

Hunterston Site Stakeholder Group - Notes

SUB-GROUP MEETING OF THE SITE STAKEHOLDER GROUP - Hunterston A SSG response to the consultation on proposed statutory guidance from the Scottish Ministers to the Scottish Environment Protection Agency on the UK Strategy from Radioactive Discharges

Thursday 5th January 2006 in Conference Room 1, Hunterston A, West Kilbride

PRESENT

North Ayrshire Council

Councillor Richard Wilkinson (Chair)

National Farmers Union

Mrs Eleanor Lamont (Vice Chair)

Community Councillors

Mr Frank Craik - Ardrossan

Mr John Lamb - West Kilbride

Mrs Rita Holmes - Fairlie

British Nuclear Group

Mrs Alyson Russell-Stevenson (Secretariat)

Members of the public were not in attendance.

APOLOGIES FOR ABSENCE

All sub-group members were in attendance.

1. CHAIRMAN'S OPENING REMARKS

Councillor Wilkinson welcomed the members of the sub-group of the Hunterston Site Stakeholder Group (SSG). He explained that the primary purpose of this meeting would be to formulate the member's responses and comments on the 'Consultation on Proposed Statutory Guidance from the Scottish Ministers to the Scottish Environment Protection Agency on the UK Strategy from Radioactive Discharges', as discussed by the SSG members at the public meeting held on the 23rd November 2005. He continued, that he could foresee the need for more sub-group meetings to be held as the SSG continued to develop and to be consulted by a growing number of bodies and that the SSG to use this opportunity between main meetings.

Councillor Wilkinson explained that the Scottish Executive was consulting on its Statutory Guidance to be issued to the Scottish Environment protection Agency (SEPA) on the application of that Strategy in Scotland. He explained that the purpose of the Statutory Guidance was to ensure that there would be a transparent and auditable link demonstrating the commitment of the Scottish Executive to ensure that, through SEPA's authorisation process under the terms of the Radioactive Substances Act 1993 (RSA93), the devolved administration in Scotland contributes to the UK commitment to comply with the OSPAR Strategy for radioactive substances.

2. CONSIDERATION OF STATUTORY GUIDANCE

Councillor Wilkinson asked the members to consider the draft guidance document by section. He explained that all views would be taken forward to the Radioactive Waste Team and that the members did not require a consensus in any area or on any point. He explained that the comments on any part of the document would be welcomed but that the members should pay particular attention to the following 3 points:

0. Whether you agree that the statutory guidance will ensure that there is a transparent and auditable link demonstrating that the Scottish Executive has ensured compliance in Scotland, through SEPA's authorisation process for regulating discharges of radioactive waste, with the UK commitment to comply with the OSPAR Strategy for radioactive substances;

Members' Response: *Agree. Members felt there should be a Scottish wide authorisation process and would like a caveat to include a Scottish limit.*

0. Whether you agree that the statutory guidance should be a high-level document and that the provision of detailed guidance is to be left to SEPA itself;

Members' Response: *Agree. SEPA are guardians of the environment. It was agreed that it was important that these were high level guidelines and that SEPA would be independent to conduct the 'nuts and bolt' details of complying.*

0. Whether you agree that the manner and nature of any detailed prescription, for example desk instructions to officers, is to be left to SEPA, to be exercised within its normal regulatory process.

Members' Response: *Agree. No comments*

Councillor Wilkinson thanked the members for their productive discussion and asked the members to consider general notes or comments they may have to be taken forward to the radioactive Waste Team.

3. GENERAL POINTS TO BE TAKEN FORWARD

- The members were concerned that (p6 para 2.2) the points should read 'year on year' drop in emissions and not 'by the year 2020' as stated. They seek clarification on this point.

- The members felt strongly that (p12 para 25) if additional costs 'financial burdens' were incurred this should not be the driving force or stop SEPA from doing it. Financial constraints should not be a barrier to regulating.
- The document was very repetitive covering the same points at length in a number of different sections.
- It was felt to be a very 'flexible' document, which could be open to a wide number of interpretations, by individual officers.
- The document doesn't mention guidance on 'new nuclear sites'
- It was unclear whether the document was proposed for all sites or decommissioning sites only
- It did not include any changes to existing guidelines

4. ANY OTHER COMPETENT BUSINESS

Councillor Wilkinson shared with the group a letter he had received from the Nuclear Decommissioning Authority (NDA) which gave the members guidance on the proposed end-state for the sites. He asked the members to think about a number of points to consider to take the SSG forward before the next meeting.

- Secretariat issues - think about alternative support evening/weekends recognising the growing role and increased support needed for sub-group meetings and consultation papers from other agencies etc.
- Independent resource/experienced individual from the site to research/give guidance on possible options for the Hunterston A site end-state
- Details of the SSG budget for the forthcoming year to allow for the continued growth
- Possible SSG Newsletter to be written/published for the wider community

Councillor Wilkinson asked the SSG Secretariat to discuss these matters with the Site Manager and Site NDA Rep to seek a way forward of what would be possible.

5. CLOSE OF MEETING

Councillor Wilkinson closed the meeting and thanked everyone for their continued support and commitment for attending meetings, and their preparation beforehand in reading the 'mountains of paperwork' which had become part of being a member of the SSG.

Councillor Richard Wilkinson
SSG Chairman