The Environment Council

BNFL NATIONAL STAKEHOLDER DIALOGUE

CO-ORDINATION GROUP

November 2002

REPORT TO MAIN GROUP

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Produced by The Environment Council

November 2002

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Registered Charity Number: 294075 Certificate of Incorporation Number 2004003 VAT Number 577 8121 11

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1. Introduction

The programme for the Dialogue since March has been the continuing work of the Plutonium Working Group and the establishment of the Business Futures Working Group. In this report to the November 2002 Main group meeting, the Co-ordination Group

- makes some recommendations concerning these Working Groups' efforts,
- makes some further recommendations based upon a review of learning obtained since the process began in 1998.

2. The Context of the BNFL National Stakeholder Dialogue Process

At the first meeting of the BNFL National Stakeholder Dialogue process in September 1998, over 70 participants representing a wide range of stakeholder constituencies met to identify issues which would affect the Company's environmental performance. A prioritisation analysis was undertaken and this has been used to determine the content and order of work carried out by the various working groups that have been established as part of the dialogue process.

Since 1998, the external "climate" in which the Company and the Dialogue process operate has evolved. Most recently, the advent of the "Managing the Nuclear Legacy" White Paper and the proposed introduction of the Liabilities Management Authority (LMA) will change the institutional landscape regarding the UK 's nuclear legacy.

The Evidence Report presented to the Main Group in March 2002 detailed BNFL's evolving Corporate strategy and the Company's views about how this has been influenced by the National Dialogue process. A subsequent note on Company Re-structuring provided BNFL's views on how the Company is also responding by the re-alignment of businesses with its main customers. BNFL is now structured into two business groups, a Nuclear Utilities Business Group to serve nuclear utilities customers and a Government Services Business Group to meet the needs of the other main customer group - governments across the world.

Much has therefore changed since the National Dialogue was first convened in September 1998. The issues and priorities identified by the stakeholders at the first Stakeholder Workshop, which helped to define the ongoing Dialogue work programme, could also have evolved and changed. The Co-ordination Group is therefore anxious to ensure that the Dialogue process remains focussed on dealing with issues that are most relevant to informing BNFL's environmental performance in the context of its overall development. The Group believes that the recommendations of this report, the Plutonium

Working Group's Final Draft Report, and of the Business Futures Working Group's Interim Report define a valuable way forward for the Dialogue in terms both of subject matter and resources required.

Recommendation 1. The Co-ordination Group recommends that the Main Group endorses the basis of this approach, comments on any omissions and indicates where improvements can be made.

3. Co-ordination Group Membership

The current members of the Co-ordination Group of the BNFL National Stakeholder Dialogue are:

- Peter Addison (Nuclear Installations Inspectorate)
- Fred Barker (independent nuclear policy analyst)
- David Bonser (BNFL ALFA)
- Gregg Butler (University of Manchester/Westlakes Research Institute)
- Mark Drulia (BNFL ALFA)
- Linda Hayes (CANT)
- John Kane (GMB)
- Peter Kane (GMB)
- Grace McGlynn (BNFL)
- Brian White (Copeland Borough Council)
- Rupert Wilcox-Baker (BNFL ALFA)
- Pete Wilkinson (Wilkinson Environmental Consulting Limited)

The Main Group in March 2002 agreed that the membership of the Co-ordination Group and Dialogue Review Group should be rationalised. This has resulted in a consolidated membership of the Co-ordination Group. The members of the Group are willing to continue but would welcome a review of membership. Other stakeholders are encouraged to join to ensure that all constituencies are fully represented. The Co-ordination group meets on average once every 6 weeks to work through any issues which would impact upon the Dialogue process itself, rather than the detailed content of work being undertaken by the Working Groups. The Group operates under the Ground Rules for membership of a Working Group.

4. Plutonium Working Group

The Co-ordination Group notes that the Final Draft Report of the Plutonium Working Group has been distributed to the Main Group. This draft report reflects a very substantial body of work that will be discussed at the Main Group meeting. The Co-ordination Group looks forward to receiving the Main Group's comments on the recommendations made.

