



# **The Society for Radiological Protection**

*incorporating The Institute of Radiation Protection*

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NDA Draft Annual Plan 2007/08 Consultation

Herdus House

Westlakes Science & Technology Park

Moor Row

Cumbria, CA24 3HU

The Society for Radiological Protection (SRP) welcomes the opportunity to respond to the NDA Draft Annual Plan for 2007/08. The policy which the Council of the Society normally follows in relation to Consultation Documents is that it only responds on those matters which have a bearing on the professional activities and status of its members and those for whom they have responsibilities. This is on the basis that the nuclear sites, firms and institutions from which our members are drawn will be commenting in greater detail in their own name on the complete range of issues addressed in the document.

We welcome the statement early in the document that “Safety, security and environmental protection are paramount.” We also note that a top priority for 2007/08 is to deliver a net efficiency saving on site programme costs of 2%. SRP would encourage the NDA to have effective measures in place to monitor how this is delivered, ensuring that its delivery does not impact adversely on safety, security or environmental protection.

We note that the current trend in nuclear decommissioning is to try to make savings in waste disposal costs by implementing a range of waste treatments to achieve free release to the environment. Whilst minimisation of radioactive waste for disposal is to be encouraged, as are cost savings on the waste disposal budget, these should not be achieved through a disproportionate increase in worker radiation dose. It is anticipated that the revised Basic Safety Standards (BSS) will be in force by 2008, introducing changes in the radioactivity limits for exemption and clearance of waste and introducing activity limits for recycling of building materials. SRP would encourage the NDA to ensure systems are in place to assess any adverse impact these changes might have on worker exposure.

The same is also applicable in respect of efforts to achieve reductions in discharges to the environment, where the dose increase to the workforce may be substantially greater than the reduction in dose to the prospective critical group, yet large sums of money may have been spent on abatement technology. Choice of the best practicable environmental option (BPEO), taking costs, worker doses and public doses into account is essential as part of a sound waste management strategy.

The consultation draft states “We will ensure that good practice in health, safety and environmental management is shared and promulgated...” SRP strongly endorses such a policy and would encourage the NDA to actively support SRP and encourage their contractors to do likewise, thereby recognising the value to industry of having an active and vibrant professional body to aid them in achieving the above.

The consultation document recognises the risk of not having sufficient radiation protection professionals to deliver its business. SRP was encouraged to note the good initiatives that the NDA proposes to fund in 2007/8. The issue of concern is the absence of any co-ordinated programme for the UK to address the problem. SRP believes that what is actually required is a UK PLC coherent approach, looking holistically at the future demand for such skills. The NDA is encouraged to take a lead in establishing such an approach, noting that SRP would be willing to participate through its own Qualifications and Professional Standards Committee. Whereas the NDA are keen to identify that their remit would not extend to a new wave of nuclear construction, the skills initiative that the NDA funds now could be adversely affected if their suitably trained professionals chose to seek employment on the new nuclear build sites. SRP also strongly supports the NDA policy of broader skills initiatives and will co-operate where it can in developing those skills in the radiation protection arena.

We note that a top priority in 2007/8 is to complete the review of site end states with local stakeholders and develop recommendations for revised end states to be included in a modified strategy. SRP would encourage the NDA to fund a public education programme, to facilitate understanding of why the achievement of “green field” status is neither practicable nor a financially viable option for many of the nuclear sites undergoing decommissioning.

The Society notes the NDA’s continued support of the UK National Stakeholder Group. As the only UK Scientific Society to cover the whole field of radiological protection, the SRP would welcome the opportunity to be represented on the Group. The Society believes this would be beneficial to other stakeholders, our own members and to the NDA.

Whereas SRP was pleased to note the proposal to allocate £20m to fund relevant R&D to underpin its work programme, there was no direct mention of funds being available for radiation and health research. The NDA is now responsible for the scientific study of health effects amongst the BNFL and UKAEA workforces, including historical employees. These workforces represent an internationally important resource for the study of health effects of radiation exposure. This work needs to be properly financed and conducted for the long term future, to ensure that this ongoing data resource is available for the significant contribution it brings to our understanding of the scientific basis of radiological protection.

One aspect of the NDA draft plan that appears to be missing is any reference to the NDA’s review of its internal procedures. The draft plan appears to focus heavily on encouraging and rewarding culture change to bring about improved performance on the nuclear sites but the absence of NDA internal (and external) review was noted. Maybe this is a role that could best be delivered by external independent expert review, along the lines previously delivered by The Radioactive Waste Management Advisory Committee?

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President of SRP