

## Comments log for Draft 3.1

Prepared by CIRIA  
Nov 06

Sub-section	Sub-section paragraph	Page	Comment
<b>PRELIMINARIES (preface, acknowledgements, executive summary, abbreviations)</b>			
			None
Acknowledgements		2	My affiliation is "British Nuclear Group Magnox Electric Ltd" Katherine Eilbeck's is "British Nuclear Group Sellafield Ltd"
Executive Summary	4	3	Sentence starting "Stakeholder expectation is that:" needs a little amplification to clarify what stakeholder(s) this statement applies to.
Executive Summary	para 1	3	Delete 'and is key to achieving all the others'. This is nonsense and perpetuates the dangerous idea that recording something makes it right.
Executive Summary	para 3	3	The terminology in the first sentence is not consistent with LMGv1 and what is proposed for LMGv2. 'Management' includes most of the activities mentioned and the term 'remediation' is never used.
Executive Summary	para 3	3	In line 6, which 'organisation'?. See also later comments on long-term record-keeping.
Executive Summary	last	3	Please replace this para. It is pompous and could be construed as offensive. Plus see comment above on what is meant by 'organisation'.
Abbreviations		4	M&O and GIS to be added The E in SEPA is "Environment"
Abbreviations		4	Scottish Environment Protection Agency (not Environmental)
			Whilst the contents list etc is of an appropriate level of detail I was expecting a document more akin to CLR II 'The Model Procedures for the Management of Contaminated land' in terms of structure and form with maximum use made of flow diagrams to guide the reader through the guidance and define the process of identifying and retaining the required records with appropriate decision points.
<b>SECTION 1 – INTRODUCTION &amp; BACKGROUND</b>			

			None
1.1	para 1	6	In line 4 delete 'and is key to achieving all the others'. See comment on ES.
1.1	para 1	6	Opening sentence - should be 'SAFEGROUNDS Learning Nwtwork' not 'SAFEGROUNDS website'.
1.1		6	Text covering the SAFEGROUNDS context could be improved e.g. some background on the development of the principles and summary information on how they are applied through the guidance
1.1	para 3	6	This will only be true if records are accessible to many stakeholders. Section 4.6 implies that they will not be.
1.3			What about regulatory requirements for Defence Sites such as the Public records Act as amended by FOI Act, the FOI Act itself and FEIR as well as inspections by Local Authorities under Part II A of the EPA 1990? As it stands the bias is too much towards Nuclear Licensed sites despite DE provided funding
1.1	para 3	6	2nd sentence - what is meant by 'the reasons behind it' - reason behind contam or reason behind decision making?
General			Need to make clear who the stakeholders are in section 1 (as suggested in the project spec). The term stakeholders is used a number of times before you set out who they are, which is confusing.
1.1	para 5	6	"relevance to <b>related topic areas</b> such as management of safety, environment, waste and decommissioning" - a bit confusing/ vague - safety and environment are broad areas relevant to contam land, waste management etc. and decommissioning encompasses contam land and waste.
1.1	bullets	6	Listing the issues comes across a little negatively. Would be good to rephrase this section to make a positive statement about what the guidance addresses e.g. "This guidance has been written to address the need for:"; then change sub-headings to positive e.g. 'clear recording of information'.
1.1		7	Final sentence "Participation ...." - this might sit better in the prelims under the list of PSG members
1.3		7	List could be simplified/ summarised - currently reads like a contents list
<b>SECTION 2 – THE REQUIREMENTS FOR RECORDS</b>			

