

**REVISION OF SAFEGROUNDS GUIDANCE FOR SITE CHARACTERISATION FIRST  
CONSULTATION ON FIRST DRAFT OF VERSION TWO  
SUMMARY OF RESPONSES**

There were 7 responses to the consultation. The responders are listed in Table 1 and referred to in the text by the letters in the table, eg [B]. The consultation asked eleven specific questions about major issues for Site Characterisation Guidance version 2 (SGv2) in Part 1, nine general questions about the content and report structure in Part 2, and in Part 3 detailed comments were requested by reference to report sections.

This paper summarises responses to all the questions, and proposed a way forward. Any unresolved issues will be decided upon at the PSG sub-group meeting on 23<sup>rd</sup> January 2008.

**Part 1 Specific Questions**

**Question 1: Is sufficient information supplied on radioactivity and background conditions in Chapter 2, given that this document is aimed at signposting the reader to other information, and how could it be improve for a technical audience?**

**Summary of Responses**

Four respondent indicated that there was broadly sufficient information [A,C,D,E]. Specific errors were pointed out by C. More signposting to HPA and/or IAEA documents is required [D & E]. [B] had a more fundamental concern expecting the audience to be essential SQEP, and therefore suggested Chapter 2 should be in an Appendix or a separate document.

**Proposal**

Since this section is broadly acceptable and it is proposed that only specific errors and comments will be will be corrected/addressed, and more document signposting will be included. It also proposed that a statement will be added to the effect that the audience, particularly for Sections 6-11, will be expected to be SQEP. For Sections 1-5 SQEP will not necessarily be assumed. See response to Question 8.

**Question 2: Is sufficient information supplied on specific health and safety issues in relation to SAFEGROUNDS site in Chapter 3, given that this document is aimed at signposting the reader to other information, and how could this be improved for a technical audience?**

**Summary of Responses**

Four respondent indicated that there was broadly sufficient information [A,C,D,E]. F made no comment. It was suggested the term 'SAFEGROUNDS' sites should be changed. A more fundamental concern was that the audience should be SQEP [B], and most of the information is standard company procedure. It was also pointed out that the effects of health and safety from chemicals and radiation contamination of aquifers was understated [G].

**Proposal**

Since this section is broadly acceptable it is proposed that only specific errors and comments will be will be corrected and addressed. It also proposed that a statement will be added to the effect that the audience, particularly for Sections 6-11, will be expected to be SQEP. For Sections 1-5 SQEP will not necessarily be assumed. See response to Question 8. The comments reflected by [G] are regarded as being more pertinent to a risk assessment.

**Question 3: How much emphasis should be set on objective setting related to performance management to identify 'measure', 'targets' and 'responsibilities' to achieve cost-effective project management?**

**Summary of Responses**

One respondent [A] considered the document had the correct balance, but this was

outweighed by the opinion of five respondents that the chapter had too much generic information. [B,C,D,E,F].

**Proposal**

It is proposed to remove generic information and signpost to other good practice guidance.

**Question 4: How much should the guidance reflect the US EPA DQO procedure?**

**Summary of Responses**

Five respondents [B,C,D,E,F,] indicated that the guidance should demonstrate awareness of DQO procedures and give a brief insight with signposting. The onerous sampling schemes were not considered appropriate. One respondent made no comment [A]. Another respondent [D] suggested DQO as an example of objective setting.

**Proposal**

It is proposed to accept the advice given and incorporate it in the guidance.

**Question 5: Do you agree with the interpretation of the implication for requirements for site characterisation that have been summarised in Section 4.42 and tables**

**Summary of Responses**

Specific comments for amendments are made by five respondents [A,B,C,D,E,F]. One respondent [E] considered it was generally acceptable. One respondent would prefer a more prominent position [B]. One respondent [C] stated the reason for separating 4.4.2 and 4.4.1 is unclear. The comment by [G] appears to refer to Chapter 8.

**Proposal**

It is proposed to accept the advice given in the specific comments and to combine sections 4.4.1 and parts of 4.5, while 4.4.2 is put to Appendix 4. Since there is no general requirement to make the section more prominent, it will remain as it is.

