

Chapelcross Site Stakeholder Group

AGENDA

Agenda for the SSG meeting to be held on Wednesday 12 March 2025

**Annan Athletic Football Club
Galabank
North Street
Annan
DG12 5DG**

-
- 1. (10:00 – 10:02) Chairman's welcome**
 - 2. (10:03 – 10:05) Announcements and apologies (*including any Declarations of Interest*)**
 - 3. (10:06 – 10:08) Minutes of previous meeting and Matters Arising**
 - 4. (10:09 – 10:29) Chapelcross Site Director's Report (*including update on NRS Socio-Economic Scheme*)- *Richard Murray, Chapelcross Site Director.***
 - 5. (10:30 – 10:45) NDA Update – *David Wallace***
 - 6. (10:46 – 11:00) NRS Update – *Bill Hamilton***
 - 7. (11:01– 11:35) Other reports from SSG bodies - ONR, SEPA, Scottish Government.**
 - 8. (11:36 – 11:38) External Meetings and Invitations**
 - 9. (11:39– 11:49) CX Project Update - *Helen Emberson, CX Programme Lead*
*SoSE Update - Donna Mounce***

10. (11:50 – 11:51) Any Other Business

11. (11:52 – 12:00) Public Forum

Next Meeting - 10am, Wednesday 20th August 2025

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**MINUTES OF THE MEETING OF THE
CHAPELCROSS STAKEHOLDER GROUP (SSG)
HELD AT ANNAN ATHLETIC FOOTBALL CLUB, ANNAN
WEDNESDAY 20 NOVEMBER 2024**

Attendance/Apologies list

Attendance

Cllr Archie Dryburgh MBE	Annandale East and Eskdale (Chair)
Cllr George Jamieson	Annandale South (Vice Chair)
Neil Carruthers	Royal Burgh of Annan Community Council
Cllr Sean Marshall	Dumfries & Galloway Council
Willie McNairn	2km Resident Representative
Carol Midwood	Federation of Community Councils/Canonbie and District CC
Jaime Nicholson	Dumfries & Galloway Council
Ian Park	NRS Trade Union Representative
Andy Stott	Restoring Annan's Waters

Operators and Officers

Claire Aitken	NRS
David Carson	Amentum
Colin Hargreaves	NRS
Richard Murray	Site Director, Chapelcross
Peter Hughes	ONR
David Wallace	NDA
Geoffrey Dore	Minute Taker

Apologies

Cllr Lynne Davis	Annandale North
Helen Emberson	Dumfries & Galloway Council, CX Programme Lead
Bill Hamilton	NRS
Diane Hamilton	Scottish Government
Donna Mounce	SOSE
David Stone	SEPA
Cllr Stephen Thompson	Annandale North

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1. CHAIR'S WELCOME

Cllr Archie Dryburgh welcomed the attendees to the Chapelcross SSG meeting. He thanked Cllr George Jamieson for chairing the previous meeting.

2. ANNOUNCEMENTS AND APOLOGIES

Apologies for absence were received from Cllr Lynne Davis, Helen Emberson, Bill Hamilton, Diane Hamilton, Donna Mounce, David Stone and Cllr Stephen Thompson.

There were no declarations of interest.

3. MINUTES OF PREVIOUS MEETING AND MATTERS ARISING

Andy Stott noted that there had been an action for Claire Aitken to circulate a document from Scottish Water. Claire Aitken apologised for the delay.

Action: Claire Aitken to circulate the document from Scottish Water regarding the water extraction on the Annan.

Andy Stott noted that, during the last meeting, Peter Dreghorn had advised on the difference between the definitions for green energy and renewable energy. However, the definitions had not been included in the meeting minutes. The definitions were as follows:

All installation and maintenance of energy production units have an impact on the environment in their structures and materials. Green energy production has least impact on the environment at the point of production, for example solar, water and wind power. There is no fuel involved in green energy production. Renewable energy uses fuel but that can be replaced. The wood fired power station at Lockerbie uses willow and soft wood. Unlike green energy, the growing, delivery and burning of trees has an environmental impact.

