

# Minutes of Meeting

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<b>Client</b>	UKAEA	<b>Client Reference</b>	3000033273
<b>Our Reference</b>	14731	<b>Issued By</b>	Daren Luscombe
<b>Issue Number</b>	01	<b>Issue Date</b>	14 April 2005
<b>Meeting Date</b>	11 March 2005	<b>Location</b>	Pentland Hotel, Thurso
<b>Present at Meeting</b> (Distribution Copies)	<b>Steering Group:</b> Bill Fernie (Chair) Fred Barker Iain Baikie		
	<b>Consultant Team:</b> Daren Luscombe (Entec UK Ltd) Alison Millward (Alison Millward Associates)		
	<b>Observers:</b> Paul Dale (Scottish Environment Protection Agency) Frank Dennis (UKAEA) Graeme Morgan (UKAEA) June Love (UKAEA)		
<b>Apologies for Absence</b> (Distribution Copies)	Ian Clark Rick Nickerson John Thurso		
<b>Additional Distribution</b> (Distribution Copies)	UKAEA website		
<b>Project Name</b>	Particles BPEO Consultation		
<b>Subject</b>	<b>EXTERNAL CONSULTATION STEERING GROUP MEETING</b>		

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## **Actions**

### **1. INTRODUCTIONS AND AGENDA**

Apologies were received from John Thurso Rick Nickerson and Ian Clark. Introductions were made.

FD introduced the Entec consultant team and explained the reasons for tendering the work for Stage 2 – Stage 4 of the public consultation. It was necessary to tender the work due to rules surrounding the letting of contracts of the potential value suggested and to ensure best value was established. Four tenders were received and Entec were awarded the contract, based on a combination of skills, experience and price.

FD introduced the UKAEA's position regarding recent press articles. The

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articles covered four subjects:

- A report by the Committee on Medical Aspects of Radiation in the Environment (COMARE) regarding leukaemia clusters across the UK;
- Claims regarding poor safety practice at Dounreay in the past,
- Claims that a Particle find on Sandside Bay in 1984 was not reported; and
- The discovery of a radioactively contaminated stone on Dunnet beach on 2 March 2005, 3 days into a 60-day monitoring programme.

The subject of the COMARE report is a broad issue and is not considered by UKAEA to be directly related to the Particles issue. The claims of poor safety practice are not considered by UKAEA to be new information. The claim by a former employee, who retired in the late 1980s, that an additional Particle was found on Sandside Beach in 1984, is being investigated by UKAEA. The discovery of a contaminated stone on Dunnet Beach is currently being investigated further to establish the nature of the rock and contamination.

FD stated that the contaminated stone was not a Particle (i.e. fragment of irradiated fuel) and this distinction must be made in the forthcoming Particles BPEO consultation. DL noted JT's concerns (expressed in a telephone conversation of 10 March 2005) that the issue of the stone must be covered by information used in the consultation exercise; furthermore, JT expressed that how the stone relates to Particles and why it is not within the scope of the current work needs to be made clear as the public will not necessarily make a distinction between Particles and the radioactively contaminated stone found on Dunnet beach.

PD clarified the SEPA monitoring requirements for Dunnet Beach and noted that these will be reviewed following completion of the current programme of work. The extant Technical Implementation Document requires the production and implementation of a strategy to quantify the extent of the contamination of the environment by fragments of irradiated nuclear fuel, to quantify the uncertainties in the nature and behaviour of fragments of irradiated nuclear fuel in the environment and investigate the activity distribution of fragments of irradiated nuclear fuel. SEPA consider that a final decision on any remediation option for particles will be premature before UKAEA are able to determine the extent of the contamination. A forthcoming change to the Technical Implementation Document will require UKAEA to gain a better understanding of the contamination on the seabed and develop a strategy for dealing with it.

FB stated that it was important for people to have as up to date information as possible and especially those being consulted throughout Stage 2. The principle should be to work with the best data available.

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FB stated that it was important for people to have the most up to date information, particularly those being consulted throughout Stage 2. The principle should be to work with the best data available.

