



Site Stakeholder Group

Hunterston Site Stakeholder Group

Notice of the Seventy-eighth Meeting

The next meeting of the Hunterston Site Stakeholder Group will be held:

 Thursday, 4 December 2025

 13:30 hrs

 Via Microsoft Teams

AGENDA

13.30 Chairman's Opening Remarks and Declarations of Interest

13.35 Chair and Vice Chair Updates and Correspondence

13.45 Actions and approval of previous Minutes

13.50 Hunterston B Site Reports

Hunterston B Report – Andy Dalling

ONR Report – Tim Saunders

SEPA Report – Keith Hammond

Members Question and Answer Session Public Forum

14.25 Hunterston A Site Reports

Hunterston A Site Report – Daniel Smith

ONR Report – Peter Hughes

SEPA Report – Melanie Hayes

Members Question and Answer Session Public Forum

15.00 Update from Scottish Government

Diane Hamilton

15.10 Update from NDA

David Wallace

15.20 NRS Corporate Update

Bill Hamilton

Members Question and Answer Session Public Forum

15.30 Any Other Business

2026 dates TBC



**MINUTES OF THE MEETING OF THE
HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
HELD AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG
THURSDAY 4 SEPTEMBER 2025**

Attendance/Apologies list

Attendance

Ms Rita Holmes	Fairlie CC (Chair)
Mr Stuart McGhie	EDF (Vice Chair)

Operators and Officers

Ms Fiona McCall	EDF
Mr Daniel Smith	Site Director (Hunterston A)
Mr Andy Dalling	Site Director (Hunterston B)
Mr Keith Hammond	SEPA (Site Inspector, Hunterston B)
Mr Stewart Ballantine	SEPA (Site Inspector, Hunterston A)
Mr Peter Hughes	ONR (Site Inspector, Hunterston A)
Mr Tim Saunders	ONR (Site Inspector, Hunterston B)
Ms Claire Aitken	NRS
Mr John Hulme	NRS
Ms Ruth Norbury	NRS
Mr David Wallace	NDA (Stakeholder Lead Scotland)
Ms Diane Hamilton	Scottish Government

In Attendance

Mr Alan Holden	Fairlie CC
Mr Graham Wallace	Cumbrae CC
Mr Nicol Armstrong	West Kilbride CC
Ms Billie Walker	Skelmorlie CC
Ms Sarah Freer	Skelmorlie CC
Ms Brenda Knox	Representing Irene Campbel MP
Mr Ken Macintosh	Largs CC
Mr Angus Cochran Patrick	Hunterston Estate
Mr John Lamb	Member of the public
Mr Hugh Mackem	Member of the public
Mr James Riddley	Member of the public
Mr Fraser Wood	Member of the public
Mr Geoffrey Dore	Minute taker

Apologies

Mr Bill Hamilton	External Affairs Director, NRS
Mr John McHenry	Cumbrae Community Council
Mr Scott McKenzie	North Ayrshire Council
Mr Alistair Walker	NRS
Cllr Eleanor Collier	North Coast and Cumbraes Council
Cllr Tom Marshall	North Coast and Cumbraes Council

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1. CHAIR'S OPENING REMARKS AND DECLARATIONS OF INTEREST

The Chair opened the meeting at 13.35. Apologies were noted from Cllr Tom Marshall, John McHenry, Scott McKenzie, Alistair Walker, Eleanor Collier and Bill Hamilton.

The Chair noted that John Lamb had resigned from West Kilbride Community Council after 42 years, having also sat on the SSG since its inception in 2005. She expressed gratitude on behalf of the SSG for his dedication and presented him with a medal and card. Angus Cochran Patrick also presented John Lamb with a medal. The SSG afforded John Lamb a round of applause. John Lamb thanked the SSG. It was confirmed that Graham Buckley would replace John Lamb as a representative on the SSG.

No interests were declared.

2. CHAIR AND VICE CHAIR UPDATES AND CORRESPONDENCE

The Chair presented her report.

The Chair and the Vice Chair had continued to liaise with Hunterston A. Simon Napper had delivered an online briefing on behalf of Nuclear Waste Services on 18 June, and on 30 June, the NDA/NGO had held a forum webinar on the ethics of radioactive waste management. The Chair and Vice Chair had attended the SSG chairs and vice chairs' dinner and meeting on 1 and 2 July.

The NGO briefing on the NDA's strategy 5 had taken place on 7 July. It was noted that a webinar on strategy 5 would take place on 5 September, and the SSG would be expected to provide a response to the consultation. The Chair had attended the Nuclear Regulatory Taskforce workshop on 18 August in London. NGOs had raised concerns and cautioned that a taskforce to review regulations could potentially undermine public faith. NGOs had also taken exception to the process of judicial review and the wording within the review document. Regulators had been blamed for delays in delivering nuclear build, while NGOs remained of the view that the delays were due to a lack of investment funding, applications from 'cowboy developers' and the extra burden placed on ONR.

NGOs had queried the evidence that had been submitted to the taskforce, and the Chair understood that the NDA had submitted evidence. NGOs had also questioned the information utilised by the taskforce to reach its interim report and had recommended better funding for ONR. The SSG wished that regulators remain independent, well-resourced and trusted.

The Chair had attended the Festival of Politics Day on 20 August and the Scottish nuclear sites meeting on 26 August. The monthly online update on the socioeconomic fund had taken place on 27 August.

The Chair had submitted a draft revised constitution to the NDA and had also recently contacted John Doherty, who was the headteacher at Largs Academy, regarding student and staff participation in the SSG. John Doherty had responded positively, and it was likely that individuals from Largs Academy would partake in the December SSG meeting. Largs Academy had also expressed an interest in a site visit.

3. ACTIONS AND APPROVAL OF PREVIOUS MINUTES

Claire Aitken reported that the Civil Contingencies team was yet to provide an update regarding arrangements following the 'fuel free' verification. Andy Dalling stated that Hunterston B was addressing erecting signage on the road network that would point towards the site.

Stuart McGhie proposed that the minutes of the previous meeting be approved. The Chair seconded the motion. The minutes of the meeting of 12 June 2025 were approved as a true and accurate representation of the meeting.

4. HUNTERSTON B SITE REPORTS

Hunterston B Site Report

Andy Dalling presented his report.

Reactor 4 had been declared fuel free. The transition to a decommissioning site was progressing well, and it was hoped that it would conclude by the end of September. Hunterston B remained on target to become an NRS site on 1 April 2026. Decommissioning work would continue on a small level and would grow over the next five to 10 years. Hunterston B would work closely with NRS on the construct of the decommissioning plan.

Safety performance remained positive. There had been a period of change, and the site continued to work hard on its communication. As part of the reorganisation, staff had begun to leave the site via voluntary redundancy. The next wave of individuals would depart in October. Following the completion of formal consultation and recruitment, 96% of employees' aspirations had been met.

ONR Report

Tim Saunders presented his report.

The nuclear taskforce had been conducting its review, and ONR had welcomed the positive stakeholder feedback and the recognition of the importance of ONR's independence. ONR had also welcomed the identified challenges.