Cllr George Jamieson clarified that there had been an action to provide members of the SSG group with the memorandum of understanding (MoU) between SOSE, Dumfries & Galloway Council and the NDA.

Subject to the amendments, the minutes of the previous meeting were proposed by Ian Park and seconded by Willie McNairn.

4. CHAPELCROSS SITE DIRECTOR'S REPORT

A. Richard Murray (Site Director, Chapelcross)

EHSS&Q Performance

Richard Murray reported that the total recordable injury rate (TRIR) was 0.46. He noted that, prior to the last meeting, a contractor had suffered an injury to his arm while attempting to install pipework, and the contractor had received five stitches. An investigation had commenced, and the individual had fully recovered and returned to work. The environment had been proactively governed, while the radiation dose was being managed in compliance with NRS safety rules. Work had started on the potable water project.

Site News

The CXPP drum filling was progressing well, and 28 were complete. The design for the cooling tower land remediation had been completed, and the objective to deliver £5 million of asset care improvements remained on target.

Sellafield's head of final decommissioning had visited the site, and there had been much shared learning between Chapelcross and Calder Hall. Jayne Scott, who was a recently appointed independent non-executive director at NRS, had also visited the site.

Recruitment

Two lab technicians had been onboarded, while the site was also in the process of recruiting instrument mechanics. The operational apprentices had completed their apprenticeships.

CXPP Commissioning

Richard Murray reported on the process line retrieval enablers and stated that installation and inactive commissioning of the lifting equipment had begun. Much test work had taken place in the workshop, and when the VPE tank removal is started there is an objective to swiftly remove it from the plant area and package the cut sections to minimise discharges..

Pond Decommissioning

Zeolite skip commissioning is on-going with an objective six have been retrieved from the ponds and grouted into concrete boxes this financial year. The site would also review the ILW and LLW skips, furniture and sludge from the ponds, utilising divers. NSG had been engaged to assist with the programme of work.

One active drop had been processed through the Modular Active Effluent Treatment Plant (MAETP).

Regarding the cooling tower remediation, sealing of the 4' culverts had been slightly delayed, and physical work was now planned to commence in November. A contractor was on site, who would cut into, and seal, the culverts. The short contract was due to be completed in January. Other works associated with the final remediation of the cooling tower would be subject to a design cycle during the next financial year.

Waste

10 shipments of LLW had been despatched from the site, with a year end target of 14. 103m³ of legacy waste had been removed from the site that year, while Chapelcross also continued to progress problematic legacy wastes, including oils and liquids and graphite. There had been significant WEEE and redundant assets disposals.

Asset Care

Glazing replacement was complete on reactors 1 and 2, with work taking place to complete up to level 4 on reactor 3. The potable water replacement work had commenced. The project consisted of three phases, and it was anticipated that the work would be completed by April 2025.

Carol Midwood asked if there was much crushed concrete. Richard Murray responded that there was thousands of cubic metres of crushed concrete. Carol Midwood asked if it had been offered to local builders. Richard Murray explained that it would be sent to a waste brokerage for recycling.

Neil Carruthers asked if the VPE tank would be cleaned or a sealed entity. Richard Murray explained that the circumferential cutter would cut the tank and plastic end caps would be placed on the cut ends, the cut sections would then be inserted into a foil bag and sealed. Neil Carruthers asked if the internals had been cleaned. Richard Murray said it had not been. It would be joined to the ventilation.

Ian Park noted that the recent apprentices had had to be trained at Bridgwater and proposed emphasising access to a local training provision. Richard Murray said there had not been any progress in this area, but it was a view for the future. Cllr Archie Dryburgh said there needed to be a strategy in place for decommissioning of all nuclear sites in Scotland.

Cllr Sean Marshall noted that the recent Cross-Party Group (CPG) meeting had addressed skills, and several sites in Scotland had stated that it was not ideal for apprentices to be trained at Bridgwater. Disappointment had also been expressed regarding the lack of involvement of Skills Development Scotland (SDS). There had been an action for the area representative to increase their involvement with Dumfries & Galloway College. There was no avenue to train apprentices other than Bridgwater.

