Local Community Liaison Council

Bradwell Local Community Liaison Council (LCLC)

(Meeting No. 79)

Agenda

Wednesday, 24th September 2025

Via ZOOM Meeting to commence at **19:00**

1. **Welcome from the Chair**
   - Apologies for absence

2. **Approval of the minutes of the 78th meeting – 26th March 2025**

3. **Matters arising from the previous minutes**
   - Flood defences

4. **NRS Corporate Update** - Bill Hamilton

5. **Bradwell Site Director's Report** - Alan Walker

6. **NDA Update** – Alastair Findlay

7. **Environment Agency Report** - James Heavingham
   - EA report Bradwell LCLC
   - Flood defences

8. **AOB**
   - Bradwell LCLC Constitution and NDA Guidance
   - Bradwell LCLC response to NDA group Draft Strategy 5

Next meeting date: TBC

Please be reminded, following a request from the Chairman, any requested amendments to the previous minutes should be submitted to the LCLC Secretariat, in writing, prior to the meeting: bradwell.lclc@nrservices.uk

BRADWELL SITE LCLC

Minutes of the 78th Local Community Liaison Council (LCLC) meeting

held via Zoom

7.00 pm Wednesday 26 March 2025

ATTENDANCE

LCLC Executive		
Brian Main	-	LCLC Chairman
Cllr John White	-	Deputy Chairman
LCLC Members		
Alan Walker	-	Bradwell/Dungeness/Sizewell A Site Director
James Heavingham	-	Environment Agency
Kayleigh Ridley	-	Communications Lead, NRS
Cllr John Lambert	-	Latchingdon Parish Council
Cllr Andrea Luxford Vaughan	-	Colchester City Council
Cllr Matthew Neall	-	MDC
Cllr John Driver	-	Maldon District Council
Members of the Public		
Cllr John Akker	-	West Mersea Town Council
Linda Gemmill	-	Bradwell BAN
Varrie Blowers		BANNG
Andrew Blowers		BANNG
Ian Clarke		BANNG
SSG Secretariat		
Kim Avery	-	Virtual event host
Charlotte Molyneux	-	Marick

I **Introduction**

3352 The Chairman welcomed everyone to the meeting and asked new members to introduce themselves.

II **Apologies for Absence**

3353 Received from Paul Burgess of Althorne Parish Council, Gill Winsor of Latchingdon Parish Council and Shirley Swan, member of the public.

III **Approval of the Previous Minutes**

3354 John Akker pointed out that he had been incorrectly noted as a Councillor of Tillingham Parish Council; he was not a councillor at that time, nor from Tillingham. The Chairman noted that, in addition, John Noble was recorded as being a member of the public when, in fact, he had represented Bradwell-on-Sea Parish Council. The minutes were then approved as a true record of the meeting on 2 October 2024.

IV **Matters Arising from the Previous Minutes**

3355 There were no matters arising.

V **NRS Corporate Update**

3356 No representative of the NRS Corporate was present but Alan Walker offered to talk through their presentation as part of his Site Director's report.

VI **Bradwell Site Director's Report**

3357 Alan Walker, Site Director of Bradwell and Sizewell A sites, started by referring to the Government spending review. He stated that NRS sites, excluding Dounreay, had received a one-year settlement of around £540 million, which he said was flat funding and did not allow for inflation. A number of NRS projects had been due to start, which required more funding than was allocated, so some had been paused or slowed down, which may have some minor impact on Bradwell, such as a delay in the receipt of ILW packages from Sizewell A. Final site clearance at Bradwell may be affected by this but elements could be accelerated to keep it on track for the 2070s if more funding became available. The outcome of the spending review should be known in June, enabling us to plan up to the financial year 2029-30.

3358 Regarding Bradwell:

- Safety, compliance and environment: no incidents, accidents nor security issues at Bradwell since the last LCLC meeting. The security exercise (in collaboration with Essex Police) in December had gone well. The Environment Agency had completed a year-long review of management arrangements of the site in Care & Maintenance (C&M). Fly tipping was still an issue. The Bradwell mobilisation had started on 17 March and would run for 15 weeks.
- Waste received and dispatched: one waste package had just been received from Dungeness A. The Interim Storage Facility (ISF) crane had been out of action for a long time, but a new hardware/software system had now been installed.
- Asset and infrastructure care work: outage scheduled for March to June, when the reactor building void defects would be repaired. If the system of repair proves successful, the inspection intervals could be lengthened. 200 compliance and maintenance routines will also be carried out.
- Socio-economic funding: remains at £1.1 million pa, including £6,000 per site for 'Good Neighbour' projects. Three Bradwell projects had been funded to date, totalling £44,953.65. Applications for projects of under £2,000 should be sent to Kayleigh Ridley and for projects over £2,000 to Jessica Dawson. This year support had been given to

the Saltmarsh coast walking festival, U Fest and Maldon District Council's productivity in rural economies project.

3359 John White asked for confirmation that Bradwell mobilisation was about all the things that had to be inspected annually. Alan confirmed this and added that some things need five-yearly inspection.

3360 John also asked whether the Police participation in the December exercise had raised any concerns from members of the public who may have seen it and not known it was an exercise; there were no concerns raised.

3361 Ian Clarke asked for clarification on whether care and maintenance at Bradwell would end after final site clearance or after care and maintenance at Sizewell A has occurred. Alan explained that Dungeness A would be first, then work on Sizewell A would start before Dungeness was finished and Bradwell would start as Sizewell A approaches final site clearance, i.e. when the reactor bio-shield is to be worked on.

3362 Ian then asked what the end of care and maintenance and final site clearance at Bradwell currently looked like, bearing it mind there could be delays at the other sites, possibly due to funding. Alan agreed that there could be delays but, if more funding becomes available, things could move more quickly. Ian asked what dates were envisaged for Bradwell for the end of care and maintenance and the end of final site clearance. **Action: Alan Walker to check and report back**. *Post meeting note - Current forecast is that Bradwell starts Reactor Dismantling and Site Clearance in March 2075 and finishes January 2098. This is subject to change pending the final outcome of the spending review.*

3363 John Akker asked whether Alan would know more in June or July about funding. Alan confirmed that the amount allocated until 2029-30 would be known then, which would allow NRS to make plans, even if it was still flat funding. John asked for information on the situation to be made available in July. Alan stated that there would be no impact on maintenance work at Bradwell in the short term. Once the amount of funding is known, planning can be done to give an overall picture of future work. He would know more by the next LCLC meeting and would then report on any effect on the long-term planning at Bradwell.

3364 Andrew Blowers asked whether there were any signs of deterioration in the cores or elsewhere and how often the situation was being monitored. Alan reported that the pressure vessels were the most robust items on site and that no internal inspections had been done since defueling. External camera inspections during care and maintenance preparations showed no degradation.

VI **<u>Nuclear Decommissioning Authority Update</u>**

3365 No representative of the NDA was present. The Chairman asked for a report, if one was available, to be circulated after the meeting. **Action: Alan Walker**. *Post meeting note – the NDA report is included in the meeting pack attached to the LCLC invitation emailed Wed 12/03/2025 13:35, pages 8-15.*

VII **<u>Environment Agency Site Inspector's Report</u>**

3366 James Heavingham reported on his action from the last meeting to look at the flood defences: he pointed out that the EA did not own those defences but was responsible for maintaining them. Such assets were given a score of between 1 (excellent) and 5 (bad) plus a target score of how it should be maintained, based on the associated risk. The defences around Bradwell had been given a target score of 3 (fair) and all were rated as fair, apart from a 200 metre-long stretch to the north-west of the site, which was rated as 4 (needs improvement). The next survey would take place on 24 May 2025, when an improvement and repair plan would be put together.

3367 Ian Clarke asked how the risks from climate change, sea surges, etc were accommodated and were they included in the current assessment or for the future? James stated that climate change was considered when considering the risk of the asset failing but it was not considered as far ahead as the end of the century. **Action: James to find out how far ahead this is considered**. This would be reassessed every few years and the Bradwell assessment is done annually.

3368 John Akker was concerned about the impact of sea level and surges in the North Sea, and asked James to find out what authorities the assessments are based on to assess future risks. John was concerned that there were significant changes occurring on the Blackwater. James would attempt to find that out before the end of the meeting but stated that predictions were currently based on work done in 2018. John offered to have a conversation with the EA directly, if it would help. **Action: James to relay this offer to his colleagues**.

3369 Andrew Blowers suggested that a presentation to the LCLC on coastal change and climate change impacts would be helpful. He wondered how far the EA's site management plan tied in with this discussion about the state of the defences. He felt that a report on climatic changes and their effects on site management and predictions would be useful. The Chairman concurred. **Action: James to follow up and to ask a representative of the EA's flood defence team to report to the LCLC**, even though this was more than just a Bradwell site issue.

James asked for LCLC members to put together a list of questions they would like answered around the risks of coastal flooding. **Action: Andrew Blowers, Ian Clarke and John Akker to create and send a list to the Chairman and the secretariat** so it could be taken further with James.

3370 The EA continued to hold monthly meetings with the Sizewell A staff who looked after Bradwell. There had been no major issues but fly tipping was a concern. Regarding compliance: the long-term care and maintenance review had been completed, which had checked that assumptions made when Bradwell first went into care and maintenance were still valid. A summary report would be prepared.

The only issue that was not as originally assumed was the rate of ground water ingress into the waste vaults, which had increased. The EA will work with NRS on this issue, which was likely to worsen as climate change leads to an increase in ground water.

3371 The RIFE (Radioactivity in Food and Environment) report had been published in November 2024 for the year 2023. For Bradwell, the dose for a representative person was unchanged from the previous year and was less than 1% of the Government limit.

3372 Linda Gemmill asked for clarification on the water ingress issue and whether “waste vaults” meant the intermediate waste storage facility. James explained that there was no water ingress into the reactor voids but there was into the waste voids. Linda asked whether water getting in could get out again and Alan Walker responded that it could not.

3373 Linda also asked about the discharge from the rainwater drain and the “small increase to the standard reporting values”: what was its nature – was it water or something else? James explained that there were limits for radioactivity on the permit for surface water discharge and standard reporting values were used, which were an average of measured discharge, reviewed regularly. The reported slight increase was on the figures in the review of 2020 and was not indicative of increased discharge, more of a fluctuation in measurement values.

3374 Ian Clarke asked whether the waste vaults were decontaminated to the extent that the ingressing water was not active. Alan Walker stated that there would be traces in the water from the vault surfaces and a sampling campaign was monitoring the water. He emphasised that the amount of water ingress was very low, and James noted that it had been expected in the care and maintenance plans.

VIII **<u>Any Other Business</u>**

3375 Andrew Blowers suggested a change to the constitution: that the category of Voting Member shall be extended to representatives of Residents' Associations, Farming Representatives, Community and Environmental Groups etc. All other categories shall be non-voting and in attendance. Observers, by agreement of the Chairman are members of the public and the Press.

Andrew explained his reasoning: that the current constitution did not reflect our membership. He stated groups such as those stated above should be moved to the voting category as they have a role to play and might as well participate fully. He expected this to result in little change, as votes were rare and generally passed by assent, and that such groups should not have a subordinate categorisation.

3376 John Akker supported this recommendation and would encourage more people to participate. Linda Gemmill also supported it and said that Bradwell Action Network would like to be formal members of the group.

Andrew felt it would be useful to identify who the members actually were as some were active and some not. Each group should have one full member representative, and others could attend as observers, if they wished. He felt that we did not really know who our membership was because many people did not attend meetings.

Matthew Neall said he would like clarity on who the current voting members were and supported Andrew's recommendation.

3377 The Chairman asked those present whether they felt any disadvantage at all, as a non-voting member, in relation to our communications. He pointed out that we only vote on two issues: election of the Chair and Vice-Chair and changes to the constitution. No-one did; and the Chairman gave his view that voting members should be democratically elected. Owing to some instances of misrepresentation in the past, he was concerned about the legitimacy and real representation of significant groups. He felt that giving a vote on the election of the Chair and on the constitution to all groups would not be right.

Andrew Blowers believed that these points were covered in the constitution and thought that no groups who might be deemed 'illegitimate' would gain membership. Members should be identified so we know where they come from; however, the Chairman felt that the terms in the constitution were very broad and that council representatives had already been elected by large numbers of members of the public and therefore represented all views and groups.