5. Spent Fuel Management Options Working Group

The Spent Fuel Management Options Working Group (SFMOWG) report was approved by the Main group and published in July 2002[1]. The report had used the Strategic Action Planning (SAP) approach to produce a series of detailed scenarios and recommendations. The Co-ordination Group requested that BNFL provide an update on the Company's response to the SAPs and report recommendations. This update is given in Appendix 1 to this report.

Recommendation 2. The Co-ordination Group recommends that BNFL continues to provide similar updates to the Main Group.

6. Learning from the Dialogue process

The Main Group meeting in March 2002 considered an Evidence report, as part of the Co-ordination Group report. This provided the results of a process of gathering "evidence" of the dialogue's influence, productivity and impact. Stakeholders will make their own assessment of the value of the Dialogue process. The Co-ordination group continues to believe that the Dialogue process and its outputs remain worthwhile and should therefore continue.

In seeking to make recommendations about improving the ongoing process, a subgroup of the Co-ordination group undertook a review of "learning" from the process to date. This included the following strands of work:

- an examination of Key Issues from the Evidence report
- an examination of the recommendations from the Working Group reports to track whether they had, where necessary, been addressed by ongoing working groups
- to determine if any packages of work arising from these recommendations could be identified for the future attention of the Dialogue process. The output of this process has been fed into the Business Futures Working Group as indicated below
- a consideration of options to more systematically monitor, evaluate and explain the influence of the dialogue on the Company.

[1] Available on the Environment Council web site www.the-environment-council.org.uk

7. Key Issues from the Evidence Report

The Coordination Group has reviewed the Evidence Report presented to the last Main Group Meeting. The outcome of this review is attached in Appendix 2, which provides:

- a summary of the value of the Dialogue; and
- an outline of what process-related lessons have been learnt and applied, and what process issues require further exploration.

Recommendation 3: As a result of its review, the Coordination Group recommends that in order to increase the value of the Dialogue:

- **3.1 - improvements to monitoring, evaluation and reporting of the influence of the Dialogue be built into future work programmes wherever possible;**
- **3.2 - more systematic consultation with stakeholders that are either outside the Dialogue, or not members of a specific working group, be undertaken and reported;**
- **3.3 - working groups give careful consideration to the purpose, role and timing of SAP exercises within their work programme; and**
- **3.4 - the Company strives to be open and transparent and meet legitimate Dialogue needs for information and, when this is not possible, the Company should provide the earliest possible explanation of why this is the case.**

The Coordination Group has also identified two specific issues that require further exploration: the extent to which the Dialogue should focus on issues judged to be most likely to have a significant influence on the Company; and ways of encouraging and promoting collaborative negotiation within the Dialogue.

Recommendation 4. The Coordination Group recommends that these issues be included in the further evaluation process proposed below.

8. Review of Previous Dialogue Issues and Recommendations

The Coordination Group has reviewed all Working Group recommendations, and this review is given in Appendix 3. In particular, this analysis has allowed ongoing actions and issues to be identified to make sure that they can be picked up by future Groups if appropriate. Appendix 3 also reveals several major themes:

1. The monitoring of progress and decision making against the recommendations and Strategic Action Plans identified by Working Groups
2. Effects of programmes and plant developments on discharges, against the background of the Discharge Working Group's 'Region of Optimisation', and the requirements of OSPAR as interpreted by the UK Discharge Strategy
3. The timing of, and methods for, decommissioning and the treatment of legacy waste, and the effects on both long term waste management and on discharges
4. Updating the socio-economic impact studies to cover changes in programme or new options examined by BFWG
5. The development of measures of progress and programme comparison, which should include a consideration of the balancing of different factors called for in the points above.
6. The use of Stakeholder Dialogue Working Group reports and Main Group views to inform UK Government policy and regulation.

We have attempted to map the linkages revealed by the studies and this is represented in Figure 1. Plotting the dialogue activities against time shows the linkages and interactions between the Main Group, Working Groups and Advisory and Task Groups.

