

Second consultation on the Citizens Guide – Log of comments					
Name	Organisation	COMMENTS			
		Sub-section	Sub-section paragraph	Page	Comment
PRELIMINARIES (preface acknowledgements executive summary abbreviations)					
A N other 1					Where are they?
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	Acknowledgements			
Mike Pearl (O)	UKAEA	Report Title			The title to the document should be “The SAFEGROUNDS Approach to Managing Contaminated Land on Nuclear and Defence Sites - A Citizens Guide” – or similar
Sue Brett (O)	Cumbria County Council (CCC)	Version control	History	cover	it states that this draft is based on “responses to the consultation on the scope and outline contents of document that took place in November 2007” Should this be in the future tense or should the date be 2006?
Sue Brett (O)	Cumbria County Council (CCC)				an executive summary and a list of contents would be useful
Sue Brett (O)	Cumbria County Council (CCC)				abbreviations are already in the end pages glossary, but need expanding
SECTION 1 – SAFEGROUNDS					
Mike Pearl (O)	UKAEA			1	The introduction should introduce the problem, then SAFEGROUNDS.
Sue Brett (O)	Cumbria County Council (CCC)		para. 1	1	why would you find radioactive contamination on non-nuclear defence sites? I can understand that they may have ordnance or chemical contamination, but that’s not what the text says. This is explained more comprehensively in para. 7, page 3 – perhaps this should be referenced.
Mike Pearl (O)	UKAEA				An additional section is needed to talk about radioactivity - Refer or use Section 2 of the original Safegrounds Characterisation document – “Radioactivity in the Environment”.
Valerie Mainwood (C)	Bradwell for Renewable Energy		e.g. 1.1	Para . 3	4
A N other 1		e.g. 1.1	Para. 3	4	Needs to be briefer and reference core documents
Pete Booth	Nexia Solutions (O)				Need to say early who the targeted audience is.
SECTION 2 – RADIOACTIVE CONTAMINATION					
A N other 1					OK but needs to be briefer
Mike Pearl (O)	UKAEA	Title		2	The title to the section should be Land Contamination on Nuclear and Defence Sites. The first subsection can then be radioactive contamination and another sub-section chemical contamination.
Pete Booth	Nexia Solutions (O)			Page 2	What about inserting a diagram depicting the source-pathway-receptor relationship?
Paul	University of			Page	Not sure about 'low levels of contamination are generally considered to pose little risk'.

Dorfman (I)	Warwick			2	
Andy Thomas (I)	Future Solutions			2	"Low levels of radioactive contamination are generally considered to pose little risk" is somewhat subjective and meaningless unless defined e.g. what about 'hot particles'
Pete Booth	Nexia Solutions (O)		Last paragraph	Page 2	The discussion may be factually correct but it could give the impression, especially if read in isolation, that every incidence of contamination may pose a significant health risk. Without watering down the facts this needs to be tempered somewhat.
Mike Pearl (O)	UKAEA		2 and 3	2	The definition of contamination is too difficult for the layman. Paragraphs 2 and 3 would be made a lot clearer if the author had used a typical diagram/sketch (eg from HSA etc) that shows a hypothetical site, contamination in the ground and exposure pathways.
A N other 2		2	6	2	LLRC position: PCAH is concerned that differences in opinion are highlighted in the 1 st line
Valerie Mainwood (C)	Bradwell for Renewable Energy	Introduction	Para 3 Para 4 Para 6	3	Would be preferable to give a short general description of the various pathways of radioactive intake, rather than the isolated examples given. The next para is good – that is what is needed in the context of simplicity "little risk" – keep value judgements out "Short half-life" – needs a reference as to what this is.
Mike Pearl (O)	UKAEA		3		Terminology for the layman: biodistribution ? Tritiated water ? External exposure? Absorbed dose?
Mike Pearl (O)	UKAEA		5	5	The language is too emotive for normal contaminated land situations. Rather than starting to talk about high levels of radioactivity, talk about what's normally found on UK sites.
Mike Pearl (O)					Define dose, risk (probability), hazard – in a text box. Give some examples of levels of risk
SECTION 3 – NUCLEAR-LICENSED & DEFENCE SITES					
A N other 1					References to defence sites are flawed
Pete Booth	Nexia Solutions (O)		Paragraph 2	Page 3	Hydrocarbon spills are used as an example here to highlight a non radioactive contaminant. It may be worth mentioning asbestos here as many people are aware of the health issues surrounding it but may not consider hydrocarbons in the same manner.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	3	1 st para	3	I suggest the first paragraph should read: "Nuclear licensed sites include civil nuclear sites that are being or have been used for electricity generation or other purposes and defence nuclear sites that are being operated for the Ministry of Defence by contractors". This would avoid the question of whether NDA owns all decommissioning nuclear sites (including military in future).
Andy Thomas (I)	Future Solutions			3	British Energy also own Sizewell B
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	3	3 rd para	3	BE own Hunterston B. Sizewell B missing from BE list.
Sue Brett (O)	Cumbria County Council (CCC)		para. 5	3	are the SLCs actually being sold by the NDA to new Parent Body Organisations? The NDA website implies that the PBO wins a contract to run an SLC – so, for example, the LLWR Ltd. SLC has a PBO of British Nuclear Group at present, but very soon the PBO changes to UK Nuclear Waste Management Ltd.
Andy	Future Solutions			3	SLCs are not being sold but the equity is transferred to PBOs who successfully win limited term operator