3378 The Chairman suggested that this matter should be considered further and not voted on in the current meeting; an AGM would be a more appropriate forum for such a vote. He felt that the current situation facilitated discussion with any and all people and groups as anyone was entitled to attend and participate.

The Chairman proposed that this matter be put on the agenda of the AGM, which should be held at the next meeting.

3379 John White expressed disappointment that Bill Hamilton and John MacNamara were not present to represent the NDA, as these meetings were an opportunity for members of the public to communicate with them. **Action: SSG Secretariat to convey this message**.

3380 Andrea Luxford Vaughan said it would be useful for attendees at LCLC meetings to put their full name and who they represent as their username so everyone would understand who was present. It was explained that attendees could right-click on their name on the screen and input their name as they wished it to appear.

Matthew Neall suggested that everyone introduce themselves at the beginning of each meeting, to save needing to change names.

3381 The Chairman noted that meetings had changed from a morning slot to an evening one and asked if anyone found this difficult as it made the working day long for those representing corporate organisations but, on the other hand, enabled members of the public to attend. No-one had a problem with the evening slot, so it would remain. The next meeting would be on 24 September 2025.

There being no further business, the Chairman closed the meeting.

Action arising from LCLC meeting Minute 3369

Report from EA on Coastal Flooding

This action requests a Report from the EA to be presented at the September meeting concerning risks to the Bradwell site from Climate Change.

The Report should cover the following issues and questions:

Maintenance of sea defences.

- The next survey would be undertaken on 24 May 2025 following which an improvement and repair plan would be put together.
- Will this be presented at the September meeting?
- The EA is responsible for improvements but is not owner of the defences. Does the owner contribute to repair and maintenance?
- Has the EA got adequate resources to make a timely and effective maintenance plan?
- Apart from the LCLC who does the EA report to when there is any significant finding on the adequacy of sea defences?

Assessment of Future coastal conditions

- How often and how far ahead are assessments made and updated?
- Are assessments made up to the point of provisional site clearance at the end of the century?
- Are assessments made for the period beyond 2100?
- How detailed is the modelling and forecasting of Climate Change impacts including coastal processes, sea level rise and storm surges for the Blackwater region? Are these data available for information?

Assessment of Risk

- What is the assessment of risk of overtopping and degradation or destruction of earthen defences in conditions of high sea levels and tidal surge?
- In event of flooding of the site how far is security compromised by impact on sea defences?

Adaptation to coastal conditions

- What measures of adaptive management will be considered will be in response to changing coastal conditions?
- What plans and possibilities are there for removal of radioactive materials from the site?
- In particular what plans are there for removing materials, especially graphite from the reactor cores?
- What are current plans and timescales for graphite management?
- What is the current estimated timescale for site clearance and remediation?

Implications of Climate Change

- How far does future site maintenance take into account potential extreme conditions arising from Climate Change in future?

- In particular is account taken of possible accelerating sea level rise, storm surges and coastal processes that could increase in intensity and frequency as the century progresses?

- Is there any consideration of risks arising that could impact the site beyond 2100?

Prepared by:
Andrew Blowers, Ian Clarke and John Akker, Members of the LCLC

23 May 2025

From:	Ian Clarke
To:	Bradwell LCLC (NRS)
Subject:	Questions Arising for LCLC Meeting - Concerns re Adequacy of the Sea Defences
Date:	02 September 2025 12:06:53
Attachments:	Possible Enhancment to Sea Defences at Bradwell NPS.png

CAUTION: External Email

Bradwell LCLC Secretariat

Questions arising from Bradwell LCLC Meetings - Concerns re Adequacy of Sea Defences

I have reviewed the apparent vulnerability of the Bradwell site to a breach of the sea defences
between Bradwell harbour and St Peter's Chapel at Sales Point eg by a "storm surge" .

The borrow-dyke behind the sea wall appears to extend throughout that distance which would allow any breach between those points to threaten the inundation of the site itself .

I accept the reactors are on raised ground but appears not defended with facing as a sea wall

It would appear that to mitigate against this sea defences by the site should be improved and be constructed leading from the existing sea wall inland to higher ground by the site

I will raise this at the forthcoming LCLC meeting but ask that this is reviewed in the interim

Attached files: 3 x Jpg

With thanks

Ian Clarke

[redacted]

From: Ian Clarke [redacted]
Sent: Saturday, May 24, 2025 11:57
To: Andrew Blowers [redacted]; John Akker [redacted]
Subject: Re: Questions rising from Minutes of LCLC meeting 26 March 2025

Dear Andy

Thank you for consolidating this and then for presenting it so well

I am now of the opinion any breach in a tidal surge would be problematic to repair as it infers defences in adjoining areas may also be breached and a significant area adjoining the site on either side would also be flooded

Attached 1 x Jpg

With thanks

Ian

From: Andrew Blowers [redacted]
Sent: Friday, May 23, 2025 18:23
To: John Akker [redacted] Ian Clarke [redacted]
Subject: Fwd: Questions rising from Minutes of LCLC meeting 26 March 2025

For information

Andy

> Begin forwarded message:
>
> **From:** Andrew.Blowers [redacted]
> **Subject: Questions rising from Minutes of LCLC meeting 26 March 2025**
> **Date:** 23 May 2025 at 18:21:44 BST
> **To:** "Bradwell LCLC (NRS)" <bradwell.lclc@nrservices.uk>, Brian Main [redacted]
>
> FAO SSG Secretariat and Chair, Bradwell LCLC
>
> Dear Brian and Tonya
>
> An Action was laid on Ian Clarke, John Akker and myself in request of a report to be presented by the EA at the September meeting concerning risks to the Bradwell site from Climate Change. Minute 3369 of the meeting refers.

I have coordinated the attached set of issues and questiokns which we consider should be covered in the EA's Report to the next meeting of the LCLC.

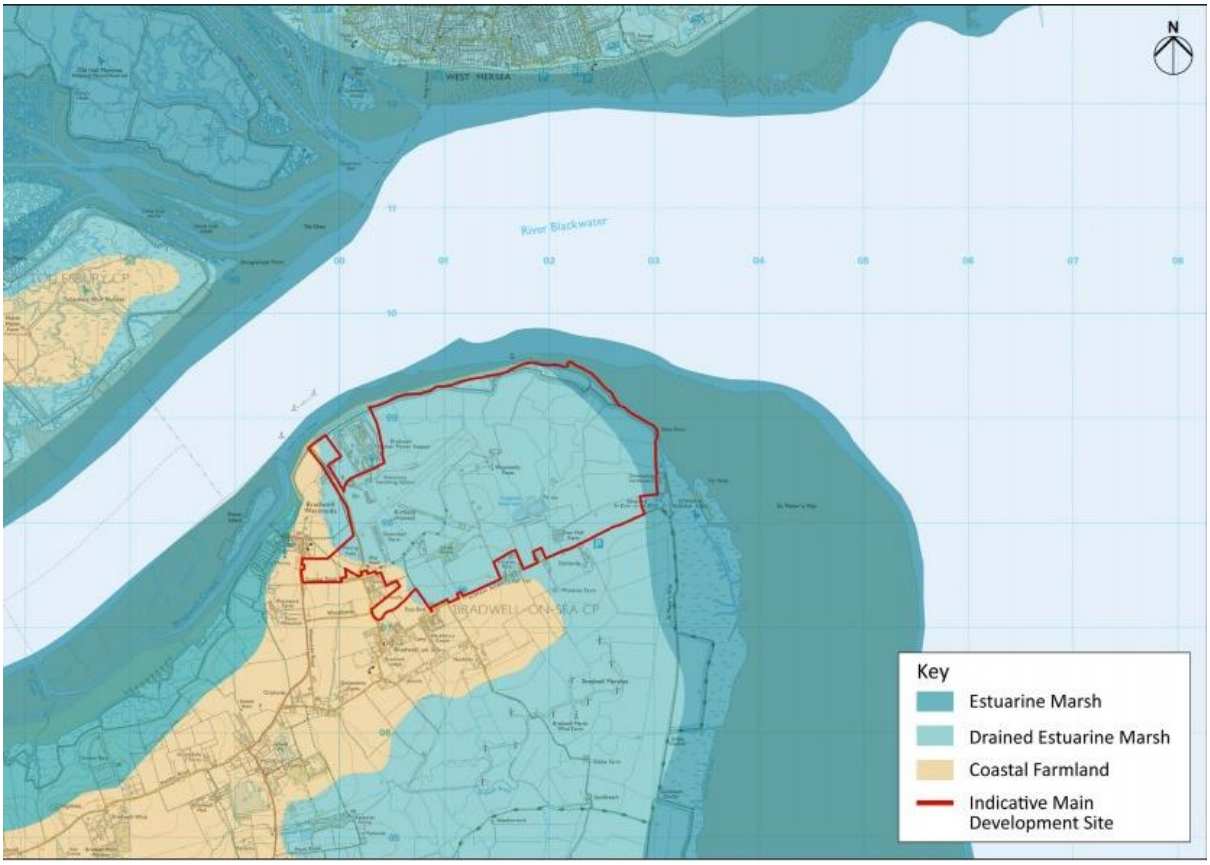
Kind regards

Prof Andrew Blowers
Member of LCLC

Andrew Blowers
Emeritus Professor of Social Sciences Open University

Andrew Blowers
[redacted]


Enhanced Sea Defences >
Google Maps


N
River Blackwater
WEST MERSEA
BRADWELL-ON-SEA CP
Key
Estuarine Marsh
Drained Estuarine Marsh
Coastal Farmland
Indicative Main Development Site

NDA Update for Bradwell

September 2025

Contents

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

Government Update

The Government Spending Review process informs decisions on public spending. NDA group funding is made up of the funding we receive from Government and the income we generate. We have already communicated on NDA group funding for 2025/26 which at just over £4bn includes increased Government funding, demonstrating significant public investment in our nuclear sites and facilities though this will not be without challenges.

We have now been advised of our allocation for 2026/27 through to 2029/30 from our Government sponsoring department, the Department for Energy Security and Net Zero (DESNZ). This gives the NDA long term visibility of our Government funding to the end of the decade.

Despite funding challenges, we're focused on our nationally important mission to ensure the safe and efficient decommissioning of the UK's nuclear legacy, with much to deliver, including a Geological Disposal Facility (GDF), which remains government's policy for the long-term storage solution for the most hazardous radioactive waste. Additionally, we are preparing for the transition of the Advanced Gas-Cooled Reactors (AGR) into our group for decommissioning, thereby expanding our responsibilities and scope. Our role in new nuclear initiatives remains important, highlighting our part in supporting the UK's energy security and sustainability goals.

Outreach activities

David Peattie, NDA Group CEO, Clive Nixon, Group Chief Nuclear Strategy Officer, and Holly Cresswell, International Relations Manager, represented the NDA at the recent UK-France Civil Nuclear Seminar. The event brought together senior figures to explore future collaboration between the UK and France in civil nuclear with panel sessions considering:

- Building a Workforce for the Future
- Ensuring a Responsible Nuclear Legacy
- Preparing for European Ambitions: Advanced Modular Reactors and Research

A key discussion point included the critical role of international collaboration in delivering our mission, particularly in tackling shared challenges in decommissioning, dismantling, and waste management. Whilst a key takeaway was the value of our partnerships—especially the knowledge exchange through Nuclear Waste Services (NWS) on radioactive waste and geological disposal. These relationships help us strengthen our technical capabilities and deliver more effectively for the UK public.

We also reaffirmed our long-standing cooperation with the French Alternative Energies and Atomic Energy Commission (CEA), agreeing to deepen collaboration on decommissioning and waste management—areas central to our work.

The nuclear industry has marked three significant anniversaries as His Majesty the King met with members of the Nuclear Decommissioning Authority (NDA) group in Caithness Scotland, during his annual visit to the region. The visit recognised the NDA group's progress in its national mission to safely decommission the UK's earliest nuclear sites, and its long-standing contribution to sustainability and economic development in the region and across the UK.

The visit coincided with the NDA group marking several significant milestones including the 20th anniversary of the NDA and 70 years for NRS Dounreay, which has been an enduring presence at the heart of the Caithness community. This year also marks 50 years for Pacific Nuclear Transport Ltd (PNTL). Founded in 1975, PNTL is the world's leading maritime nuclear transporter and part of NDA subsidiary, Nuclear Transport Solutions (NTS). The King also viewed the Pacific Heron, part of the PNTL fleet of ships designed to safely transport nuclear materials around the globe.