The Co-ordination group believes that the major themes identified above will form areas of real significance for the future work programme of the Business Futures Working Group and that this analysis is further developed in the BFWG's proposed "Way Forward", which has been provided for the Main Group's deliberations. The BFWG proposal has also been informed by a sub-Group of the Working Group meeting with David Bonser, the BNFL Executive Director who "champions" the Stakeholder Dialogue process.

This results in a substantial work programme for BFWG. The draft interim report from BFWG contains a recommendation that the Group would wish to involve appropriate expertise, including members from the Main Group, to form Sub Groups, Advisory or Task Groups where appropriate. This has been considered by the Co-ordination Group, and would seem to recommend a future structure for the Dialogue process which is different to that used in the past.

Recommendation 5. The Coordination Group recommends that only one Working Group continues, namely the Business Futures Working Group, with a series of associated Sub Groups, Advisory or Task Groups, where appropriate, examining specific issues identified within the agreed BFWG work programme.

For example, the Security and Safeguards Sub Group which has contributed to the Plutonium Working Group could continue to contribute to the BFWG workstream on understanding the impact of security requirements on the achievement of openness and transparency (and vice versa).

We believe that this approach could function with approximately the same level of resource as running the current system of two working groups, though the number of concurrent topic groups is likely to be limited by the effort available.

9. Business Futures Working Group

The Business Futures Working Group (BFWG) structured its initial phase of work around the "Managing the Nuclear Legacy" White Paper consultation. The Group has provided a draft submission of key principles which it believes should guide and inform the development and operation of a future Liabilities Management Authority.

Recommendation 6. The Co-ordination Group commends these draft principles to the Main Group and recommends their endorsement.

The BFWG has also proposed developing its initial work plan to take account of work undertaken by previous Groups, to identify significant outputs of continuing relevance. In addition to continuing to assess the ongoing implications of the formation of the LMA and its impact upon BNFL, the Group wishes to review and monitor the Company's strategy in respect of providing services to its identified customer bases, namely Governments and Nuclear Utilities.

Recommendation 7. The BFWG seeks input from the Main Group about how best to develop its ongoing work programme, and has circulated its 'Business Futures Working Group Draft Interim Report' with its suggestions.

10. Monitoring and Evaluation Options

The Co-ordination Group considered whether improvements could or should be made to the current approaches of evaluation. The present process involves the Main Group evaluating the draft reports prepared by Working Groups and the Co-ordination Group. Using an analysis produced by Richard Harris (attached as Appendix 4), the Co-ordination Group considered three evaluation options:

A. An internally managed evaluation process
B. An evaluation process independently managed by a third party
C. A Joint Fact Finding approach (such as the Socio-economic report and the JASM project, although not on the same scale) delivered by a third party, but designed, steered and overseen by the Co-ordination Group.

Each of the options above carry their own advantages and disadvantages. However, Option C was felt to offer the best way forward. It is relatively innovative, consistent with practice developed elsewhere in the dialogue and should be straight forward to manage and resource efficiently.

Recommendation 8. It is recommended that the Main Group mandate the Co-ordination Group to initiate an evaluation process along the lines suggested (i.e. drawing on lessons from previous work using "Joint Fact Finding" approaches) and report back to the next Main Group on progress.

11. Participation in Working Groups

The Co-ordination Group is aware of a particular issue regarding participation within Working Groups. Participating in the Dialogue process places immense time and resource commitments on a wide range of stakeholder constituencies, especially given the demands of the "day job" that everyone has to fulfil. The great level of interest in many of the areas which could potentially fall within a Working Group's remit (and especially the suggested scope of the work of the BFWG) obviously means that many stakeholders volunteer to be involved.

