

Comments log for Draft 3.1

Prepared by CIRIA

Feb 07

Name	Organisation	Sub-section	Sub-section paragraph	Page	Comment	Response
PRELIMINARIES (preface, acknowledgements, executive summary, abbreviations)						
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Acknowledgements		2	My affiliation is "British Nuclear Group Magnox Electric Ltd" Katherine Eilbeck's is "British Nuclear Group Sellafield Ltd"	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Executive Summary	4	3	Sentence starting "Stakeholder expectation is that:" needs a little amplification to clarify what stakeholder(s) this statement applies to.	Done
Marion Hill	Independent Consultant	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.	Done
Marion Hill	Independent Consultant	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.	This is the list agreed at one of the project workshops
Marion Hill	Independent Consultant	Executive Summary	para 3	3	In line 6, which 'organisation'?. See also later comments on long-term record-keeping.	Done
Marion Hill	Independent Consultant	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'.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Abbreviations		4	M&O and GIS to be added The E in SEPA is "Environment"	Done
Marion Hill	Independent Consultant	Abbreviations		4	Scottish Environment Protection Agency (not Environmental)	Done

Mark Hill	Defence Estates				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.	High level flow diagram added to Summary Document and Section 1
SECTION 1 – INTRODUCTION & BACKGROUND						
Marion Hill	Independent Consultant	1.1	para 1	6	In line 4 delete 'and is key to achieving all the others'. See comment on ES.	Done
	CIRIA	1.1	para 1	6	Opening sentence - should be 'SAFEGROUNDS Learning Nwtwork' not 'SAFEGROUNDS website'.	Done
	CIRIA	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	Is this something you could provide?
Marion Hill	Independent Consultant	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.	Section 4.6 contains exhortation to keep records as free of security sensitive material as possible
Mark Hill	Defence Estates	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	Tried to address better in this draft
	CIRIA	1.1	para 3	6	2nd sentence - what is meant by 'the reasons behind it' - reason behind contam or reason behind decision making?	Done

	CIRIA	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.	Done
	CIRIA	1.1	para 5	6	"relevance to related topic areas 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.	Removed
	CIRIA	1.1	bullets	6	Listing the issues comes across a little negatively. Would be good to re-phrase 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'.	Re-phrased and moved to 2.3
	CIRIA	1.1		7	Final sentence "Participation" - this might sit better in the prelims under the list of PSG members	Done
	CIRIA	1.3		7	List could be simplified/ summarised - currently reads like a contents list	High level flow chart added
SECTION 2 – THE REQUIREMENTS FOR RECORDS						
Marion Hill	Independent Consultant	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.	Done
	CIRIA	2.1	para 1	8	slightly awkward first sentence - suggest change 'producing' for 'achieving' and split sentence after "value for money"	Done
	CIRIA	2.1	para 1	8	Need to make it clear who the 'stakeholders' are (see comment on section 1)	See above
	CIRIA	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	Done

					manage...' - reads awkwardly	
	CIRIA	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.	Done
		2.1	3	8	<u>Third sentence</u> Add: "land" after: "successful" To clarify the subject of the sentence	Done
Mark Hill	Defence Estates	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.	Tried to address better in this draft. Comments on which paras should come out for the final document welcomed
Mark Hill	Defence Estates	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	Amended
		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.	Any examples in mind?
	CIRIA	2.2	para 1	8	1st sentence - 'are about to experience great organisational change' - suggest change to 'are currently'	Done
	CIRIA	2.2	para 2	9	1st sentence '..yet much of what drives interest...' - whose interest? i.e. not site managers.	Amended

		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>	Done
Marion Hill	Independent Consultant	2.2	Table	9 -10	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.	Tried to address better in this draft.
		2.2	Table	9	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.	Done
		2.2	Table	9	Under the box on general public and NGO do we need to add SSGs?	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	2.2	para 2, 3rd sentence	9	I guess the "confidentiality constraints" referred to here are "personal confidentiality", rather than extending to "commercial confidentiality". Worth making explicit?	Commercial confidentiality made explicit
Mark Hill	Defence Estates	2.2	para 2 and 3		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	Tried to address better in this draft