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Cllr Sean Marshall highlighted the cooling tower remediation work and noted that the previous minutes had stated that there would be a contract to create a pad around the area with the crushed concrete, which would take the heat exchanger when they were set down for disposal. Richard Murray stated that this remained the favoured management position. However, some concrete would still be disposed.

Andy Stott asked if there was any synergy between nuclear, oil and gas. Cllr Archie Dryburgh replied that there was between the major companies which addressed decommissioning work. While there had been many discussions regarding apprentices and university degrees, there was still a requirement for other functions, such as crane and forklift drivers.

David Wallace explained that Decom Mission wanted to include nuclear in its story. Many Scottish Parliament members were unaware of the amount of money that Scotland had spent on decommissioning. There would be an increase in the profile of the issues and what needed to be addressed.

Cllr George Jamieson said there was a clear gap in the market for high-skilled specialist jobs. He also noted that Chapelcross had several contractors and asked if it was a case of supply and demand. Richard Murray said there was a real demand-driven market. Through the NDA, Chapelcross would encourage small and medium-sized enterprises (SMEs), while local businesses also presented a challenge. The sustainability programme would encourage bigger companies to employ local people.

Ian Park said there needed to be small packages of training. The apprentice route would bind an individual to a fixed pattern of two to three years, while the trainee path would provide the necessary requirements in a short period. Scottish Vocational Qualifications (SVQs) and short packages would provide more benefit. Cllr George Jamieson acknowledged Ian Park's comments. Discussions could take place with the colleges to identify the best approaches to train people.

Ian Park said there was no way to mimic the work that was taking place on site. Richard Murray noted that Chapelcross had trained three local individuals to a certain standard, and the site had learned much during this process. Cllr Sean Marshall said there needed to be an earlier solution to allow sites to train and support apprentices, and it was hoped that there would be a Scottish solution. He suggested that the issue be raised in different forums. Richard Murray stated that Bridgwater had advanced hundreds of apprentices. There needed to be a commitment, and if there was not a pipeline there would be a cycle of nothingness.

David Wallace highlighted skills as a major issue and proposed that the SSG formalise its views to the chair of the CPG, the NDA and NRS.

Action: The SSG to formalise its views regarding skills, training and support of apprentices to the chair of the CPG, the NDA and NRS.

Cllr Sean Marshall asked if there was a forum where the SSGs could express their views. David Wallace explained that the Scottish Government hosted a meeting for sites. Susie Stirling, whose remit focused on skills, had attended the last CPG, and David Wallace would propose that she attend the next Scottish Government meeting to discuss the topic.

5. NDA UPDATE

A. David Wallace (NDA)

David Wallace's report was taken as read. The CPG had tasked SDS with forming connections with CPG stakeholders and devising a plan. David Wallace intended to request a progress report and provide an update to the SSG.

Emma Harper MSP would introduce a motion into Scottish Parliament in January regarding skills. David Wallace and Gail Ross were assisting Emma Harper in wording the motion.

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The next CPG meeting would take place on 17 December and would address radioactive waste in Scotland. The Scottish Government was due to consult on the high-activity waste policy in early 2025, and the CPG would also make a submission to this.

An NDA secondment into the Scottish Government was due to conclude on 18 December. Another NDA employee would be seconded for 18 months, but this was likely to be delayed to March 2025. The NDA would undertake a spending review, and it was hoped that there would be an awareness of the settlement in early January.

David Wallace highlighted the Scottish Councils Committee on Radioactive Substances (SCORRS). The NDA and the Scottish Government would appoint an engagement officer, who would work for the chair of SCORRS, and SCORRS meetings would recommence.

Corhyn Parr had resigned as chief executive officer of Nuclear Waste Services (NWS). Dave Wilson had commenced his role as managing director at Dounreay.

David Wallace reminded the SSG that the NDA and NRS had launched a review of the SSGs. A meeting had taken place with SSG chairs and vice-chairs on 15 November, and next steps needed to be agreed. The NDA and NRS would welcome feedback from Chapelcross.

