Comments on the 1st draft of the guidance (skeleton report)

Consultation: Phase 1 (August 2004)

Chapter	Reference	Comments on:		Comment
		Content	Structure	
1	Section 1.1, p 3	Y	N	A brief indication of the range of materials that will be considered in the report would be useful at this stage.
1	Section 1.3, p 3	Y	N	How material has been managed on decommissioning sites to date i.e. what has been re-used on site and what has been available to the open market to recycling?
1	Section 1.4, p 3	Y	N	Potentially flawed assumption that there will be high volumes of aggregates available to the construction industry. As a rough rule of thumb, at least 80% of demolition rubble has been used as infill in the vast voids (e.g. cooling water structures, turbine hall basements, Active Effluent Treatment Plants, Ponds etc.,).
1	Section 1.4, p 3	Y	N	Is the construction industry the only avenue for re-use of materials arising from the decommissioning of nuclear sites? An indication of other potential applications for re-use of materials would be useful, even if the construction industry is the major option
1	Section 1.5, p 3	Y	N	Consideration of barriers and opportunities if changes are made to regulatory framework would be useful.
2	Section 2.1, p 4	Y	N	Scope of materials or starter for ten should be stated (e.g. presumably not just demolition rubble). In cases where data is poor, need to know when it will be improved
2	Section 2.1, p 4	Y	N	Use of pre-demolition audits should be considered to maximise recoverable materials.
2	Section 2.2, p 4	Y	N	Assessment of the timing of when materials are likely to become available for re-use during the decommissioning timetable would be useful.
3	Section 3.1, p 6	Y	N	Inclusion of cost information and market trends, e.g. scrap values at 2003 prices, could aid the sustainable use of materials as the economic argument can also be made.
3	Section 3.2, p 6	Y	N	Predicting demand should be given in tangible time frames (e.g. 5, 10, 15 years) that would make more sense to business/project planning. Can any sensible view be given over 50 years?
3	Section 3.2, p 6	Y	N	Link overview of the UK market with some comment on the European and global markets, particularly emerging economies such as China.
3	Section 3.3, p 6	Y	N	Experience to date in decommissioning on Magnox sites has been that this is a particular issue. It is recognised, however, that to date relatively small quantities of exempt material have been released in a rather ad hoc manner. If such material were to be released as a matter of policy, public concern may increase. It would be interested to assess whether there has been an increase in public concern in this regard in recent years due to increased awareness. Other issues that go along with this may relate to the ability to adequately characterise the waste and hence be assured that it is either below the 4Bq/g or 0.4Bg/g. Also, concerns about diluting LLW to become suitable for off-site use. There needs to be a recognition that are a large number of stakeholders with complex views brought about by a wide variation in knowledge of the subject.
3	Section 3.3, p 6	Y	N	Include factors such as pollution prevention of stored materials for re-use, value added processing on and off site.

3	Section 3.3, p 6	Y	N	Quality of product (include baseline for acceptability e.g. British Standards test references for various end uses e.g. for concrete/hydraulically bound materials, use as infill etc., Need to understand aspects on the provenance of materials/waste streams in terms of what is acceptable and what isn't, including restrictions.
3	Section 3.3, p 6	Y	N	Public perception may be an issue; especially in regard to transport of materials for re-use/recycling. This is somewhat separate issue from perceptions of the product acceptability. However, this material is likely to have to be removed from site anyway, so the re-use/recycle option may not result in a significant increase in transportation of waste.
3	Section 3.4, p 7	Y	N	Capturing extent of re-use of material at all UK sites would be useful.
4	Section 4.1, p 8	Y	N	Scenario method to include constraints, enablers and pre-requisites in the MADA or analysis.
4	Section 4.1, p 8	Y	N	Discussion of application of methodology and indicators in other industries and countries?
4	Section 4.2, p 8	Y	N	How realistic is a greenfield site scenario, would a more realistic 'end point' for a nuclear site be at the long-term care and maintenance stage?
4	Section 4.2, p 8	Y	N	With regard to processing – would decontamination be considered here? There are issues in relation to sustainability that need to be addressed with regard to secondary waste arisings and their management.
1	Section 1.2	Y	N	it would be useful to refer to the recent Government update of decommissioning policy. I understand that the amendment to Cm2919 will come into effect as of 9 September 04.
1		Y	N	A discussion on the justification/reasoning behind the 4q/g limit is needed. The paper infers it is derived from the LLW limit; it is not.
1	Section 1.5	Y	N	it may be useful to look across at IAEA and EC guidance. For example EC guidance documents RP114 and RP 122 about clearance levels for high volume, low activity materials may be useful. Also, a recent IAEA report on clearance levels for commodities provides some useful references.
1		Y	N	Suggest it would also be useful to have a Section discussing the concepts of exclusion, exemption and clearance.
1		Y	N	It would be useful to distinguish between material and waste as defined in RSA 93. Note also, SEPA policy on waste is to dispose of it as soon after its generation as practicable.
2		Y	N	Sections 56-58 of the guide to the administration of the 1960 Act provide some useful information, which should be referred to.
3		Y	N	Suggest a discussion on the business drivers behind this project. Why is this project so important and why now.
3		Y	N	A discussion on societal issues/acceptance would be useful.
3		Y	N	Another issue is the discussion on the acceptability of recycled waste versus virgin material and the role of economic instruments.