Engagement priorities for 2025

As you are aware, the consultation on the NDA draft **Strategy 5** was launched on 7 August and will close 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 this has concluded and we analyse comments the final document will be produced and published in March 2026.

As part of the consultation and engagement process for Strategy 5 there will be an online webinar on Friday 5 September.

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

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

Environment Agency Report Bradwell Local Community Liaison Council September 2025

This report covers our regulation of Nuclear Restoration Services Limited (NRS) at Bradwell Site, over the period from March 2025 to September 2025.

Radioactive substances regulation

We regulate radioactive waste disposals and discharges to the environment. We do this by placing limits and conditions in environmental permits, which helps us to ensure that radioactive waste discharges are minimised, and that the environment is protected. We carry out regular checks of NRS's compliance with our regulatory requirements.

We also regulate and control other activities through our environmental permits, including surface water discharges to surrounding water bodies and emissions to air.

Radioactive substances compliance assessment reports (RASCARs) summarising our inspections, and any non-compliances found, are made available to the public on request.

Permitting

NRS holds a radioactive substances activity permit under the Environmental Permitting Regulations (EPR) at the Bradwell site (EPR/ZP3493SQ). No changes have been made to the permit since the last LCLC meeting.

Compliance activities

Bradwell site is managed by NRS staff based at Sizewell A. We hold monthly meetings with Sizewell A's environmental management team to discuss any updates to projects or emerging issues at the Bradwell site.

We review NRS reports of operational events and incidents that have occurred on site and follow-up on these where appropriate. No significant matters of regulatory concern have been raised.

In this period, we have completed our review of the Care and Maintenance management arrangements in place at the Bradwell site. The objective of the regulatory review was to assess the overall effectiveness of the Care and Maintenance Strategy at the Bradwell site.

In May 2025, we completed a review of the record keeping, planning and optimisation for the final site clearance and the management of on-site contractors.

We were satisfied that the NRS's Record Management System is robust and appears to be well managed. We recommended small changes to further improve the clarity and ease of use of the system.

It was clear that NRS are investing time and energy into planning and optimisation for final site clearance at Bradwell. Information was limited in some areas such as end state strategy, final land status and land re-use strategy. It is expected that more information will be available when NRS have completed the Bradwell site Waste Management Plan (WMP) and Site-Wide Environmental Safety Case (SWESC). These documents are due for submission in December 2025.

This was the final part of our Care and Maintenance management review. In July 2025, we produced a summary report about the suitability of the on-site arrangements. It was concluded that the care and maintenance arrangements in place at the Bradwell site are satisfactory and comply with the relevant conditions of the environmental permit.

The review process did not identify any areas of significant concern, and we did not identify any non-compliances with permit EPR/ZP3493SQ. However, it has highlighted that topics such as groundwater ingress into the Active Waste Vault Complex and the review of the WMP and SWESC will require further regulatory work and will be used to inform future intervention planning. We will ensure that our regulatory approach is proportionate to the associated environmental risk.

Enforcement

We have not identified any permit non-compliances or taken any enforcement action at Bradwell in the period since our last report to the Local Community Liaison Committee in March 2025.

Discharges from site

The site's environmental permit requires NRS to use best available techniques (BAT) to manage its operations and ensure their impacts on the public and wider environment are minimised. Disposal of wastes – as solids, liquid or gases can only be made via permitted routes or by transfer to permitted sites. A report of the liquid and gaseous discharges to the environment, and the results of the environmental monitoring programme must be submitted to us on a periodic basis. We assess these returns to review compliance with requirements of the permit and to review any trends and summarise our findings in a RASCAR.

The discharges from Bradwell site are reported annually, within three months of the end of the calendar year. We received the annual discharge returns for Bradwell site for the 2024 calendar year on time, in February 2025. We are satisfied the levels of reported discharges from site did not cause any regulatory concern and we did not identify any trends of concern.

Liquid radioactive effluent discharges and most gaseous emissions are based on standard reporting values because the dose impact of these emissions is expected to be very low. The standard reporting values are based on historic discharges, measured over an appropriate period. In the case of the reactor buildings, emissions were measured from when defueling was completed in 2006, until 2010. NRS periodically monitor emissions and compare these results with standard reporting values. If the measured result is greater than a standard reporting value plus four standard deviations from the mean, NRS will reassess the standard reporting value used. Emissions from the reactors were most recently monitored in September 2022. No change to standard reporting values was required.

Discharges from mobile extraction units (MEU's), when used during inspection and maintenance work, are monitored when required and reported in total. There were no discharges from MEUs in 2024.

Discharges of active liquid effluent from the site have ceased. Rainwater drains to a single point on site (the Main Drains Pit) and is periodically discharged to the Blackwater Estuary. Activity concentrations measured in the main drains pit from February 2015 until January 2017 were averaged to derive initial standard reporting values for liquid discharges from Bradwell site. Reporting values were re-assessed in early 2020 using data collected in 2019. This assessment resulted in a small increase to the standard reporting values but did not indicate any significant impact on the environment.

Environmental impact

Radioactivity in food and the environment report

Our annual report was published in November 2024 on GOV.UK [Radioactivity in food and the environment (RIFE) report](https://www.gov.uk) - GOV.UK (www.gov.uk)

This report gives a detailed assessment of radioactivity in food and the environment and the public's exposure to radiation during a specific year. It shows that the public's exposure to permitted discharges and direct radiation near nuclear and non-nuclear sites is low and within dose limits.

The report brings together the nationwide monitoring programmes of the UK's food standard agencies and environment agencies. This monitoring is independent of, and is also used as a check on, the monitoring carried out by site operators.

This is now the second year we have published the whole report as a HTML document with associated ODS files. We no longer issue a PDF or print copy. Previous reports are on the National Archives website.

The annual report highlights:

- Overall, between 2022 and 2023 there were no significant changes to the radioactivity measured in food and the environment.
- The dose received by the public near to nuclear licensed sites and industrial and landfill sites in the UK is low and again well within legal limits.
- Food remains safe and the public's exposure to artificial radiation is within legal limits.
- Radioactivity from natural background, rather than nuclear sites, continues to be the more significant source of exposure to communities in all areas of the UK.
- Around 10,000 analyses and dose rate measurements were completed in 2023.
- The data from our monitoring programme in this report demonstrates that radioactivity in food and the environment is safe.

For Bradwell, the total dose for the representative person was less than 0.005mSv in 2023, unchanged from 2022, and less than 1% of the government derived limit to protect members of the public. Levels of radioactivity found in the environment remain low.

Our annual report for 2024 is due to be published in November 2025.

Bradwell site's permit requires NRS to carry out a programme of environmental monitoring to monitor and assess the impact of discharges on the environment. NRS report on the results of this programme annually, within three months of the end of the calendar year. The results of the environmental monitoring programme for the 2024 calendar year were received on 26 February 2025. A review of the returns found that they were consistent with previous years and identified no results or trends of concern.

Other Matters

On 23 May 2025, Bradwell LCLC members submitted a request to the Environment Agency (EA) for a report on the coastal flooding risk and climate change impacts at the Bradwell site. The document 'Actions arising from Bradwell LCLC meeting: Report on Coastal Flooding' was completed jointly by NRS and EA and was submitted to the LCLC for review on 9 July 2025.

Further Information

The Environment Agency's Nuclear Regulation Group (South) (NRG(S)) is responsible for the environmental regulation of radioactive waste disposals on or from nuclear licensed sites in southern England. We also support NRW in this role in Wales. We work closely with local Environment Agency teams as well as external bodies such as the Office for Nuclear Regulation.

The Environment Agency’s Lead Regulators for Bradwell is James Heavingham.

NRG(S) Address	Environment Agency, Nuclear Regulation Group, Red Kite House, Howbery Park, Wallingford, Oxfordshire, OX10 8BD
Email	nrg@environment-agency.gov.uk
Local Office Address	Environment Agency, Iceni House, Cobham Road, Ipswich, Suffolk, IP13 9JD

For regular updates on our work in regulating radioactive substances and nuclear sites visit our Linkedin page:

https://www.linkedin.com/showcase/regulating-radioactive-substances

A public register service is available on the GOV.UK website at:

https://environment.data.gov.uk/public-register/view/index

Alternatively, you can request access to public documents directly by contacting the Customers and Engagement Team in the Wallingford office. Please email:

WTenquiries@environment-agency.gov.uk

Further information on how we regulate different types of nuclear sites, and protect people and the environment is available on the GOV.UK website at:

https://www.gov.uk/guidance/nuclear-sites-environmental-regulation

Our enforcement and sanctions policy is publicly available on the GOV.UK website at:

https://www.gov.uk/government/publications/environment-agency-enforcement-and-sanctions-policy/environment-agency-enforcement-and-sanctions-policy

Our public participation statement on when and how we consult on permit applications is available here:

https://www.gov.uk/government/publications/environmental-permits-when-and-how-we-consult

UK Health Security Agency has placed guidance on ionising radiation dose comparisons on the GOV.UK website at:

https://www.gov.uk/government/publications/ionising-radiation-dose-comparisons

All our open consultations will appear on this webpage

Nuclear consultations - Environment Agency - Citizen Space (environment-agency.gov.uk)

National news items

Public consultation now closed: Regulation of solid radioactive waste disposal facilities - proposed guidance

The Environment Agency, NRW and NIEA consulted on proposals to update the guidance on how we regulate near surface and geological disposal facilities between November 2024 and February 2025. The draft guidance documents explain what an operator must show us to obtain an environmental permit or permits for such a radioactive waste disposal facility. The draft guidance we consulted on consists of:

- Disposal facilities for solid radioactive waste: guidance on the requirements for authorisation (GRA)
- Guidance on staged regulation

The consultation on the draft GRA applied to England, Wales, and Northern Ireland. There is a separate consultation on a version of the GRA for Scotland which closed on12 May 2025.

The consultation on our staged regulation guidance is for England only.

The documents are still available to read.

GOV.UK Regulation of solid radioactive waste disposal facilities: proposed guidance - GOV.UK

Consultation response page Guidance on the requirements for authorisation and staged regulation for the disposal of solid radioactive waste - Environment Agency - Citizen Space

We are now carefully considering all the relevant information we received during consultation, together with existing information. We will publish a summary of relevant responses made during this consultation in the summer of 2025. We aim to publish our new guidance in 2026.

Nuclear new build – early engagement guidance – Published June 2025

We have published new guidance for developers and designers of new nuclear power stations who ask for a ‘tier 3 preliminary design review (PDR). It complements guidance we published in March 2024 which sets out our early engagement process and how applicants can engage with regulators prior to entering generic design assessment or environmental permitting – or the ONR’s site licensing process.

We’ll provide technical advice and guidance on our expectations for new reactor designs, potential acceptability for deployment, and the routes to regulatory approval.

This joint guidance developed by the Environment Agency, ONR and NRW has been published on the joint GDA webpages on ONR’s website.

Last Energy Preliminary Design Review report – Published 29 July 2025

Last Energy is proposing to build four microreactors at its Llynfi site in south Wales and has been working with the UK's nuclear regulators through our new innovative review process for reactor designers.

The company entered the regulators' early engagement process in May 2024, taking part in three technical workshops with teams from the Environment Agency, Office for Nuclear Regulation and Natural Resources Wales. It then began the Preliminary Design Review (PDR) part of this new process in February 2025.

During the PDR we focussed on three submissions relating to Last Energy's PWR-20 nuclear reactor design and its UK organisational plans: "organisational plans and arrangements", "environmental protection and decommissioning", and "safety analysis processes and maturity".

Last Energy has now become the first company to complete the Preliminary Design Review (PDR).

Tim Fediw, the EA's New Nuclear Sites team leader said: 'The Early Engagement process allows regulators to provide targeted advice on specific aspects of reactor designs at an early stage. Our recent Preliminary Design Review has given Last Energy the opportunity to improve their design, based on feedback we've provided. They are considering the comments we have raised, which will help them develop their design and prepare them for making environmental permit applications in the future.'