2.1	1	8	Delete 'record-keeping is the lifeblood of liabilities management'. This is nonsense. Record-keeping is important but not nearly as important as protecting people and having enough money to do the job properly.
2.1	para 1	8	slightly awkward first sentence - suggest change 'producing' for 'achieving' and split sentence after "value for money"
2.1	para 1	8	Need to make it clear who the 'stakeholders' are (see comment on section 1)
2.1	para 2	8	Why 'in the past' - presumeably a number of these statements still apply. Plus the sentence then finishes in the present i.e. 'and is actually quite difficult to manage...' - reads awkwardly
2.1	para 3	8	Instead of 'selected remedies' suggest that you use 'management options' to be consistent with other SAFEGROUNDS guidance. It may also be better to include the points as bullets.
2.1	3	8	<u>Third sentence</u> Add: "land" after: "successful" To clarify the subject of the sentence
2.1			The style is not concise or succinct enough, is a little melodramatic and contains too much conjecture on the part of the author. All of which affects the credibility of the guide and its length.
2.2	1		Again needs to be more succinct. Reference to 'defence estate' is more appropriate than 'defence sector'. Also change has been taking place since before the Cold War. More recently there has been the progressive loss of Crown immunity combined with strategic realignments in response to changes in the defence requirement. Also MOD has the same policy of openness etc as the NDA
2.2	1	8	May be worth mentioning that under the new and continually changing working arrangements there may be new site licences also set up, which is also a key driver because these Tier 1 contractors may not previously required a site licence.
2.2	para 1	8	1st sentence - 'are about to experience great organisational change' - suggest change to 'are currently'
2.2	para 2	9	1st sentence '..yet much of what drives interest...' - whose interest? i.e. not site managers.

2.2	Table	9	<p><u>Third row: "Regulators". First sentence</u>  Replace: "certain legal requirements" with "all legal requirements"  <u>Third row: "Regulators". Second sentence</u>  Add: "comprehensive, reliable, " before: "accurate"  <u>Third row: At end.</u>  Add a statement covering the following: "Records are required for day-to-day control of contaminated land until remediation is achieved, for strategy decisions, for remediation planning, for applications for waste disposal authorisations, for applications for delicensing of site and for stakeholder interactions/ public information obligations."</p>
2.2	Table	9 -10	<p>This table is about responsibilities as well as expectations. It raises, but does not answer, the question of who keeps the records in the long-term. This was actually the main reason for having the key principle and is not well-addressed in this document.</p>
2.2	Table	9	<p>Table needs a title. Additionally, do we need to draw a distinction between the term contractor used in boxes 2 and 4 of this table.</p>
2.2	Table	9	<p>Under the box on general public and NGO do we need to add SSGs?</p>
2.2	para 2, 3rd sentence	9	<p>I guess the "confidentiality constraints" referred to here are "personal confidentiality", rather than extending to "commercial confidentiality". Worth making explicit?</p>
2.2	para 2 and 3		<p>Again needs to be more succinct. Reference to 'defence estate' is more appropriate than 'defence sector'. Also change has been taking place since before the Cold War. More recently there has been the progressive loss of Crown immunity combined with strategic realignments in response to changes in the defence requirement. Also MOD has the same policy of openness etc as the NDA</p>
2.2			<p>Need to add an additional driver: liability protection. See also comment below in respect of Sub-section 2.3 Page 11</p>
2.3			<p>The initiatives and challenges need to be clearly signposted using further sub headings</p>

2.3	all		<p>Question reference to 'defence sector' rather than defence estate</p> <p>Also the challenges could be presented more succinctly and without the current level of conjecture on the part of the author</p> <p>The guide need to be a slick and succinct as possible</p>
2.3	1	10	<p>It should not be overlooked that contaminated land (at least on nuclear licensed sites) should be continuously <u>managed</u> from time of the contamination event, time of burial of activity or time of discovery until remediation is completed.</p>
2.3	2	10	<p><u>Third sentence</u> The author does not give the source or reference of this statement nor the type of site concerned. I recommend MoD and/or author are asked to clarify prior to publication of this paper.</p>
2.3	para 3, 1st sentence	10	<p>It would probably be not unreasonable to state "... referenced (if at all) only by manual card systems ..."</p>
2.3	3		<p>Question accuracy of reference to 'only manual card systems', but agree that adequate indexing of documents and information is an issue.</p>
2.3	4	11	<p>It is unfortunate to highlight a single site. It might be more appropriate to present a generic statement that some data has in the past been allowed to degenerate or be lost and that multi-layered arrangements should be in place to avoid this.</p>
2.3	para 4, 1st sentence	11	<p>The episode referred to has a complex history pre-dating the splitting of the Hunterston A and B sites at the break-up of the SSEB. There is no particular value in 'naming and shaming' the particular site (although this has already been done in the press). There is also a further aspect of the story that illustrates a point about organisational change and traceability/loss of records. Please re-phrase as: "Unintended physical damage or loss of records has also occurred. For example, water ingress into a basement used for records storage resulted in the destruction of records relating to authorised solid waste disposals on a nuclear power station site, and the then regulator's copies of the same records have not been traced."</p>