Cllr Sean Marshall welcomed the impending recommencement of SCORRS meetings. David Wallace explained that SCORRS had had its funding doubled, and it would be administered through Nuleaf. Nuleaf would also be able to offer additional resource.

Cllr Sean Marshall noted that neither the Scottish Government nor NRS had not submitted a report. Richard Murray explained that he would provide a short update on behalf of Bill Hamilton.

Ian Park said there were six to seven packages that were all specific. While there needed to be a waste strategy for final disposal, there also needed to be an awareness that there were enough packages that had been standardised throughout the industry. There was a 'constant turmoil' of having to learn new processes. David Wallace acknowledged Ian Park's comments. MSPs would receive a presentation at the next CPG that would address the topline issues in relation to radioactive waste. The intention of the CPG was to ask a question in the House regarding the upcoming consultation, and the follow-up question would be related to whatever arose after the meeting.

Richard Murray stated that a strategic view of the final disposal options was necessary. David Wallace noted that the policy had been formed 10 years ago, and there had been many changes. There needed to be a view on how matters had advanced. Cllr George Jamieson said civil servants were often key, as they would review topics from an objective standpoint and make recommendations to the politicians.

6. OTHER REPORTS FROM SSG BODIES

ONR

Peter Hughes took the report as read. He explained that he had been on site in October and November, and both inspections had received an 'adequate' rating. A transport issue had been raised due to some paperwork not being properly completed. The transport inspector had considered the licensee response as appropriate.

Cllr Sean Marshall asked Peter Hughes to elaborate on the paperwork errors. Peter Hughes explained that several packages would be sent out in one consignment, but due to a lack of clarity in the supporting procedure, only one package had included the paperwork. The error had been minor, and the public had not been exposed to any risk.

SEPA

The report was taken as read.

Cllr Sean Marshall noted that SEPA had stated that it was determining the site's application for a variation to its EASR permit and that SEPA would be undertaking a public consultation

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on the application in early 2025. He asked if this would cause any operational issues or delays. Richard Murray said it would not.

Scottish Government

It was noted that there was no report. Claire Aitken stated that she had asked Diane Hamilton if she would submit a report, and Diane Hamilton had replied that she did not have an update. She had added that the Scottish Government was reviewing the feedback from the high-active waste responses. Cllr Archie Dryburgh said he would ask the Scottish Government to submit an update.

SOSE

It was noted that there was no report.

Cllr George Jamieson noted that, during the last meeting, he had requested visibility of the MoU. He also noted that one requirement included an annual review of the MoU and asked if a review had taken place. David Wallace agreed to check this.

Action: NRS to provide a brief on the MoU at the next SSG.

NRS Update

Richard Murray reported that the Chapelcross roadshow was planned for March 2025 and would involve a mobile exhibition and several interviews with members of the local community. NRS was also keen to obtain the views of those who were between the ages of 15 and 24.

7. EXTERNAL MEETINGS AND INVITATIONS

Cllr Archie Dryburgh noted that an NWS annual review and NDA SSG Chairs/Vice Chairs Review Teams meeting had taken place, while a National Audit Office report had been issued.

David Wallace stated that Euan Hutton had been promoted to the permanent position of Sellafield CEO.

Cllr Sean Marshall explained that he had attended the Stakeholder Summit on 17 and 18 September on behalf of the Chapelcross SSG. Although the panel sessions had been informative, there had not been much interaction with the audience. There had been many networking opportunities and good interactions. He and Helen Emberson had attained interest from other sites regarding the Chapelcross project. David Wallace stated that Trawsfynydd wanted to visit the Chapelcross site.

David Wallace explained that the CPG aimed to attend sites in 2025 and wanted to visit Chapelcross first.

8. CHAPELCROSS PROJECT UPDATE

It was noted that Helen Emberson had offered her apologies but had sent a written report. The report was taken as read.

Cllr Sean Marshall stated that the recent economy and environment and area committees had addressed the B-class road that linked Annan to the B725. There was a need to review the nearby U-class and C-class roads and not only concentrate on the main road that would feed the main development on the Chapelcross site.