The PDR summary concludes that "Last Energy has built confidence in the regulators that it understands regulatory expectations in those three areas and is planning to address them as its design, safety, and environmental cases progress". The summary also notes that PDR is "not a substitute for generic or site-specific design assessment, nuclear site licencing, or environmental permitting processes. Further regulatory assessment of the design, safety, security, and environmental cases by ONR and the environmental regulators will therefore be required."

Next steps: The Environment Agency and NRW's nuclear regulators will be available to continue to advise Last Energy as it develops its design and proposals further. Last Energy has informed the regulators that, at this time, it does not intend to complete a Generic Design Assessment (GDA) but will instead apply directly for nuclear site licensing and environmental permitting for the Llynfi site in south Wales.

Read the report: The joint regulators' executive summary report is published on the ONR's website: Last Energy PDR Summary Report | Office for Nuclear Regulation

About Last Energy: Last Energy | 20 MWe SMR | Fully modular, factory made

Nuclear Regulatory Taskforce

In February 2025 Government announced its plans for nuclear energy, including setting up a review of nuclear regulation.

The Nuclear Regulatory Taskforce is reporting directly to the Prime Minister and is led by John Fingleton. Read about its role and Terms of Reference.

We welcome the Nuclear Regulatory Taskforce's work and this opportunity to help improve regulation in the nuclear industry and to contribute to the government's growth mission through supporting sustainable development.

We are working with the taskforce to help identify and implement improvements that could improve the effectiveness and efficiency of our arrangements and processes.

We submitted a response to the call for evidence. Highlights include:

Emphasising the strong working relationship with other regulators, particularly the ONR, but also committing to further collaboration on nuclear site regulation.

Noting the work already happening in response to other Government Reviews (including Corry), where our implementation of their recommendations will have benefits for nuclear regulation.

Noting the benefits of our non-prescriptive regulatory regime, and how this enables innovation by the sector. Also promoting our joint working with ONR on regulating innovative techniques such as AI, etc.

Emphasizing the need to maintain focus on the backend of the fuel cycle and to ensure a resilient waste infrastructure.

In August the taskforce published its interim report.

We acknowledge publication of the Nuclear Regulatory Taskforce's interim report and its preliminary findings and recommendations and welcome the Taskforce's recognition of our role as an expert and independent regulator.

We note that some of the regulatory challenges identified in the interim report are like those identified in other recent Government reviews (such as by Dan Corry) and ongoing work to address these should also benefit the nuclear sector.

We look forward to further engagement with the taskforce and providing further input as necessary to help inform the final report conclusions and recommendations.

ref: AW-LCLC0425
Date: 10/04/2025

Bradwell Site LCLC Flooding Question

During the LCLC meeting held on 26th March 2025 concerns were raised regarding the condition of the coastal defences around the Bradwell Site and the meeting was given the opportunity to pose follow up questions.

The following question was emailed by Mr Ian Clarke after the meeting to the Secretariat and was forwarded by the EA Site Inspector:

In respect of the issue that I raised of risk from tidal surges to the sea defences protecting the site I would i

In reply have appreciated assurance that the site has a contingency plan in respect of mitigating the risk to the site

should the sea defences be over-topped and fail? . I ask if you can confirm this as I was not reassured by the reply.

I accept that this is unlikely but with climate change etc and 1953 event or worse is likely to occur more often.

Response

The Bradwell Site is situated at an elevation of 5.5m above Ordnance Datum and currently has a 4.8 – 5m high sea wall and a gully to provide protection from high sea levels and surges.

The various Care and Maintenance Safety Case submissions for the Bradwel site all consider the possibility of Coastal Flooding as an External Hazard.

Based on the predicted flood level rises due to climate change, the safety case estimates that the site level is above the worst case predicted 1 in 100 per annum return frequency flood level from when it entered its Care & Maintenance (C&M) period in 2018 up to circa 2090. However, the safety case does also predict that the general site area could flood during a 1 in 1000 per annum return frequency event towards the latter part of the C&M period.

Modifications made to the site during the C&M preparations took every opportunity to minimise the likelihood of flooding within the various facilities e.g. door thresholds on the cladding system are higher than the 1 in 1000 per annum flood levels and the Interim Storage Facility floor (ISF) (see Fig 2) is raised relative to the general site level on a sloping apron.

Each Reactor Safestore and the Ponds and Vaults complex had a 0.7m high trough (see Fig 1) drainage system installed during C&M preparations around the entire perimeter of the facilities. This in conjunction with sealing all underground tunnels and penetrations provides additional resilience against flooding for the structures with radiological inventory.

Bradwell's current safety case is valid until November 2030. Company processes require us to periodical review and revise the site safety case to match the standards, guidance, and available technology levels at the time of writing, this includes taking account of the latest global climate change information and predictions.

Consequently, circa 2028-2029 the safety case department will begin developing the revised safety case for Bradwell which will use the most up to date climate predictions and this will determine if any improvements to mitigate the flooding risk are required.

The site documentation includes contingency arrangements to manage site events, including adverse weather, should they arise e.g. Incident Management Arrangements and Incident Management Handbook. These are supported with specific Plant Item Operating Instructions to undertake recovery tasks. NRS has an event recovery process which has the scope to pull-in expertise and resources from across the business should the Site Team need additional assistance.

Figure 1, 0.7m Trough

Figure 2, Ramp to the raised ISF floor

Actions arising from Bradwell LCLC meeting: Report on Coastal Flooding

Introduction

On 23 May 2025, Bradwell LCLC members submitted a request to the Environment Agency (EA) for a report on the coastal flooding risk and climate change impacts at the Bradwell site. The purpose of this report is to provide the requested information to the Bradwell LCLC members.

Method

Bradwell LCLC members provided a list of questions covering the following topics:

1. Maintenance of sea defences
2. Assessment of future coastal conditions
3. Assessment of risk
4. Adaptation to coastal conditions
5. Implications of climate change

After reviewing the questions, it was concluded that it would be appropriate for Nuclear Restoration Services Ltd (NRS), as the site operator to address the topics related to site risk and the EA would provide information related coastal defences and coastal conditions.

Therefore, the EA has provided responses to questions concerning topics 1 and 2. NRS have provided responses to questions regarding topics 4 and 5 and both organisations have provided responses for topic 3.

NRS provided responses to the EA on 3 June 2025. These can be viewed below and the original document provided by NRS is in appendix 1.

The Bradwell LCLC members had previously submitted questions relating to site flooding after the meeting of 26 March 2025. NRS provided a response to those questions on 10 April 2025, which for completeness, is reproduced in appendix 2.

EA response to Bradwell LCLC

1. Maintenance of sea defences

1.1. *The next survey would be undertaken on 24 May 2025 following which an improvement and repair plan would be put together. Will this be presented at the September meeting?*

The most recent inspection was completed in early June. Any significant defects will be noted, and a bid will be placed for repairs where this is deemed necessary. If these bids are accepted, they will be included as part of the published maintenance programme for future years. Details of asset condition is only shared with the relevant landowner.

1.2. *The EA is responsible for improvements but is not owner of the defences. Does the owner contribute to repair and maintenance?*

The EA is not responsible for improvements; we only maintain the defences under our permissive powers. Ultimate liability for maintenance lies with the landowner. Where significant investment is required, we would seek partnership funding contributions from beneficiaries such as the landowner.

1.3. *Has the EA got adequate resources to make a timely and effective maintenance plan?*

Our resources are limited, and even if defects are identified, and bids are placed for their rectification, it is not guaranteed that funding will be made available for their rectification. All bids for both routine and intermittent maintenance are considered at a national level, and prioritised based on the level of flood risk to nearby people and property. As the former power station site is higher than the defences and is not presently identified as a tidal flood risk. The presence of the Bradwell site does not influence the level of funding received for the Bradwell area.

1.4. *Apart from the LCLC who does the EA report to when there is any significant finding on the adequacy of sea defences?*

The EAs findings on the adequacy of sea defences and all flood defences are reported to the Department for Environment, Food and Rural Affairs (DEFRA).

2. Assessment of future costal conditions

2.1. *How often and how far ahead are assessments made and updated?*

We review our tidal and coastal flood models approximately every 10 years. The Colne and Blackwater estuaries model was last updated in 2018 and uses the UK

Climate Projections 2009 (UKCP09) data. The next review will use the updated UK Climate Projections 2018 (UKCP18) data.

2.2. Are assessments made up to the point of provisional site clearance at the end of the century and are assessment made for the period beyond 2100?

Yes, the current model includes assessments up to 2115.

2.3. How detailed is the modelling and forecasting of Climate Change impacts including coastal processes, sea level rise and storm surges for the Blackwater region? Are these data available for information?

Coastal processes (specifically erosion) are modelled and reviewed as part of our National Coastal Erosion Risk Mapping work and can be accessed through the Shoreline Management Plan (SMP) explorer tool Home | Shoreline Management Plans (click Explore Coastal Erosion Risk at the top of the page). Our tidal and coastal flood models use the UKCP Climate Change data sets. At present the Colne and Blackwater estuaries model uses UKCP09 Climate Change Data. The outputs of the model can be requested from the Environment Agency as a product 6 data package. The process for obtaining this information product is explained here: Flood risk assessments: applying for planning permission - GOV.UK

3. Assessment of Risk

3.1. What is the assessment of risk of overtopping and degradation or destruction of earthen defences in conditions of high sea levels and tidal surge?

There is no standard assessment. The risks are considered by a subjective assessment. This includes a consideration of:

- The level of exposure
- The direction that the assets face
- The height and standard of protection of the asset
- The mass and size of the asset
- The angle of the slope
- The vegetation type and cover
- The duration of any overtopping
- The condition and the presence of erosion protection to the front and rear faces.

Derived from operational experience, a clay embankment with slopes of approximately 1 in 2.5 or shallower with fair grass cover will stand up well to limited, occasional overtopping.

3.2. *In event of flooding of the site how far is security compromised by impact on sea defences?*

The Bradwell site is outside of the tidal flood zone, therefore the impacts of tidal flooding around the site are a matter to be addressed by the site operator.

NRS response to Bradwell LCLC

3. Assessment of Risk

3.2. *In event of flooding of the site how far is security compromised by impact on sea defences?*

Physical security is provided by a robust external fence. For this to be challenged the sea defences would need to be breached and the gully flooded to a height above the fence for a small boat or raft to potentially navigate above it. The site would still have the ability to monitor for such an incursion and take appropriate action.

4. Adaption to coastal conditions

4.1. What measures of adaptive management will be considered will be in response to changing coastal conditions?

Bradwell's current safety case is valid until November 2030. Company processes require us to periodical review and revise the site safety case to match the standards, guidance, and available technology levels at the time of writing, this includes taking account of the latest global climate change information and predictions. Consequently, circa 2028-2029 the safety case department will begin developing the revised safety case for Bradwell which will use the most up to date climate predictions and this will determine if any improvements to mitigate the flooding risk are required. NRS will continue to undertake routine reviews until Final Site Clearance (FSC). However, if evidence or data of a significant unforeseen change came to light e.g. a new climate prediction highlights a vastly different trend or forecast, the site can always trigger a targeted review early to address the issue and mitigate accordingly.

4.2. What plans and possibilities are there for removal of radioactive materials from the site?

The Intermediate Level Waste (ILW) packages in the Interim Storage Facility (ISF) will be removed from site when the Geological Disposal Facility (GDF) is available to receive waste. Latest forecasts indicate that this could be in the 2050's – see https://www.gov.uk/government/publications/finding-a-suitable-site-for-a-geological-disposal-facility/what-is-the-timescale-for-the-gdf-programme

4.3. In particular what plans are there for removing materials, especially graphite from the reactor cores?

Trawsfynydd is now the lead and learn site for Reactor Dismantling within NRS Rolling Programme of Decommissioning. Lessons will be applied to Bradwell and other sites. The strategy for graphite is to retrieve the waste and place in baskets for encapsulation into ILW boxes. See https://ukinventory.nda.gov.uk/wp-content/uploads/2023/01/9B312.pdf

4.4. What are current plans and timescales for graphite management?

Current plans forecast the graphite retrieved from the late 2080's. NRS is also considering innovative methods for the treatment of and disposal of graphite.

4.5. What is the current estimated timescale for site clearance and remediation?

The current strategy is for the Bradwell reactors to be dismantled, and the site cleared from the 2070's to the 2090's. The site is logic linked to Dungeness A and then Sizewell A from a priority and funding perspective. The timescales are subject to change pending funding availability for undertaking the work.