Experience within both the Plutonium and Business Futures Working Group has demonstrated that both the content and process is disadvantaged if there is lack of continuity of representation on Working Groups. Constituency groups are also disadvantaged if their input to, and feedback from, a Working Group is infrequent. One suggestion from the Co-ordination Group recommends that caucus meetings of stakeholders from each particular constituency area could decide whom from within their resources could best

be involved in a Working Group or Sub-Group. Methods of ensuring feedback to, and input from, these constituency groups could also be developed.

Recommendation 9. The Co-ordination Group therefore recommends that the experience of previous groups should be taken into account in future, with particular care being taken to ensure consistency of membership from the outset.

12. Other matters

When considering the future programme, the Co-ordination Group recognised the relevance of the Magnox Decommissioning Dialogue to the ongoing work of the BNFL National Stakeholder Dialogue. The Co-ordination Group feels that a closer relationship could be beneficial to both dialogues.

Recommendation 10. The Main Group is asked to endorse that a meeting of representatives from the Co-ordination Group and the Magnox Decommissioning Dialogue Steering Group should be convened to explore and develop options for closer links.

The Jointly Agreed Sampling and Monitoring Group (JASM) met on 25 April 2002 and produced the conclusions and recommendations attached in Appendix 5. The Co-ordination Group has noted recommendations 1-4, but at this time does not feel that further verification and comparative work is required. As with recommendations from previous Working Groups, the JASM recommendations and lessons learnt from the process will be taken account of by the Business Futures Working Group.

Recommendation 11. The Main Group is asked to endorse that the Business Futures Working Group takes on board the recommendations and lessons learned by JASM (see Appendix 5) in addition to the recommendations of other Groups reviewed in Appendix 3.

The Co-ordination Group has endorsed a Communications Strategy developed by a sub-set of its members and The Environment Council. This is attached as Appendix 6.

Recommendation 12. The Main Group is invited to endorse the use of the Communications Strategy.