2.3			This is perhaps the appropriate section in which to address some of my general points (below) about organisational change and longevity of site life-cycles.
2.3	Para 4 to 6 LCR Box		<p>Options for use and role/application of the LCR has not been adequately addressed. As a SiIC I see this as a wasted opportunity. What about planning applications and the provision of information under Part IIa etc?</p> <p>Current DE policy is for an LCR to be produced for each site and act as a living summary of the site condition and index of reports and investigations etc as well as providing an overview of concerns over data quality etc. It is also then available to third parties such as the Local Authority and environment agencies and can be used to assist with planning applications. One other role is that it can provide a consolidated summary of all available information sources to assist those undertaking Land Quality Assessments. Its role in land transactions is limited by the fact that MOD undertake detailed Land Quality Assessments as part of the sale/disposal process.</p> <p>All boxes could do with numbering and indexing</p>
2.3	para 5	11	It would be useful to include a little more on the problems that arise from a range of different disciplines/professions coming together on contam land problems and how standardising data can help this - i.e. I think there is one missing sentence of explanation.
2.3	6	11	The reference to future liability should also be introduced as one of the drivers at sub-section 2.2. It also should be emphasised that it is the licensee (not the site owner) that has the duties and responsibilities under NIA65.
2.3	para 7	11	Final sentence of section - left me thinking 'why' with respect to its particular relevance to defence sites (presumably a link to final sentence in para 6) and 'how' with regard to its useful application on some nuclear sites. I think a bit more explanatory text would be useful here.
2.3	Para 7		<p>Cane MOD tap into SHIRE?</p> <p>Are there no other initiatives?</p>

2.3	last	12	This seems to be all about England and Wales. What about Scotland?
2.3	Box titled Land Condition Records	13	By placing this text in a box is there an inference that the Land Condition Records are more important than anything else, or is that what the author wishes?
2.3	Box entitled NII expectations	13	Where have these expectations been derived from? Is it the HSE reference on the line below?
2.4			This section is a partial (only) résumé of the actual regulatory requirements. As such it is potentially misleading. For example, the relevant nuclear site licence conditions are not limited to LC6 (and LC23/LC36) as the text implies. Other LCs are relevant and obligations responsibilities and liabilities under NIA65 (as amended) are not limited to the conditions attached to the licence. The RCL regulations introduce further tasks.
2.4			Need sub headings to separate Nuclear and Defence.
2.4			What about the public Records Act, FOI Act, FEOR and Part IIa etc for defence sites both retained and alienated (sold)?
2.5	4	14	The text box on the NDA NNA currently found in Section 4.5 would be more prominent and helpful if presented here in Section 2.5.
2.5	all	14	I would have expected this to say that it is the owner of the land that has to keep records in the long-term and that records should be passed on to new owners (see LMGv1). It might be helpful at the beginning of the section to make a clear and general distinction between site owners (the NDA, MoD, etc) and site operators (SLCs, AWE, dockyard operators).

2.5			<p>Like the NDA MOD requires records and date to manage its sites, identify environmental and health risks, make appropriate decisions and enable regulatory compliance. Equally compliance with JSP 441 is required and the guide needs to reflect this. Currently it merely provides a summary of the JSP which adds no value.</p> <p>Will the proposed EU Directive affect MOD in the same way as the NDA?</p> <p>Again I am disappointed at the obvious bias towards the NDA and lack of effort on the part of the author to adequately address the situation with respect to MOD and defence sites</p>
Appx A	3	41	The HSE documents referred to in this Appendix could usefully be added to the list of references on page 34.
<b>SECTION 3 – GUIDANCE ON THE RECORDING OF INFORMATION</b>			
3.1	1 <sup>st</sup> set of bullets	15	Do you need to add “assist in decision making” and “determining site end points” or is that covered in estate management?
3.1			The terminology is biased towards nuclear licensed sites rather than defence sites and both must be catered for.
3.1	1	16	Should this not a risk based process? What about implementing the strategy? This para appears to be referring to the act of remediation, is this the case? Greater clarity is required.
3.1	fig 1	16	Has this been not been updated?
3.1	2	15	The final bullet “estate management” records will need to include sufficient evidence to support the case for future use of the land and /or delicensing.
3.1	2nd list of bullet points	15	I suggest ‘decontamination’ could be replaced by ‘contaminated land remediation/clean-up’
3.1	para before fig 1	15	This needs a better link to Figure 1 than just a colon.
3.1	para after fig 1	16	I suggest referring to CLR11 as well as the CIRIA reference.
3.1	fig 1	16	This is out of date and should be replaced.
3.1	para 1	16	There should be no mention of the CIRIA 2004 document. This document is inconsistent with LMGv1 and not endorsed by many SAFEGROUNDS members.