5. Implications of climate change

5.1. How far does future site maintenance take into account potential extreme conditions arising from Climate Change in future?

At time of Bradwell entering Care and Maintenance the safety case used available climate predictions up to circa 2090. The latest climate predictions will used when the safety case is periodically reviewed. The site infrastructure is regularly inspected as part of our processes and licence condition requirements.

5.2. In particular is account taken of possible accelerating sea level rise, storm surges and coastal processes that could increase in intensity and frequency as the century progresses?

Bradwell's current safety case is valid until November 2030. Company processes require NRS to periodical review and revise the site safety case to match the standards, guidance, and available technology levels at the time of writing, this includes taking account of the latest global climate change information and predictions. Consequently, circa 2028-2029 the safety case department will begin developing the revised safety case for Bradwell which will use the most up to date climate predictions and this will determine if any improvements to mitigate the flooding risk are required. NRS will continue to undertake routine reviews until Final Site Clearance (FSC). However, if evidence or data of a significant unforeseen change came to light e.g. a new climate prediction highlights a vastly different trend or forecast the site can always trigger a targeted review early to address the issue and mitigate accordingly.

5.3. *Is there any consideration of risks arising that could impact the site beyond 2100?*

Any risks associated with extending timescales will be factored into safety case justifications, asset management strategies and funding prioritisation.

Appendix 1 – NRS response (reference AW-LCLC0525 date 3 June 2025)

NRS
Nuclear Restoration Services

ref: AW-LCLC0525
Date: 03/06/2025

Action arising from LCLC meeting Minute 3369

Request for a Report from the Environment Agency on Coastal Flooding – Questions raised by [redacted] on 23rd May 2025 and forwarded to NRS via James Heavingham (Environment Agency Site Inspector).

NRS Questions (highlighted in yellow) and Responses (highlighted in green)

The Report should cover the following issues and questions:

Maintenance of sea defences.

- The next survey would be undertaken on 24 May 2025 following which an improvement and repair plan would be put together.
- Will this be presented at the September meeting?
- The EA is responsible for improvements but is not owner of the defences. Does the owner contribute to repair and maintenance?
- Has the EA got adequate resources to make a timely and effective maintenance plan?
- Apart from the LCLC who does the EA report to when there is any significant finding on the adequacy of sea defences?

Assessment of Future coastal conditions

- How often and how far ahead are assessments made and updated?
- Are assessments made up to the point of provisional site clearance at the end of the century?
- Are assessments made for the period beyond 2100?
- How detailed is the modelling and forecasting of Climate Change impacts including coastal processes, sea level rise and storm surges for the Blackwater region? Are these data available for information?

Assessment of Risk

- What is the assessment of risk of overtopping and degradation or destruction of earthen defences in conditions of high sea levels and tidal surge?
- In event of flooding of the site how far is security compromised by impact on sea defences? *Physical security is provided by a robust external fence. For this to be challenged the sea defences would need to be breached and the gully flooded to a height above the fence for a small boat or raft to potentially navigate above it. The site would still have the ability to monitor for such an incursion and take appropriate action.*

Adaptation to coastal conditions

- What measures of adaptive management will be considered will be in response to changing coastal conditions? *Bradwell's current safety case is valid until November 2030. Company processes require* *us to periodical review and revise the site safety case to match the standards, guidance, and available technology levels at the time of writing, this includes taking account of the latest global climate change information and predictions. Consequently, circa 2028-2029 the safety case department will begin developing the revised safety case for Bradwell which will use the most up to date climate predictions and this will determine if any improvements to mitigate the flooding risk are required. NRS will continue to undertake routine reviews until Final Site Clearance (FSC). However, if evidence or data of a significant unforeseen change came to light e.g. a new climate prediction highlights a vastly different trend or forecast, the site can always trigger a targeted review early to address the issue and mitigate accordingly.*

- What plans and possibilities are there for removal of radioactive materials from the site? *The Intermediate Level Waste (ILW) packages in the Interim Storage Facility (ISF) will be removed from site when the Geological Disposal Facility (GDF) is available to receive waste. Latest forecasts indicate that this could be in the 2050's – see https://www.gov.uk/government/publications/finding-a-suitable-site-for-a-geological-disposal-facility/what-is-the-timescale-for-the-gdf-programme*

- In particular what plans are there for removing materials, especially graphite from the reactor cores? *Trawsfynydd is now the lead and learn site for Reactor Dismantling within NRS Rolling Programme of Decommissioning. Lessons will be applied to Bradwell and other sites. The strategy for graphite is to retrieve the waste and place in baskets for encapsulation into ILW boxes. See https://ukinventory.nda.gov.uk/wp-content/uploads/2023/01/9B312.pdf*

- What are current plans and timescales for graphite management? *Current plans forecast the graphite retrieved from the late 2080's. NRS is also considering innovative methods for the treatment of and disposal of graphite.*

- What is the current estimated timescale for site clearance and remediation? *The current strategy is for the Bradwell reactors to be dismantled, and the site cleared from the 2070's to the 2090's. The site is logic linked to Dungeness A and then Sizewell A from a priority and funding perspective. The timescales are subject to change pending funding availability for undertaking the work.*

Implications of Climate Change

- How far does future site maintenance take into account potential extreme conditions arising from Climate Change in future? *At time of Bradwell entering Care and Maintenance the safety case used available climate predictions up to circa 2090. The latest climate predictions will used when the safety case is periodically reviewed. The site infrastructure is regularly inspected as part of our processes and licence condition requirements.*

- In particular is account taken of possible accelerating sea level rise, storm surges and coastal processes that could increase in intensity and frequency as the century progresses? *Bradwell's current safety case is valid until November 2030. Company processes require us to periodical review and revise the site safety case to match the standards, guidance, and available technology levels at the time of writing, this includes taking account of the latest global climate change information and predictions. Consequently, circa 2028-2029 the safety case department will begin developing the revised safety case for Bradwell which will use the most up to date climate predictions and this will determine if any improvements to mitigate the flooding risk are required. NRS will continue to undertake routine reviews until Final Site Clearance (FSC). However, if evidence or data of a significant unforeseen change came to light e.g. a new climate prediction highlights a vastly different trend or forecast the site can always trigger a targeted review early to address the issue and mitigate accordingly.*

- Is there any consideration of risks arising that could impact the site beyond 2100? *Any risks associated with extending timescales will be factored into safety case justifications, asset management strategies and funding prioritisation.*

Appendix 2 – NRS response to initial questions (reference AW-LCLC0425 date 10 April 2025)

NRS
Nuclear Restoration Services

ref: AW-LCLC0425
Date: 10/04/2025

Bradwell Site LCLC Flooding Question

During the LCLC meeting held on 26th March 2025 concerns were raised regarding the condition of the coastal defences around the Bradwell Site and the meeting was given the opportunity to pose follow up questions.

The following question was emailed by [redacted] after the meeting to the Secretariat and was forwarded by the EA Site Inspector:

In respect of the issue that I raised of risk from tidal surges to the sea defences protecting the site I would i

In reply have appreciated assurance that the site has a contingency plan in respect of mitigating the risk to the site

should the sea defences be over-topped and fail? . I ask if you can confirm this as I was not reassured by the reply.

I accept that this is unlikely but with climate change etc and 1953 event or worse is likely to occur more often.

Response

The Bradwell Site is situated at an elevation of 5.5m above Ordnance Datum and currently has a 4.8 – 5m high sea wall and a gully to provide protection from high sea levels and surges.

The various Care and Maintenance Safety Case submissions for the Bradwel site all consider the possibility of Coastal Flooding as an External Hazard.

Based on the predicted flood level rises due to climate change, the safety case estimates that the site level is above the worst case predicted 1 in 100 per annum return frequency flood level from when it entered its Care & Maintenance (C&M) period in 2018 up to circa 2090. However, the safety case does also predict that the general site area could flood during a 1 in 1000 per annum return frequency event towards the latter part of the C&M period.

Modifications made to the site during the C&M preparations took every opportunity to minimise the likelihood of flooding within the various facilities e.g. door thresholds on the cladding system are higher than the 1 in 1000 per annum flood levels and the Interim Storage Facility floor (ISF) (see Fig 2) is raised relative to the general site level on a sloping apron.

Each Reactor Safestore and the Ponds and Vaults complex had a 0.7m high trough (see Fig 1) drainage system installed during C&M preparations around the entire perimeter of the facilities. This in conjunction with sealing all underground tunnels and penetrations provides additional resilience against flooding for the structures with radiological inventory.

Bradwell's current safety case is valid until November 2030. Company processes require us to periodical review and revise the site safety case to match the standards, guidance, and available technology levels at the time of writing, this includes taking account of the latest global climate change information and predictions.

Consequently, circa 2028-2029 the safety case department will begin developing the revised safety case for Bradwell which will use the most up to date climate predictions and this will determine if any improvements to mitigate the flooding risk are required.

The site documentation includes contingency arrangements to manage site events, including adverse weather, should they arise e.g. Incident Management Arrangements and Incident Management Handbook. These are supported with specific Plant Item Operating Instructions to undertake recovery tasks. NRS has an event recovery process which has the scope to pull-in expertise and resources from across the business should the Site Team need additional assistance.

Figure 1, 0.7m Trough

Figure 2, Ramp to the raised ISF floor

CONSTITUTION FOR THE BRADWELL
LOCAL COMMUNITY LIAISON COUNCIL (LCLC)

ISSUE 6

The Bradwell LCLC is an independent, local community-based body that is funded by the Nuclear Decommissioning Authority (NDA). The LCLC is not a decision making body on matters regarding the site. It operates under the principles of openness and transparency, with the aim of being accessible to its communities. It is primarily site-focused, but takes account of wider policy issues and developments.

The overarching purpose of the LCLC is to:
Inform the public of activities on site and of the site operator.
Act as a conduit for two-way information provision and flow.
Act as a 'clearing house' for community concerns by providing independent interpretation of information in ways that carry the confidence and trust of the community.

The specific role and purpose of the LCLC is to:

- Act as a proactive, two-way channel of communication, gathering and disseminating views, between the site operator, the NDA, and the local community.
- Provide an opportunity for questioning the site operator.
- Provide an opportunity for questioning the regulators of the site.
- Receive reports from the site operator and other bodies.
- Receive and comment on emergency plans & arrangements.
- Scrutinise environmental plans & arrangements of the site operator.
- Receive reports from the NDA on the future of the site.
- Provide independent views and advice to the NDA and to regional and local planning authorities on the future of the site.
- Provide independent views and advice to the NDA on contracts with the site operator.
- Provide independent views and advice to the NDA on the performance of the site. operator against those contracts.

VOTING MEMBERS

Elected representatives of the community.
For example:

- o Representatives of: Parish, Town, Borough or District Councils, Unitary or CountyCouncils and MPs.
- o Representatives of Residents' Associations, Farming Representatives, Community, and Environmental Groups etc.

NON-VOTING MEMBERS

- o representatives of stakeholder bodies, for example: Emergency Services, Regulators, Food Standards Agency, appropriate Health Bodies, Local Businesses, etc.
- o representatives of the NDA, the Operator and site union representatives.

THE PUBLIC & PRESS

Members of the public and the press may attend the LCLC meetings, and contribute to the discussions where appropriate.

REVIEW

- Membership should be kept under review to ensure the correct balance of:
  - o numbers.
  - o new blood/experience.
  - o mix of representation.
  - o the changing needs of the site through the life-cycle.

- the need to be forward-looking to upcoming requirements.
- the need to co-opt specialists from time-to-time.

- Members should be accountable for 2-way communication to their constituency, in whatever capacity they are present.

- Members, with assistance from fellow members, should be accountable for the development of their capability to discharge their duties, and so should identify and express their needs.

The LCLC will achieve this purpose through the following structure and arrangements:

CHAIR AND VICE CHAIR

- To be appointed by the voting members of the LCLC.
- Are to be independent of the Site Operator and the NDA (i.e., not employed by either).
- Be of a calibre and background which inspires local trust and confidence.
- The term of office should be up to five years but be eligible for re-election for another term.
- The Vice Chair will act in the event of the absence of the Chair.