9. ANY OTHER BUSINESS

Peter Hughes reported that the Chief Nuclear Inspector's annual report had been issued in November and was available on the ONR's website. Chapelcross's regulatory attention level remained as 'routine'.

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Richard Murray stated that NRS had observed continual fly tipping at its effluent pipeline property in the town and asked the SSG to provide support in this area.

Claire Aitken explained that the aim was to advise the community that people should not be fly tipping. NRS staff were not responsible for removing items. It would welcome NRS and representatives from the SSG engaging with the local newspaper to highlight the issue. Jaime Nicholson proposed that Claire Aitken discuss the matter with the Wheatley Homes group.

Ian Park noted that the SSG had previously discussed a cycle route to the site and suggested that it was less likely that items would be left on the pipeline if a cycle route were to be in operation. Cllr Sean Marshall proposed making an appeal through the press and reviewing ways to restrict access to the pipeline. It was agreed that the SSG would make an appeal via the local media.

Carol Midwood asked if there was an update on the site visit. Claire Aitken responded that the initial dates had needed to be rearranged. There were two additional dates that Claire Aitken would circulate.

10. PUBLIC FORUM

There were no comments.

Next Meeting date: Wednesday 12 March 2025.



NDA Update for CPX SSG

March 2025



Contents

1.0 NDA Stakeholder Update March 2025



NDA Stakeholder Update

Please find below a brief update on main points of interest since the last meeting.

Government Update

David Peattie, along with Corhyn Parr and Euan Hutton, appeared before the Energy and Net Zero committee (ESNZ) on the 18th December and answered questions on a wide variety of subjects connected to the NDAs mission. The hearing is available to view online [here](#).

The Government laid a Written Ministerial Statement (WMS) in House of Commons on Friday 24 January identifying that DESNZ will work with the NDA to immobilise the UK owned civil separate plutonium inventory at Sellafield. The WMS can be found [here](#) and the press release from NDA [here](#).

Board updates

- The NDA group's All Boards Event took place over 3 and 4 December 2024. It brought together board members from the NDA, Sellafield, NRS, NWS and NTS to network and welcome new appointments to the group. The programme's main topics of discussion included mission delivery and strategy, future funding challenges and opportunities, and further group alignment under the One NDA model

Outreach activities

- On the 15th and 16th January the UK decommissioning sector came together in Telford. On the 15th DECOM 25 took place with delegates from across the decommissioning sector discussing a whole range of topics, including the development of the UK sites and the opportunities for the supply chain, the skills needed to succeed, decommissioning in other sectors and the challenges of preparing for the future of decommissioning. On the 16th January there was an NDA supply chain event proving 1700 delegates the opportunity to connect with 300 exhibiting companies.
- We are in the process of developing and designed our next broad **stakeholder survey**. More details will be available in due course.
- The last **CPG** took place in December 2024 at the **Scottish Parliament** with the main topic being 'Radioactive Waste - dealing with the legacy'. Topics including how waste was generated, how it is dealt with in Scotland, movement of waste located in Scotland and non-energy sources of radioactive waste. There were



around 40 attendees both in person and via Teams. The next CPG will be held in Annan close to CPX site with the main topic being 'Site End States'.

- The first Wales CPG took place at the Senedd in January 2025.

Engagement priorities for 2025

- As mentioned in previous updates, we have undertaken an independent review into the SSGs. This exercise provides an opportunity to reflect on the successes of the stakeholder voice in the local community over the last 20 years and how best to address some of the challenges that face us as we think about the future. Following the conclusion of the report we are working with the chair and vice chair of the National Site Stakeholder forum on implementation.
- Nuclear week in Parliament took place at the end of January with the NDA and NDA group Operating Companies hosting events. The event included a Scottish Round Table hosted by NRS AND Jamie Stone MP.
- As you will be aware preparation is underway for **Strategy V** which we expect to publish in March 2026. Our strategy document is published every 5 years and describes our high-level approach to delivering our mission. Within that we identify several critical enablers essential to the successful delivery of our mission including public and stakeholder engagement. The strategy will go out to consultation in May 2025.

