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**MINUTES OF THE MEETING OF THE
HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
HELD AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG
THURSDAY 7 DECEMBER 2023**

Attendance/Apologies list

Present:

Community Council Representatives

Rita Holmes - Fairlie CC HSSG Chair)

John Lamb - West Kilbride CC

Jamie Woodburn - Largs CC

North Ayrshire Council

Eleanor Collier - Councillor

Stewart McKenzie - Environmental Protective
Services

Leslie Jeffrey - Ayrshire Civil Contingencies Team
(ACCT)

Nuclear Restoration Services

Mark Blackley - Station Director Hunterston A

Richard Gibson - Engineering and Infrastructure
Manager

Colin Hargreaves - Independent Site Inspector

Alistair Walker - AGR Programme Development
Manager

Claire Aitken – Communication/Secretariat

EDFe (Hunterston B)

Joe Struthers - Station Director Hunterston B

Stuart McGhie - TUC (HSSG Vice Chair)

Fiona McCall - External Communications

Nuclear Decommissioning Authority (NDA)

David Wallace - Stakeholder Lead Scotland

Scottish Government (SG)

Diane Hamilton - (Radwaste Team)

National Farmers Union (NFU)

William Jack - NFU Scotland

Hunterston Estate

Angus Cochran Patrick

Office of Nuclear Regulation

Peter Hughes - HNA Inspector

Steve Saunders - HNB Inspector

**Scottish Environmental Protection Agency
(SEPA)**

Melanie Hayes - HNA Inspector

Keith Hammond - HNB Inspector

Paul Dale - SEPA Director

Civil Nuclear Constabulary (CNC)

Inspector Paul Gilmartin

Minute Taker

Matthew Dent

MOP

Alan Holden

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Apologies

Tom Marshall - NA Councillor

Patricia Gibson MP

Bill Hamilton - NRS

1. CHAIRMAN'S OPENING REMARKS AND DECLARATIONS OF INTEREST

Ms Holmes, Chair, welcomed everyone to the seventieth meeting of the Hunterston Site Stakeholder Group in the Waterside Hotel, West Kilbride. Introductions were made around the table.

Claire Aitken read the apologies as listed above. There were no declarations of interest.

2. Chair and Vice Chair Updates and Correspondence

The Chair provided her report to the SSG:

Since the September meeting Stuart and I have had monthly updates from A station online and had ready access to B station management when necessary.

We attended the NDA Chairs and Vice chairs annual meeting in Manchester, in October to speak with the NDA Board and site updates. We met with Magnox (now called Nuclear Restoration Services) Chairs and Vice chairs at its annual meeting, also in Manchester last month. Bill will probably say more about that.

Jill Callander received a gift as thanks from all the sites for the kind, competent way she delivered secretariat services to us over many years. It was lovely to spend time with her before the business meeting next day. Thank you Bill for making that possible. Sheila who diligently took the minutes of our meetings has left and we have a replacement service today.

I want to mention three things:

The first relates mainly to Sellafield, the second to ONR's Consultation on EDF's proposed decommissioning plans and Environmental Impact Assessment for Hunterston B decommissioning and the third to Near Surface Disposal and better Characterisation of Bunker Waste.

1. Sellafield, has been described as a "bottomless pit of hell, money and despair" at Europe's most toxic nuclear site. That is what NDA is charged with cleaning up and making safe. That is what ONR has to stringently regulate. Sellafield is what the Guardian has been recently reporting on. ONR has warned that toxic work cultures have been factors in all major nuclear accidents and the Civil Nuclear Chief Constable Simon Chesterman has voiced his disappointment at the press article saying it has evidence of officers being involved in a group sending unacceptable and offensive messages of racist, homophobic nature as well as joking about paedophilia. The CNC, NDA and Regulators have much to consider, particularly regarding the Sellafield site which has multiple legacy waste problems to rectify, and of course the 120 tons of plutonium. The public expects better of a workforce, a management and a constabulary which are supposed to be keeping a potentially catastrophic site safe and secure. Sellafield is not just of relevance to the people of West Cumbria, who ONR has stated are living with an intolerable risk. It is relevant globally. We are all living with that intolerable risk from Sellafield. On a positive note, I am regularly told by ONR that Hunterston B is one of the best sites and has one of the best workforces. We suspected that already, but it is always good to hear.
2. The second item is ONR's Public Consultation on EDF's decommissioning plans for HNB. HNB has already consulted locally and we had a chance to make preliminary comments then. Thank you for that. I assume that as the plans are now more specific, then we should as an SSG make time to meet together and discuss these in early 2024 and well before

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the 28th March, the closing date for responses. It would be helpful if we could also be made aware of any changes NRS may have in mind to the EDFe decommissioning plan, as we are aware that A and B have been liaising.