Thomas (I)					contracts, for the lifetime of the contract
Andy Thomas (I)	Future Solutions			3	Actually, the Clyde (Faslane) base is not a nuclear licenced site and is run by the Royal Navy (with support from Babcock). Devonport is run by Devonport Management Ltd, the SLC (now owned by Babcock) on behalf of MoD. Aldermaston is managed by a consortuim called AML (AWE Management Ltd) who hold the equity in AWEplc who is the SLC
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	3	5 th para	5	Best not to say how many SLCs there are – subject to change. My understanding is that the SLCs are not being sold to new Parent Companies. To quote the NDA website, “The SLCs are owned by a Parent Body Organisation (PBO) for the duration of a contract awarded by the NDA”. Under this arrangement (defined by the Energy Act), each SLC remains a ‘transferrable entity’ that will outlast the term of an individual contract and cannot be ‘sold’ in the conventional sense.
Mike Pearl (O)	UKAEA				Diagrams required – at least of the nuclear licensed sites in the UK – see Section 1.3 of the original Safegrounds Characterisation document.
Sue Brett (O)	Cumbria County Council (CCC)		para. 7	3	spurious ‘a’ between ‘not’ and ‘one’ in last line
Sue Brett (O)	Cumbria County Council (CCC)		para. 8	3	what happens in Northern Ireland? I know that NI don’t have any nuclear licensed sites, but they have 106 former military sites (non-nuclear defence) that could have radioactive contamination from luminised instruments.....
SECTION 4 – REGULATION					
A N other 1					Simplify and make briefer
Mike Pearl (O)	UKAEA				The structure of the section needs to be introduced.
Mike Pearl (O)	UKAEA				This is a section on regulation – for contam land on Nuclear and Defence sites – there is nothing on the conland regs for chemical contams on these sites.
Andy Thomas (I)	Future Solutions			5	By “the principles by which these are regulated are common to all sites” do you mean the RSA?
Mike Pearl (O)	UKAEA				Bullet point 1 – what does this mean. Bullet point 2 – only applies to non-licensed sites. Bullet point 4 – remediation doesn’t necessarily result disposal of wastes. MOD is subject to RSA 93.
Paul Dorman (I)	University of Warwick				p.6 end para: where does 'so far as reasonably practical' come from?
Valerie Mainwood (C)	Bradwell for Renewable Energy		Bullet 2 Bullet 4	Page 7 Page 8 Page 9	EPA Explain “Remediate “ - Use clean up The concept of de-licensing needs an explanation in the body of the text – there is much confusion over this term – perhaps there could be a comparison with “unlicensed “ : “Exemption orders..” the sentences are too long and indigestible RAWMC – out in full – this paragraph is incomprehensible
			Para 4		