The Chair is accountable for:

- delivering the entirety of the Constitution (roles and mechanisms).
- Respecting the boundaries of the LCLC business.
- two-way access to all opinion within the community.
- ensuring a balance of views in the Council and its Sub-Committees.
- ensuring that the agenda meets forward-looking needs.
- developing the capability of the Membership.
- playing a full role in relevant conferences (addressing cross-SSG and National issues).
- upholding the LCLC Constitution, and ensuring that it is reviewed on a regular basis and revised if necessary.

DECISION-MAKING

Any matters requiring resolution should be decided by the Voting Members by simple majority. In the event of a tie, the Chair will have a casting vote.

LOCATION

- Meeting venues should be selected to suit local community needs.

TIMING

- The Chair should keep the timing of all meetings under consideration to meet the various needs of the members and of observers.
- The Chair should determine the duration of meeting.

FREQUENCY

- The Chair should be mindful of the needs of the community, the operator and the NDA.
- As Bradwell is no longer generating, two meetings per year will be adequate (including the AGM).
- Sub-group meetings and Extraordinary General Meetings will be convened as deemed necessary by the LCLC Executive.

- Pre-determined dates are preferable for accessibility, but flexibility is needed in order to respond to requests and events. Arrangements should be in place to allow the Council to convene at relatively short notice and outside the programmed meetings in order to respond promptly to specific issues.
- Virtual meetings will be allowed as circumstances dictate.

CONTENT

The content of meetings should be set to ensure that all the duties included in the Constitution are dealt with adequately and in the light of local site and community needs. The meetings should be about looking forward, just as much as reviewing past performance.

PROCESS

- The LCLC should consider operating by more than just a formal committee meeting. Options might include forming sub-groups, both permanent and temporary, to concentrate on specific areas of work or to deal with topical issues. The LCLC should consider holding workshops and discussions in order to develop understanding and to formulate opinions. The LCLC should undertake regular site and other visits, training and awareness sessions from experts, and should acquire expertise from other sites. It should conduct, when appropriate, its own surveys and information gathering exercises.

- The LCLC should adopt the following Rules of Conduct for all its dealings:
    a. Respect each person.
    b. Share responsibility.
    c. Challenge only ideas, **not** people.
    d. Keep an open mind.
    e. Question and participate.
    f. Listen constructively.
    g. Be punctual attending meetings.
    h. The public may speak providing the topic is relevant to the agenda item in question.

Recording is not allowed. The media or the public may only bring recording equipment into any meeting or sub-group of the LCLC with the permission of the Chair.

STRUCTURE

The Chair should consider flexible, innovative ways of working. Sub-committees or working groups should be used to work on the detail of issues as required.

Co-opting non-voting temporary members as appropriate may help get work completed efficiently.

SECRETARIAT

The operator will provide a supporting Secretariat (using NDA funds)
The Secretariat should be accountable for:

- Maintaining an understanding of local needs and liaising with the Chair to develop the agenda for each meeting.
- Producing and circulating papers in suitable styles and language for Members.
- Publishing LCLC reports, minutes, members' list etc. as agreed with the Chair.
- Circulating copies of regulatory and other appropriate reports to the LCLC membership.
- Administering the payment of the Chair and Vice Chair, payment of agreed expenses for members on LCLC business, and booking travel tickets and accommodation for members on LCLC business.

- Circulating reports from the Emergency Planning Consultative Committee (EPCC).
- Implementing a system for ease of identifying voting members at LCLC meetings.
- Clearly identifying voting and non-voting members on any published material such as minutes.

ACCESSIBILITY

- The LCLC should consider the use of multiple mechanisms for making information available locally.

For example:

- local newspapers.
- press releases.
- newsletters, including an LCLC Newsletter.
- websites, with comprehensive use of links.
- local radio.
- Parish and other local magazines.
- advertising the time and place of next LCLC meeting.
- publishing promptly minutes of meetings and relevant reports.
- Social Media.
- The LCLC should consider developing a wide range of mechanisms for gathering information locally.
- The Bradwell LCLC Executive (Chair, Vice Chair and Secretariat) can act as official spokespersons as and when required.

CAPABILITY

There should be a simple, local induction process for new members that include, at minimum:
an induction pack, a site visit, at least one meeting with the principal members of the LCLC at which current and forthcoming issues are explained, and a review of the LCLC Constitution.

- To fulfil their accountability, members need to be developed in their understanding of all the issues that come before them. A programme should be developed locally to meet members' needs.

- All bodies providing information to the LCLC are accountable for ensuring that the membership understands their communications, by using suitable language, by introducing suitable experts as appropriate and by helping raise the capability of members. There must be recognition by all parties that members of the LCLC need may need time and help to understand technical concepts.
- All bodies dealing with the LCLC need to appreciate that members are part-time and should keep their demands on time to an appropriate level.

COST REIMBURSEMENT

The NDA will be prepared to consider the payment of an emolument to holders of the posts of Chair and Vice Chair on request, in accordance with published guidelines.

APPENDICES.
Appendices 1,2 & 3 of the NDA Guidance for SSGs May 2025.

Nuclear Decommissioning Authority (NDA) Guidance for Site Stakeholder Groups (SSGs) – May 2025

1. Introduction

1.1 Our strategic objective is to build a better understanding of our mission among the public and our stakeholders and maintain their support, confidence and trust. Effective engagement with our broad range of stakeholders is central to achieving this objective.

1.2 The NDA Group recognises it cannot deliver its mission successfully without a social licence to operate from the communities in which it serves. This draft revision of the NDA's Guidance for Site Stakeholder Groups (SSGs) has been informed by independent third-party evaluation, feedback from a range of stakeholders and, crucially, consultation with the SSG community. It aims to build on the SSGs' success since the NDA was set up in 2005. Further consultation with the SSGs will follow before the final revised guidance document is adopted.

1.3 This Guidance defines the remit and roles of the independent Site Stakeholder Groups (SSGs) and describes what the Nuclear Decommissioning Authority (NDA) expects from the SSGs and what support the SSGs can expect in return. It also provides the basis of a generic constitution that SSGs are expected to adopt, or adapt, to inform their own Membership. The Guidance provides definitive clarity and consensus on the aims and operation of the SSG.

1.4 Within the context of the SSGs, independence is defined as being outside the formal organisational functions of the NDA Group and operating companies. As such, Chairs and Vice Chairs as Office Holders of their own SSGs are expected to be independent of employment to work in these organisations and to declare any conflicts of interest resulting either from previous employment in the sector or from other links, including financial, to the nuclear industry. As such the SSGs receive public funding via the NDA and required to adhere to these agreed Guidelines.

1.5 The NDA recognises that each site is uniquely situated, has its own priorities and varied stakeholder interests. For example, Sellafield and Dounreay are Category 1 sites, with different security and safeguarding requirements from other sites in the NDA Group. The size and complexity of these sites results in complex and multi-faceted work programmes. There is, therefore, a need for some flexibility in the detailed arrangements that apply at each site. However, there is also a strong degree of commonality between the SSGs in terms of their scrutiny function. Through continued dialogue between the independent groups, the NDA, and our sponsoring department DESNZ, agreement to adhere to certain minimum standards in composition, conduct and operation is expected by all parties.

1.6 The SSGs organise a National SSG Chairs' Forum, with a Chair and Vice Chair elected every five years by the Chairs. Whilst this forum does not occupy a formal role in the accountability framework for the SSGs, and can help facilitate the sharing of best practice, the NDA recognises it has a useful function of allowing the Chairs to discuss matters of concerns and should relay these to the NDA along with written feedback and any agreed proposals or action points.

2. Purpose of the SSG

2.1 Before the NDA was set up in 2005, Local Community Liaison Committees (LCLCs) were the principal conduits for dialogue between the site operating companies and local communities. LCLCs were chaired by the Site Director, who set the meeting agenda and agreed who could attend the meetings.

2.2 The NDA facilitated the establishment of the SSGs to ensure more open and transparent dialogue with local communities and greater accountability of the NDA. A commitment to open and transparent engagement with stakeholders is included in the Energy Act 2004.

2.3 The SSG is a standing forum for communications between the NDA, NDA group operating company and the local community. It has the overarching aim of ensuring that the NDA Group's interactions with local communities are conducted openly and transparently and that decisions taken by the NDA are informed by the local community's views.

2.4 All SSGs are financed and resourced by the NDA Group, with Secretariat provided by the relevant Operating Company. Each SSG has a Chair and Vice Chair who receive remuneration in recognition of the additional time and work they undertake to ensure the views of their communities are represented, and that meetings are conducted in line with NDA expectations as detailed in these guidelines.

2.5 The NDA is committed to underpinning the right and ability of an SSG to scrutinise and hold the NDA Group to account on behalf of its community – but in return the NDA expects accountability for ensuring meetings are conducted in line with best practice and with the appropriate use of public funds.

2.6 The NDA also supports the view of the SSG Forum, that the meetings are fundamentally "open to all, and all are welcome." It is in the interests of the operators, the regulators, and not least the host community itself to aim for an inclusive approach to scrutinising the work of the nuclear industry and its regulators.

2.7 The primary objectives of each SSG are:

	Objective	Examples of how this could be delivered
1	Scrutiny - To provide an opportunity for questioning the operators, NDA, operating company, regulators and the supply chain on behalf of the community.	Information circulated by NDA, operating company or regulators on local or national issues. Presentations, briefing papers and structured questioning time.
2	To receive and comment on progress reports and forward plans for the sites.	Receive updates on site progress. Request updates on issues of interest.

3	To represent the views of the local community through the provision of timely advice to NDA, operators and regulators.	Represent local views at local and national level: e.g. National Stakeholder Summits, SSG Chairs' Forum, as well as SSG meetings and other ad hoc meetings. Raising issues of local concern. Responding to NDA consultations. Input on site socio-economic fund applications.
4	To act as a two-way conduit for information between the Members and the operating company, NDA and the regulators.	Representatives are expected to give feedback from SSG meetings to members of their organisations in a timely and impartial manner; circulate the minutes of SSG meetings and other relevant paperwork to the organisations they represent; and represent the views of their organisations at SSG meetings, including asking relevant questions on their behalf.
5	Respond to NDA consultations (and other relevant consultations as required) in a timely manner.	Circulating the consultation and relevant supporting information to SSG members in good time to allow proper consideration of the issues at hand. Receiving presentations and/or briefings from NDA staff as required. Ensuring the SSG responds in a timely manner to consultations, reflecting the full balance of views expressed by the membership rather than trying to seek a consensus.

2.8 SSGs are not executive decision-making bodies. The objectives above do not interfere with the accountability of relevant decision-making bodies on the sites or of statutory organisations such as the regulators and local authorities.

2.9 Submissions to NDA group consultations (Objective 5) are an important part of the NDA's remit. Submissions do not have to provide a consensual view of all SSG members but should aim to highlight where agreements and disagreements exist on the SSG and why they exist. The NDA and the SSG Secretariat will provide advance notice of major consultations to the SSGs: e.g. NDA Strategy and Business Plan consultations.

2.10 As representatives of their local communities, the NDA recognises that SSGs will be approached by organisations that wish to use SSG agenda time for matters that fall outside the NDA's core remit (nuclear new build, including fusion and SMR projects, and any of the organisations that occupy the Harwell Campus, for example). In some instances, nuclear new build may directly impinge upon activity at an NDA or adjacent site: for example, where NDA land is directly involved or if the pace of decommissioning activity is affected by new build development. While the NDA accepts that SSG meetings should make appropriate time for discussion of these matters, it is expected that discussion on new build programmes will be conducted through other forums, if available, set up by the developer and that such issues should not dominate meeting agendas or prejudice the discussion of core SSG business. Where the NDA Group wholly funds an SSG via the Secretariat, it expects discussion to focus on activity at NDA sites. While other issues may be of interest to the SSG, the NDA expects discussion at SSG meetings on such issues to be limited to brief updates and not take up significant agenda time.

2.11 However, the NDA recognizes that the SSG may sometimes touch on wider issues. It respects that SSGs have an independence of action and membership, and that issues affecting NDA land may impact local communities. Equally, the NDA cannot use taxpayers' money to step outside its vires. In all cases, common sense should prevail, but the SSG should not be used as the primary vehicle for community engagement by any organisation other than the NDA or the relevant operating company. A similar principle should be applied to invitations that SSG members may receive to attend conferences and other events – if the subject matter falls within the NDA's core remit and attendance would help the SSG to deliver the purpose and objectives in Section 2 of this guidance, then there is a reasonable expectation that any costs involved will be covered by the SSG Secretariat. If it does not, then funding support to cover attendance at the event concerned should be sought from the event organisers before accepting any such invitations and SSG members should discuss such matters with their Secretariat.