Mike Finnerty had been appointed as the new Chief Nuclear Inspector of ONR. It was noted that the site had been completely defueled, leading to ONR changing its regulatory perspective to ensure alignment with site operations. The regulatory responsibility had been changed once the site had become fuel free, leading to Tim Saunders's appointment.

Tim Saunders stated that he would attempt to implement a process whereby ONR's reports were better aligned with the SSG meetings. This could involve him producing interim reports. Since the last meeting, ONR had permissioned the post-defueling safety case and the revised emergency arrangements while also approving the revised site security plan. All these actions were aligned to the reduction of hazard and change of balance of hazard on site.

A joint inspection with SEPA had been conducted on 3 September, and the site had successfully demonstrated that it had reduced its hazardous substances on site, which were now below the threshold for the Control of Major Accident Hazards (COMAH) regulations.

SEPA Report

Keith Hammond presented his report.

SEPA had inspected the site on 18 June to review its gaseous discharge system, and on 20 August to examine its permit compliance arrangements. Regarding the latter, Keith Hammond had reviewed the document that would come into effect once Hunterston B moved under NRS, as it tied into the site's transfer application. As part of the application, NRS must manage radioactive substances, and this must be controlled by a fit and proper person. The compliance arrangements within the integrated management system appeared positive.

The site was under the threshold for COMAH. Regarding the UK Emissions Trading Scheme (UK ETS), the station would submit an application as the number of diesel applications on site reduced. Future reports would [be unlikely to?] report on COMAH and the ETS. The transfer

applications and variation application for the aqueous gaseous discharge were progressing well.

Questions & Answers

Stuart McGhie asked Andy Dalling if he still believed that the transfer of staff within or outside NRS could be managed before a transfer and not result in any compulsory redundancies. Andy Dalling responded that he remained positive. The number of potential compulsory redundancies were reducing, while voluntary redundancies had commenced. There would be further waves of voluntary redundancy in October, December and March 2026.

The Chair asked if the decommissioning waste processing facility and operational waste processing facility would both go into ex-laundry building. Andy Dalling replied that the operational waste processing facility would not go into the ex-laundry building. The site was of the view that it could process and package local to the pond without building a structure.

The Chair requested an update on efforts to refurbish the active drain system. Andy Dalling said good progress was being made. Keith Hammond commenced the appointment of a project manager.

The Chair requested an update on the active effluent discharge pipe. Andy Dalling stated that this continued as an active project. The Chair noted that there would be the same discharge volume and rate as the variation had not been approved. Andy Dalling said while this was accurate, Hunterston B had significantly reduced its discharge rate due to its operational state. The Chair recalled that, during a presentation provided to Fairlie Community Council, Hunterston B had said the discharge pipe would be altered to maintain a discharge flow from Hunterston A. She asked if the design had been progressed. Andy Dalling responded that it had been.

5. HUNTERSTON A SITE REPORTS

Hunterston A Site Report

Daniel Smith presented his report.

NRS's 10-year strategy consisted of four pillars: delivery, transform, innovate and grow. Hunterston A's business plan was aligned to the 10-year strategy. The site had clearly outlined its goals, and the business plan had been shared with staff and contract partners.

Staff had completed an employee engagement survey, and the site's results had been encouraging. Participation had increased from 72% to 88%, while the engagement score had risen from 6.8 to 7.4. Three focus areas had been identified: maintenance, growth & development and learning.

There had been several site visits, including from Peter Hill, Catriona Schmolke and Ross McAllister. Following the last SSG, the site had approved a total of 20 vacancies, and it was managing recruitment and future resilience.

The site's Total Recordable Incident Rate (TRIR) and Days Away Case Rate (DACR) were both at zero. There was a heavy focus on environment management improvements. A security demonstration emergency exercise was planned for September. Daniel Smith presented photographs that detailed works to the site laboratory, following the regulatory notice. A good amount of work had taken place in this area.

The SILWE encapsulation project remained a major scope of work. Once they were encapsulated, the packages would be ready for long-term storage within the ILW store. Hunterston A had achieved its target of installing a shielded wall at the SILWE plant.

Daniel Smith presented the higher activity radioactive waste (HAW) tracker. The site had currently recovered 14.7te of HAW, against a target of 63.5te. Six drums, against a target of 41, had been transferred to the store.

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Daniel Smith highlighted the low active waste tracker. The low-level waste team had already met its target for metallic waste, processing 9.82te of metallic waste. Two waste consignments had been transferred of a target of five. The legacy waste target of 21.5 cubic metres remained on track.

Hunterston A had contributed £78,447 in the last financial year to support local communities. This included providing support to AC Irvine 2014s football team and Fairlie organic growers.

ONR Report

Peter Hughes presented his report.

Peter Hughes had visited the site twice with one visit happening following the forklift incident. ONR had raised an enforcement letter against the contractor and a regulatory issue against NRS with several actions. The contractor had responded positively to the issues, which were now closed, and work was taking place with NRS to address the final actions.

As part of his second site visit, Peter Hughes had positively observed Hunterston A's contingency exercise. He had also undertaken a culture assessment, which had been extremely encouraging.

SEPA Report

Stewart Ballantine presented his report.

There had been one compliance inspection to review the environmental monitoring programme. The site had been found to be fully compliant with the requirement. Regarding the variation to the aqueous discharge, Keith Hammond had agreed to determine both applications.

Stewart Ballantine highlighted the regulatory notice and stated that the site was undertaking its internal commissioning, and it would then approach SEPA to commence its review. Until the notice was lifted, the samples would continue to be analysed externally.

SEPA had observed a significant upturn in its engagement with the site. Work had been undertaken to address the regulatory notice. There had been positive change following Daniel Smith's appointment.

Questions & Answers

The Chair referred to the waste characterisation. SEPA's report had noted that NRS had demonstrated a forward direction of travel. She asked if this meant NRS would proceed without sanctions. Stewart Ballantine said Melanie Hayes would now determine the permit variation.

The Chair asked if the active commissioning of the SILWE plant would commence in the summer of 2026. Daniel Smith said the current plan involved active commissioning beginning in July 2026. There was close engagement with SEPA, and NRS had listened to SEPA's feedback. It was reviewing several different options regarding the requirements in relation to the characterisation of the waste in the bunkers.

The Chair referred to Hunterston B's transfer to NRS and asked if it was advantageous that Andy Dalling had knowledge of Hunterston B. Andy Dalling responded that there was predominantly a corporate-to-corporate programme. Daniel Smith added that there was much interaction between the two sites, and both he and Andy Dalling would work together to identify future opportunities.

The Chair asked if there would still be two separate site directors following Hunterston B's transfer to NRS, as well as separate regulatory inspectors for both sites. Stewart Ballantine responded that SEPA did not intend to change its inspector arrangement. Tim Saunders said

he would remain as Hunterston B's ONR inspector until 2027. ONR would then assess its arrangements. Daniel Smith stated that there were no plans to have one site director.