3.2	General		Could the LCR fulfil the Land Quality File role or be adapted to do so? If so then the guidance needs to recognise and possible endorse this.
3.2	General		<p>There is benefit in using additional sub-headings to provide clear guidance on content for each section of the LQ File in the same way that guidance exist on how to complete an LCR or else include the detail in an annex. In this way consistency will be achieved.</p> <p>Should those maintaining the LQ File have a minimum level of competence, if so then what should this be and how should it be gauged?</p> <p>Should they ideally be SiIC registered for instance?</p> <p>How does the proposed LQ File sit/fit with CLR11?</p>
3.2	Para 1	17	Do we make it clear who might be responsible for owning the land quality file?
3.2	LQF contents item 1	17	Should this be 'Overview document' rather than 'Executive Summary' – the latter suggests a report with conclusions rather than a live file.
3.2	Sec 8.4	18	To avoid confusion this should read: explosive ordnance/munitions surveys
3.2	LQF contents item 9	18	This seems a bit of a mix of different categories of documents. I don't know what is meant by 'material movement tracking', but it sounds more like a 'management' activity to be put into the current Item 10.

3.2	LQF contents items 8 onwards	18	<p>Personally, I would recommend the following structure:</p> <p>8: Desk study and factual investigation information</p> <p>8.1 Geology etc</p> <p>8.2 Land quality desk study findings</p> <p>8.3 Contamination investigations</p> <p>8.4 Non-intrusive radiological surveys (if this needs to be separate from contamination investigations)</p> <p>8.5 Munitions surveys</p> <p>9. Live index of areas of potential concern (contaminant sources)</p> <p>10. Time-series monitoring results</p> <p>11. Interpretations and assessments</p> <p>10.1 Conceptual site model</p> <p>10.2 Environmental risk assessments</p> <p>10.3 Other interpretative activities including modelling</p> <p>The idea behind my proposed item 9 is to have a live document that keeps track of current knowledge on areas of potential concern, some of which may have been identified in a desk study then closed out by subsequent investigation or remediation.</p>
3.2	LQF contents	18	<p>A 'home' needs to be found for records of decommissioning and decontamination of below-ground structures. These records may be created within decommissioning projects that may have little recognition that the residual below-ground structure will effectively become part of 'land quality'.</p>
3.2	LQF contents item 10	18	<p>Worth mentioning PPC SPMP and permit surrender reports?</p>
3.2	2	17 18	<p>The list of data to be acquired, managed and retained appears comprehensive. However, the description of the "fixed structure" of the LQF is of concern. It should be flexible enough to ensue that records are retained for all feasible needs noting that circumstances can change over the many decades that the data may have live relevance.</p>

3.2	2nd para after LQF contents	19	I feel the current proposed contents structure does not give enough prominence to the conceptual site model(s) (CSM). Should each iteration of a CSM be recorded in the LQF, so that the development of the CSM can be traced?
3.2	Land Quality File Sec. 10	18	The title of this should be 'Management of the Contaminated Land'. Note that this comment and the subsequent ones about titles of sections in the Land Quality File are for consistency with LMGv1 and LMGv2.
3.2	Sec 10.2	18	I think these activities are part of the short-term measures in Sec 10.1.
3.2	Sec 10.3	18	The title of this should be 'Establishment of long-term management strategy and priorities for action'.
3.2	Sec 10.4	18	Title should be 'Establishment of preferred long-term management options for specific areas'.
3.2	Sec 10.5	18	Title should be 'Long-term management methods implemented for specific areas'.
3.2	Sec 10.8	18	Title should be 'Validation activities'
3.2	Sec 10.12	18	Title should be 'Achievement of final end-state'.
3.2	Annex 4	18	Stakeholder Involvement (not Engagement).
3.2	Annex 5	18	I do not understand what is included in this annex. Surely it is all in Sections 10.3 and 10.4.
3.2	para 3	19	Please reword the first sentence. (Records do not produce information or develop models.)
<b>SECTION 4 – RECORD KEEPING SYSTEMS AND ASSOCIATED PROTOCOLS</b>			