**Question 6: BS10175 essentially provides the basic guidance on site investigation and CLR11 and the associated CLRs on risk assessment for contaminated land? What should be the added value of this guidance?**

**Summary of Responses**

One respondent [C] considered the question poorly worded. Another respondent [B] said that the guidance CLR11 and BS10175 should say these documents are under review. More reference was required to RCLEA, ReCLAIM and HPA W36, [B]. Others [D, E] said the context of working with radioactive materials, background radioactivity, aspects of managing radioactive waste and heightened regulatory requirements/oversights should be brought out as well as using the guidance to explain the key difference and challenges working on sites with radioactive contamination. [F] required the guidance to cover omissions to radioactively contaminated land not cover in CLR11 and BS10175.

**Proposal**

It is proposed to address the comments of [B], and to highlight the more complex issues referred to by [D, E and F].

**Question 7: What further guidance is required on the management of uncertainty in site Characterisation? Chapter 11.**

**Summary of Responses**

It was generally felt that the level of content of Chapter 11 is about right, but it needs a thorough review and refining [A,B,C,E,F]. [B] has concerns about the target audience and that uncertainties may be misinterpreted by some stakeholders. Table 11.2 is regarded as potentially useful [C]. Three aspects of uncertainty were considered important a) the conceptual model [A,F], b) data uncertainty [F] c) risk estimation [F]. Comments by [G] did not appear to pertain to this Chapter.

**Proposal**

It is proposed to thoroughly review and refine this chapter, and incorporating the specific comments.

**Question 8: Who do you think is the target audience for this guidance?**

**Summary of Responses** Two respondents [F&C] agreed with the target audience as set out in Section 1.4. One respondent [A] saw Chapter 1-5 aimed at managers and Chapters 6-10 at practitioners. One respondent [E] considered the document was to be aimed at potential contactors and expert buyers. Another [C] respondent thought the target audience was technical project managers who would use the document to benchmark against good practice. One respondent [B] cautioned against using the guidance to train to SQEP standard. [G] said it should cover many audiences.

**Proposal**

It is proposed that the target audience as set out in Section 1.4 remains, but that a statement is added to the effect that Chapter 1-5 is aimed at managers and Chapters 6-10 at practitioners. Previous consultation have regarded that this is a technical or informed audience so it will not cover 'many' audiences.

**Question 9: What aspect of the guidance is most useful?**

**Summary of Responses**

A variety of views were expressed from all of the guidance in one place [C,D,E], to Chapters 6, 7, 8 and 9 together with the regulatory section, to specific section identified by [G] on the status of the document, an introduction to radioactivity and a description on background radioactivity. [C] referred back to responses to first draft, including the most important of signposting to other guidance. [F] made no comment.

**Proposal**

The responses have not highlighted anything new, so there is no proposal to make a change in response to this question.

**Question 10: What could be deleted?**

**Summary of Responses**

Again a variety of views were given. Four respondents [C,D,E,F] suggested sections of Chapter 4, and respondent [B] suggested generic information should be put in appendices or a separate document.

**Proposal**

It is proposed to restructure Chapter 4 in line with the response to Question 3.

**Question 11: Given that there is already a considerable amount of generic advice referred to in this document, what areas should be developed further for specific advice within or outside this document?**

**Summary of Responses**

Specific responses were given:

- To employ SQEP professionals [B];
- Improved radiological survey methods[C];
- Better integration of radioactivity analytical methods [C];
- Sonic Drilling [C];
- Improvements in geophysical methods [C];
- Improvements in non-rad field measurements [C];
- Interpretation and evaluation of results [D];
- Expand on uncertainty [F];
- Case histories [D,E]

**Proposal**

It is proposed to include the first point and check and improve on all the other points which have already been included to some degree. Case histories will be placed on the web site at a later date with the mechanism to be discussed by sub-group of PSG.

## Part 2 General Questions

### Question 12: Does the document have a logical structure

#### Summary of Responses

Five respondents considered that the document did have a logical structure [A,B,C,D,E]. [F] suggested including uncertainty within Sections 4 and 5, and that Section 4 should be trimmed as be included in Section 5. [G] commented on the numbering on chapter sections, figures and tables.

#### Proposal

It is proposed to keep the chapters as set out in the second draft. Chapter 4 will be edited in line with response to Question 3. It is also proposed that more cross referencing to uncertainty will be made in Chapters 4 and 5. The numbering on chapter sections, figures and tables will be reviewed.