The Chair said she understood that the Fuel Element Debris (FED) waste would be the first to be processed through the SILWE plant. She asked how the total volume of waste would be encapsulated. Daniel Smith outlined that bunker 1 represented the FED waste, and there was an intention to first encapsulate the bunker 1 waste before moving on to bunkers 2 to 5, which typically contained graphite waste.

Alan Holden observed that it was difficult to read the information that had been detailed in Daniel Smith's presentation. Daniel Smith acknowledged Alan Holden's observations.

6. UPDATE FROM SCOTTISH GOVERNMENT

Diane Hamilton presented her report.

The Scottish Government team had reviewed the 2011 HAW policy and had undertaken work with the NDA and SEPA concerning current and future options for HAW. The team would now review real-world issues, including conducting site visits. The Scottish Government team would also schedule meetings with regulators and industry personnel. Public consultation would take place after the election.

7. UPDATE FROM NDA

David Wallace presented his report.

He welcomed the new members and potential inclusion of Largs Academy students within the SSG. The strategy 5 webinar was scheduled for 5 September. The webinar would be detailed and allow attendees to ask questions. The 12-week consultation would conclude on 29 September.

The Festival of Politics event had been positive and had received good feedback. The NDA had been allocated £154 million in government funding to develop specialised capabilities at Sellafield, to enable plutonium disposal. This was in addition to the £5 million fund to support 20 PhD students, who would investigate the safest way to contain plutonium in a disposition centre, in preparation for a geological disposal facility (GDF).

The next Cross-Party Group (CPG) meeting would take place on 22 September at Hunterston. CPG members would also visit the Hunterston A and B sites to receive an update on the AGRs. A note had been circulated to all seven local authorities that did not have a representative on the Scottish Councils Committee on Radioactive Substances (SCCORS).

The Chair suggested that [West Kilbride?] Community Council write to North Ayrshire Council and voice its concerns that the council did not have a representative within SCCORS. It had been highlighted during the Scottish site's meeting that it was important for SCCORS to exist as a separate entity. David Wallace said Oliver Mundell, who was the chair of the CPG, had written to all 32 local authorities asking them to ensure representation. North Ayrshire Council had responded with a series of questions, which the NDA had addressed.

8. NRS CORPORATE UPDATE

Claire Aitken provided an update on behalf of Bill Hamilton.

The NRS roadshow would visit Largs, West Kilbride and Ardrossan during the week commencing 22 September. Information on this would be circulated to attendees after the meeting.

9. ANY OTHER BUSINESS

The Chair thanked those present for attending and closed the meeting at 15.01.

2026 DATES TBC

Actions from Hunterston SSG Meetings

ACTIONS FOLLOWING SSG MEETING 04.09.25

ACTION	DETAIL	RESPONSE	STATUS	DATE
Largs Academy to partake in next SSG	Following an update to the Hunterston SSG constitution, Largs Academy to be invited to join future SSG meetings.	The Chair to speak with John Doherty, Head Teacher	ONGOING	
Update from Civil Contingencies on arrangements following fuel free and transfer to NRS	The Chair asked whether the involvement of the Civil Contingencies team would change following the 'fuel free' verification and also when EDF transfers to NRS.	An update has been requested from the Local Authority on this point.	ONGOING	

Site Stakeholder Group

Hunterston B Station Director's Report

Period: Aug 2025 to Oct 2025

1. Transfer and Deconstruction

On 30th of September, the station completed the transition from a defueling to a decommissioning site. There has been a lot of hard work from the station teams with support from our internal and external regulators to get us to the position and to achieve some major milestones. This was marked by the unveiling of our newly engraved granite rock.

In the last quarter we implemented new proportionate, emergency arrangements, the agreed Deconstruction Organisation and the new Nuclear Site Security Plan (NSSP) for a fuel free site. We have also configured the plant for decommissioning.



Site Transfer to NRS

EDF and NRS are continuing to work together to deliver the safest, most cost-effective solution for decommissioning the UK's Advanced Gas-cooled Reactor (AGR) fleet, including transfer of the seven sites to NRS after the completion of defueling by EDF.

A work breakdown structure and joint plan for Hunterston B were agreed which outlines the scope of work required to enable transfer by April 2026. Both NRS and EDF remain fully committed to working together to deliver seamless transfer of the site licence to NRS.

We are currently working together with NRS and our regulators to demonstrate our ability to transfer and remain compliant through shadow working. The output from this will support the NRS site licence application for the Hunterston B site.



Andy Munro, NRS Managing Director of AGR & Paired Sites, officially opened our brand-new Model Office.

This space has been created to provide a connection on the NRS IT network to facilitate training, testing and shadow working activities. Shadow working activities have commenced and will continue into Q4 this year.

During the period we held another NRS staff engagement day. These sessions provide opportunities for staff to speak to NRS colleagues and find out more about the positions within different departments and the type of work involved.

TUPE consultation is well underway, and joint meetings are held regularly to ensure timely progress of any actions.

Deconstruction Delivery

Work continues in deconstruction, which started at the beginning of defueling. The overall decommissioning strategy remains 'Early Safestore'.

We continue to work closely with NRS to further develop our Deconstruction Plans. This Joint Working Team have contributed to further updates to the decommissioning plans incorporating NRS processes and procedures, which NRS and EDF are currently reviewing.

Some highlights for the quarter in terms of delivery have been:

- Cladding replacement of the main B Station building has continued with a third of the cladding on the north and south elevations already complete. This work will continue through to year end.
- Early demolition works have also continued across several small buildings on and off-site.
- Demolition of the Fish Farm will recommence in late November. This work will remove the transformer bund and the last remaining bay of the building which in turn will allow us to complete boundary fencing remediation works.
- Preparations are ongoing for starting major decommissioning projects, such as the circulator hall and the turbine hall deplanting.
- Ongoing work is progressing collaboratively between EDF and NRS to develop an updated Site Specific Deconstruction Plan which will build on the maturity of the existing plans to provide agreed scope and deliverables.
- New Discharge Line modelling work has progressed well with plans now in place to complete physical trials to replicate an installation scenario and confirm feasibility.

2. Safety and Environment

Station Industrial Safety Performance

Over the last three months the station has experienced no significant safety events and maintained a strong industrial safety performance. Total Recordable Injury Rate (TRIR) remains at 0.

During the reporting period, we have had several visitors including from NRS to carry-out technical reviews of industrial safety and the management of asbestos and evaluate the station's readiness for transfer in these areas. A team from EDF's corporate Safety, Health, Environment and Quality (SHEQ) department were also hosted for a surveillance visit for two days to help identify areas where they could help the station whilst on its route to exiting EDF. Reports are being produced by the groups from NRS and EDF which will help shape the focuses for Industrial Safety as we continue towards transfer.

Compliance Evaluations have remained a key area of activity in the last three months and will continue to be a focus in Q4. This is to ensure we comply with our internal fleet programme and maintain our compliance with ISO 45001. The station is 100% compliant and will continue to maintain compliance with EDF BEG SPECS right up until transfer.