All sub sections	General		<p>The section needs to be more succinct and to the point and use simple easy to follow diagrams. Fig 3 is particularly difficult to follow.</p> <p>The guidance must tell the reader clearly and succinctly what must be considered and what constitutes an effective system and associated protocol.</p> <p>Again flow diagrams with decision tress would be good. These would signpost key components and provide decision points etc as well as help compress the guidance and make easier to follow/apply.</p> <p>I would also prefer the term 'must' to be used in preference to 'should'.</p> <p>All figures must be adequately referenced/indexed</p> <p>Can we remove the bias with respect to references to the nuclear industry?</p> <p>The author appears to have spent some considerable time investigating NDA initiatives but not DE or MOD ones.</p>
4.1	para 1	20	I think it is necessary to be careful here about who is making and keeping records. Typically those making the records are not the site owners who are responsible for liabilities. The owners do need to keep or arrange for someone to keep the records in the long term.
4.1	para 1	20	Surely the guidance is here to set out good practice with respect to the keeping of records associated with the management of contaminated land rather than attempting to demonstrate good practice? If it is the latter then the value of the guidance must be questionable?
4.1	para 1	21	What is meant by 'multiple geographies'?
4.1	para 3	20	To cover the point above, perhaps 'organisations' not 'an organisation'.

4.1	3	20	The discussion of record disposal should have a “health warning”. Site operators and licensees need to ensure they have clear, transparent (and well peer reviewed) arrangements to ensure that decisions on retention and disposal are appropriate and formalized.
4.1	Final bullet before Fig 2	20	For consistency with what is said later about archives, I suggest this should read: “... or permanently storing those of legal, historical or other significance, or transferring those suitable for preservation in a Public Records Place of Deposit (archive).”
4.1	Figure 3		There seems to be an unnecessary diversity of shapes of box which do not obviously have any specific meaning. Is the word ‘Distribution’ concealing a dotted or solid tie-line? What is the ‘System’ near the middle of the diagram?
4.1	4th of 1st set of bullets	22	400 hours/year seems meaningless if the size of organisation is unknown.
4.1	last para on page	22	“... to ensure it is adopted...” What is “it”?
4.1	Note	23	What value does this add?
4.1 & 4.2	all	20-26	Rewording is required to make these sections less prescriptive. In particular, replace ‘must’ by ‘should’ or ‘it is recommended that’ or ‘it is good practice to’.
4.3.2			DE has developed GEODE and we are more than happy for you to investigate/discuss this. We also use Retrieve to manage and store electronic copies of LQAs. For defence sites any solution must be compatible with the Defence Information Infrastructure (DII) initiative.  The author appears to have spent some considerable time investigating NDA initiatives but not DE or MOD ones.
4.4		28-29	See general comments about longevity of records and mapping of terminology to NII language in Appendix B.

