

UKAEA RESPONSE TO ENTEC UK LTD REPORT ON ANALYSIS OF CONSULTATION RESPONSES ON THE DRAFT BEST PRACTICABLE ENVIRONMENTAL OPTION DOCUMENT.

Following the final stage of consultation on the preliminary Best Practicable Environmental Option (BPEO) for managing radioactive particles in the environment UKAEA has considered the recommendations made in the final report.

For ease of reference the recommendations are given along with the UKAEA response.

With regard to the draft BPEO, it is recommended that UKAEA:

1. In defining its strategy proposal, takes full cognisance of the overwhelming support for discarding Option 1, proceeding with Options 3 and 2 and targeting key areas first. If UKAEA moves away from this position, it should fully explain reasons for and consult on any revised strategy.

UKAEA recognises and agrees with the overwhelming support for discarding Option 1 and will finalise the BPEO proceeding with the recommendation for implementation, initially of Option 3, followed by Option 2. It is envisaged that the progress of the clean-up operations will be reported on a regular basis and any changes to the stated position will be clearly explained outlining the reasons..

2. Provides a clear statement of the strong consultee support for discarding Option 1, proceeding with Options 3 and 2 and targeting key areas first when making its strategy proposal to the Highland Council (HC), Nuclear Decommissioning Authority (NDA), Scottish Government (SG), Scottish Environment Protection Agency (SEPA) and other stakeholders.

UKAEA will provide a clear statement in the final BPEO. A Scottish Government meeting is held bi-annually which includes representatives from the SEPA, Highland Council, NDA, Health Protection Agency, Food Standards Agency, COMARE and the Dounreay Particles Advisory Group. Regular updates of the BPEO consultation have been provided and discussions will continue until the strategy is finalised and agreed. Minutes of these meetings are available on the UKAEA website.

3. Considers how best to address the comments and questions of clarification raised by stakeholders on end state parameters prior to finalising the parameters in its strategy proposal to SEPA, SG, NDA and other key stakeholders.

Comments and questions of clarification will be considered within the final BPEO and discussions will continue with SEPA and other key stakeholders to ensure a clear set of parameters for the end state.

4. Responds to stakeholder comments on establishing end state parameter targets by undertaking scoping work to establish whether such targets are possible and useful to define. If the outcome of the work is positive, to establish the nature of such targets.

This will be a matter of discussion and agreement with SEPA and other key stakeholders. As targeted clean-up progresses, further information on particle location, activity and depth will be obtained which will inform UKAEA and key stakeholders on proposals for end-state targets.

5. Consults widely on any proposed end state for both onshore and offshore environments.

UKAEA will consider how best to ensure that the proposed end state for both onshore and offshore environments are reported and how stakeholder communication can best be achieved. It is believed that the end state will be for SEPA to agree and the conditions of the site's authorisation (for monitoring) will continue until SEPA is assured that the end state has been achieved and the risk to the public is acceptable. Consultation on the end state is therefore not planned.

6. Proceeds with the proposed plan to report on progress with the strategy implementation with particular attention to the use of local press and ensuring that processes are in place to assure local beach information is kept up to date.

UKAEA will continue to report progress with the strategy implementation in an open and honest way, paying particular attention to local press as well as other media. Information provided at local beaches will be reviewed on a regular basis and updated as appropriate.

7. Reviews the comments and suggestions made on the management strategy and regarding general issues in the process of finalising the strategy.

All comments and suggestions will be considered before finalising the BPEO. Where appropriate, the BPEO will be revised.

With regard to the process of consultation, it is recommended that UKAEA:

8. Carries out a review of methods to encourage participation and engagement on this type of consultation (ie a consultation not supported by exhibitions or workshops) with a view to increasing participation rates and achieving a greater mix of stakeholder respondees in terms of age, gender and location. Such a review should consider appropriate techniques to increase engagement and submission of responses across a range of stakeholders including those most likely to be affected by the management strategy, and

The consultation process adopted is flexible enough to cater for additional stages if required. UKAEA has built a strong reputation for consulting with stakeholders and wishes to build on the good practice that has been established. UKAEA's process and methods of consultation are kept constantly under review and this will continue.

9. Considers inclusion of the additional information suggested by stakeholders in future communications.

UKAEA will consider the suggestions made by stakeholders in future communications.

Conclusion

UKAEA is grateful to all those who participated in the particles consultation including those who visited the exhibitions, took part in workshops, the scoring panel, and those who provided written responses. Key organisations have also been instrumental in helping UKAEA Dounreay to define a suitable way forward which we believe is environmentally and publicly acceptable.

UKAEA, Dounreay

5th February 2008