It was recommended that the following information is considered for inclusion in consultation materials:

**GM**

- Number of Particles found on Sandside Bay, the Dounreay foreshore and offshore/on the seabed (although it was recognised that no clear figure will ever be available for the total number of Particles).
- The nature of the contaminated stone on Dunnet Beach needs to be mentioned and made distinct from Particles.
- A question regarding whether or not people feel that they have enough information about the Particles issue to make a decision at the current time.
- Better analogies for people to be able to assess the health risk should be considered.

GM stated that the scope of the BPEO could be extended to include other forms of discrete contamination within the marine environment, e.g. contaminated stones.

PD clarified the nature of the work SEPA has commissioned relating to the Particles. The work comprises assessments of the hazard from a particle and the potential for a member of the public to be exposed to a particle. The groups being considered are a 1 year old, 3 year old, average male, average female and protracted passage through the body following ingestion (i.e. due to constipation).

AM summarised the hierarchy of information that would be available to the public for Stage 2 as: Exhibition Boards, Newsletter 5, Options and Attributes Report and the Technical Résumé. It was acknowledged that more information would be required for Stage 3 including SEPA data on the public health impacts of Particles. FB stated that this should include feedback as to how the information gathered from Stage 2 has been used to prepare for Stage 3.

FD agreed to revise the executive summary and introduction of the Technical Résumé as soon as possible so that the consultation can commence.

**FD**

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**Actions****2. MINUTES OF THE LAST MEETING**

It was noted that:

- The request for IB to attend the Dounreay Particles Advisory Group (DPAG) as an observer from the ECSG had been declined.
- A conference has been organised regarding Particles, to be held in Nairn on 30-31 August 2005. IB noted that information from the Nairn conference should feed into the BPEO thinking and that delegates could be asked to fill in the questionnaire.
- An estimate of the total number of Particles in the environment and the number of Particles recovered is to be included in the newsletter (see above).
- Actions: all actions complete except action 5, a role description of an independent expert. PD is to supply a list of potential candidates.

**DL****3. PROCESS REVIEW**

DL introduced the findings of the review of the proposed process (i.e. the consultation process proposed by the previous contractors). The executive summary of the report is presented in Appendix A.

Extensive discussion was had of the review and the proposed revised consultation process. The following issues were raised:

- BF questioned whether there was too great an emphasis on the use of a website questionnaire in Stage 2 of the process. DL & AM explained that the website (containing links to the newsletter, questionnaire and supporting documents) is part of a suite of techniques including wide distribution and direct mailing of hard copies of the newsletter and questionnaire, 2 exhibitions regarding the Particles and outreach meetings that will enable deeper discussion and understanding of issues with a selected group of stakeholders representing a variety of interests.
- IB questioned whether the number of participants in the outreach meetings would be less than the workshops originally proposed. DL explained that the number of participants would be the same (75).
- BF questioned how visitors to the beach from outside Caithness might be included in the consultation. DL & AM agreed to consider how this could be achieved.
- IB & BF questioned the breadth of stakeholder groups covered by the outreach meetings and how those who wanted to be part of an

**DL & AM**

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outreach meeting (but not invited as part of an outreach stakeholder group) could be involved. Through BF, RN commented that he was concerned that moving from workshops to outreach meetings may reduce the breadth of stakeholders at meetings. It was noted again that the outreach meetings were one of a suite of techniques being used and that exit interviews will be held at exhibitions (using the questionnaire as a format) and that this will allow deeper discussion with yet more stakeholders. It was agreed that invitees to the outreach meetings would be encouraged to nominate up to 2 people from their organisation for inclusion in an outreach meeting. This might generate up to 15 small groups of 5-10 participants each.

- An invitation would also be extended to those individuals on the stakeholder list, but not specifically selected for the outreach meeting, to consider whether they would still like to send a representative to an outreach meeting. Those wanting to participate could then be included in an appropriate outreach meeting or an additional meeting (if demand dictated). If demand was high, an outreach meeting (of up to 10 people) will also be made available to those attending exhibitions who wish to attend such a meeting.
- IB noted that he thought the number of ECSG meetings was important. It was agreed that the next ECSG should be between Stage 2 and 3 as proposed in the revised process. The date and positioning of ECSGs will be reviewed as part of an ongoing process.
- FB commented that the ECSG needs to have sufficient time to consider the implications of Stage 2 for Stage 3 of the consultation process. Currently 3 weeks is programmed for this. The consultant team will endeavour to provide the ECSG with as much time as possible to consider the implications.
- IB commented that with the reduced number of ECSGs, being kept up to date with progress would be important. It was agreed that the ECSG members will be forwarded the bi-monthly consultant project management reports. These reports will note progress on key issues such as stakeholder recruitment and reporting. **GM**
- IB requested that publicly available technical information regarding Particles and the Dunnet Beach stone be forwarded to him. **JL**

It was agreed that, taking into account the above comments, the revised process was accepted.