4.4 & 4.5	all	28-29	These sections do not really help at all with how to meet the basic thrust of the key principle, which is about keeping records in the long term and making these records accessible. There is also confusion about who has to do what (see previous comments). I suspect that the PSG will need to sort this out, if not here then for LMGv2.
4.5	1	29	There may be other uses for data than the basic legal obligations identified in the text. I suggest replacing: "Records are" with: "Records might be" and adding the caution above. The reference document, T/AST/033, points out the legal and commercial risks that a licensee takes in deciding to destroy records. This point should be identified within the text of section 4.5.
4.5		29	The section heading should presumably include 'Destruction'
4.5	Para 1	29	Is there any practical difference between multi-decade management of inactive records and 'permanent storage'?
4.5	Para 2	29	Should this refer to 'National Nuclear Archive' or 'National Archives'?
4.5	Box on NNA	29	See suggested move to Section 2.5.
4.5	Box on NNA	29	Suggested re-wording of final 2 sentences in box: "Site Licence Companies (SLCs) and stakeholders must be clear that the purpose of the NNA will not be to manage operational records, including land quality records; the emphasis of the NNA is clearly on historical and local interest data. SLCs are entirely responsible for the management of records on the sites they operate, up until de-licensing, and should not anticipate a transfer of records to the NNA."
4.6	Box	30	Why is this text in a box?
4.6	Para after box	30	"of" missing from 2 <sup>nd</sup> sentence.
4.6	4th para after box, final sentence	31	Capital R on "Restricted"
4.6	last few paras	30-31	The discussion of OCNS guidance and security markings does not fit well here and I do not believe that it is relevant to contaminated land, which always contains low levels of radioactive contamination. It is certainly not relevant to defence sites that are to be sold.

4.5/4.6			<p>What about the Public Records Act as amended by the FOI Act and in particular the 30 year rule?</p> <p>Also you were given a copy of JSP 441, is there anything that needs to be brought out in the guidance?</p> <p>What about security markings for instance?</p>
4.7		31-33	Sub-headings 'Paper' and 'Electronic Media' are not adhered to – e.g. para before box on P 31. Sub-headings better left out?
4.7	Graphics	32	Graphics are not explained and probably superfluous. If it's a freeware calculator on a website, give the reference.
4.7		33	Reference to Appendix C should be to Appendix D.
4.7		33	Some indication would be useful as to whether the authors consider the HSE guidance in Appendix D to be in line with the general 'body of knowledge' in records management.
4.7		33	Please give an example of 'WORM' medium – e.g. CD-ROM?
<b>END PAGES (references, glossary)</b>			
Refs		34	There are documents not listed here but could be expected to be so. E.g. the NIA65 and HSE/NII's SAPs and guidance documents.
References		34	It would be helpful for the references to give more information that would help readers obtain copies (e.g. websites).
References		34	Do we need to reference any pertinent IAEA documents?
Contaminated land glossary		36	The definition of 'remediation' is dreadful. It is not consistent with EPA90 nor with HSE usage. The best thing to do is to avoid this term altogether, as is done in LMGv1.
Contaminated land glossary	last	36	Why is this incredibly narrow definition of 'uncertainty' needed?
Contaminated land glossary	first	37	This definition of 'verification' should be deleted. LMGv1 uses the tem 'validation' and so will LMGv2.
<b>APPENDICES</b>			
A	3	41	The documents referred to in this appendix could usefully be included in the list of references (Page 34)

A	General		<p>What about defence sites?  Inspections under Part IIa, Planning, FOI, FEOR and the Public records Act etc?</p> <p>Why the bias to the nuclear industry?</p>
A	NII expectations box		And the same is true of MOD/DE.
A		44	Might the fact that you devote an entire appendix covering regulatory requirements but only discuss those pertaining to the NII infer to the readership that the EA/SEPA do not have any regulatory requirements?
B			<p>Anything of relevance in JSP 441?</p> <p>Any relevant guidance for defence sites?</p>
C	1st line	48	It would be helpful to give some indication of the provenance of this 'sample document' – e.g. "based on guidance produced for a major financial institution by a provider of records management services".
C			Does this fit with JSP 441?
			Appendix E is poorly reproduced and difficult to read.
F			See general comment about naming specific service providers.
G			I'm not sure this is appropriate in this report – it looks a bit like a marketing leaflet.
I	Waste management	75	It is not appropriate to refer to IAEA TECDOCs. These have a very low status. The appropriate IAEA requirements and guidance are in Safety Standards series documents
I	Decommissioning	76	It is not acceptable to reference or quote draft IAEA Safety Standards (DSS documents) that have not been approved by Member States. I suggest leaving this section out until the new SAPs appear.
I	QA	76	<p>The old IAEA documents mentioned here have been replaced by ones on 'Management Systems'.</p> <p>What about QA for defence sites?</p>
<b>GENERAL COMMENTS</b>			
The paper is a useful first step in preparation of the desired guidance document but additional work is required.			