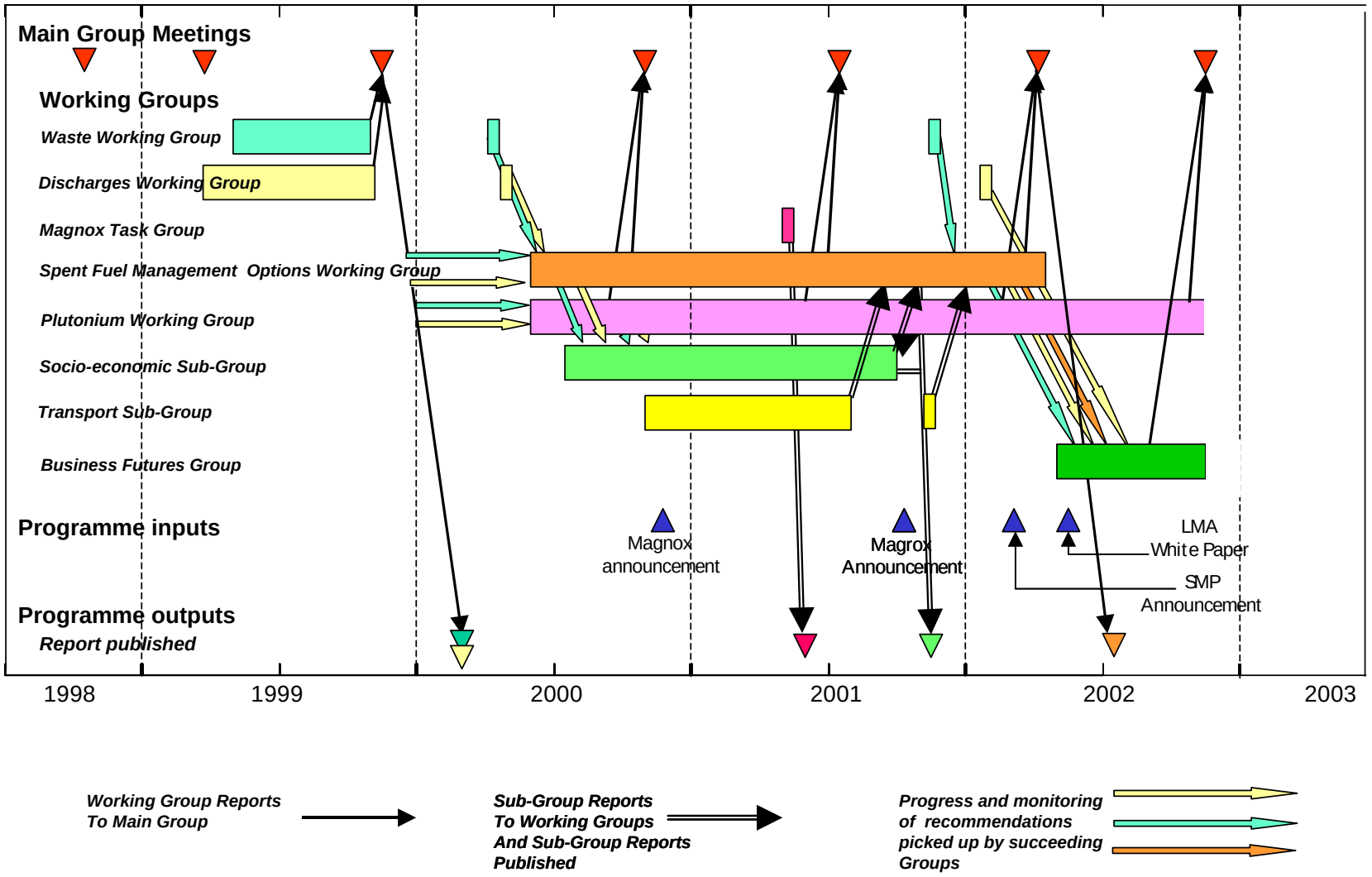

Figure 1. Linkages demonstrated by the review of Dialogue Recommendations and Issues

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Appendix 1 - BNFL Update on Spent Fuel management Options Working Group Strategic Action Plans and Milestones

Magnox Reactors and B205 Magnox Reprocessing Plant

In line with the Strategic Action Plans from the Spent Fuel Management Options Working Group report, BNFL continues to monitor B205 performance. The Magnox Reprocessing throughput in 2001/02 totalled 786 tonnes, a significant increase compared with recent years. The 2002/03 target is 800 tonnes, which has to be achieved within 9 operating months due to the biennial shutdown of B205 which began in September 2002. The reprocessing total to the start of the biennial outage was 46 tonnes behind the rate required for the 800 tonnes target. This was due to problems experienced with effluent pumps in the Fuel Handling Plant and the decision to bring forward the biennial shutdown.

The biennial shutdown contains work programmes to:

- implement project improvements, to improve reliability
- implement maintenance programmes, to ensure reliability
- undertake inspection programmes, to maintain confidence in the condition of the plant and systems.

Operational, engineering and technical support teams have all been strengthened during 2001 and 2002 to ensure that improvements to Magnox reprocessing are not constrained because of resources.

The amount of Magnox fuel to be reprocessed before the end of the reprocessing programme in 2012 has changed due to the quantity reprocessed to date, the early closures of Calder Hall and Chapelcross stations announced in July 2002 and due to updated generation programmes. The following table gives the closure dates for the Magnox power stations as at November 2002.

Station	**Lifetime dates as at 8 November 2001[2]**	**Latest date for end of generation**
Calder Hall	2006/8	2003
Chapelcross	2008/10	2005
Bradwell	2002	Closed in 2002
Hinkley Point A	2000	Closed in 2000
Dungeness A	2006	2006
Sizewell A	2006	2006
Oldbury	2008	2008
Wylfa	2009	2010[3]

[2] Dates reflect the 23 May 2000 announcement plus the later announcement that Magrox fuel would not be used in Oldbury or Wylfa

[3] The current target is 31 March 2010. Continuing to run Wylfa to this date will depend upon the successful outcome of a further Periodic Safety Review.