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**Actions****4. THE NEWSLETTER**

The latest draft of the newsletter was reviewed. Detailed comments were made on the newsletter with regard to phrasing, punctuation, etc. Besides these detailed comments, key issues were:

- IB: information on the Dunnet Beach stone needs to be included. It needs to be made clear that the stone is not a Particle.
- IB: the number of Particles needs to be included.
- IB: a precise issue date is required due to the nature of ever changing information.
- IB: unhappy about the comment regarding stakeholders attending the 2003 exhibition perceiving the risks as very low. It was explained that this was the view expressed by stakeholders attending the exhibition.
- IB: the title of the options should be reconsidered to make them easily understandable.
- FB: the other documents available (the Options and Attributes document and Technical Résumé) should be signposted in the newsletter.
- IB, FB: the sub-criteria column should be removed from the attribute table to make it easier to comprehend.
- IB: A paragraph on the socio/economic effects of the Particle problem should be considered.
- IB: A paragraph on what is not known should be considered.

Comments will be taken into account in production of the newsletter.

**GM**

It was agreed that the information to be mailed out (newsletter and questionnaire) and made available on the website (newsletter, questionnaire, Option & Attributes document and Technical Résumé) will be accompanied by a brief document (2 pages of A4 maximum) containing the latest information regarding the Dunnet Beach stone.

**JL**

FB asked whether additional information such as a report of the outcomes of the 2003 Exhibition and the screening process completed so far could also be made available.

**JL**

Together with the newsletter, the first drafts of display boards were briefly reviewed. It was noted that the display boards should be consistent with information provided in the newsletter, providing a summary of information and visual representation of issues where possible.

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**Actions****5. AOB**

The ECSG members thanked the consultant team for their work that was considered to be professional, thorough and well thought through.

**6. DATE OF NEXT MEETING**

The next meeting is currently scheduled for either the 19, 26 August or 2 September 2005 but this will be confirmed closer to the time. It was noted that FB would be unavailable from 6-21 August 2005.

**JL**

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**APPENDIX A – EXECUTIVE SUMMARY OF PROCESS REVIEW REPORT**

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# Executive Summary

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## Introduction

Fragments of irradiated nuclear fuel, referred to as 'Particles', have been detected and removed from the environment around UKAEA's Dounreay site since 1983. UKAEA is currently developing a strategy for the long-term management of the Particles issue. UKAEA have adopted the best practicable environmental option study (BPEO) method as an aid to decision making with regard to management option selection as part of this strategy development.

The BPEO method encourages the participation of stakeholders throughout the development and implementation of the BPEO study. A public consultation project to provide such participation was initiated in 2003. Stage 1 of the public consultation project is complete. Project progress during Stage 1 may be summarised as follows:

- Launch of the consultation through public exhibitions in Thurso and Reay and publication of the document 'Dounreay Public Participation Newsletter 2 – Radioactive Particles in the Environment';
- The External Consultation Steering Group (ECSG) was established and convened to discuss a range of issues surrounding the consultation process;
- A broad programme for the consultation comprising four stages was proposed and the objectives of each stage discussed; and
- Public consultation and public participation newsletter documents were drafted and reviewed.

Entec UK Ltd has teamed with Alison Millward Associates to deliver Stages 2 to 4 of the consultation process. The first task of Stage 2 is to review of the proposed outline BPEO consultation process. This report presents the findings of the review.

## Review Findings

The project team has examined the proposed process, building understanding from papers presented to the ECSG, the ECSG minutes and discussion with UKAEA staff. Generally, the proposed process is considered satisfactory and in line with good practice. There are however the following issues that should be addressed:

- Methods: whilst it is entirely necessary to establish early involvement in the options and attributes stage, the suite of methods used (exhibitions, internet questionnaire and workshops) should be reconsidered for Stage 2 (concerned with initial development of attributes, options assessment and process objectives);
- ECSG: the number of ECSG meetings proposed (eight) should be reduced; and
- Timescale and event timing: the process as planned will not be completed until April 2007. This timescale will create problems with regard to process continuity, momentum and cost.