Regarding your specific questions:

Structure logical, Style clear, terminology consistent, the balance between guidance and supporting information is appropriate, "regionality" is not addressed (the drivers may be different in the north and south of Britain – so site options and hence data demands may be somewhat different)

Key points and detail addressed above. The document is not fully comprehensive but this will not be difficult to rectify. Other points in your list of topics to address are covered in the specific paragraph comments above,

My main comment is on the content of the publication. It is overly comprehensive and at 77 pages is very long! There is much text book material on records and record keeping which is best left within those publications or it can be referenced using Government guidance/direction, ISO and BSI standards. Thus I would prefer to see a specific guide on contaminated land as contained in Section 3. The remainder belongs in a general records treatise which could emanate from the NDA or other body

Each site is required to make provision for its records management and should be following some form of records programme already and not starting from scratch in this one area as the guide indicates

The content of section 3 is a very useful guide as to what goes into our Retention Schedule. Little guidance or instruction is given on retention times or trigger events and further indicative times for differing value records would be appreciated. The alternative will be to keep everything for ever.

I think the title is not self-explanatory to someone who does not know the scope of SAFEGROUNDS. My suggestion would be: "Good practice guidance for land quality records management – A report prepared for the SAFEGROUNDS Learning Network".

Overall, I think this report has the potential to be a very useful pointer towards what represents good practice. However, to realise this potential, I think the vision of the 'Land Quality File' needs to be sharpened (see below).

The report should identify from the outset that "Land Quality" is a more neutral and comprehensive term than "Contaminated Land", and that although "Contaminated Land" is the term used in defining the SAFEGROUNDS remit, "Land Quality" is the preferred term for this guidance document. As an example, there may well be land to be de-licensed that is not contaminated, but for which land quality records will be very important.

I think the report needs to set out a case (if it can be made) that land quality records need special treatment compared to other records that a nuclear or defence site operator may need to manage. Conversely, if there are other aspects of nuclear or defence site management that have similar special requirements to land quality (e.g. recording of the condition of wastes and structures to be placed into long-term safe storage) then this should be highlighted.

The term "Land Quality File" appears to be a new term defined in this report. If so, this should be made very explicit. Otherwise, one can get the impression that it is something that has been defined elsewhere that this report recommends and develops.

Assuming that the “Land Quality File” (LQF) is a new term, then it is potentially the most useful contribution of the report in terms of pointing those responsible for creating and organising records towards workable good practice. It is therefore very important that the concept of the LQF is explained as clearly as possible. The place to address this is in Section 3.2, but I feel this is so key that it is better dealt with under ‘General comments’. Section 3.2 leaves me uncertain as to what the authors have in mind. It would be helpful to present the structure and a description of the format of a Land Condition Record (LCR) as an appendix to the report, so that the differences between an LCR and LQF can be made clearer.

The proposed contents structure for a LQF (with an ‘Executive Summary’ and ‘appendices’) looks like a table of contents for a report, yet some sections (e.g. 8 and 9) seem to be more about sign-posting existing reports. Personally, I think that if the LQF is interpreted by readers of the guidance as a proposed structure for a ‘master report’ that summarises or even replicates information in existing reports, which is somehow supposed to be kept ‘live’, it will be seen as unworkable or will be tried and fail. I think the authors intend the LQF to be primarily a means of organising diverse types of information; some historic, some recent reports, some gaps to be filled by ongoing or future work or information-gathering. If so, I do not get a ‘feel’ for what this would look like. Is it something that (when active) sits in a filing cabinet or on a server or some hybrid? I think the authors should give a view on whether anything other than a fully electronic filing system for active records (with hard copy originals in secure storage) could be claimed as good practice.

I feel that the demarcation between ‘main file’ contents and appendices to the LQF is vague. The notion of ‘appendices’ seems more appropriate to a single document than a ‘file’.

More specific comments on specific aspects of the proposed LQF structure and content are given in reference to Section 3.2.

For at least some nuclear sites, there is an expectation on the part of liability holders and regulators that records will have to out-last the organisations that create them (e.g. site licence companies). Much of the generic guidance on record-keeping comes from contexts where companies need to keep records to ensure their continued profitable existence. The guidance needs to explore the extent to which the needs of the nuclear industry are unique, and ensure that terminology and definitions developed in the mainstream commercial environment are not uncritically transferred to this context. The guidance also needs to do more to address records management issues that arise from organisational change.