If Magnox stations operate to their lifetime dates as detailed above, as at 1 April 2002, some 9,800 tonnes of Magnox fuel would require to be reprocessed before the 2012 closure date for B205. A Magnox reprocessing target of some 900 tonnes per year would therefore be required.

The indicative programme used as part of the Spent Fuel Management Options Working Group's deliberations envisaged a total as at 1 April 2001 of 11,100 tonnes which would require to be reprocessed by 2012. Even if this indicative programme was still being followed, as at 1 April 2002 some 10,400 tonnes of fuel would have been required to be reprocessed.

A key recommendation from the Magnox Task Group update (included in Appendix 9 of the Spent Fuel Options Working Group report) was that the B205 throughput review "window" should be represented in diagrammatic form. A graph was produced and included as Figure A9 in the report. This graph is being updated by BNFL and will be made available to the Main Group on 28/29 November.

Update on SFMOWG recommendations and Strategic Action Plans – actions, explorations and contingency plans

"BNFL should match the projected lifetime arisings of spent Magnox fuel as closely as possible to the performance of B205 without compromising reactor operations. In the event of sudden or terminal failure of B205 the objective is to ensure that there is a minimum amount of Magnox fuel remaining in ponds. No plans should include long term storage of wetted Magnox fuel."

BNFL continues to match the projected arisings of Magnox fuel to the performance of B205 and its associated facilities. The Magnox fuel delivery strategy balances the requirements of receiving fuel from those stations which are still operational and the requirements to remove fuel from Hinkley Point and Bradwell, which have ceased operation. Wet fuel stocks are minimised by the following actions:

- **Hinkley Point and Bradwell**. Following closure, the ponds were emptied of stored fuel prior to the start of the reactor de-fuelling. De-fuelling is carried out in a manner that gives a minimum storage period in the station pond prior to transfer to Sellafield.
- **Operating Stations**. Pond stocks are managed to ensure that each station pond stock remains within an acceptable range.
- **Sellafield Fuel Handling Plant Pond**. Stock is controlled primarily by maximising reprocessing rates.

"Decide whether or not to build a Head End on Thorp"

Should B205 be unable to reprocess Magnox fuel, and there were significant quantities of wetted fuel remaining to be processed, one option could be to build a new Head End on Thorp (for the initial cutting up of the Magnox fuel and preliminary chemical processes).

Any decision of whether or not to build a new Head End on Thorp is linked to the potential of using the existing Thorp dissolvers, which were designed to process oxide fuel, to process Magnox fuel. BNFL has begun investigating what the potential implications would be for the Thorp processes. A technical research and development programme is expected to deliver results by Spring 2004, which would meet the milestone of end 2004 for a decision about whether to proceed or not, as recommended in the Spent Fuel Management Options Working Group report. It is recognised that there would be also be regulatory and other stakeholder considerations which would be required to be taken into account in any decision-making process.

"BNFL should ensure that every effort is transparently made to reduce discharges and minimise waste at the earliest opportunity and that the achievement of early passivity is a defined target."

The discharge of technetium 99, from the Magnox reprocessing cycle, was highlighted as a key concern by the Discharges Working Group. This concern was also reflected in the separate consultation on options to reduce technetium discharges, conducted by the Environment Agency (EA). One of the preferred options contained in the EA's Decision document is to deal with ongoing wastes containing technetium by diverting the particular waste stream to the vitrification process. The technical and safety case assessments for this Medium Active Concentrate diversion have been completed. Diversion of this stream to the HA plants and vitrification will have advantages by reducing discharges, but has the disadvantage of increasing High Level liquor stocks and the number of vitrified waste containers that would be made. Although the EA's Decision document is still with Defra Ministers for approval, BNFL intends to use the re-start of Magnox reprocessing, following the current shutdown, to undertake preparatory work which would permit the diversion to vitrification to take place.