				Page 10	<p>“environment agencies” – not the EA? Needs explaining</p> <p>“...chances of occurring..” – does this mean “accidents”? If so, better not shrink from it</p> <p>Sustainability – would it be proper to be more active and infer that the regulatory bodies are actively seeking improvements that increase further sustainable development?</p>
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	4	4 th para on p6	6	The current HSE/NII view on the status of what they call ‘radioactively contaminated land’, set out in the SAPs (2006) is that it is a form of ‘nuclear matter’ (not necessarily radioactive waste). My understanding is that this effectively supersedes the earlier view (as radioactive waste) expressed in 2001 guidance to inspectors.
Sue Brett (O)	Cumbria County Council (CCC)		para. 7	6	where does the contaminated land strategy for a site fit with the Integrated Waste Strategy?
Mike Pearl (O)	UKAEA	Nuclear Licensed Sites		6	“HSE Nuclear Directorate....” “...to meet Site licence conditions” – plural.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	4	Starting at 4 th para on p6	6-7	The provenance of this summary of HSE views should be clarified. If any of it is based on the 2001 guidance to inspectors, it should be replaced by a summary based on the 2006 SAPs.
Mike Pearl (O)	UKAEA		7		An unnecessary paragraph
A N other 2		Delicensing	4	7	Capping of compensation claim time is not helpful & the 30 yrs covers a local PCAH worry
Sue Brett (O)	Cumbria County Council (CCC)		para. 9	7	in the bullet point at the top of the page, ‘If’ should not have a capital
A N other 2		RSA (93)	2	8	What is meant by exemption?
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	4	Final para under ‘delicensing’	7	This para does not relate to delicensing, but is a general provision of NIA.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	4	2 nd -last para on p7	7	I think it is misleading to include airborne radioactively contaminated dust as a form of radioactive waste. I cannot imagine this ever being authorised as a recognised waste disposal route. In the context of a ‘citizens’ guide’, it implies the possibility of a lack of control during remediation that would not be countenanced by operators or regulators.
Mike Pearl (O)	UKAEA		8		<p>“HSE regards land contamination as an accumulation of radioactive waste....”</p> <p>This is not the latest position – see the contam land SAPS (2004).</p> <p><i>“HSE treats radioactively contaminated land and emplaced radioactive substances on nuclear licensed sites as accumulations of nuclear <u>matter</u>, unless they are, or arise from, authorised disposals.”</i></p> <p>There is an important distinction between “waste” and “matter”.</p>
Mike Pearl (O)	UKAEA		9		“waste” used again when it should be “matter”
Mike Pearl (O)	UKAEA	Delicensing	1	7	Define delicensing – by explaining that when sites no longer carry out nuclear activities they are decommissioned and residual hazards removed so that the operating nuclear licence can be terminated –

					thus enabling the site to be used for other purpose. Licence termination is known as delicensing .
Sue Brett (O)	Cumbria County Council (CCC)		last	8	when and where will the new regulations for land contaminated by an accident at a nuclear site be issued?
Pete Booth	Nexia Solutions (O)	Contamination in emergencies	Last paragraph	Page 8	I think the sentence alluding to "land contaminated by a radiological emergency" could be phrased better.
Mike Pearl (O)	UKAEA		2		Rather than say "no danger" use the phrase used above ie "ceased to be danger"
Mike Pearl (O)	UKAEA		3		"If land is designated..." Why is designation discussed in a section on delicensing. Designation of rad conland applies to Part IIA for rad, which doesn't apply to licensed sites
Mike Pearl (O)	UKAEA	RSA (93)			Title should be in full "Radioactive Substances Act"
Mike Pearl (O)	UKAEA		2		"Exemption Orders" introduced at this point but not explained until 3 paragraphs later (over the page)
SECTION 5 – KEY PRINCIPLES					
Paul Dorfman (I)	University of Warwick				This section needs to be thought through more clearly, e.g. P2 p. 10 suggest deletion of 'for legal reasons final decisions on how to manage contam land have to be the sole responsibility of the site owner' - this not worked through by SAFEGROUNDS yet. Also unsure about the last 2 para's of P2. P3 p.10, not sure about first para beginning 'site owners should....' - potentially problematic use of the word 'consultative'.
Sue Brett (O)	Cumbria County Council (CCC)			9	in the blue box next to Principle 1, it just says 'Main Guide Section 5', whereas all the other blue boxes have 'See' in front of text
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	5	All		See my comments on the KPs in the primary setting of LMGv2.
Valerie Mainwood (C)	Bradwell for Renewable Energy	Principle 2			All stakeholders should be involved at the outset, rather than early on. From experience, if everyone does not explore together from scratch, there are problems.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	5	Principle 3	10	It may be worth introducing the concept of strategic and technical options.
Valerie Mainwood (C)	Bradwell for Renewable Energy	Principle 2 Principle 1	Para 4	Page 10 Page 10	Adherence. There must be agreement and understanding across all sectors as to the nature and expectations of stakeholder involvement in a particular project. The word "accident" needs to be mentioned
A N other 1					Why not leave out most of the detail and reference the core document?
SECTION 6 – LEVELS OF PROTECTION					
A N other 1					This needs to be simplified and made briefer. Also where does RCLEA and RGVs fit in?