2.12 Any questions about any of the above should be addressed to the Secretariat, who will liaise with the NDA Stakeholder Relations Team as required.

3. Constitution and Code of Conduct

3.1 This guidance provides a standard foundation for the SSG constitution. **Each SSG should develop its own constitution** based on a common template provided by the NDA, reflecting specific local stakeholder requirements as needed. To ensure alignment with NDA Guidelines, each draft constitution will be submitted to the NDA for comment before adoption. New constitutions should be adopted and published on the website as soon as possible. All members of SSGs should receive a copy of their local constitution and the NDA Guidelines annually.

3.2 All SSGs are required to adopt the Common Code of Conduct (provided at Appendix 1).

4. Membership and Public

4.1 Members. SSG membership should reflect the local community and its interests, as well as the operational status of the site and requirements of the NDA. In this context, a local community is typically defined as living adjacent to site, although discretion should be applied on a site-by-site basis.[1]

4.2 The SSG, supported by the Secretariat, should make efforts to engage with the community to ensure that all relevant stakeholders are represented on the SSG. On that basis, the SSG should have provision to include members from at least the following:

- Elected representatives (i.e. MPs, MSPs and members of the Welsh Parliament);
- Representatives of Local Authorities, parish councils and community councils;
- Local community groups with an interest in the site, including environmental groups and non-governmental organisations (NGOs);

- Local resident associations or local residents with a declared interest in the site;
- Site union/workforce representatives;
- Other local organisations such as businesses, the voluntary sector and educational institutions (such as local schools, colleges or training facilities);
- The Business Community – local business or trade associations or Chambers of Commerce; and
- Relevant economic development organisations.

4.3 Criteria for membership. Precise criteria for membership may vary between each SSG - and should be included in the SSG constitution - but they should be consistent with the overarching principles set out in this guidance and include the categories stated above. The accountabilities of each SSG member, including the community of interest they represent, should be carefully considered and clearly defined in the SSG's Constitution. From time-to-time, new organisations may wish to become members of the SSG. Votes to admit a new member to the SSG should be included as an item on the meeting agenda and notified to SSG members in advance of the meeting. Members should vote on a member's potential inclusion based on the following criteria. Those wishing to become SSG members are eligible if they:

- Represent an organisation or a community of interest that warrants inclusion on the SSG and does not replicate the roles of other organisations, thereby unbalancing representation;[2]
- Organisations must have a well-defined local interest in the site's operations and be supported by a formal constitution;
- Be willing and able to fulfil the roles and responsibilities of an SSG member as set out in the Guidance; and

[1] Please refer to Section 2 of this Guidance: Purpose of the SSG.

[2] Please refer to Section 4.1 above.

- Adhere to the SSG's Constitution and Code of Conduct.

4.4 Official Representatives. It is expected that representatives from the following organisations will also attend and provide updates to SSG meetings:

- Appointed representatives of relevant organisations such as the regulators, trades unions, emergency, health services and environmental organisations;
- A representative of the NDA, normally a member of the stakeholder relations team or a nominated deputy;
- Representatives of the site operators, normally the Site Closure Director/Station Manager or deputy;
- Officers from the local councils at County, District and Parish level or Community Councils in Scotland and Wales; and

4.5 Public. The public should be able to attend SSG meetings, ask questions and contribute to discussions with members when appropriate. The NDA considers it good practice for the Chair to allow members of the public the opportunity to ask questions for an allocated, proportionate time-period following each agenda item.

4.6 Press. The press should be able to attend SSG meetings and ask questions at least at the end of the meeting. This is at the discretion of the Chair.

4.7 Role and responsibilities of members. Being an SSG member means that:

- You represent your organisation or 'community of interest' actively on the SSG, including consulting them beforehand on major agenda items and asking questions on their behalf;
- You formally update your organisation or 'community of interest,' after SSG meetings, either verbally or in writing;
- You attend every SSG meeting, where possible, or send a nominated representative;
- You read papers circulated in advance of SSG meetings; and
- You update other SSG members promptly after representing them at another meeting.

These responsibilities should be monitored by the Secretariat and enforced where possible by the Chair and/or Vice Chair.

4.8 Decision-making. Given that the SSG is not an executive body, voting should be avoided except on matters that require formal resolution: e.g. changes to the Constitution, the election of the Chair/Vice Chair and the admission of new Members. A list of organisations that have a voting member will be detailed in the Constitution and should reflect the range of local community stakeholder views, not dominated by one particular viewpoint. 4.9 describes the process that should be followed for the election of the Chair and Vice Chair. For votes on other matters, a simple show of hands should be sufficient.

4.9 Election voting process: The Secretariat will inform members at least one month before the meeting detailing the purpose and the process of the elections to appoint a Chair and a Vice

Chair. Each Member is entitled to one nomination per position. Nominees must be SSG Members and should consent to their nomination. If only one named nomination is received, the person nominated shall be deemed to have been appointed and no election will be required. An anonymous ballot vote should be held at the next meeting. Elections will be decided on a simple majority basis. In the event of more than one candidate receiving the same number of votes, the successful candidate shall be decided by lot.

4.10 Wider community engagement. The NDA expects SSGs to make reasonable efforts to reach out to members of the wider community who do not routinely attend SSG meetings to raise the profile of the SSGs' activities. This work, including efforts to engage seldom heard groups, especially young people, could result in the SSG partnering with the NDA Group, or delivering bespoke packages of work if agreed in advance and suitably resourced by the NDA. Success of this outreach will be enhanced by adherence to a diversity of membership as illustrated in 4.2. From time-to-time, the NDA group may also undertake wider engagement with the community. In such instances, the NDA group will inform the SSG and engage with its members. This would allow the SSG to exercise influence without having to manage and deliver wider engagement activities themselves. The NDA would expect to work in partnership with the SSG at community events or on outreach.

4.11 This work in the wider community could aim to encourage greater diversity among the SSG membership, ensure the sustainability of SSG membership and would be mutually beneficial for the SSG and the NDA Group.

5. Chair

5.1 The Chair of the SSG should:

- Be independent of the NDA group: i.e. not employed either by the NDA or by an operating company;
- Be aware of best practice in terms of length of office and ensure there is fair opportunity for elections at least every five years and encourage wider participation. However, the SSG eligible voting membership retain the right to vote on and select their independent chair.
- Be supported by a similarly elected Vice Chair; and
- Be transparent about any conflicts of interest, by declaring them at the start of SSG meetings.

5.2 The Chair is accountable to the SSG members through their formal election for:

- Upholding the SSG's Constitution in its entirety;
- Respecting the boundaries of SSG business;
- Planning forward to ensure that agendas meet the needs of stakeholders, SSG members, the site operators and NDA in the context of SSG objectives;
- Managing SSG meetings to ensure that a balance of views is heard and that all members are able to contribute to discussions;
- Liaising with the Secretariat to enable the development of both new and existing members through appropriate training, site visits and other support;
- Holding SSG members to account for reporting back to their constituent organisations, where appropriate, and encouraging membership from relevant

local stakeholders;

- With support from the NDA Group, ensuring the SSG makes reasonable efforts to reach out to and promote the work the SSG to the wider community, including seldom heard groups and young people;
- In conjunction with other nominees, representing the SSG at national level and in other meetings as needed;[3]
- Circulating updates to SSG members from any relevant meetings they attend; and
- Ensuring the SSG responds in a timely manner to NDA consultations;

5.3 Meeting once a year with the NDA to ensure these Guidelines are being adhered to, that SSG members, Chairs and Vice Chairs are adhering to the Codes of Conduct and to discuss areas of mutual benefit and support. Training, briefing updates as required should be offered to SSG Chairs and Vice Chairs.

[3] This includes representing views expressed on the SSG with which the Chair/Deputy does

- Ensuring SSG subgroups (if applicable) update the full SSG meeting, with an opportunity for discussion.
- Assisting the Secretariat in assessing SSG activity requirements for the year ahead.
- Considering with the Secretariat how best to provide for smooth succession of the Chair post.

5.4 In considering the selection of a Chair, the SSG will want to consider qualities such as independence, local reputation, experience in chairing groups of this sort and having the time, interest and willingness to fulfil this demanding role.

5.5 At the beginning of each term of office, the NDA will brief the SSG Chair and Vice Chair on the NDA Group's remit, its expectations of how the Chair and Vice Chair will ensure the SSG fulfils its functions in line with NDA guidance and the support that the SSG can expect to receive from the NDA Group.

5.6 Should any issues arise that require discussion or resolution, the SSG Chair is expected to contact the Secretariat in the first instance. If the Secretariat is unable to resolve the matter, the SSG Chair should contact the Site Director or the relevant Operating Company Stakeholder Engagement lead, or the NDA stakeholder lead, depending on the issue

5.7 All SSG Chairs are required to adhere to the Code of Conduct for SSG Chairs and Vice Chairs at Appendix 2.

6. The Vice Chair

6.1 The Vice Chair of the SSG should:

- Be independent of the NDA group;
- Be subject to re-election at least every five years (see 5.1);
- Provide support to the Chair;

- Be transparent about any conflicts of interest, by declaring them at the start of SSG meetings; and
- Comply with the SSG Chairs' and Vice Chairs' Code of Conduct (Appendix 2)

6.2 The Vice Chair is accountable for:

- Upholding the SSG's constitution in its entirety, with appropriate training and Secretariat support provided by the NDA Group;
- Respecting the boundaries of SSG business;
- Covering the accountabilities of the Chair in the Chair's absence (see section 5.3);
- In conjunction with other nominees, representing the SSG at national level and in other meetings as needed.

7. Secretariat

7.1 The relevant operating company will provide Secretarial support funded by the NDA. Funding will be ring-fenced solely for SSG use, and made available by the operating company, on behalf of the NDA. This Secretarial support should include:

- Administering SSG meeting dates, venues and refreshments;
- Reimbursing agreed out-of-pocket expenses for members on SSG business;
- Booking travel tickets and accommodation for members on SSG business;
- Administering the payment for the Chair and Vice Chair (see section 11);
- Arrange minute-taking and, where applicable, simultaneous translation into Welsh;
- Promptly circulating and publishing minutes from SSG meetings to members and wider interested parties, including an Executive Summary of key bullet points that members can pass on to their organisation;
- Managing and updating the relevant website, and working with the SSG Chair and Vice Chair to make best use of the website to publicise the activities of the SSG and encourage attendance from a wide range of local stakeholders;
- Circulating relevant papers to members promptly, including communications from relevant external bodies: e.g. the Office of Nuclear Regulation (ONR) and the Environment Agencies;
- Organising inductions for new SSG members;
- Organising biennial (i.e. once every two years) site visits for SSG members or if there is a business need identified by the NDA group; and
- Liaising with the Chair and with adjacent sites (where appropriate) to ensure that relevant issues are adequately covered on SSG agendas.

7.2 <u>Information volume and format.</u> The Secretariat has an important role in challenging the organizations and individuals that submit information to the SSG to help ensure that it is as useful and relevant as possible. Questions to ask include but are not limited to:

- Is the information relevant?

- Does the information assist the SSG in fulfilling its purpose and remit?
- Is the information for noting, discussion or a decision?
- Can the information be presented in a more useful way for SSG members given their time constraints and technical background?
- What information would they like to be passed to SSG members' constituents?
- Is the information presented in a suitable format to easily allow this?
- Are there specific questions that merit further discussion by members' constituents?

7.3 Where sites are joint or closely adjacent and share, for historic reasons, an SSG (e.g. with EDF Energy at Dungeness, Hinkley Point, Hunterston and Sizewell and the MoD at Dounreay), the Secretariats or relevant Communications Officers should:

- Jointly input to agenda planning with the SSG Chair; and
- Recognise that, although sites may be owned and operated by different organisations, there is significant overlap and some common services on shared sites. The agenda for SSG meetings should reflect this and allocate an appropriate proportion of time to each site, based on the needs and interests of the SSG members as well as the site operators themselves. The meetings are solely for the discussion of the delivery of the NDA Group's mission in decommissioning and waste management, and the relevant social value attached to that mission.