### Question 13: Is the contents list of an appropriate level of detail?

#### Summary of Responses

Five respondents thought the level was appropriate [A,B,C,E,F]. [G] requires more information about timescales, long-term costs and assurance of commitment.

#### Proposal

No changes are proposed to the level of detail as this is considered satisfactory. The comments by [G] are more pertinent to stakeholder guidance.

### Question 14: Is the document repetitive?

#### Summary of Responses

Three respondents considered that the document was not repetitive [A,B,C]. [E] considered there was some but did not identify sections, whereas [F] found Chapter 4 & 11 disjointed.

#### Proposal

It is proposed to thoroughly review Chapter 4 and 11 in line with the reponses to questions 3 and 7.

### Question 15: Does the guidance cover the subject comprehensively?

#### Summary of Responses

Six respondents considered that the guidance was general comprehensive [A,B,C,D,E,F]. More specifically [B] also considered the approach was too 'broad brush' for practitioners. [E] considered that there should be more recognition of environmental risk assessment. [G] considered that site characterisation was only for 'post adoption'.

#### Proposal

Although [B] considered the guidance 'broad brush' five other considered it was generally comprehensive, so it is only proposed to add to the content by addressing the specific contents, and making more cross reference to the conceptual model and risk assessment.

### Question 16: Does it provide fundamental principles of good practice?

#### Summary of Responses

Five respondents generally agreed that the guidance did cover this point [A,C,D,E,F]. [B] considered the document was generally lacking in this area, and more should be provided on the planning process/layout. [G] has provided specific comments.

#### Proposal

The general consensus is that the fundamental principles of good practice are provided, but B will be contacted when available to discuss concerns.

### Question 17: Are there areas that you feel have been skimmed over too lightly?

**Summary of Responses**

Four respondents [A,C,D (I think from the wording this should be 'no' rather than 'yes'),E]. Specific areas identified for additional material were for professional advice, SQEP qualified personnel [B], more flow diagrams [D] and greater recognition of risk assessment [E]. [F] considered more should be included on uncertainty, quality plans, pro's and con's of investigation techniques, and hazardous waste classification. [G] found some acronyms were hard to find explanations for.

**Proposal**

It is proposed to address all the specific issues raised.

**Question 18: Are the illustrations, tables etc. appropriate?****Summary of Responses**

Four respondents [A,B,D,E] considered these features were adequate. Specific comments were made by [B] on the contribution of Figure 5.1, by [F] on Table 7.2 which does not compare similar attributes consistently, and the example field logging proforma is poor. [C] requires the use of the terms Boxes, Tables and Figures to be sorted out. [G] commented that changes to the diagrams were discussed at the PSG meeting.

**Proposal**

It is proposed to address the specific comments made and update the Figures with the latest versions of flow diagrams from LMGv2.

**Question 19: Is the target audience defined and its contents clearly targeted at the target audience?****Summary of Responses**

Five respondents generally agreed that the audience had been defined [A,C,D,E,F], but [B] disagreed, as did [G].

**Proposal**

It is proposed to make changes in line with the proposal for question 8.

**Question 20: Is the split between the information in the main body and the appendices appropriate?****Summary of Responses**

Three respondents [A, C, E] broadly agreed that the split was about right, but also specific comments were made. [B] considered that there was too much detail in the main body and that this should be removed to appendices.

**Proposal**

It is proposed to deal with the specific comments which are likely to meet some of respondent [B]'s concerns.

**Part 3 Further Detailed Comments** are to be addressed by a comments log ( see attachment).

**Table 1 Responders to Second Consultation on First Draft**

	<b>Name</b>	<b>Organisation</b>	<b>Responding as Individual or Organisation</b>
A	Shelly Mobbs	HPA	individual
B	Helen Beddow	Nukem Ltd	organisation
C	Hugh Richards	Magnox Electric Ltd (North)	organisation
D	Mike Pearl	UKAEA	organisation
E	Peter Booth	Nexia Solutions	organisation
F	Andy Clifton	RPS Planning & Development	organisation
G	Colin Rogers	Parents Concerned About Hinkley	organisation