Mostly notably over the past three months, a sub-set of the Safety Focus Action Team embarked on developing and delivering a Safety Evolution campaign. This kicked off with unveiling a new slogan on the granite rock which has changed to "safety is our overriding priority". The Safety Evolution campaign was designed to re-set and re-focus on conventional safety aspects which will prevail and be key to a decommissioning site, and to mark the end of certain nuclear safety measures that are no longer required. Included in the campaign, which ran throughout October, were Dynamic Learning Activities (DLA's) where all site EDF and contract partners engaged in various activities which were set-up in the workshop covering electrical safety, lifting operations, asbestos, working at height, CDM and radiological safety. Over 300 staff attended the sessions, and generally positive

feedback has been received from many of the new teams and departments in the deconstruction structure.

The transfer of our Integrated Management System also remains a focus with a new lead having been appointed in the last three months to continue to drive this workstream. The work to revise ~3900 controlled documents for transfer continues at pace and plans are also developing for the preparation and execution of the physical transfer of these documents in Q1 2026.

Radiological Protection

The radiation dose of each worker is assessed individually by an electronic personal dose meter. A computer database keeps records for each worker. Exposure is continuously monitored and ultimately compared with the levels specified in the Ionising Radiations Regulations (2017) which are the UK Health and Safety legislation that applies to work with radiation.

During the reporting period the Collective Radiation Exposure (CRE) was below plan (see table below). Collective doses are pre-planned for each year based on scheduled maintenance, outages and routine operations. A breakdown of dose received is shown below (along with a comparison of relevant dose statistics).

All work is fully reviewed and justified in order to ensure all doses received were ALARP (As Low As Reasonably Practicable). This involves justifying and optimising the dose, as well as remaining within those dose limits.

Differences between the actual and planned dose can be down to a range of factors including changes to the work programme, development of new techniques for carrying out work that will result in a lower dose and the deployment of new equipment.

There were no reportable radiological protection events during this reporting period.

Radiation Dose to workers (August 2025 - October 2025)		
Planned collective dose	3.0man.mSv	
Actual collective dose	0.632man.mSv	
	Employee	Contract Partner
Total Dose	0.500man.mSv	0.132man.mSv
Average individual dose	0.002mSv	0.001mSv
Highest individual dose	0.027mSv	0.019mSv
Individuals	243	172

Chest X-ray	Transatlantic Flight	CT scan	Average UK annual dose to public	EDF Energy Dose Restriction Level	UK legal dose limit for radiation workers
0.014mSv	0.08mSv	2.0mSv	2.6mSv	10mSv	20mSv

Explanatory notes:

- mSv: milliSieverts (SI unit of dose received by an individual)

- man.mSv: The collective dose for a group of workers (i.e. the total of the doses received by each member of a group).

Environmental Safety

There have been no significant environmental events in the period August 2025 to October 2025.

The site continues to record the leak rate of biodegradable insulation fluid from one of the station electricity supply Transformer cables. If the rate increases to a point where a tracer can be detected, further investigation will be carried out. So far, the leak rate has been too low to use a tracer effectively. SEPA has been kept fully informed.

The site has been working closely with NRS to plan for the transfers of environmental permits. Transfer applications from EDF to NRS have been submitted to SEPA for the site's water discharge permits and combustion plant permit; these are currently with SEPA for determination.

Radioactive gaseous and aqueous discharges arising from normal plant operations remain at levels well below those authorised by SEPA.

The programme of off-site environmental monitoring and radiation surveys in the district has continued throughout the period and demonstrates that the radiological discharges from the station have a negligible impact on the local environment. Reports are provided monthly and quarterly to SEPA, detailing the samples and results of analysis performed.

Work to process and package solid low-level wastes has continued in the period, as part of normal operations and consignments have been made to our regular partners.

Emergency Arrangements

There have been no activation or issues with the emergency arrangements at Hunterston B during this reporting period.

During the reporting period, we commenced our Q4 exercise season and have undertaken three shift exercises, which allows our existing role holders and trainees to exercise their roles in conventional hazard-based scenarios. These exercises will help to facilitate our ongoing role succession plan and will increase the opportunity for training and authorisations later this year.

We also have two further exercises planned between now and year end. We have a planned Level 1 exercise in November where Hunterston B will be looking to demonstrate our emergency arrangements to the ONR. We also have a shadow working exercise in conjunction with NRS, which shall test the NRS emergency arrangements ahead of the point of transfer and this shall have a focus on testing the notification chain as well as the central support.

3. People

The station transitioned to a Decommissioning Organisation, with more than 100 employees being redeployed into new positions within the structure. Following the completion of formal consultation and recruitment, 98% of employee's aspirations have been met.

To mark this significant milestone in Hunterston B's journey into decommissioning all staff and contract partners were invited to attend sessions with Andy Dalling, Station Director and other members of the management team.

Further recruitment is ongoing with an expectation that the number of employees whose aspirations have not yet been met will further decrease.

Following previous successful Engagement Days back in June 2024 and March 2025, further engagement activities have taken place in the form of small group virtual sessions at a departmental level, as well as an onsite Engagement Day in October for all staff to attend. These sessions have provided opportunities to speak to NRS colleagues to find out more about the positions within those departments and the type of work involved.

Andy Dalling has held monthly Leaders' sessions, discussing topics like the station business plan, people plan and safety evolution. Sessions have been well attended with good engagement from our leadership population and key messages for cascading. This is also an opportunity for leaders and Trade Union representatives to come together and ask questions and share experiences.

The company Pensions Manager visited site in September and held a number of Pension and Financial Awareness sessions over three days with everyone invited to the relevant session for their circumstances. This was a chance to understand the pension arrangements in relation to Transfer, and to understand the pension arrangements for those that are exiting the business. Origen Financial Services continue to provide monthly clinics for staff to provide independent financial advice on areas of financial planning.

4. Sponsorship and Donations

Hunterston B continues to support our local community by providing donations to local groups and charities. Over the reporting period we have made contributions to the following groups:

- Dykesmains Primary School
- CS Dance Academy
- Largs Pickleball Club
- Ardrossan Academicals Rugby Football Club
- Ardrossan Academy
- North Ayrshire Foodbank
- Dalry Thistle Football Club

5. Company Update

Two UK nuclear plants to generate for longer supporting energy security

- Heysham 1 and Hartlepool power stations will continue generating until March 2028, an extension of 12 months
- The decision secures more than 1,000 high-quality local jobs in the Lancashire and Teesside areas for longer
- Extending lifetimes at these stations also helps support UK energy security and reduces the use of imported gas.

EDF has confirmed further life extensions for two of its UK nuclear power stations. Heysham 1 in Lancashire and Hartlepool in Teesside will continue generating until March 2028, an extension of 12 months.

The decision was taken following a series of positive graphite inspections at both stations over the past nine months.

Dr Mark Hartley, Managing Director of EDF's Nuclear Operations business, said: "I am pleased we have been able to confirm a further 12 months of operation for Heysham 1 and Hartlepool.

