

REVISION OF SAFEGROUNDS GUIDANCE FIRST CONSULTATION ON CITIZENS' GUIDE SUMMARY OF RESPONSES AND PSG DECISIONS

Comments were received from 21 respondents, of which 14 were from the nuclear industry and associated consultants and 2 from regulators. 5 were from local government and NGOs, in line with expectations and including those judged most likely to be involved in later stages. The responses are summarised below, according to the questions posed in the consultation document. Decisions made by the SAFEGROUNDS Project Steering Group (PSG) about the way forward for the document are also given. The respondents are listed in the table at the end of this summary and referred to in the text by the letters in the table, eg [B].

Question 1: Need for and Proposed Purpose of the Citizens' Guide

Four respondents made no comment, but the remainder supported the production of a Citizens' Guide (albeit with different levels of enthusiasm). With some caveats, the responses were generally supportive of the proposed purpose of the Guide as a means of helping to promote constructive stakeholder engagement. Some respondents emphasised particular aspects. For example, two respondents made specific reference to the need for an independent/non-partisan document (regulator, NGO), two others (industry) made reference to an aim of correcting misapprehensions about the subject. The PSG decided that no changes were needed to the proposed purpose of the document.

Question 2: Proposed Scope

A majority (14 respondents) agreed with limiting the scope to, or focusing primarily on, radioactively contaminated land. 3 of these [K, F & S] favoured including a brief summary of guidance available on other contaminated land, and 2 [I & O] considered there was a need for something on non-radioactively contaminated land in a separate document or future update. Of the other 11 respondents, one favoured a scope covering all contamination for nuclear licensed and defence sites (industry - B), and 3 explicitly favoured a scope that includes both types of contamination [B, M & P]. One (NGO - J) felt there was a need to include land potentially contaminated (e.g. through radioactive waste storage or disposal). The PSG agreed that the Citizens' Guide will be mainly about radioactively contaminated land, in line with the original intent, but will mention non-radioactive contamination, in a way that is consistent with LMGv2.

Question 3: Other Topics to Add or Omit

14 of the respondents made a variety of suggestions.

- 2 respondents (industry – F & N) expressed specific concerns about the content of Part 3, one of whom was specifically concerned it might contradict other guidance;
- 4 respondents [B, G, I & Q] suggested that more explanatory material about radiation and radioactivity, or explicit links to further information, be included to cater for a variety of levels of reader;
- 1 respondent each suggested further information on the following specific issues:
 - radon [E];
 - nuclear convoys [E];
 - 'contamination' of land through future storage or disposal of radioactive waste on it [J];
 - impact/consequence assessment [C];
 - risk [D];
 - technical options [D];
 - context [D];
 - decisions being made as part of a strategic vision [D];

- suggested levels of stakeholder involvement (appropriate to each specific case) [D];
- how rigorously radioactively contaminated land has been and is controlled [N];
- who the regulators are and what they do [M];
- moral implications of leaving contamination on sites [P]
- and smaller radioactively contaminated sites [S].

The PSG decided that the Citizens' Guide should include some basic information about radiation and radioactive materials, and that Part 3 of the Guide should only describe decision-making processes in outline, because details may change. The other points made will be considered as drafting proceeds.

Question 4: Audience and Format

No respondents raised any basic objections to the proposed audience and format. One [N] commented that the proposed document seemed much longer than expected and another (industry - F) emphasised the need to be absolutely clear about intended audience (believing it to be unclear at present). Respondents generally recognised a need for the Guide to be accessible to the "layman", but several specifically suggested a need for consultation with a broad range of people (beyond normal SAFEGROUNDS circles) to help decide how this can be achieved. The PSG agreed that no changes were needed to the intended audience or format. Consultation with a broad range of people is planned when drafting the Guide.

One (NGO - V) noted the importance of it being a 'non-partisan' document, which is potentially at odds with some industry comments about the need for 'reassurance'. The intent remains to produce a non-partisan document, so careful drafting will be required.

Other Comments

Respondents made 9 substantive comments:

- include a link to UK Resilience web site [E];
- complement the guide with an online – updateable – glossary [P];
- do not raise false hopes about levels of stakeholder involvement – the level should be proportionate to the problem [H];
- have a clear plan of how to bring the Guide to the attention of stakeholders [H];
- plan how to keep contact details up-to-date in the future [H];
- it will be impossible to produce a single document that is all things to all people [T];
- caution advised in making the document too simplified [S];
- an accessible guide to option comparison needs to be available here or in that guide [V];
- clarify who subscribes to the SAFEGROUNDS principles and what that means [R].

These comments will be taken into account when drafting the Guide.

Respondents to First Consultation on Citizens' Guide

	<i>Name</i>	<i>Organisation</i>	<i>Responding as individual or organisation</i>
B	Andy Dietzold	Low Level Waste Repository	individual
C	Andy Thomas	Future Solutions	organisation
D	Dr Doug Graham	UKAEA	individual
E	John Kelly	Oxfordshire CC	organisation
F	Kim Baines	RSK ENSR	individual
G	Mike Pearl	UKAEA	organisation
H	Peter Booth	Nexia Solutions	individual
I	Steve Handsley	Scott Wilson Ltd	individual
J	Val Mainwood	Bradwell for Renewable Energy	organisation
K	Sue Crisp	Cumbria County Council	organisation
L	Hugh Richards	British Nuclear Group Magnox Electric Ltd	individual
M	Alison McKay	BAE Systems	individual
N	A N Other (1)	MoD	individual
O	A N Other (2)	MoD	organisation
P	A N Other (3)	CBO	organisation
Q	A N Other (4)	Regulator	individual
R	A N Other (5)	Regulator	individual
S	Jack Armitage	NUKEM Limited	individual
T	Janet Young	Magnox (north)	individual
U	Paul Dorfman	University of Warwick	individual
V	Richard Bramhall	LLRC	organisation