		2.2			Need to add an additional driver: liability protection. See also comment below in respect of Sub-section 2.3 Page 11	Done
Mark Hill	Defence Estates	2.3			The initiatives and challenges need to be clearly signposted using further sub headings	Done
Mark Hill	Defence Estates	2.3	all		Question reference to 'defence sector' rather than defence estate Also the challenges could be presented more succinctly and without the current level of conjecture on the part of the author The guide need to be a slick and succinct as possible	Tried to address better in this draft
		2.3	1	10	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.	Added
		2.3	2	10	<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.	Personal Knowledge
Hugh Richards	British Nuclear Group Magnox Electric Ltd	2.3	para 3, 1st sentence	10	It would probably be not unreasonable to state "...referenced (if at all) only by manual card systems ..."	Done
Mark Hill	Defence Estates	2.3	3		Question accuracy of reference to 'only manual card systems', but agree that adequate indexing of documents and information is an issue.	See above
		2.3	4	11	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.	See below

Hugh Richards	British Nuclear Group Magnox Electric Ltd	2.3	para 4, 1st sentence	11	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."	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Done
Mark Hill	Defence Estates	2.3	Para 4 to 6 LCR Box		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? 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.	Tried to address better in this draft.

					All boxes could do with numbering and indexing	
	CIRIA	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.	Done
		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.	Done
	CIRIA	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.	Done
Mark Hill	Defence Estates	2.3	Para 7		Cane MOD tap into SHIRE? Are there no other initiatives?	Tried to address better in this draft.
Marion Hill	Independent Consultant	2.3	last	12	This seems to be all about England and Wales. What about Scotland?	Not aware of any Scottish specific initiatives
		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?	Yes
		2.3	Box entitled NII expectations	13	Where have these expectations been derived from? Is it the HSE reference on the line below?	Added

		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.	Done
Mark Hill	Defence Estates	2.4			Need sub headings to separate Nuclear and Defence.	Don't agree but have tried to make clearer
Mark Hill	Defence Estates	2.4			What about the public Records Act, FOI Act, FEOR and Part IIa etc for defence sites both retained and alienated (sold)?	Added
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Relevant text from box added here
Marion Hill	Independent Consultant	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).	Added

Mark Hill	Defence Estates	2.5			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. Will the proposed EU Directive affect MOD in the same way as the NDA? 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	Tried to address better in this draft.
		Appx A	3	41	The HSE documents referred to in this Appendix could usefully be added to the list of references on page 34.	Done
SECTION 3 – GUIDANCE ON THE RECORDING OF INFORMATION						
		3.1	1 st 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?	Lists were agreed on at a project workshop
Mark Hill	Defence Estates	3.1			The terminology is biased towards nuclear licensed sites rather than defence sites and both must be catered for.	Tried to address better in this draft.
Mark Hill	Defence Estates	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.	Agree - lack of clarity of risk based process and the act of remediation seems to be a SAFEGROUNDS weakness
		3.1	fig 1	16	Has this been not been updated?	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.	Amended

Hugh Richards	British Nuclear Group Magnox Electric Ltd	3.1	2nd list of bullet points	15	I suggest 'decontamination' could be replaced by 'contaminated land remediation/clean-up'	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	3.1	para before fig 1	15	This needs a better link to Figure 1 than just a colon.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	3.1	para after fig 1	16	I suggest referring to CLR11 as well as the CIRIA reference.	Done
Marion Hill	Independent Consultant	3.1	fig 1	16	This is out of date and should be replaced.	Done
Marion Hill	Independent Consultant	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.	Done
Mark Hill	Defence Estates	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.	No - issue addressed in this draft
Mark Hill	Defence Estates	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.</p> <p>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>	Tried to address better in this draft.
		3.2	Para 1	17	Do we make it clear who might be responsible for owning the land quality file?	Added

Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Done
Mark Hill	Defence Estates	3.2	Sec 8.4	18	To avoid confusion this should read: explosive ordnance/munitions surveys	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	3.2	LQF contents items 8 onwards	18	Personally, I would recommend the following structure:8: Desk study and factual investigation information 8.1 Geology etc 8.2 Land quality desk study findings 8.3 Contamination investigations 8.4 Non-intrusive radiological surveys (if this needs to be separate from contamination investigations) 8.5 Munitions surveys9. Live index of areas of potential concern (contaminant sources)10. Time-series monitoring results11. Interpretations and assessments 10.1 Conceptual site model 10.2 Environmental risk assessments 10.3 Other interpretative activities including modellingThe 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.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	3.2	LQF contents	18	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'.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	3.2	LQF contents item 10	18	Worth mentioning PPC SPMP and permit surrender reports?	Done

		3.2	2	17 18	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.	Tried to address better in this draft.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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?	Done
Marion Hill	Independent Consultant	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.	Done
Marion Hill	Independent Consultant	3.2	Sec 10.2	18	I think these activities are part of the short-term measures in Sec 10.1.	Done
Marion Hill	Independent Consultant	3.2	Sec 10.3	18	The title of this should be ‘Establishment of long-term management strategy and priorities for action’.	Done
Marion Hill	Independent Consultant	3.2	Sec 10.4	18	Title should be ‘Establishment of preferred long-term management options for specific areas’.	Done
Marion Hill	Independent Consultant	3.2	Sec 10.5	18	Title should be ‘Long-term management methods implemented for specific areas’.	Done
Marion Hill	Independent Consultant	3.2	Sec 10.8	18	Title should be ‘Validation activities’	Done
Marion Hill	Independent Consultant	3.2	Sec 10.12	18	Title should be ‘Achievement of final end-state’.	Done
Marion Hill	Independent Consultant	3.2	Annex 4	18	Stakeholder Involvement (not Engagement).	Done
Marion Hill	Independent Consultant	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.	Follows LCR Structure

Marion Hill	Independent Consultant	3.2	para 3	19	Please reword the first sentence. (Records do not produce information or develop models.)	Done
SECTION 4 – RECORD KEEPING SYSTEMS AND ASSOCIATED PROTOCOLS						
Mark Hill	Defence Estates	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>	Tried to address better in this draft.
Marion Hill	Independent Consultant	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.	Covered elsewhere

Mark Hill	Defence Estates	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?	Amended
Mark Hill	Defence Estates	4.1	para 1	21	What is meant by 'multiple geographies'?	Amended
Marion Hill	Independent Consultant	4.1	para 3	20	To cover the point above, perhaps 'organisations' not 'an organisation'.	Amended
		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.	Added to 4.5
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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)."	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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?	May need to be improved for final document
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.1	4th of 1st set of bullets	22	400 hours/year seems meaningless if the size of organisation is unknown.	Deleted
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.1	last para on page	22	"... to ensure it is adopted..." What is "it"?	Amended

Mark Hill	Defence Estates	4.1	Note	23	What value does this add?	Amended
Marion Hill	Independent Consultant	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'.	Amended
Mark Hill	Defence Estates	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.	Discussion held with MOD and decided to leave as is
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.4		28-29	See general comments about longevity of records and mapping of terminology to NII language in Appendix B.	Amended
Marion Hill	Independent Consultant	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.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.5		29	The section heading should presumably include '/Destruction'	See comments above

Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.5	Para 1	29	Is there any practical difference between multi-decade management of inactive records and 'permanent storage'?	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.5	Para 2	29	Should this refer to 'National Nuclear Archive' or 'National Archives'?	NA
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.5	Box on NNA	29	See suggested move to Section 2.5.	Part copied to 2.5
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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."	Done, with extra addition by Simon Tucker
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.6	Box	30	Why is this text in a box?	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.6	Para after box	30	"of" missing from 2 nd sentence.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.6	4th para after box, final sentence	31	Capital R on "Restricted"	Done

Marion Hill	Independent Consultant	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.	Conflicting views expressed on this - Security markings are certainly becoming an issue for con land reporting on licensed sites. Wording for this draft was amended in light of OCNS feedback
Mark Hill	Defence Estates	4.5/4.6			What about the Public Records Act as amended by the FOI Act and in particular the 30 year rule? Also you were given a copy of JSP 441, is there anything that needs to be brought out in the guidance? What about security markings for instance?	Tried to address better in this draft.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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?	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.7	Graphics	32	Graphics are not explained and probably superfluous. If it's a freeware calculator on a website, give the reference.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.7		33	Reference to Appendix C should be to Appendix D.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Done