"Extending the life of these stations makes sense. It secures employment for longer for more than 1,000 people who work at those sites, and it supports the UK's ambitions to have a clean, secure electricity supply.

"A further year of operation for these two stations has the potential to power more than four million homes and reduce the need for imported gas."

In December 2024, EDF extended the lifetimes of all four of its generating Advanced Gas-cooled Reactor (AGR) stations. At that time Heysham 1 and Hartlepool were given a one-year extension on the basis that there were a number of important inspection and safety case milestones due in 2025. Positive progress in these areas has supported the decision to extend the lifetime by an additional 12 months.

Heysham 2 and Torness, which are both scheduled to generate until March 2030, were not in scope for this review after a two-year extension was granted last year.

EDF's ambition is to continue making zero-carbon electricity at its four generating Advanced Gas-cooled Reactor (AGR) stations for as long as it is safe and commercially viable to do so and will keep station lifetimes under review.

Holtec International, EDF UK and Tritax announce plans to develop Cottam site with data centres and advanced nuclear technologies

Holtec International, EDF UK and Tritax Management today announced their intent to work together to develop Holtec's SMR-300 small modular reactors at the former Cottam coal-fired power station in Nottinghamshire, to provide clean, secure power to new, advanced data centres on the site. This intent is formalised through a Memorandum of Understanding signed between Holtec, EDF UK and their real estate partner Tritax Management.

The announcement, made ahead of the State Visit of U.S. President Donald Trump to the UK, signals a landmark transatlantic cooperation in delivering clean energy and digital innovation. The project could transform one of the UK's historic "Megawatt Valley" sites into a hub for clean energy and new investment opportunities, whilst demonstrating the benefits of U.S.- UK collaboration in advanced nuclear technologies and data centre development.

The 900-acre Cottam site offers an unparalleled location, with grid connections and critical infrastructure that will significantly reduce development costs and timelines. This project could create thousands of high-skilled manufacturing and construction jobs, as well as long-term roles in operations to the benefit of the local community. The project will also enable

foreign direct investment into the UK, including into nuclear fuel fabrication and services by Framatome and turbine manufacture by Arabelle Solutions.

The UK programme will benefit directly from Holtec's SMR-300 deployment at Palisades, Michigan - the first SMR-300 plant in the U.S. As a second-of-a-kind deployment, the UK project will benefit from lessons already learned, to reduce risk and accelerate progress. Holtec is already advancing the SMR-300 design in close collaboration with UK regulators, paving the way for greater regulatory alignment between the U.S. and UK. As part of this collaboration, Holtec International will provide the SMR-300 technology and lead early development activities.

Feasibility studies and early-stage investment discussions are now underway, with Holtec International and EDF UK engaged with relevant parties within UK and U.S. governments, including Great British Energy - Nuclear and The National Wealth Fund. The 1GW data centre project for Cottam is targeted to come online by the end of the decade and forms part of the Trent Valley Supercluster, submitted as an AI Growth Zone to the UK Government. The data centre project will initially have a significant contribution from renewable generation, with the SMR element becoming operational in the 2030s.

6. Contacts

For more information about anything in this report or other station issues, contact:

Fiona McCall, Senior External Affairs Manager

Tel: 07813 232 347

E-mail: fiona.mccall@edf-energy.com

Nikki Thomson, Communications Advisor

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E-mail: nikki.thomson@edf-energy.com



For the future of our environment

Hunterston Site Stakeholders Group

SEPA Update- Hunterston B

December 2025

If you would like this document in an accessible format, such as large print, audio recording or braille, please contact SEPA by emailing equalities@sepa.org.uk

Regulation

Environmental Authorisations (Scotland) Regulations 2018 (EASR)

Amendments to the Environmental Authorisations (Scotland) Regulations 2018 (EASR), which took effect on 1 November 2025, streamline the regulatory landscape, replacing eight pieces of existing environmental legislation on waste management, water and industrial activities.

Targeted at protecting and improving the environment, the new regulatory framework also responds confidently to the challenge of public service reform which calls for simplification and more efficient, good quality and effective services across Scotland's public sphere.

The changes mean applying for an authorisation is simpler and more user-friendly, with one application process for all. Meanwhile, the type of authorisation required is set according to the risk of the activity being carried out, offering the greatest protection for our environment and reducing regulatory burden where appropriate.

Crucially, the new rules also move the dial on prevention, with enhanced powers to ensure authorisations don't end up in the wrong hands. In particular, the new legislation significantly strengthens the regulation of the waste sector, which can be disrupted by illegal activity.

In addition, new tools are available to regulators to enable quick interventions when operators are at risk of non-compliance.

The changes will allow SEPA to focus more resource on front-line regulation.

Radioactive substances activities

Please note that radioactive substances activities have been regulated under EASR since 2018.

We have continued communication with the station throughout the period, including formal weekly call-downs with the station's Environmental Safety Group and corporate Environment Standards

and Sustainability Branch as well as monthly updates from the EDF internal regulator on site. We have also attended routine meetings with corporate EDF, NRS, ONR and EA on strategic issues, including transfer to NRS and decommissioning.

The station has been visited twice since the last SSG meeting. On 22 October 2025, SEPA inspected the site to see how the staff were adjusting to the new deconstruction structure with a focus on the Environmental Safety Group and the new Waste Department, as well as to observe the progress on the refurbishment of the Radiochemistry Laboratory. The opportunity was also taken to get updates on both the landward and seaward aspects of the Alternative Aqueous Effluent Discharge Line (AAEDL) project and the refurbishment of the Low Level Waste Facility/Laundry building. No contraventions were found.

The station was visited again on 11 November 2025 along with ONR to look at plant items beyond the current site licence boundary and to determine if they would have any impact on either the relicensing by ONR or permit transfers by SEPA. The plant items included the Land Shaft (“Guinness Pot”), package sewage plant, 39” outfall lagoons and the jetty. No issues were identified.

The station applied to SEPA on 31 January 2024 to vary its EASR permit to remove the minimum aqueous discharge flow rate ($7\text{m}^3/\text{s}$) and tidal window requirements (one hour after high tide to one hour before low tide) whilst keeping the same discharge point in the Firth of Clyde. SEPA has requested the full outputs of the PC CREAM and GoldSIM models submitted with the application in order to verify the conclusions presented. We expect to determine the variation application by 1 August 2026.

EDF and NRS have submitted a joint application to transfer the EASR permit for radioactive substances activities from EDF to NRS. We are currently consulting with ONR and Food Standards Scotland on our draft determination and thereafter we will consult with Scottish Ministers. Depending on the outcome of these consultations, we will formally share our determination with EDF and NRS by the end of January 2026 and undertake a readiness inspection in March 2026. Please note that there will be no formal public consultation on the transfer application.

Industrial activities

This was formerly Pollution Prevention and Control (PPC), and its permit covers the emergency diesel generators, auxiliary boilers and waste oil burner.

An application has been received by SEPA to transfer this permit from EDF to NRS. We expect to determine the application before the transfer of the site on 01/04/2026.