Paul Dorfman (I)	University of Warwick				p.13 Not sure about the thrust of this section - tends to default to regulatory risk model - although makes a stab at accounting for other views.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	6	Radioactively contaminated land, 1 st para	13	Why are the 'scientific uncertainties' and 'differences of view' issues given such prominence at the outset?
Mike Pearl (O)	UKAEA	Rad Conland	1-4	13	These paragraphs look like they're trying to explain Tolerability of Risk. This need illustrating with a diagram.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	6	Last para on p13	13	The word 'thereby' implies that application of ALARA and ALARP below assessed risks of 1 in a million takes account of differing views amongst stakeholders on the health risks from intakes of radionuclides. Is that what is meant?
Mike Pearl (O)	UKAEA				ALARP and ALARA principles – not defined
Mike Pearl (O)	UKAEA				RCLEA and RSGVs – not mentioned
Valerie Mainwood (C)	Bradwell for Renewable Energy		Para 2	Page 14	"1 in a million" risk – to the public this concept is meaningless. More explanation? Referencing? How does this neat figure come about? What range of opinion is used in attempting to quantify risk? This concept is high on the public's agenda.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	6	1 st para on p14	14	See my comment about applicability of 'radioactive' Part 2A in Section 6.2 of LMGv2.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	6	3 rd para on p14	14	See my comment on 'unacceptable risk' in Section 6.3 of LMGv2.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	6	5 th para on p14	14	See my comment on the alternative texts suggested for Section 6.3 of LMGv2, regarding the fact that only one aspect of CLR11 is inconsistent with ALARA/ALARP.
Valerie Mainwood (C)	Bradwell for Renewable Energy			Page 15	"Acceptable risk" See above
A N other 1(C)					I challenge the assertion that CLR 11 is not consistent with ALARA and ALARP
Mike Pearl (O)	UKAEA	Non-Rad Conland	1		CLR 11 MODEL procedures
Mike Pearl (O)	UKAEA		2		Implication in this paragraph is that "guideline values" are concentrations values above which risks are "unacceptable". This is not the case. Guideline values are generic. If a site has contam values above these levels then the next step is a site specific assessment – using site specific criteria (habits) to assess risks. If this is unacceptable then remediate.
Mike Pearl (O)	UKAEA				There is no mention of other non-rad legislation eg groundwater regs.
SECTION 7 – SAFEGROUNDS PROCESS					
A N other 1					This should be briefer and could emphasise that the guidance and key principles do provide a flexible framework for the management of land contamination
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	7	Fig 1	16	See my comments on this figure and the concepts it illustrates, in LMGv2.

