how those views, and those of independent experts such as DPAG (Downreay Particles Advisory Group), have been taken into account.

- Recognise that there is a continued need to provide independent information to stakeholders as an integral part of any particles management strategy.

UKAEA will ensure that stakeholders are kept up to date on information both from a site and independent viewpoint.

With regard to developing its approach to the particles BPEO, UKAEA should:

- Consider weighting criteria at 'criteria level' where appropriate.

It is not UKAEA's intention to carry out further weighting of the scored options for reasons described above.

- Alongside the BPEO approach, UKAEA should provide an assessment of option cost profiles over time.

The preliminary BPEO will be revised, taking feedback and views into account. This will help us arrive at a strategy which is both environmentally and publicly acceptable. As a result of the feedback already received it is clear that some of the options are not acceptable from an environment or socio-economic viewpoint and therefore once we have identified the options which are acceptable, cost profiles will be considered and highlighted in the BPEO.

- Together with providing an option cost profile, determine and provide more accurate option costs and carry out proportionate engagement with stakeholders to determine views on these issues. Such engagement may be achieved through discussion at meetings of the Dounreay Stakeholder Group (DSG) Environment sub group and through a short questionnaire to a limited number of stakeholders, for example, participants of the 2007 workshops.

UKAEA's intention is to issue a consultation summary document which will provide background to the work already undertaken and a narrative on how feedback has been taken into account when outlining the recommendation for the long term management strategy. This document will be distributed widely and feedback will be invited before UKAEA finalise the BPEO and enter into discussions with our regulators.

The Dounreay Stakeholder Group is the link between the site and the community and it would be our intention to discuss progress and the logic behind the proposed BPEO, via the Environmental sub group. In addition, the External Consultation Steering Group will meet to review the documents to ensure accuracy and suitability before being published.

- Continue to use workshops as the core approach to engaging stakeholders in BPEO processes, whether this is regarding particles or other challenges facing UKAEA at Dounreay.

UKAEA recognises the importance of workshops as a core approach to engaging stakeholders and will continue with this practice. We are committed to continuously improving our consultation process and will continue to learn from our own process and the experiences of others.

UKAEA, Dounreay
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