SEPA continues to monitor the minor leak of non-radioactive biodegradable oil from an oil-filled cable which services a transformer on site to ensure it is having no significant environmental impact.

Water activities

This was formerly Controlled Activities Regulations (CAR) and it comprises one abstraction authorisation and five non-radioactive discharge authorisations.

Applications have been received by SEPA to transfer these authorisations from EDF to NRS. We expect to determine the application before the transfer of the site on 01/04/2026.

Fluorinated Greenhouse Gase Emissions (F-Gas)

This legislation is not included in in EASR.

There have been no other issues relating to the station's F-Gas usage since the last scheduled SSG meeting.

UK Emissions Trading Scheme (ETS)

This legislation and its permit are also not included in in EASR.

The station has applied to surrender the ETS permit, and this has been granted. EDF now have 28 days to appeal, before the surrender becomes effective. The surrender means that they can no longer operate combustion appliances over 20MWth in aggregate, yet the permit is still in force insofar as the reporting and surrender of allowances conditions are concerned.

Once the permit surrender becomes effective, EDF can report final emissions, surrender allowances, and SEPA will then issue cessation notice. Only this will nullify the permit. EDF have until the end of March 2026 to report and the end of April 2026 to surrender allowances, but they can do these as soon as the surrender becomes effective.

Environmental Events

There were no reportable incidents, complaints or non-compliance events affecting SEPA's interests at the station known to have occurred since the last meeting of the SSG at the time of drafting this report.

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. 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 Hunterston B. 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 (RIFE 30) covering 2024 has been published and can be obtained from SEPA's website along with previous year's reports. RIFE 30 reports that the total dose for the representative person (most exposed) around the Hunterston site, which includes both

Hunterston A and Hunterston B, for 2024 was 0.006 millisieverts, which is well below the legal annual dose limit of one millisievert as set out in paragraph 26, Schedule 8 of EASR18.

Scottish Pollutant Release Inventory (SPRI)

The Scottish Pollutant Release Inventory (SPRI) is a publicly accessible electronic database of releases of pollutants to all environmental media and transfers of non-radioactive waste. We intend that, as far as practicable, SPRI be the principle means by which information on Scottish pollutant releases and non-radioactive waste transfers is collected and made public. Wherever possible, such information will be collected and presented by this one system. The data for 2024, including that from Hunterston A and B, have been published and are available on SEPA's current beta website under "*Topics/Environmental data and reporting/SPRI*".

Mr Keith Hammond

Radioactive Substances Specialist/Speisealach Stuthan Reidio-beo

19/11/2025



Office for
Nuclear Regulation

ONR site report

Nuclear Restoration Services – Hunterston A

ONR site report

Nuclear Restoration Services — Hunterston A

Report for period: 1 July – 30 September 2025

Authored by: Nominated Site Inspector

Approved by: Head of Regulation – Decommissioning, Fuel, and Waste

Issue: 1

Published: October 2025

Record reference: 2025/36084

Foreword

This report is issued as part of our 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 Hunterston Site Stakeholder Group and are also available on our website: www.onr.org.uk/publications/regulatory-reports/site-specific-reports/lcsvg-reports.

Our site inspectors usually attend Hunterston 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 us via email at contact@onr.gov.uk.

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- 5. News from ONR 9
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1. Inspections

1.1. Date(s) of inspection

Our site inspector made inspections on the following dates during the report period 1 July to 30 September 2025:

- 2 – 4 September 2025

The ONR security inspector inspected the site on the following date:

- 30 September 2025

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 Hunterston A covered the following:

- Safety culture; and
- Witnessing the security regulator-evaluated demonstration exercise.

Members of the public who would like further information on our inspection activities during the reporting period can view site inspection records on our website:

www.onr.org.uk/publications/regulatory-reports/site-specific-reports/inspection-records.

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

2.2. Other work

Throughout this reporting period, our nominated site safety inspector has held regular telephone meetings with Hunterston A leadership team representatives to maintain situational awareness of matters related to nuclear safety.

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

Other routine matters discussed during this period included:

- Decommissioning progress on the site;
- Progress on restoring laboratory capability at Hunterston A; and
- Recent site safety matters.

3. Non-routine matters

Licensees are required to have arrangements to respond to non-routine matters and events. Our 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

We may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, we issue regulatory documents, which either permit an activity or require some form of action to be taken. These are usually collectively termed licence instruments but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an enforcement notice.

The following licence instruments, enforcement notices and enforcement letters have been issued during the period:

Table 1: Licence instruments and enforcement notices issued by ONR during this period

Date	Type	Reference	Description
28/07/25	Enforcement letter	ONR-EL-25-11	Served on Altrad Services Limited following a dropped load from a forklift truck in April 2025.

Reports detailing the above regulatory decisions can be found on our website: www.onr.org.uk/publications/regulatory-reports/site-specific-reports/project-assessment-reports.

5. News from ONR

For the latest updates and information on our work, please subscribe to our regular email newsletter, ONR News, at www.onr.org.uk/news/newsletter.

6. Contacts

Office for Nuclear Regulation
Redgrave Court
Merton Road
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Merseyside
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Website: www.onr.org.uk
Email: contact@onr.gov.uk

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Hunterston Site

Stakeholders Group

SEPA Update

Hunterston A



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Regulation

Environmental Authorisations (Scotland) Regulations 2018 (EASR)- radioactive substances

Engagement with the site continued throughout the period since the last SSG in March, including formal monthly and weekly update meetings. Routine discussions with Hunterston A on site issues, and the corporate NRS team on strategic issues have also continued.

Site Inspections

No site visits have been undertaken since the last SSG meeting.

Updates to ongoing situations are in bold.

SEPA Site Inspection 11 June 2025

SEPA attended the Hunterston A site to undertake an inspection of the Hunterston A Environmental Monitoring Programme (EMP). SEPA did not find any non-compliances whilst undertaking the inspection.

SEPA Site Visit 17-18 March 2025

SEPA attended the Hunterston A site to continue its investigation into the laboratory issues.

SEPA Site Visit 21 – 23 January 2025

SEPA attended the Hunterston A site to commence its investigation into the laboratory issues.

This was the initial stages of the investigation, and this will be ongoing over the coming months.

SEPA Site Inspection 28th March 2023

SEPA undertook an inspection of the process employed by Hunterston A to submit the monthly gaseous discharge returns. The inspection focused specifically on the process for sample receipt in the labs and monthly reporting of the gaseous ‘any other radionuclides’ on the permit, i.e., the particulate alpha and beta.

During the inspections SEPA found that Hunterston A are not reporting the monthly gaseous ‘all other radionuclides’ as per the requirements of Schedule 2: Data Return Requirements of the Environmental Authorisation (Scotland) Regulations 2018.

The site was therefore deemed to be non-compliant with a number of standard conditions of the site EASR permit.

In July SEPA wrote to the site requesting timelines for a return to compliance as well as confirmation of the status of the data provided in previously submitted data returns. The site provided a response on 10th August, and SEPA is in the process of considering the programme supplied by the site and will respond in due course.