Publications, public service and policy updates

- As previously advised, we expect the Scottish Government to start its review into its policy for higher activity radioactive waste (HAW) over the next few weeks. The policy framework is set out in a 2011 Policy and the 2016 Implementation Strategy.
- Following the publication of the Chapelcross masterplan in August 2024, the NDA has been leading work to identify a strategic partner for the development that will deliver the vision for the site's transformation into a green energy hub. We are now evaluating the proposals from potential partners and hope to be able to make an announcement this Spring.



- DESNZ has [opened a consultation](#) on the draft of the new nuclear National Policy Statement (EN-7), applicable to nuclear power stations expected to deploy beyond 2025. The consultation closes **midday 3 April**.

Mission delivery

- The NDA recently launched its brand-new, specialised cyber facility to accelerate collaboration and innovation across nuclear operators and the supply chain, enhancing the collective ability to successfully defend against cyber threats. The Group Cyberspace Collaboration Centre (GCCC) provides a space for experts in cyber, digital and security to come together and share knowledge and learning on how best to defend against evolving threats. The centre is a multi-functional space for collaborating, brainstorming, workshops, talks, learning and tutorials, cyber exercising, incident management and more. It aims to encourage our cyber, digital and security experts to think and work differently, with our shared future foremost in mind.

Thank you for taking the time to read our update. If you have any questions, please feed-back through the Secretariat or raise with the NDA official at the SSG meeting.



Nuclear
Decommissioning
Authority



Office for
Nuclear Regulation

ONR Site Report

Nuclear Restoration Services – Chapelcross

ONR Site Report

Nuclear Restoration Services - Chapelcross

Report for period: 1 October – 31 December 2024

Authored by: Nominated Site Inspector

Approved by: Delivery Lead Decommissioning, Fuel, and Waste

Issue: 1

Published: Jan-25

Record reference: 2025/1063

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed to members for the Chapelcross Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/ilc/>).

Site inspectors from ONR usually attend Chapelcross Site Stakeholder Group meetings where these reports are presented and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

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References.....**Error! Bookmark not defined.**

1. Inspections

1.1. Date(s) of inspection

The ONR nominated site safety inspector made inspections on the following dates during the report period 1 October – 31 December 2024:

- 16-17 October 2024
- 11-12 November 2024

The ONR fire safety inspector inspected the site on the following date:

- 31 October 2024

2. Routine matters

2.1. Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the Energy Act 2013;
- the Health and Safety at Work etc Act 1974 (HSWA74); and
- regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The inspections entail monitoring the licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of Chapelcross covered the following:

- plant commissioning – zeolite skip retrieval and encapsulation
- life fire safety
- staff training, qualifications and experience
- organisational nuclear safety baseline
- security (managing human performance)

During my inspections I also held meetings on the following topic:

- feedback on recent health and safety events

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records on our website www.onr.org.uk.

Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

2.2. Other work

Throughout this reporting period, ONR's nominated site safety inspector held regular meetings with Chapelcross leadership team representatives to maintain situational awareness of matters related to nuclear safety. No significant issues were raised with ONR.

The site inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

3. Non-routine matters

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

There were no such matters or events of significance during the period.

4. Regulatory activity

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'Licence Instruments' (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

No LIs, Enforcement Notices or Enforcement letters were issued during this period.

5. News from ONR

For the latest news and information from ONR, please read and subscribe to our regular email newsletter 'ONR News' at www.onr.org.uk/onrnews.

6. Contacts

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
website: www.onr.org.uk
email: Contact@onr.gov.uk

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Chapelcross Site Stakeholder Group

SEPA Update- Chapelcross

12th February 2025

Regulation

Environmental Authorisations (Scotland) Regulations 2018 (EASR)- Radioactive Substances

Following on from the COVID-19 pandemic and its associated restrictions, telephone communication with the site has continued including formal monthly telephone calls. Routine teleconferences with the Chapelcross site and the corporate NRS (Magnox Ltd) team on strategic issues have also continued as before.