3. Near Surface Disposal and better characterisation of bunker waste are also on our minds today so it is good to have Paul Dale of SEPA here today for an update on these.

On 12 December, the NDA group would be running a virtual stakeholder summit called 'Creating Meaningful Conversations'. David Wallace confirmed that around 140 people were registered to attend at the moment, and it was open to all stakeholders.

Stuart McGhie stated it had been noted that the councillors had not attended many of the recent meetings and suggested that the SSG write to them to say that their attendance would be advantageous.

Steve Saunders provided a response regarding Sellafield on behalf of the ONR:

"The ONR undertook several hundred inspections each year and were satisfied that Sellafield was meeting the high standards of safety and security required by law. If shortfalls were identified, they would and had taken timely and proportional regulatory action to bring about required improvements. The ONR's regulatory strategy for Sellafield encouraged the safe and timely reduction of hazards and risks whilst ensuring the site continued to meet its legal obligations. Significant progress had been made in decommissioning projects in recent years, and the ONR would continue to work to ensure this momentum was maintained. With respect to *The Guardian* article, *The Guardian* had not consulted with regulators before publication. There were a number of factual inaccuracies in the report, in particular regarding the cyber issue. The ONR had placed a rebuttal statement on its website that there was no evidence that Sellafield systems had been hacked by state actors. More information could be obtained from the ONR press office."

Jamie Black noted he had expected to hear a bit more about the plans for Hunterston B, with which he agreed. The Chair noted that the plans would formally go to the ONR, who were seeking comments from the public. Steve Saunders noted the closure date for the consultation was 28 March 2024, and was prominent on the ONR website. The Chair said the SSG secretary could circulate the link.

ACTION: The secretary to circulate the link to the ONR consultation on the plans for Hunterston B.

3. ACTIONS AND APPROVAL OF PREVIOUS MINUTES

There were no actions from the previous meeting.

John Lamb proposed that the minutes of the previous meeting be approved. William Jack seconded the motion. The minutes of the previous meeting were approved as a true and accurate representation of the meeting.

4. HUNTERSTON B STATION REPORTS

Hunterston B Site Report – Mr Joe Struthers

Joe Struthers presented his report. He highlighted that industrial safety had remained strong. In regard to radiological protection, the maximum individual dose had been slightly raised, which was associated with an emergent defect repair carried out in that period.

Revised emergency arrangements, which remain proportional to the hazards during defueling, are being implemented. A Proof of Concept exercise has been completed and the Station are

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endeavouring to implement the changes in January 2024 subject to a Licence Instrument being granted.

On defueling, a milestone had been achieved with the first AGR in the UK being defueled on 18 September, with all fuel being removed from reactor 3 on plan, on budget, and done safely. There had since been an outage period overhauling fuel route equipment, prior to commencing reactor 4 defueling. The fuel removed from reactor 3 had been shipped offsite.

ONR Report – Mr Steve Saunders

Steve Saunders presented his report, which covered the period from 1 July to 30 November.

The ONR's focus remained on continued safety of defuelling operations and the move to decommissioning and transfer. Fuel had been removed from reactor 3, and in all cases the ONR had been satisfied that legal requirements had been met.

The ONR had had a number of meetings on emergency response and the proof of concept exercise, relating to proposed changes to recognise the reduction of risk on site. Once additional work had been completed on site, there was no reason why approval for the revised arrangements should not be able to be granted.

SEPA Report – Mr Keith Hammond

Keith Hammond presented his report.

SEPA had been onsite a few times since the last SSG meeting, mostly focused on transition and deconstruction, the refurbishment of the new decommissioning waste processing facility, and the installation of the alternative active effluent discharge line. An application on this would be coming to SEPA shortly.

SEPA had been monitoring the non-radioactive oil leak from transformer 3, which was being managed. It had been discovered that the entire fleet had been using zinc bromide in windows of the irradiated fuel dismantling cell, which being dealt with on a fleet basis. The Radioactivity In food in the Environment (RIFE) report covering 2022 had been published in early November, and the dose around Hunterston was 0.005 mSvs, down from 0.006 mSvs 2021, and against the legal limit of 1 mSv.