Mike Pearl (O)	UKAEA				There is no mention of records in the text.
Valerie Mainwood (C)	Bradwell for Renewable Energy		Para 3		Difficult to understand
Mike Pearl (O)	UKAEA				This needs a paragraph that says that the approach for conland needs to integrate with other activities on the site eg decommissioning etc....otherwise it gives the impression that the safegrounds process drives the operation of a nuclear site.
Mike Pearl (O)	UKAEA	Stage 3			Characterise – it is not obvious from the text that this is staged process starting with a historical review of site use and incidents. This leads to “immediate measures” /short term strategy. From there characterisation is about gaining an understanding about the contam and its behaviour – which involves ground investigation. The results and evaluation of the investigation data are then used to plan a “long term” management option – taking into account prioritisation factors.
Andy Thomas (I)	Future Solutions		3	17	Characterisation is more than just about the contaminant, it is also about the geology, hydrogeology etc of the site
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	7	Stages 4 & 5	17	As commented on LMGv2, there should be a stronger distinction drawn between Stages 4 and 5. Readers should be made aware that Stage 4 may be constrained by over-riding land use requirements (including requirements of overall site decommissioning strategies).
Sue Brett (O)	Cumbria County Council (CCC)		para. 12	17	the use of ‘areas’ in the last line is misleading – it could mean areas of the UK. Perhaps ‘zones’ is a better word?
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	7	Stages 4 & 5	17	A forward reference to p20 may be helpful
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	7			There is no discussion of implementation.
Valerie Mainwood (C)	Bradwell for Renewable Energy		Scoring Para 1	Page 18 Page 19	This could do with more explanation, as some stakeholders may not be experienced in this activity. Could a small simple example be included? Needs to be clearer
SECTION 8 – CHOOSING A STRATEGY					
A N other 1					Relevance? Why not keep it brief and refer to the core document
Mike Pearl (O)	UKAEA				Emphasis conland management will integrate with other site activities
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	8	Marginal note	19	I thought the options comparison document would be a guidance document, not an information paper.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	8	Marginal note	19	I thought the options comparison document would be a guidance document, not an information paper.
Paul Dorfman (I)	University of Warwick				p.12 Fig 2 not sure about 'stakeholder input <u>may</u> be appropriate'
Pete Booth	Nexia Solutions (O)		Title	Page 19	I am not convinced that this is the most appropriate title (the use of the word strategy) for the section as the text refers mainly to options.
Valerie Mainwood	Bradwell for Renewable Energy			Page 21	Too bureaucratic in tone

(C)				just before figure 2	
Valerie Mainwood (C)	Bradwell for Renewable Energy			Page 21	"outcome not decision" Needs flagging up as an important principle. Perhaps earlier on?
SECTION 9 – STAKEHOLDER INVOLVEMENT					
A N other 1					The references to defence sites are flawed and have been written without prior consultation or the consent of DE/MOD. Why?
Mike Pearl (O)	UKAEA				Needs to start with a diagram of who are stakeholders (and this must include internal site stakeholders)
Paul Dorfman (I)	University of Warwick				p.21 'Key stakeholders' should include local CBO's, NGO's.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	9	1 st bullet on p21	21	I assume this means 'consult key stakeholders about who else to try to involve' (not 'what should be done about the contaminated land').
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	9	2 nd para on p22	22	The 'major shareholders' phrase seems a little odd in the context of guidance concerned with what is almost entirely a publicly owned set of liabilities.
Valerie Mainwood (C)	Bradwell for Renewable Energy			Page 22	"capacity build" – jargon. Explain
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	9	Last para on p22	22	'engineers' could usefully read 'engineers/scientists'.
A N other 2		Trust	8	22	'Differences' – it would be arrogant to assume that today's science is perfect. History shows us that the specialist often make mistakes because they think they know better than the public. 'Irrelevant' or 'Unscientific' – ethical careers in science published by S.G.R etc. A common and insulting assumption is that NGO's are unscientific. This is particularly annoying as most rank & file members are highly motivated and informed, and leading NGO figures are science graduates who have turned down the industry that they are horrified at for science reasons.
Sue Brett (O)	Cumbria County Council (CCC)		para. 5	22	between 'building' and 'trust' an 'of' is missing
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	9	3 rd para on p23	23	The 2 nd sentence highlights a recurrent theme in my comments on this suite of documents, namely the need to set out the hierarchy of strategic and technical decision-making and communicate some of the constraints that may exist relating to strategic decision-making which are not purely concerned with the management of contaminated land.
Paul Dorfman (I)	University of Warwick				p.23 Framing para 3 - public involvement in technical matters can be facilitated via other expert or NGO representation.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	9	4 th para on p23	23	I don't understand the 3 rd sentence