SEPA is determining the site's application for a variation to their EASR permit. This application relates to an increase in the site limit for the discharge of gaseous radionuclides excluding tritium. SEPA will be undertaking a public consultation on the application in early 2025. The stakeholder group will be informed when the consultation starts. At this time, it is planned that the consultation will start in March 2025.

SEPA continues to engage with the Chapelcross site on a number of projects to support the ongoing decommissioning of the site. This has included the active commissioning of the modular active effluent treatment plant (MAETP) which has been identified as the Best Practicable Means (BPM) for minimising the activity in aqueous discharges to the marine environment, the preparations for zeolite skip retrieval from the ponds and its management in accordance with Scottish Government Policy on Higher Activity Waste.

SEPA undertook an inspection of the Chapelcross site's procedures for the monitoring of solid waste that is believed to be non-active using RADOS large article monitors on 13th November 2024. The inspection found that the site had in place adequate procedures and suitably qualified and experienced staff to ensure compliance with the relevant conditions in the EASR (2018) permit. In addition, a visual inspection of the facility housing the monitors revealed that it was maintained adequately to ensure the control and segregation of the waste packages requiring monitoring.

Non-Rad Regulation

There have been no environmental issues relating to non-radioactive regulation since the last scheduled SSG meeting.

Environmental Events

There have been no environmental events reported to SEPA by the Chapelcross site.

Consultations

SEPA published three Consultations relating to the regulation of Radioactive Substances on 10th February 2025. The links to these consultations are below should you wish to comment:

Consultation on our Objectives and Principles for Regulating Radioactive Substances Activities

<https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-our-objective-and-principles-for-r/>

Consultation on the Environmental Standards for Inputs of Radioactive Substances into Groundwater

<https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-the-environmental-standards-for-in/>

Consultation on Near-surface Disposal Facilities on Land for Solid Radioactive Wastes: Guidance on Requirements for Authorisation

<https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-near-surface-disposal-facilities-o/>

Radioactivity in Food & the Environment (RIFE)

RIFE is a collaborative report on work carried out by SEPA, the other UK environment agencies, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and the environment in the UK. The RIFE reports aim to provide an in-depth assessment of radioactivity in food and the environment in the UK and the public's exposure to radiation, including in the vicinity of the Chapelcross site. The RIFE report incorporates the results from the analysis of a wide range of samples and key information on

local habits to demonstrate both that food remains safe and that the public's exposure to ionising radiation is within legal limits.

The latest edition of RIFE has just been published. RIFE 29 covers the year 2023 and can be accessed electronically at [Radioactivity in food and the environment \(RIFE\) report - GOV.UK](#)

Dr David Stone

Radioactive Substances Specialist

12/02/2025

SCOTTISH GOVERNMENT UPDATE TO CHAPELCROSS SITE STAKEHOLDER GROUP – 12TH MARCH 2025

SCOTTISH GOVERNMENT RADIOACTIVE SUBSTANCES AND NUCLEAR DECOMMISSIONING POLICY TEAM

Review of Scotland's Higher Activity Waste Policy

We conducted our initial round of engagement with stakeholders last year and are currently considering the responses received before moving forward. Thank you to everyone who provided information or took part in discussions. There will be further opportunity to input as we move through the review process and we will provide further updates as this work progresses.

A high level summary of some of the main views received is included below;

- A number of stakeholders asked for clarity around particular areas of the policy including;
 - the interface between the revised UK Radioactive Waste Policy and SG Policy;
 - the interpretation of near-site;
 - what is meant by retrievability;
 - what will happen to challenging wastes that will not be suitable for near surface disposal, including reconsideration of our policy regarding geological disposal;
 - the definition of near surface.
- Include consideration of sustainability, value for money, intergenerational equity and waste management principles considerations;
- Updates in light of technical developments over the last 13 years;
- The idea that radioactive waste can be disposed of be rejected in favour of indefinite storage and development of another solution;
- Any process or activity that involves new or additional radioactive discharges into the environment be opposed;
- The policy of 'dilute and disperse' as a form of radioactive waste management (i.e. discharges into the sea or atmosphere) be rejected in favour of a policy of 'concentrate and contain' (i.e. store safely on-site);
- The principle of waste minimisation be supported;
- The unnecessary transport of radioactive and other hazardous wastes be opposed;
- Wastes should ideally be managed on-site where produced (or as near as possible to the site) in a facility that allows monitoring and retrieval of the wastes;
- the term higher activity waste is confusing due to its similarity with the term high level waste and should be phased out.