Questions and Answer Session

John Lamb asked how much was still outstanding in terms of fuel from reactor 4 which needed to go offsite. Joe Struthers explained that defueling had just started on reactor 4, and everything removed from reactor 3 had been shipped to Sellafield. All of the containers were moved by rail.

The Chair queried whether the earlier flooding of reactor 4 had made any difference to the state of the reactor. Joe Struthers confirmed it had made no difference to refuelling operationally. No additional issues specific to reactor 4 were anticipated. The Chair asked whether when both sites came under the NDA in a few years, whether the existing welfare provisions would be upgraded. Joe Struthers said Hunterston B facilities were upgraded every year. Mark Blackley added that there had been a lot of work to upgrade the welfare facilities over recent years, and as the sites were joined opportunities would be sought to operate safely and more efficiently.

Jamie Woodburn queried the strategy for Hunterston B. There had been nothing in the NDA business plan around a plan for Hunterston B. Joe Struthers explained that EDF had well-developed plans for decommissioning and were working closely with NRS on a seamless combined plan. Public consultations had taken place in 2022 and 2023. A lot of joint working was taking place. Steve Saunders added that LC35 required the station to have a decommissioning strategy. Inspectors were working to ensure a seamless transfer, and if they were not comfortable around this a licence was unlikely to be granted to NRS. Jamie Woodburn asked when the decommissioning plan would be published. Steve Saunders explained that the plan was being worked on and the required detail was not yet present.

5. HUNTERSTON A SITE REPORTS

Hunterston A Site Report – Mr Mark Blackley

Mark Blackley presented his report.

There had not been any new significant nuclear, radiological, environmental or security issues since the last SSG meeting. There had been one conventional safety accident whereby a security camera had been lowered in uncontrolled manner causing a hairline fracture to the worker's left ankle. An investigation was being carried out. Since the last SSG meeting there had been a successful demonstration of the accident, emergency and security contingency arrangements.

In relation to the variation request which had been submitted, a constructive meeting had taken place with SEPA and the ONR regarding characterisation of the bunker waste. It had been agreed to produce a report examining all of the options for package measurement and refinement of package inventories.

Waste was being recovered from the bunkers, with 306 boxes from bunker 1 having gone to the store, equating to 183 tonnes.

Preparations for active commissioning of WILWREP acid retrievals were continuing. It is expected that active commissioning will start in January.

Recruitment was continuing, with 16 roles at various stages of the resourcing process. There had been seven new starts between September and November. Two graduate apprentices in engineering were to be recruited in 2024, jointly with Hunterston B

ONR Report – Mr Peter Hughes

Peter Hughes presented his report, which covered from 1 July to 30 September.

Inspections had focused on the reactor buildings and roof work which had taken place. It had been determined that adequate arrangements existed. A security inspection had also been held, the results of which had been adequate.

A high radiation dose had been found in the cooling ponds. This was being dealt with appropriately.

SEPA Report – Ms Melanie Hayes

Melanie Hayes presented her report, which covered from the last SSG meeting to mid-November.

Melanie Hayes had been on site on 31 October to undertake an inspection of the temporary process put in place to submit monthly gaseous discharge returns. The inspection had found that measures put in place were likely to ensure the future discharge returns were being submitted compliantly, until a permanent process could be put into place.

An inspection had taken place of the work instructions for the new visual inspections of the site discharge ventilation systems and stacks. A very high standard of work had gone into this. An information notice had been sent requesting provision of information to assess compliance of the ventilation systems. Almost all of this had been submitted. Melanie Hayes would be back on site in February to discuss whether the site had returned to compliance.

Paul Dale explained that SEPA had been asking for appropriate characterisation of bunker waste for four years. This had not come forward, and various information had come forward from the site in support of the EA(S)R variation. An external consultant had reported back that the information was not sufficient to underpin a variation, and SEPA had met with Magnox jointly with the ONR to make this clear. It had been agreed that bunker 1 waste would be treated separately to bunkers 2 to 5, and Magnox would undertake the report examining all of the options.

Questions and Answer Session

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The Chair asked whether the National Nuclear Laboratory report was what SEPA had relied on to claim that characterisation had not been completed. Paul Dale explained that it had been an independent review, which had confirmed SEPA's views. The Chair asked why ONR appeared less stringent. Paul Dale explained that management and disposal of waste was a SEPA responsibility, whilst safety was an ONR responsibility. The driver for bunker 1 was safety.