3		Y	N	Don't forget the vast amount of recycling work done by Capenhurst in 1980's and 1990's. Major learning lessons there - quite a few papers published in the public domain by Dave Clements (who is no longer there). You could try contacting Peter Roach (Head of Site) who may be able to point you to someone who can assist.
3		Y	N	Also work done at Sellafield on demolition of B16 Chimney. Try contacting Pat Salmon
5		Y	N	Where will the SD-SPUR 'Principles' that we are developing through stakeholder dialogue fit in?
6		N	Y	Too long
General		N	Y	My major concern is that the document as laid out will fail to grab the reader's attention. It needs to be short and punchy otherwise it will come across as yet another technical document that looses the reader's attention at an early stage.
General		N	Y	To structure the document properly I would keep all of the tables and the figures in the appendices. Launch straight into the objectives of the paper without mention of CIRIA. (Section 1.1 page 3). (While CIRIA is important to CIRIA, it is not likely to be of any interest to the reader and this will start to turn them off). Overall 45 pages is probably too many.
General		Y	N	It needs conclusions if it is to have any thrust. I think the direction may get lost in amongst the technical detail. More clearly it needs to state what the purpose of the paper is and what it expects the reader to do. Lead the reader by the hand through the issues to arrive at the conclusions.
1		Y	N	Explain why the Dounreay case study has been selected.
2	Section 2.2/2.3	Y	N	Is there really an inventory of clean materials? It may be useful to look at the arisings of exempt or VLLW materials from the nuclear industry compared with arisings of "conventional" wastes in the UK.
3	Section 3.3	Y	N	While "product acceptability" is mentioned there are quite wide PR issues which need to be addressed.
3	Section 3.4	Y	N	I'd be interested in existing examples of 'exempt' and 'clean' waste being reused? Success/failure etc.
4		Y	N	I think it's important that we understand the requirements resulting from recycle/reuse on radiometric instrumentation, identify any gaps and identify best practice or what would be best practice. I'd be interested in general best practice/methods - is there a potential Best Available Technology? a machine where I can put civil waste into a hopper and output appropriate waste streams - with, and this is critical, a high level of confidence in the categorisation.
6		Y	N	Dounreay has some unique factors associated with it's remote location, the sensitivity of the outcome to these should be identified in order to understand the general applicability of the outcomes
1	Section 1.5	Y	N	It is important that the EC Basic Safety Standards, IRRs and radioactive transport regulations are mentioned. Current international approaches to exemption for trade purposes etc, eg 'DS161' should also be included.
3	Section 3.3	Y	N	The legal constraints should include consideration of those mentioned in comment 1.

4	Section 4.4	Y	N	It would have been very useful at this stage to include a list of the sustainability indicators in the draft. These are one of the key elements of the study and it would therefore have been useful to be able to comment on them at an early stage. These indicators should include some that relate to the radiological impact on workers and the public. This is of particular importance for the 'proposed' 0.4 - 4Bq/g category.
4	Section 4.5	Y	N	There is insufficient detail here to allow comment on what is another key element of the study.
5		Y	N	There is no final summary section. It is difficult to judge at this stage whether one is necessary but it may be useful.
6		Y	N	One of the key elements of this study is the proposed 0.4 - 4 Bq/g category. For it to be regarded as a resource rather than waste would require the support of the regulators. To gain this support I think a compelling case would need to be made. I would therefore have assumed that there would be a particular section dealing in summary with this issue, or perhaps this will be somewhere in Section 5.
1	Section 1.1	Y	N	perhaps this is the place to mention what the study is NOT concerned with, e.g. contaminated soils
1	Section 1.1	N	Y	could you exchange info with the ‘EIC Contaminated Land Group’?
1	Section 1.2	Y	N	‘in the UK’ seems superfluous
1	Section 1.2	Y	N	why are only some UK sites ‘of interest’ to the project?
1	Section 1.2	Y	N	a map (have you seen the one on p36 of the ‘CoRWM revised prog sent to Ministers, June 2004’?) and a list of all nuclear licensed sites would be very useful
1	Section 1.2	Y	N	does ‘nuclear power plants’ = British Energy?
1	Section 1.3	Y	N	something should be said about the slightly arbitrary nature of these definitions, as well as how they differ between countries
1	Section 1.3	Y	N	does ‘0.4 – 4 Bq/g material’ = VLLW?
1	Section 1.4	N	Y	is there an overlap here with the work of NNC? (Potential Application of Metal Melting in the UK Nuclear Sector)
2		N	Y	can there be an exchange of info with the CoRWM Inventory Working Group?
2	Section 2.2	Y	N	some type of comparator is needed, particularly for volumes, e.g. ‘X number of football pitches to X depth’ or ‘X number of Driggs’
3	Section 3.1	Y	N	could you compare UK construction industry applications to scenarios/solutions overseas?
3	Section 3.1	N	Y	if you are talking of recycling, then you must involve the industries involved in different stages of processing materials and manufacture; for example, the union ‘Community’ (formerly ISTC) and ‘British Metals Recycling Association’ (contact points for both can be provided)
3	Section 3.2	Y	N	why look at just the UK demand? What about foreign demand/markets?
3	Section 3.2	Y	N	as an aside, could the UK provide a ‘centre of excellence’ to go abroad and deal with/comment on foreign wastes?
4	Section 4.2	Y	N	as well as green and brown field end points, should you look at the possibility of re/new build on these sites?

5	Section 5.1	Y	N	it seems that there is another objective, on the lines of 'for other stakeholders to understand the scale of decommissioning waste and the potential for re-use to assist strategy and policy formulation.' The UK needs a national strategy for the management of low level and VLLW waste arising from decommissioning - this study should inform this
6		Y	N	Why Dounreay?
3	Section 3.3	Y	N	is the order ranked? From our end of the telescope "product acceptability" (I nearly wrote "public") is a vital factor that could impact upon technical solutions.
4	Section 4.2	Y	N	Interesting that greenfield/brownfield terminology being used - these definitions do indeed impact on the scenarios, and are subject to numerous interpretations. Would like to see what you have come up with. (The Decommissioning Dialogue has worked on this too.)