Hugh Richards	British Nuclear Group Magnox Electric Ltd	4.7		33	Please give an example of 'WORM' medium – e.g. CD-ROM?	Done
END PAGES (references, glossary)						
		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.	Done
Hugh Richards	British Nuclear Group Magnox Electric Ltd	References		34	It would be helpful for the references to give more information that would help readers obtain copies (e.g. websites).	Done
		References		34	Do we need to reference any pertinent IAEA documents?	Done
Marion Hill	Independent Consultant	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.	Remediation can't be avoided! EPA 90 definition added
Marion Hill	Independent Consultant	Contaminated land glossary	last	36	Why is this incredibly narrow definition of 'uncertainty' needed?	Deleted
Marion Hill	Independent Consultant	Contaminated land glossary	first	37	This definition of 'verification' should be deleted. LMGv1 uses the tem 'validation' and so will LMGv2.	Replaced verification with validation
Mark Hill	Defence Estates				Overall these are OK	
APPENDICES						
		A	3	41	The documents referred to in this appendix could usefully be included in the list of references (Page 34)	Done
Mark Hill	Defence Estates	A	General		What about defence sites? Inspections under Part IIa, Planning, FOI, FEOR and the Public records Act etc? Why the bias to the nuclear industry?	See comments above

Mark Hill	Defence Estates	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?	Correct
Mark Hill	Defence Estates	B			Anything of relevance in JSP 441? Any relevant guidance for defence sites?	See comments above
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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".	
Mark Hill	Defence Estates	C			Does this fit with JSP 441? Appendix E is poorly reproduced and difficult to read.	See comments above
Hugh Richards	British Nuclear Group Magnox Electric Ltd	F			See general comment about naming specific service providers.	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd	G			I'm not sure this is appropriate in this report – it looks a bit like a marketing leaflet.	
Marion Hill	Independent Consultant	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	Amended
Marion Hill	Independent Consultant	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.	Amended

Marion Hill	Independent Consultant	I	QA	76	The old IAEA documents mentioned here have been replaced by ones on 'Management Systems'. What about QA for defence sites?	Amended
GENERAL COMMENTS						
					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	Need feedback on which appendices to keep / delete
					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	Amended
					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.	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd				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".	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd				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).	

Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Tried to address better in this draft.

Hugh Richards	British Nuclear Group Magnox Electric Ltd	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'.	Done to follow LCR format
Hugh Richards	British Nuclear Group Magnox Electric Ltd	More specific comments on specific aspects of the proposed LQF structure and content are given in reference to Section 3.2.	
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Tried to address better in this draft.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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).	Tried to address better in this draft.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Can be securely outsourced
Hugh Richards	British Nuclear Group Magnox Electric Ltd	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.	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd	There are a few grammatical/punctuation gremlins, especially inconsistent use of apostrophes and hyphens, which make text hard to follow in places.	Tried to address better in this draft.

Hugh Richards	British Nuclear Group Magnox Electric Ltd	SLCs are Site Licence Companies (or Site Licensee Companies) not "Site Licence Contractors".	Amended
Hugh Richards	British Nuclear Group Magnox Electric Ltd	The report should refer to CLR5 (Information systems for land contamination, DoE 1994) and provide some comment as to its continuing validity.	Done
Marion Hill	Independent Consultant	1. This is a great improvement on the previous draft. It is more focused, better organised and shorter.	
Marion Hill	Independent Consultant	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.	
Marion Hill	Independent Consultant	3. The writing style is not concise.	
Marion Hill	Independent Consultant	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).	
Marion Hill	Independent Consultant	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.	Tried to address better in this draft.
		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 RRegister and the National Nuclear Archive.	Tried to address better in this draft.
Paul Dorfman	UWE	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.	
	CIRIA	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.	Tried to address better in this draft.
	CIRIA	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.	Tried to address better in this draft.
	CIRIA	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.	Tried to address better in this draft.