The site has been served with an Information Notice to ensure that the timelines provided by the site to address these matters are adhered to. These timelines are for the provision of information SEPA believes is necessary to ensure current and future compliance at the site.

SEPA have varied the Information Notice originally issued to NRS Hunterston A in January of this year following NRS failure to meet a deadline for provision of information specified within the notice. The variation extends the deadline from 31st October to 28th of November for item 2b and 2c of the Notice only, all other outstanding deadlines remain unaltered.

Update March 2025 - SEPA have varied the Information Notice originally issued to NRS Hunterston A in January 2024 following a request from NRS for an extension to the dates for actions 2b, 2c, 3b, 4a and 4b within the information notice as they were not able to adhere with the dates previously outlined. NRS formally outlined the inability to adhere to this date in letter dated 27 November 2024.

NRS indicated that they will be in a position to submit the required information to meet Actions 2b and 2c by 30 April 2025, Action 3b by 31 May 2025, Actions 4a and 4b by 30 June 2025.

SEPA subsequently varied the Information Notice to the dates requested by NRS Hunterston A.

Update June 2025 – at the time of preparing this report, NRS have provided SEPA with information to close out actions 2b and 2c, which was received prior to the renewed action date of 30 April. SEPA will consider the information provided in due course.

Update September 2025 – SEPA is going through the information provided by the site in order to close out the Information Notice. It is noted that the site has worked hard to meet the revised deadlines. SEPA will provide a response to the site in due course.

Permit Variation Applications

Aqueous Discharge Variation Application – Update December 2025

NRS applied to SEPA on 28 February 2024 to vary its EASR permit to remove the minimum aqueous discharge flow rate (7m³ /s) and tidal window requirements (one hour after high tide to one hour before low tide) whilst keeping the same discharge point. The further information requested from the station, including a short-term release dose assessment to a swimmer during a discharge, was provided in June 2024, and the application has been deemed Duly Made. The application is expected to be determined by 1 August 2026.

Update June 2025 - At the time of writing, the 8-week consultation period for the application has ended (22 April 2025). No representations were made and SEPA will consider the application in due course.

Update December 2025 – the determination is ongoing

SILWE Discharge/ Site gaseous discharge increase variation application

SEPA received an EASR permit variation application from NRS HNA on Monday 21st August 2023. This application is primarily for the operation of the SILWE plant, which requires a permit variation in order to include the SILWE gaseous discharge stack within the site permit. In addition, the permit variation requests an increase to the site gaseous discharge limits due to the operation of this new facility as well as other imminent work on the site. Note that SEPA will consider the encapsulation of bunker 1 wastes only at this time due to the ongoing discussions around the appropriateness of the characterisation of the bunker wastes. The timely encapsulation of bunker 1 wastes is deemed necessary by ONR and is outlined in the Joint Statement provided to NRS HNA by ONR and SEPA last year.

Update March 2025 – Ongoing. Public Consultation closed. No representations were made, and the application will be determined in due course.

Update September 2025 - the application will be determined in due course,

Other EASR Regulatory Topics

Regulatory Notice – update December 2025

SEPA served NRS Hunterston A with a Regulatory Notice on 12th November 2024 requiring it to immediately cease use of the onsite laboratory for the purposes of demonstrating compliance with the site EASR permit. SEPA took this decision following the review of NRS internal investigation into shortcomings at the laboratory regarding acceptance into service and use of equipment, failure to follow or have in place adequate processes and procedures to achieve compliance and potential shortfalls in staff training. NRS have taken steps to put in place alternative laboratory arrangements to underpin its demonstration of compliance with the site permit whilst the Regulatory Notice is in effect.

Update March 2025 – due to the site receiving the regulatory notice, subsequently necessitating the use of alternative lab resource for the analysis of the samples to provide the statutory

discharge reporting to SEPA, the site requested an ongoing extension to the dates for the month discharge returns. SEPA agreed to a rolling 3 month extension to the provision of the monthly returns.

Update December 2025 – SEPA continue to liaise with the site regarding the onsite laboratory. SEPA is in the process of undertaking an investigation and the outcome of this will be available in due course.

Review of Characterisation of ILW Bunker Waste - Update December 2025

SEPA received an optioneering report from NRS on 28th March 2022 entitled “Review of Options for Managing Waste from The Hunterston A Solid Active Waste Bunkers Given its Status at May 2021 WD/REP/0032/21”.

Having initially reviewed the information sent, SEPA considered there needed to be a review of the underpinning characterisation work and whether this is sufficient to underpin the optioneering decisions.

SEPA procured a specialist contractor to review the model and associated work undertaken by NRS with regards to the characterisation of the SAWB waste. The review commenced in December 2022 and SEPA received a final version of the report in June, which was shared with ONR prior to being sent to NRS shortly afterwards.

SEPA, ONR and NRS had a joint meeting to discuss the findings of the report and a way forward on 15th November 2023.

NRS provided SEPA with a high-level scoping document which highlighted work areas required to ensure that an adequate demonstration of BPM is provided for the decisions regarding further characterisation of the bunker wastes.

SEPA received a report in September outlining Assay Options for Solid Active Waste Bunker Boxes and responded with comments to NRS with regards to this work. SEPA await further engagement in due course.

Update September 2025 – SEPA staff had a meeting with NRS to discuss the characterisation of the HNA ILW bunker waste. The meeting was constructive and NRS took on board SEPA comments. SEPA await provision of a report showing the proposed decisions, however NRS showed that they have a forward direction of travel

Update December 2025 – SEPA have been meeting with NRS on a monthly basis to discuss progress with their chosen options for further characterisation of the HNA ILW bunker waste. NRS are expected to report on their findings and recommendations in the near future.

Other Regulatory Topics

Habits Survey

The Hunterston Habits Survey for 2025 is complete and has been provided to the site.

Fluorinated Greenhouse Gas Emissions (F-Gas)

No events reported over the period.

Environmental Events

N/A

Radioactive Substances Consultations

N/A

Radioactivity and Food in 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. 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 Hunterston B. 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.

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Scottish Pollutant Release Inventory (SPRI)

The Scottish Pollutant Release Inventory (SPRI) is a publicly accessible electronic database of releases of pollutants to all environmental media and transfers of non-radioactive waste. We intend that, as far as practicable, SPRI be the principle means by which information on Scottish pollutant releases and non-radioactive waste transfers is collected and made public. Wherever possible, such information will be collected and presented by this one system. The data for 2024, including that from Hunterston A and B, have been published and are available on SEPA's current beta website under "*Topics/Environmental data and reporting/SPRI*".