8. Meeting Location and Frequency

8.1 Meetings should be advertised and must be held in locations that are easily accessible to members of the public and press, ideally within easy reach of public transport and with suitable parking. The timing should be convenient to stakeholders so that, as far as possible, they are not inhibited or prevented from attending. For example, where the timing of meetings may prohibit attendance from certain stakeholders, consideration should be given to holding meetings outside of normal working hours. In the current tight fiscal circumstances relating to public funding, SSGs should endeavour to have more on-line meetings and reduce the number of in-person meetings, while still retaining an appropriate balance.

8.2 The SSG Chair will choose the venue and location of SSG meetings from a shortlist of appropriate venues produced by the Secretariat. Cost and the general suitability should be important considerations in selecting meeting venues. As a minimum, all venues should:

- Have appropriate capacity;
- Provide seating and presentation facilities; and
- Provide appropriate audio and visual equipment and catering facilities.

8.3 The SSG, in discussion with the NDA group, will determine the appropriate level of meetings per year taking account of the site's work programme. This is expected to be between one and four meetings a year, with perhaps half by virtual, on-line means. While the NDA Group supports face-to-face meetings, SSGs are encouraged to make more use of virtual or hybrid meetings on occasions, to enable attendance from as wide a range of stakeholders possible. Where possible, there should be the facility for presenters to call in via on-line means to give presentations if they are not able to attend in person.

8.4 As the need arises, consideration should be given to holding additional or special meetings to deal with particular issues that may fall outside the routine business of the SSG. Equally, the SSG may choose to set up subgroups to address specific topics on behalf of the whole SSG. Each request to convene a subgroup meeting must be submitted to the Secretariat and approved by the NDA. Approved subgroups should seek to reflect SSG membership as set out in section 4.1 and be held virtually via online platforms to reduce cost and Secretariat resource. The work of all SSG sub-groups should be regularly shared with the relevant SSG and an appropriate opportunity for discussion given.

8.5 Appendix 3 sets out the protocol for NDA group attendance at SSG meetings during election periods.

9. Communications

9.1 Each SSG should have an online presence on an appropriate web platform.

9.2 As a minimum, the SSG website should be regularly updated to include:

- Dates, locations and agendas of future meetings;
- Past minutes and reports;
- Full list of members and who they represent;
- Key papers of interest to the community regarding SSG business;
- SSG Constitution and Code of Conduct;
- Reciprocal links to partner websites such as Local Authorities, NDA group etc.; and
- Dissemination of and links to key NDA Group publications, news and other documents as determined by the SSG that are relevant to the SSG's core business.

9.3 All organisations providing information to the SSG are responsible for ensuring it is accessible and useful to members and can be disseminated to members' organisations easily.

10. Capacity Building

10.1 Induction. To ensure the effective operation of the SSG, new members should undergo an induction process that, as a minimum, would include:

- An information pack including: information about the history of the NDA Group and its remit; a sheet about the site, copies of this Guidance, the SSG Constitution and Code of Conduct and any relevant SSG policies; and
- Meeting the SSG Chair and Secretariat to welcome them on board and clarify any questions about the SSG and its Constitution.

10.2 Information and skills gaps. Members should be encouraged to recognize their own needs to understand the issues that come before them. Additionally, SSGs should identify annually the information and skills gaps that prevent them fulfilling their objectives. The secretariat or NDA will consider how best to address these requirements.

11. NDA Group Support

11.1 Chairs' and Vice Chairs' payment Via the Secretariat, the NDA will provide payment to

Chairs and Vice Chairs that recognises their enhanced role on the SSGs. Chairs are currently entitled to claim £6,615 and Vice Chairs £2,094 per annum. Payment acknowledges the extra work involved in preparing for meetings related to the NDA's core mission, chairing meetings, undertaking appropriate follow- up actions from meetings, attending national events on behalf of the SSG and local car mileage associated with undertaking the role of SSG Chair or Vice Chair. The payment will be reviewed periodically to take account of inflation and the

11.2 Expenses. Via the Secretariat, the NDA will meet out-of-pocket expenses when on SSG business, such as reasonable travel costs on pre-approved SSG business. Travel should only take place if it is absolutely necessary to delivering SSG business. Less expensive, safer and environmentally responsible alternatives such as telephone or virtual meeting platforms must have been considered as a first option before travelling is arranged. When travelling on SSG business, SSG members should choose their mode of transport based upon what is safe, time-effective and best value for money. When selecting their method of travel, they should consider the practicalities of the journey in terms of relevance to the SSG, their own time and other related costs, as well as the actual transport cost. All travel must be agreed in advance with and booked via the Secretariat.

In line with NDA policy on travel expenses, SSG members travelling by rail on essential SSG business during normal working hours are entitled to travel first-class if the train journey time is longer than two hours. Legitimate claims for additional expenses will also be considered on a case-by-case basis. Claims may only be made with prior approval along with valid receipts and necessary paperwork.

11.3 The NDA Stakeholder Relations Team will:

- Ensure NDA representation at all SSG main meetings or arrange informed cover, except in exceptional circumstances;
- Offer regular meetings to the Secretariat and SSG Chair to clarify NDA Guidance, policies and plans;
- Ensure timely responses to SSG queries, including providing information upon request;
- Facilitate exchange visits between SSGs upon request, via the Secretariat;
- Facilitate the attendance of SSG Chairs and Vice Chairs at wider NDA meetings and nuclear industry events, where appropriate, to help build SSG capacity and expose Chairs and their Deputies to good industry practice;
- Provide oversight and advice regarding SSG operation, including maintaining an appropriate consistency of approach across the UK;
- Support an annual SSG Chairs' Forum meeting;
- Provide a Meeting Report from NDA national stakeholder events, with an Executive Summary for ease of circulation and reading;
- Clarify in advance when a response to a major consultation is required from the SSGs: e.g. Business Plan or Strategy consultation;
- Provide advice and expertise on public and community engagement;
- Keep SSG Chairs informed, where possible in advance, of announcements that are likely to generate interest locally;

- To create an NDA/SSG Forum Working Group to discuss ongoing issues and challenges in supporting the independence and successful running of SSGs; and

- To create a co-working approach to engaging with a wider range of stakeholders within NDA communities, in response to feedback from NDA's Strategy 4 on engagement with seldom heard groups (see 4.9).

12. Working in partnership

12.1 To ensure constant evolution and make best use of opportunities for improvement, the NDA commits to work with the SSGs on an informal review of these Guidelines at least every three years. This review must involve all SSG members, the NDA, operating company and potentially other interests depending on the circumstances of the site. The review should cover all aspects of the Constitution, including:

- Progress against objectives and towards achieving the SSG's primary function of providing a forum for open and transparent dialogue between the local community and the NDA Group and operating companies.

12.2 The results of each review should be made public on the website so that learning can be shared across all SSGs. Where necessary, the NDA will provide resources required to undertake the external review.

12.3 Arrangements for engaging with local communities during care and maintenance will be discussed and agreed between the SSG, local community, operating company and NDA prior to a site entering care and maintenance.

APPENDIX 1: Site Stakeholder Group (SSG) Code of Conduct

- Respect each person both during and outside of the SSG meeting.
- Prepare for the meeting by reading the agenda and reports.
- Participate fully in the meeting.
- Listen to what others have to say and keep an open mind.
- Do not talk while others are talking – allow people their say.
- Contribute positively to the discussions.
- Try to be concise and avoid speeches.
- Challenge only ideas, not people.
- It is the Chair's responsibility to bring the meeting to order.
- The Chair has right of sanction against Members.
- Have the best interests of the organization you represent in mind at all times.
- Be prepared to contribute to the SSG on behalf of your organisation by reading meeting papers in advance of each meeting and, where possible, representing the agreed view of your organisation.
- Be punctual.
- Send apologies to the Secretariat if you are unable to attend a meeting and, where possible, nominate a deputy to attend on your behalf.
- Turn off mobile phones and other electronic devices that may interrupt the meeting.

APPENDIX 2: Code of Conduct for SSG Chairs and Vice Chairs

- Uphold the SSG Constitution in its entirety.
- Ensure the SSG fulfils its primary functions and delivers the objectives agreed in the NDA Guidance.
- Ensure that SSG meeting agendas reflect the SSG's core business and that meetings run smoothly and to time.
- Ensure that SSG membership includes broad representation from the local community, including representation from the stakeholders identified in the agreed NDA Guidance, and is not dominated by one stakeholder opinion.
- Demonstrate that reasonable efforts are being made to encourage SSG attendance and representation from the wider community, including seldom heard groups.
- Lead an annual review of how the SSG is fulfilling its functions, preferably informed by 360˚ feedback from relevant stakeholders.
- Maintain an open and productive relationship with the NDA Group and Operating Groups to ensure that any issues arising are appropriately discussed and resolved, following the protocol set out in Section 5.6 of the agreed NDA Guidance.

APPENDIX 3: Site Stakeholder Group Protocol for Pre-election Periods

1. The purpose and use of the protocol

This protocol is intended to aid timely decision-making on whether or not Site Stakeholder Group meetings should be postponed during any pre-election period and what agenda items can be covered. The protocol will need to reviewed and revised before use at future elections and referendums, in line with UK Government advice to public sector workers.

The pre-election period, or period of high sensitivity, is the time immediately before, and just after elections or referendums when specific restrictions on Government Department's activities and communications are in place. This protocol is applicable to representatives of the Nuclear Decommissioning Authority (NDA) Corporate Centre, its operating businesses and subsidiaries.

In the event of a pre-election period, discussions should take place (preferably well in advance of first scheduled meeting) between representatives from the NDA, relevant operating companies and subsidiaries (where appropriate) and the Chairman of the SSG and chairs of relevant Working Groups likely to be impacted. The discussions will be around the requirements of the guidance from Cabinet Office, and the implications for each SSG and working group scheduled to take place during the pre-election period.

The decision-making meeting, referred to below as 'the meeting,' will be arranged by the SSG Secretariat and will be chaired by the SSG Chair, supported by the SSG Secretariat.

Government guidelines will be used to inform the discussions and the decision-making process.

2. Discussions will focus on:

- Government recommendations and how they are interpreted and implemented;
- Appropriateness of NDA's and operating companies' attendance;
- Each meeting will be discussed separately to ascertain agenda items and whether they are likely to contravene the pre-election period guidelines;
- The likelihood of meetings being attended by observers – (including the press); and
- How pre-election period restrictions will be managed during proceedings – (through the Chair – if the meeting goes ahead).

3. General conduct:

- All attendees at the meeting will behave in a respectful manner towards each other;
- Attendees will aim to reach an agreement that is in the best interests of all parties concerned;
- Disagreements will be discussed in an open and constructive manner to generate the best solutions for all concerned;
- The meeting will be chaired by the SSG Chairman who will manage proceedings in such a way to ensure relationships are intact following the meeting; and
- All parties concerned should respect the final outcome decision.

4. Output:

- A joint decision will be made at the meeting as to whether the SSG meetings go ahead or be postponed / cancelled;

- If no agreement is reached, the independent Chair will make the final decision as to whether the meeting will go ahead – (irrespective of representation from relevant organisations);
- The final outcome must have been decided having considered the key interests of all parties concerned;
- Members will be informed as soon as possible if meetings are cancelled or postponed and the website will be updated to reflect those changes with an explanation of why;
- Notifications and explanations may also be required for SSG members if agendas or discussions can be identified as being limited compared to the norm;
- The Chairs of any SSG meetings that go ahead during the period will remind all present at the start of the meeting that pre-election period rules will apply and must be adhered to; and
- The Chairs of any SSG meetings that go ahead during the pre-election period will facilitate discussions to ensure pre-election protocol is not contravened.

5. Advice for NDA/operating companies attending SSG meetings

Consideration should be given to:

- The agenda for meetings, and potentially controversial policy or political discussions which may arise;
- The extent to which NDA/operating companies will be required to comment on sensitive matters;
- Those in attendance – for example, the involvement of election candidates; and
- Potential competition for public attention with election campaigns.

The standard Site Director updates on site progress, regulator updates and round-up of NDA group-wide news should be able to proceed, provided they avoid topics of controversy, and attendees are aware of the need to avoid this in questions. Care should also be taken around any important corporate matters and socio-economic updates or discussions.

Examples of topics to be avoided:

- future land use;
- planning applications;
- new build;
- contentious contracts or commercial interests;
- speculation of future projects; and
- and areas of local, regional or national political controversy.