

**REVISION OF SAFEGROUNDS GUIDANCE
SECOND CONSULTATION ON
GUIDE TO THE COMPARISON OF LAND MANAGEMENT OPTIONS**

SUMMARY OF RESPONSES AND PSG DECISIONS

Comments were received from only four respondents, each of whom replied on behalf of their organisation. Two were from the nuclear industry (BNGSL and UKAEA), one from a CBO (who asked for non-attribution) and one from a regulator (the Environment Agency). The following summarises the responses to the questions posed in the consultation document and the decisions made at the June 2007 PSG meeting about the actions to be taken when producing the first complete draft of the Option Comparison Guide. The summary is initially arranged in order of the sections in the Guide; it ends with a note on comments about stakeholder involvement. There will be an opportunity to discuss the first draft of the Guide at a SAFEGROUNDS workshop in autumn 2007.

Section 1 Introduction and Scope

There was agreement amongst respondents that the range of issues to be included in the Guide is appropriate. There was a comment that there is no section in the Guide about understanding the problem for which a land management option is being selected. A subsection on this will be added in Section 1 and this will refer to the Land Management Guidance (LMG) flow diagram of the land management process. The PSG also agreed that a flow diagram for carrying out a comparison of options be added.

Section 2 Principles and Guidelines for Options Comparison

Respondents agreed that the Guide should give principles and guidelines for comparisons, provided that these are not prescriptive and there is no implication that SAFEGROUNDS is encouraging site owners/operators to micromanage the comparison process. It was suggested that there be a principle of reviewing but this comment seems to relate to reviewing the preferred land management option, not reviewing a comparison of options. Reviews of options are dealt with in the LMG so the PSG agreed that they should not be included here, except to say in Section 1 that new comparisons will probably be needed when preferred options are reviewed.

Section 3 Key Features of Option Comparison Methods

There was agreement that the range of option comparison methods to be covered is appropriate and that the way of summarising them is sensible. More detailed points made were:

- when discussing comparison methods to use for developing strategies for contaminated land on a site it is important to deal with interactions with other strategies (eg site IWS, site decommissioning strategy an organisation's contaminated land strategy for all its sites)
- the Guide should deal with 'documenting and reporting outcomes' rather than simply 'documenting' (so that stakeholders are fully informed)
- the description of each comparison method should include something on sensitivity analysis, where appropriate including sensitivity to variations in weighting factors.

The PSG agreed that these points should be taken into account in drafting the Guide.

Section 4 Selecting a Comparison Method

Respondents seemed to think the question was about selecting a land management option, not selecting an option comparison method. The PSG agreed that respondents' comments be taken into account elsewhere in the Guide.

Section 5 Applying Options Comparison Methods in Practice

The question here was about practical issues and important advice. The following points were made and will all be taken into account in drafting the Guide.

- Emphasise that a decision is necessary and an option comparison is an input to that but not the decision itself.
- Sanity checks should be made on scores when numerical methods are used, ie what is the meaning of a low/high score. It is important to express the output of a numeric score in words which can be clearly understood by stakeholders
- It would be useful to have some guidance on the need for learning between options studies – to ensure lessons are learnt and carried across from one study to another – particularly if a similar ‘pool’ of stakeholders is to be quizzed on their views.
- It is important also to recognise that uncertainties in knowledge / data do not preclude useful options assessment – and should not be seen as an excuse for ‘doing nothing’.

Appendix A Technical Options for Managing Land Contamination

The following points were made about the information to include for each technical option. These will all be taken into account in drafting the Guide.

- Add to the bulleted list:
 - type of management option (removal, immobilisation, containment) or method of control (source control, pathway interception/control, receptor control)
 - media treated (soil, groundwater, vapour)
 - limitations (eg types of soil the technology doesn't work with)
 - track record
 - on-going maintenance (ie whether on-going maintenance is required eg of a cover system)
 - regulatory environment.
- Presumably the options will be set in a UK context e.g. ‘availability’ meaning it is available within the UK market?
- Perhaps it would be useful to include links to or description of where the technical option has been used (both UK and elsewhere).
- Resource requirements should include both manpower and skills requirements as well as an indication of other resources e.g. water, energy.
- It would be best to separate discharge management aspects from management of solid wastes.

The PSG emphasised that this appendix and the main text should make it clear that this list of options is intended to provide input to the identification of the envisageable options for a particular situation. Many of them will then be eliminated during screening as not meriting detailed assessment for that situation (eg because they would not be effective or would not meet regulatory requirements).

Appendix B Detailed Descriptions of Option Comparison Methods

The question asked was whether the descriptions should follow a common structure or vary from one method to another. There was a preference (2 organisations to 1) for a common structure, as far as possible.

Appendix C Worked Examples

The suggested range of examples was felt to be about right. All respondents would like to see real case studies where available. If hypothetical examples are used they should not be too simple. At least one real or hypothetical example should deal with tackling multiple contaminants on a nuclear-licensed site that is being progressively decommissioned and where there are a number of areas where radiological and chemical contaminants are known to occur and others where contamination is suspected, there are some areas of

contamination that are polluting groundwater, and some buildings will not be demolished for several years but have contamination below them.

Stakeholder Involvement in Option Comparisons

Various points were made about stakeholder involvement in option comparisons. The points were about:

- the importance of 'new build' plans as a factor in option comparisons
- the amount of information to be given to stakeholders, especially NGOs and CBOs, some of whom will be specialists who would wish to see, for example, detailed hydrogeological information
- how to distinguish between simple, uncontentious contaminated land problems and complex, contentious ones
- not having prescriptive rules about when and how to involve stakeholders.

The PSG agreed that these points should be dealt with in drafting the Guide, in a way that is consistent with the LMG.

Marion Hill, for the consortium of research contractors
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