Melanie Hayes

Radioactive Substances Specialist,

December 2025

SCOTTISH GOVERNMENT UPDATE TO HUNTERSTON SITE STAKEHOLDER GROUP – 4th DECEMBER 2025

SCOTTISH GOVERNMENT RADIOACTIVE SUBSTANCES AND NUCLEAR DECOMMISSIONING POLICY TEAM

Designation Directions for Decommissioning Hunterston B

We have been engaging with the DESNZ and the NDA on the amended Designation Direction that is required to transfer the Hunterston B site to the NDA for decommissioning, as required by the Energy Act 2004. A direction for Hunterston B was previously laid at the UK and Scottish Parliaments in 2021. This Direction allowed the NDA to undertake preparatory work before taking ownership of the Hunterston B site, including giving the NDA the necessary powers to be able to advise the UK and Scottish Governments regarding the future decommissioning of the site. This new Direction is required as it includes updated details following preparation work over the last few years and will enable the transfer in April next year. Scottish and UK Ministers will need to approve the new Direction, with the aim being for it then to be laid at both the UK and Scottish Parliaments early next year.

NDA Strategy V

Scottish Government are continuing to work with the NDA on the development of their Strategy V document, ensuring that Scottish Policy and practices are properly reflected. The public consultation closed on 29 September 2025. The document will need to be approved by both UK and Scottish Ministers, as well as being laid at both Parliaments, in accordance with the terms of the Energy Act 2004. The intention is to publish the Strategy in Spring 2026.

Parliamentary Business

The team has been dealing with some routine Parliamentary Questions regarding Scottish Ministers role in NDA governance. We have also had some parliamentary questions in relation to Scottish Ministers role in the potential transfer of Vulcan from the MoD to the NDA. The Parliamentary Questions and the responses can be found [here](#);

[Written question and answer: S6W-40499 | Scottish Parliament Website](#)

[Written question and answer: S6W-40558 | Scottish Parliament Website](#)

[Written question and answer: S6W-40500 | Scottish Parliament Website](#)

[Written question and answer: S6W-40557 | Scottish Parliament Website](#)

[Written question and answer: S6W-40556 | Scottish Parliament Website](#)

[Written question and answer: S6W-40559 | Scottish Parliament Website](#)

Bill Kidd MSP also raised a Parliamentary Question regarding safety at Faslane following a number of media articles in relation to a reported incident at the Faslane base. Mr Kidds question and the SG response can be found here;

[Written question and answer: S6O-04914 | Scottish Parliament Website](#)

Mr Kidd initiated a debate in parliament on the issue, which our team supported at parliament. The full transcript of the debate can be found here;

<https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-17-09-2025?meeting=16579&iob=141512>

Diane Hamilton
Scottish Government



NDA Update for Hunterston SSG

December 2025



Contents

1.0 NDA Stakeholder Update December 2025



NDA Stakeholder Update

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

Government Update

David Peattie, Nuclear Decommissioning Authority Chief Executive Officer has informed the NDA Chair and Board of his intention to continue to serve the NDA group as its CEO until March 2027. He has shared his plans 18 months ahead of his intended departure to allow preparations to begin to find his replacement and ensure a smooth and comprehensive handover. As the CEO role is a government appointment a process will now be put in place to find a successor. The announcement can be found using the following link: [Leadership change at the Nuclear Decommissioning Authority - GOV.UK](#)

Outreach activities

Paul Vallance, Corporate Affairs Director for the NDA addressed the All-Party Parliamentary Group for Nuclear at the Palace of Westminster in early October. The event was attended by more than 20 parliamentarians interested in the nuclear sector. Paul updated on the following:

- The importance of decommissioning within the nuclear lifecycle.
- Resetting perceptions that decommissioning is a declining sector.
- The NDA Group's significant contribution to the UK Government's Plan for Change and economic growth.
- Euan Hutton highlighted Sellafield's role in energy and national security.
- Seth Kybrid outlined NTS's involvement in HALEU and the critical role of LLWR and GDF in completing the nuclear lifecycle.

The NDA group also hosted a Parliamentary reception in September at the Speakers House. The Rt. Hon. Sir Lindsay Hoyle hosted the event with speakers including Minister Shanks MP and former energy minister Andrew Bowie MP. David Peattie gave a keynote address to more than 150 guests to celebrate the NDA's achievements and milestones, and to mark the NDA's 20th anniversary.

Engagement priorities for 2025

As you are aware, the consultation on the NDA draft **Strategy 5** was launched on 7 August and closed on 29 September. 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. Once we have analysed all the comments the final document will be produced and published in March 2026.



This year's Stakeholder Summit was held virtually on 3 November. Marking the NDA's 20th anniversary, over 250 stakeholders joined the event with input from a range of speakers and panellists. The event was broken into 3 sessions and included key speakers from across the NDA and its Operating Companies as well as colleagues from the nuclear regulators.

Cross-Party Group

Met in September at HNA to update members on AGR transfer progress. Meeting was accompanied by sites tour of HNA/HNB and engagement with HNB workforce.

Next meeting of CPG will be on December 10th – 6pm at Scottish Parliament where main topic will be 'Skills update'.

SCCORS

The second meeting of the Scottish Councils Committee on Radioactive Substances (SCCORS) was held on 12 November in Glasgow. Amongst agenda items was an update on S5, future SCCORS engagement plans and consideration of Non-NDA Liabilities. A more detailed report on what was discussed will be given during the SSG meeting by David Wallace.

Festival of Politics

Held in August at the Scottish Parliament, the CPG hosted a public event celebrating 70 years of Dounreay titled – 'The Atomics – the story of Dounreay people'. The event was a sell-out and attended by members of Scottish SSGs as well as Scottish Government.

Publications, public service and policy updates

The NDA Annual Report and Accounts 2024/25 sets out the progress we're making against our mission, from safely decommissioning existing sites to preparing to take responsibility for more, while managing radioactive waste for our existing programme and new nuclear.

As we mark our 20th anniversary, this year's report reflects a strong year of delivery across the NDA group with continued progress on our mission: safely decommissioning our sites, managing radioactive waste, and preparing to take on new responsibilities.

Key highlights from the last 12 months include:

- Sellafield is now removing waste from all four legacy ponds and silos – a major milestone in hazard reduction.
- Nuclear Waste Services is progressing with final capping at the LLW Repository.
- Visible skyline changes across the estate, including the demolition of Sizewell A's turbine hall.
- Ongoing work to identify a suitable site and community for a Geological Disposal Facility.



- Innovation in action: sail trials for NTS ships and autonomous security systems at Winfrith.
- Preparations continue for the transfer of the AGR fleet and potential decommissioning of the Vulcan site.

Additionally, we've seen improvements in safety, environmental performance, and cyber security, supported by the opening of a new cyber facility to boost collaboration.

2024/25 also saw another year of significant investment in our people and communities. We had a record early careers intake in 2025 with over 420 apprentices and 300 graduates. As well as that, we saw continued support for skills, schools, and supply chain development – part of our £49m annual investment. And finally, we saw the continued ongoing delivery of our Inclusion Strategy, with real progress on equality, diversity, and inclusion.

Read the report here: [Nuclear Decommissioning Authority: Annual Report and Accounts 2024 to 2025 - GOV.UK](#)

We are currently in the process of drafting the NDA Business Plan which we will publish toward the end of the year for an 8-week consultation between 8 December and 2 February. We will coordinate final publication of the Business Plan with the publication of the NDA Strategy 5 around Easter 2026.

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