Pete Booth	Nexia Solutions (O)		2 nd paragraph	Page 24	We talk about the group performing the “required role”. Do we need to state what the required role is?
Valerie Mainwood (C)	Bradwell for Renewable Energy		Para 3 Para 5	Page 24	Framing – the same applies to the operator. It is easy to forget that the operator has expectations! Should there be a mechanism for allowing/financing independent consultants to represent the public? So important!!
SECTION 10 – INVOLVEMENT OPPORTUNITIES					
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	10			No mention of Scottish Executive?
A N other 2					PCAH has frequently objected to the way that Hinkley Point SSG is run. They repeatedly held meetings inside Hinkley Power Station and during working hours. They have repeatedly failed to agree to our requests to hold meetings in the nearby towns.
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	10	5 th para	25	While CoRWM/MRWS and ISOLUS are consultations that SAFEGROUNDS have learned from (and vice versa), they do not deal with contaminated land, and there seems no reason to highlight these consultations more than any other.
Paul Dorfman (I)	University of Warwick				p.25 Policy Development - needs to explicitly mention EU Aarhus driver in relation to environmental information, decision-making, environmental justice. p.26 SSG's - needs to make more clear potential concerns associated with current formulation of SSGs - thus providing rationale for extended involvement.
A N other 1					Again the text relating to defence sites is flawed. Page 27 for instance should state: 'for other MOD sites community liaison arrangements may vary and the first point of contact should be the Head of Establishment or Defence Estates.'
Valerie Mainwood (C)	Bradwell for Renewable Energy		Para 1	P27 Page 27	SSGs – this is not an adequate account of the SSGs – it should be pointed out that they vary in activity, and that some are pro-active in stakeholder involvement. Perhaps it might be worth checking with the NDA as there are changes underway. Are there really so many NGOs that they cannot be listed? If you cannot do this on this document, then invite them to be listed on your website, with reference to this document!
SECTION 11 – CONTACTS AND INFORMATION					
Sue Brett (O)	Cumbria County Council (CCC)		para. 2	27	spurious 'to the' between 'advice' and 'on'
END PAGES (references, glossary)					
Mike Pearl (O)	UKAEA			34	A request from the NGOs when developing this guide was for it to include a list of commonly used abbreviations and a glossary of terms. The list on page 34 is cursory and needs further development.
Sue Brett (O)	Cumbria County Council (CCC)			34	you should at least include all the acronyms used in the document (and ensure they are in alphabetical order) ALARP CBO DBERR MoD NFLA NIA

					DE DE&S DML EHS (NI) ENDS EPA90 HPA HSPA LLRC	NNPP NNRP NuLeAF RPD RSD RSS RWMAC SAP SLC
GENERAL COMMENTS						
1) Is the document presented in a logical fashion?						
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	Yes				
2) What areas could be improved?						
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	No specific items identified.				
3) What areas are good examples?						
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	No specific items identified.				
5) Is the document repetitive?						
4) Does the guidance cover the subject comprehensively?						
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	Adequate				
5) Does it provide fundamental principles of good practice?						
Hugh Richards (O)	Magnox Electric Ltd (North Sites)					
6) Are there specific examples that you can think of that demonstrate the application of these principles?						
7) Are there areas that you feel have been skimmed over too lightly? What additional information would you like to see included?						
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	No specific comments (answer to question 6-7)				
8) Are the illustrations, tables etc. appropriate?						
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	Yes, but see next question.				

9) Would more diagrams / schematics be helpful in explaining the process?		
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	Yes
10) What improvements could be made to the figures that are included?		
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	LMGv2 and the citizen's guide are very 'dry' and would benefit from more visual representation of concepts and information – for example to illustrate the process of sub-dividing a site into areas or zones.
11) Is the target audience clearly defined?		
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	No, and there is no statement of purpose for the document.
12) Is the content clearly targeted at the target audience?		
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	No.
13) Is the writing style appropriate?		
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	Difficult to say because target audience not defined. The style does seem to be very 'dry' and fairly technical/legal.
SPECIFIC COMMENTS		
1) Section 2 is intended as a short introduction to contaminated land. Bearing in mind that it has already been agreed that "...it is not intended as an elementary introduction. Rather, it will seek to 'bridge the gap' between existing sources of background information on radioactivity and technical documents such as the SAFEGROUNDS LMG.." what should it contain?		
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	Probably best not to attempt a summary, but just signpost references to websites and publications giving varied levels of detail, identifying which offer 'orthodox' and 'dissenting' views.
2) Are there any sources of background or more detailed information that could usefully be referenced?		
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	See comment above.
3) Are there ways the style of the document could be improved to make it more accessible?		
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	There must be, but this is not my area of expertise.
OTHER COMMENTS		
Hugh Richards (O)	Magnox Electric Ltd (North Sites)	I was not involved in identifying the need for a 'citizens guide' and am not sure what sort of audience those who identified the need had in mind. It is therefore difficult to know whether this document is 'near the mark' in general terms or not. I question whether references should be cited by authors' names, rather than originator organisations' names. This is particularly the case for other CIRIA/SAFEGROUNDS documents where authors' opinions are subordinate to PSG views.
Marion Hill (I)	Independent	<ul style="list-style-type: none"> This seems to be shaping up well in terms of basic content and writing style. There are a number of factual errors, mostly because out-of-date input material has been used. For example, on page 6 the 2006 SAPs should be quoted, not this old out of date HSE guidance (they do not now regard radioactively contaminated land as an accumulation of radioactive waste, and there are specific principles for land management that should be quoted). On page 8, the relevant MoD regulator is DNSR, not NNNP, and they apply the SAPs.