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Intuitively, the process timescale is too lengthy. The resulting timing of the key consultation events (e.g. workshops) is inappropriate due to holiday periods. Rearranging the timings would result in increased overall project timescale to June 2007.

### **Implications**

The methods used in Stage 2 should be revised. The following methods are proposed to meet the objectives of Stage 2:

- Exhibitions (as planned previously);
- Internet questionnaire (as planned previously); and
- Outreach meetings with a smaller number (but acceptable mix) of stakeholder groups (replacing Stage 2 workshops).

The following adjustments are proposed to the ECSG's work:

- No changes to the existing terms of reference but re-focussing on the auditing and guidance role;
- Reduce the number of meetings from eight to four. The meetings to be positioned between Stages;
- Reviewing and commenting on documentation to be used in the consultation process by e-mail and/or post; and
- The focus of the meetings will be primarily on the audit of the consultation process and its performance in line with the ECSG's existing terms of reference. Audit of the process between meetings will be performed through the ECSG observer(s) attending exhibitions and events.

The timescale needs to be reduced from the current implied April 2007 completion date. This could be achieved through:

- Effective project management;
- Reducing the number of ECSG meetings and the process of audit; and
- Replacing the Stage 2 workshops with outreach meetings.

With regard to timing, winter months should be avoided due to problems with achieving turnout due to inclement weather. The July and August holiday period together with weeks including public holidays should also be avoided for public-facing aspects of the process in line with good practice.

### **Conclusion and Recommendation**

The revised process described in Section 5 will have the following impact:

- Reduced individual stakeholder time commitment due to the removal of the Stage 2 workshops and the number of ECSG meetings, whilst maintaining interaction and early involvement in the process by consultees;

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- Greater emphasis on the use of the internet questionnaire for consulting on the BPEO objectives and proposed attributes and options in Stage 2;
  - Potential for reduced cost due to a reduction in the number of ECSG meetings and workshops whilst maintaining early involvement of stakeholders;
  - ECSG meetings focus on project audit and strategy with document/materials review and commenting outside the meetings;
  - Maintains essential aim of early consultation on attributes, options and BPEO objective; and
  - Allows the implications of the Scottish Environmental Protection Agency report on the risk of Particles (due April 2005) and the subsequent Dounreay Particles Advisory Group report about the same (due 2-3 months following) to be accounted for in Stage 3.

The methods used in Stage 2, the number and placing of ECSG meetings, overall process timescale and timing of events have been identified as requiring adjustment in the review. By substituting the Stage 2 workshops with outreach meetings and maintaining the public exhibitions and internet questionnaire, a proportionate level of early involvement will be maintained whilst using a process in proportion to the output required. The Stage 3 objectives and workshop process remain unchanged.

The reduction in the number of ECSG meetings and the review and commenting on materials and documents outside the meetings, will enable the meetings to focus on process audit, review and planning, whilst enabling the momentum of the consultation process to be maintained. The overall timescale of the process can be reduced. This can be achieved by effective project management, reducing the number of ECSG meetings and replacing the Stage 2 workshops with outreach meetings. The reprogramming of the process has also enabled timing of consultation events to be improved (avoid holiday periods and difficult winter month periods).

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## APPENDIX B – SUMMARY OF ACTIONS

### Summary of Actions

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Action	Who	By
Ensure information noted in section 1 is included in consultation materials.	GM	Ongoing
Revise the executive summary and introduction of the Technical Résumé.	FD	1 April 2005
Develop role description of and independent expert for the Stage 3 workshops	DL	Next ECSG
Consider how beach visitors (from outside Caithness) might be included in the consultation.	DL& AM	30 April 2005
Copy the bi-monthly consultant project management reports to the ECSG members.	GM	Ongoing
Forward publicly available information regarding Particles and the Dunnet Beach stone to IB.	JL	Ongoing
Revise the newsletter text taking into account the comments made.	GM	24 March 2005
Include a 2-page document on the Dunnet Beach stone with the mailed consultation materials and on the website.	JL	Mailing / website launch
Make available additional information regarding the outcome of the 2003 exhibition.	JL	30 April 2005

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