The Chair asked how soon local people could expect details about options proposed for dealing with waste. Paul Dale explained SEPA had asked Magnox to consider what was possible. Mark Blackley stated a scope had been written, but a timescale had not yet been arrived at. The Chair asked whether the NNL report was open to the public. Paul Dale anticipated it would form part of the SEPA response to the consultation.

John Lamb queried whether the source of the high dose item in the cooling pond had been identified. Mark Blackley said it had been the pump. Additional options for bunker 1 were being worked through.

The Chair asked whether the KUKA robot was ever going to work properly. Mark Blackley noted there were functioning KUKA robots used on site but they were having particular difficulties with the robots in SILWE.

The Chair noted the aging facility at Hunterston A, and queried whether the steam raising units were inspected closely. Peter Hughes noted that arrangements had been looked at and it had been concluded they were adequately managed at present.

The Chair asked whether there had been any movement on height reduction of the reactor building. Mark Blackley reported that the rolling plan for decommissioning was being looked at.

6. UPDATE FROM AYRSHIRE CIVIL CONTINGENCIES TEAM – MS LESLEY JEFFREY

Lesley Jeffery presented her update.

The plan which the SSG had requested had been issued to partners, dealing with movement from the site to the railway. The offsite plan had been reviewed and modified to be more user friendly. This was with the group for comment, before being issued. The team had been slow in getting this work done due to staffing shortages.

Questions and Answer Session

Steve Saunders noted the next offsite test was to be by 2025. At the present rate, the second reactor would be defueling. He suggested requesting from the ONR whether they would still hold the team to an offsite plan. Lesley Jeffery reported that these discussions were already happening. It might be a tabletop exercise. A meeting would take place in June 2024.

Richard Gibson noted that B station would go through an exercise considering worst case scenarios and external hazards, the biggest of which being aircraft impact. Steve Saunders noted that the law did not require the worst case per se, but the reasonably foreseeable worst case. In terms of nuclear, the worst case foreseeable scenario would be a local release on site. Jamie Woodburn noted that the pandemic had been unpredicted, as had other events. Steve Saunders stated that the local authority had a range of contingency plans, with nuclear being only one of them. The likelihood of a nuclear incident was very low from the start, due to the safety measures already in place.

7. UPDATE FROM NDA – MR DAVID WALLACE

David Wallace presented his report.

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The NDA had had an annual ministerial briefing on 26 October. The NDA had a statutory obligation to brief Scottish ministers on mission progress in Scotland. This had included updates on the AGR and the potential move of the MOD Vulcan site to Dounreay. This had been well received. Mairi McAllan MSP, the Scottish Government Cabinet Secretary for Just Transition and Net Zero, had asked the NDA to make contact with the innovation department at the Scottish government regarding closer working, which was an ongoing conversation.

There had been a Scottish supply chain event on 8 November at Dunblane, with a UK event taking place on 27 June in Telford. The socio-economic refresh was currently out for consultation until the end of January.

There had been a second secondment to the Scottish government, as well as a member of the Scottish Government from Diane Hamilton's team having moved into the future missions team.

Questions and Answer Session

Angus Cochran-Patrick noted that the NDA had sold six hectares of land in Scotland, and queried whether this had been at Chapelcross. David Wallace confirmed that it had been.

8. UPDATE FROM SCOTTISH GOVERNMENT – MS DIANE HAMILTON

Diane Hamilton presented her report.

Regarding the radioactive waste concept project, it had been decided that one online session would be held for all SSGs. The logistics and date for this were being decided. Survey questions were being developed for a public survey on attitudes to radioactive waste disposal, to be released in the next few weeks.

The Environmental Authorisations (Scotland) Regulations 2018 had been amended to bring together SEPA's four main regulatory regimes. The consultation for this would be available soon, including minor amendments to the radioactive substances framework for clarification.

Questions and Answer Session

The Chair queried SEPA's view on the EA(S)R amendments. Paul Dale said the intention was for a single permit across different regimes. SEPA had been very much in favour.

Jamie Woodburn asked about the attitudes survey for radioactive waste. Diane Hamilton explained it had been a commitment in the 2016 strategy. Jamie Woodburn asked what this would drive. Diane Hamilton said the questions would be very general and not site specific. She was not sure what would be done with the results once complete and would find out and come back on this. The Chair said Claire Aitken would send the link out to the SSG members.

ACTION: Diane Hamilton to come back to the SSG in regard to what the attitudes survey would be used for.

9. ANY OTHER BUSINESS

The Chair thanked those present for attending and closed the meeting.

Next Meeting date: Thursday 7 March 2024.