		<ul style="list-style-type: none"> • There are some potential inconsistencies with LMGv2 (eg on page 14, the discussion of CLR11). • The first part of Section 10 (page 25) is very poor. It is very confusing to include material on radioactive waste management and discharges because contaminated land is a completely separate issue. The policy for nuclear sites is made by HSE, not Defra. Responsibility for contaminated land policy for other sites is split between Defra and DCLG in England, and is determined by the devolved administrations in Scotland, Wales and Northern Ireland. Neither CoRWM nor ISOLUS is relevant. • On page 26, mention should be made of the NDA site end state consultations and their outcome (when the details are available). It might be worth summarising what has been agreed for the various NDA sites, so that readers have a better idea of what future site-specific NDA consultations will be about.
Mike Pearl (O)	UKAEA	<p>This is not a layman's guide to contaminated land on nuclear and defence sites – which was thought to be its purpose. Surely its aim is to aid understanding of the problem, the issues and the SAFEGROUNDS process.</p> <p>Very little is said about non-rad contamination on nuclear and defence sites which is what SAFEGROUNDS is about. It would have been useful if a few typical non-rad contaminants found on nuclear sites were listed.</p>
Pete Booth	Nexia Solutions (O)	<p>The document provides a big emphasis on SAFEGROUNDS. Ok, this is a report emanating from SAFEGROUNDS but there could be more evidence of learning or examples of success from elsewhere. (I do realise there are many organisational references at the back). This kind of work is undertaken internationally and one could argue they are way ahead of the UK or at least have different experiences. Is there nothing that could be reflected from US or other international experience?</p> <p>The report has virtually no diagrams within it. This makes it a bit drab. Is there any potential to add some diagrams or pictures?</p> <p>There are no sub-section numbers within each section.</p>
Sue Brett (O)	Cumbria County Council (CCC)	<ol style="list-style-type: none"> 1. formatting in black and white or with just 1 colour would be cheaper and more environmentally friendly 2. a simple picture on the front of the document would be more attractive 3. numbering the paragraphs would provide ease of reference 4. breaking website addresses in the middle of a word could be confusing 5. diagrams are always good – they can explain so much in a single glance 6. the document seems logical and comprehensive, is not repetitive and I can think of no extra info needed
Valerie Mainwood (C)	Bradwell for Renewable Energy	<p>This is a really good attempt at drawing all sorts of disparate material together for the citizen. Occasionally it is obvious that material has been lifted directly from the relevant body, and “bureaucracy-speak” is evident. This needs to be carefully vetted, otherwise it will put people off. I really wish I could flourish some of the stakeholder information in this document at the people with whom I am presently engaged in a stakeholder matter. The importance of framing cannot be underestimated. From personal experience I am finding how proceedings become so mired if this is not carried out properly, even with the best will in the world.</p>
GENERAL COMMENTS		
A N other 1		<p>The Citizen's guide is too long and is more of a practitioner's manual. It should be 2 to 6 pages providing an easy to understand overview with contact points and references to the Safegrounds guidance and documents.</p> <p>The references to defence sites are flawed and have been drafted yet again without consulting me as the relevant PSG representative. This has to stop. So much for stakeholder involvement/engagement!</p> <p>The author does not understand defence sites or what is happening and appears to have drafted the stakeholder engagement section in order to hold MOD to ransom rather than consult first. This is totally unacceptable and as a PSG member I must veto this publication in its current form.</p> <p>This draft should never have been issued without first going to the PSG especially bearing in mind the reservations voiced by some members including</p>

		myself.
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Please note the following:

- (I) - Individual**
- (O)- Organisation**
- (C)- Constituency**