8th Joint Convention Review

We are involved with wider UK work being led by ONR on the 8th Joint Convention report for the International Atomic Energy Authority on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management, ensuring that Scottish policies and priorities are presented appropriately. The next review meeting is due to be held from 17th of March until 28th of March 2025. Dan Couldridge from the team will be part of the UK delegation attending the first week.

Annual NDA meeting with Cabinet Secretary for Net Zero and Energy

The annual meeting between the Cabinet Secretary for Net Zero and Energy, the NDA Chair and NDA CEO, as set out in the NDA Framework document, is being organised for Spring 2025. The meeting will cover a number of issues including progress across the three NDA sites in Scotland as well as the expanding NDA mission in Scotland with the future transfers of Hunterston B, Torness and the potential transfer of the Vulcan site from the MOD, for decommissioning.

The Environmental Authorisation (Scotland) Regulations 2018 (EASR 2018) updates

The Environmental Authorisation (Scotland) Regulations 2018 (EASR 2018) are being amended to bring together all the permissioning arrangements for SEPA's four main regulatory regimes (Water, Waste, Radioactive Substances and Pollution Prevention and Control) into an integrated structure and under a single standardised procedure. As per previous updates to this group, these also include some technical updates to the radioactive substances provisions to make improvements from SEPA's experience of operating the regime since 2018.

The new regulations (Environmental Authorisations (Scotland) Amendment Regulations 2025) will now be laid on the 27 February 2025, with the coming into force date scheduled for 1st June 2025.

Diane Hamilton
Scottish Government

Chapelcross Programme Update Report to Site Stakeholder Group

Date	12/02/2025	Stage	Outline Business Case
Progress this period			
Summary The Chapelcross programme is focussed on developing the site into a high quality, green energy-focussed regional employment centre acting as a transformational project within the region. Conditional funding of £15.3m has been given from the Borderlands Growth Deal towards the project. Together with funding of £5.5m, committed by Dumfries and Galloway Council, the capital investment will be used to unlock the site for development through servicing and road improvements to access the site. Work is underway to develop the Outline Business Case (OBC), based on the recent masterplan for the site. Strategic Development Partner The programme will now find a strategic partner who will bring expertise and private finance to help deliver the partners' vision for the site. Avison Young, land agent for the Nuclear Decommissioning Authority, released a Request for Proposal for the private sector to develop the northern area of the Chapelcross site. Responses were returned on 1st November and are currently being evaluated. Once evaluation is complete, a contract negotiation period will follow that should see the partner in contract with the Nuclear Decommissioning Authority late spring 2025. Enabling Works Package – Building the Delivery Team Work to build the design team for the enabling works on the client side can start when the Request for Proposal evaluation is concluded and the intentions of the developer are understood. Dumfries and Galloway Council Engineering Design Team are meanwhile engaged to assess the emergent questions on roads to the south. A high level analysis is underway; all potential site infrastructure works will be prioritised to fit usage with the strategic partner. SOSE and CX South Purchase of Zone 3 (6.46 Ha) was successfully concluded in November 2023. SoSE has completed topographic and ground investigations; Ironside Farrar have produced a masterplan for the SoSE site. Site fencing and access control have been upgraded; a 2MW electrical capacity and connection has been secured with SPEN. Contractors have been appointed for road, water and SUDS works and are on site. Planning permission for roads, paths and drainage was granted by DGC on 7 February. Whilst discussions are ongoing with interested developers the site will now be formally marketed. Scottish Government – Regional Hydrogen Hub Chapelcross is included in the Scottish Government Hydrogen Action Plan as a regional hub.			
Activities Planned for Next Reporting Period			
• Conclude strategic partner selection • Review the enabling works infrastructure scope of work and prioritise the interventions • Commence the design team appointment for the enabling works			