More specifically, there needs to be a discussion of the relationship between the terminology used in this report (active/inactive/archive records) and that used by HSE/NII in Appendix B (non-permanent and permanent records).

I perceive a mixed message about what is good practice in storage of inactive and/or archived records. This may particularly be an issue for SLCs, which are accountable for managing their records up to the time of de-licensing. Can this be securely out-sourced or must the SLC retain direct control over records, and if so does that have to mean on a licensed site or even on the specific licensed site to which the records relate? The answers to these questions may have been answered by those planning for de-manned licensed sites. Much of the report presumes that inactive and archived records will be stored off-site.

While it is welcome to have attributed examples of good and not-so-good practice – e.g. from UKAEA and MOD, I think the guidance should avoid mentioning specific service providers (e.g. Iron Mountain and Cbd). Otherwise there is a potential risk that SAFEGROUNDS may be seen to be endorsing specific service providers. Anyone interested in identifying the vendors could contact the client organisation – e.g. Nirex. If there is a relevant trade association website and/or publication that can be sign-posted, that would be potentially useful.

There are a few grammatical/punctuation gremlins, especially inconsistent use of apostrophes and hyphens, which make text hard to follow in places.

SLCs are Site Licence Companies (or Site Licensee Companies) not “Site Licence Contractors”.

The report should refer to CLR5 (Information systems for land contamination, DoE 1994) and provide some comment as to its continuing validity.

1. This is a great improvement on the previous draft. It is more focused, better organised and shorter.

2. I still feel that there is too much background material in the document, especially in Section 2, and that Appendices E, F, G and H are unnecessary.

3. The writing style is not concise.

4. The main target audience is obviously technical people but the document does not say so. (It says ‘organisations’ but not who within those organisations.) The Executive Summary could be used to reach other audiences but needs substantial redrafting (see specific comments above).

5. The document is written for large organisations and primarily for nuclear-licensed sites. It will be difficult to update it and extend it if SAFEGROUNDS decides that LMGv2 and its supporting documents should cover to all sites where there is radioactive contamination.

Overall - pretty comprehensive covering most of the issues.

It could do with a section after the Exec Summary which summarises (i) the location in the report of the land quality file and the check lists, (ii) a table of relevant standards and legislative requirements (eg BS stds, FOI Act) eg for British Stds - BS number, title, cross ref in the report to where the std applies. This will enable the reader to be able to get to those parts of the report he likely to use on a regular basis, without having to go through lots of text.

There is some repetition between sections 2 and 4 - specifically Section 2.5 and the boxes in section 4.2.2 and 4.5 which refer to Information Asset Register and the National Nuclear Archive.

As working group member I have been involved in this, thus I am sanguine about the form and function of the document

I have no additional comments of substance to the ones you (Dick Haworth) have included.  
I fully agree with your points about license conditions and in terms of general record keeping as you know there are areas of good practice with some licensees. The only minor comment I have is about consistency of terminology between NSD and NII. I know this is difficult for people outside HSE. I would therefore suggest that where the reference should be to NII as this is the organisation that most others recognise as having the responsibility for regulation.

As part of the SAFEGROUNDS Steering Group I have provided comments on the various iterations of this report on a number of occasions.

I have not commented on any typographical or punctuation errors.

The term 'stakeholder' is used frequently. At a number of points it is not clear whether the reference is to all stakeholders, a particular group (e.g. NGOs) or a sub-set e.g. institutional stakeholders. I think it would be good to set out the different stakeholder groups in section 1 and to be clear in later sections whether you are referring to all or a particular group/ sub-set.

There are a few occasions in the early sections where it looks as if info has just been cut and pasted into the doc from the spec. On almost all occasions this info is very important, but I think a slight re-write to for instance turn the issues raised by the PSG in section 1.1 to strong statements about what the guidance will address will improve the flow and increase the readers confidence in the information provided. I hope this is clear - If not please give me a call.

I think the writing style/ sentence structure is a little vague/ awkward in parts. Some time could be usefully spent ensuring that the key messages are clear and backed up by sufficient explanatory info.