Existing stocks of Medium Active Concentrates are held in storage tanks awaiting processing through the Enhanced Actinide Removal Plant (EARP). The EARP process does not remove technetium 99 before liquid waste is discharged to sea. One option considered by BNFL and highlighted in the EA's Decision document was for the potential introduction of a chemical in the EARP process which might remove technetium into a form which could then be encapsulated into a solid waste. To undertake a trial, BNFL requires regulatory consents. EA concerns about the eco-toxicity of the chemical that would be used and the acceptability for disposal of the waste form produced have prevented the NII from giving the approval for the trial to take place.

BNFL is undertaking plant trials on Thorp on the use of iodic acid as a means of abating iodine discharges. Plant trials are also underway to assess the potential of using an ion exchange material to abate discharges of cobalt-60.

"Develop contingency plans for wetted fuel, and dry fuel in reactor cores."

In developing contingency plans, BNFL is investigating a number of technical options. For Magnox fuel which is already wet, this could include processing the fuel through Thorp (see comments regarding a new head End for Thorp) and packaging the fuel for interim surface storage. Both options would include extensive research and engineering

programmes. Again, there would be wider associated regulatory and other stakeholder issues.

BNFL is also examining contingency plans for Magnox fuel which has not been wetted. These cover:

- the engineering and technical issues which would be associated with storing fuel in reactor cores. Because Magnox stations have unique designs, this work has to be done on a case by case basis. This work is due for completion by the end of 2003.
- technical issues regarding the dry transportation of fuel from Magnox stations to Sellafield. Again, this work should be completed by the end of 2003.
- the technical issues regarding interim surface storage of fuel in purpose built stores. This project is part of the major BNFL focus on the managed, monitored and retrievable storage of all types of materials. Work is at an early stage of development and is programmed for completion by Spring 2004.

Again, there would be wider associated regulatory and other stakeholder issues.

"2002-2004 Arrive at decision on future Thorp programme based on Throughput, Contracts, Pond Capacity, Vitrification plant performance"

A five year improvement plan for vitrification plants has commenced. Already vitrification performance on Lines 1 & 2 has exceeded last year's production and is on track to produce 250 containers this year. Line 3 has undergone its first active commissioning campaign. The plan includes for investment in new equipment for handling of the containers and the deployment of new technology to extend the operational lives of the melters and hence improve throughputs.

Work continues on achieving continuous improvement in the safe storage of Highly Active Liquid Waste. This year has seen improved off gas treatment, implementation of a revised safety case and improved levels of surveillance and control. Priority continues to vitrifying High Active Liquors (HAL) derived from oxide fuels to minimise the inherent hazard potential of material in the tanks. Thorp production rates are adjusted to ensure a year on year reduction in oxide derived HA liquor and total volumes of HA liquor.

Magnox reprocessing throughput last year and in future years is not constrained by the HAL stocks position or by vitrification throughput rates. This ensures that in the long term the total hazard potential from Magnox fuel (processed or wet stored) is kept to a minimum.

As at 13 November 2002, Thorp had processed 380 tonnes of oxide fuel in the current financial year. In line with the "Managing Nuclear Legacy" White paper statement:
"Thorp will therefore continue to operate until existing contracts have been completed or the plant is no longer economic."

Policy regarding new contracts for Thorp is also covered in the White Paper i.e.:

"Decisions about new reprocessing contracts would be taken in the best interests of the UK as a whole, in the light of advice from LMA and on the basis that approval would only be given if the contract were:

- *consistent with clean up plants for Sellafield and, in the LMA's view, would not cut across implementation of those plans;*
- *was expected to make a positive return to the taxpayer after allowing for operational costs, business risks and any other costs which might be incurred as a result of the contract, including any additional clean up costs; and*
- *consistent with the UK's environmental objectives and international obligations.*

The same principles will be applied in the interim period leading up to the establishment of the LMA."

13 November 2002

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Appendix 2: Lessons from the Evidence Report

1 Introduction

The Coordination Group report to the Main Group meeting in March 2002 contained five strands of "evidence" of the Dialogue's influence and productivity (the "Evidence Report[4]"). The five strands were:

- a Company statement on the evolution of its strategy;
- a Company response to Working Group recommendations;
- Working Group comments on the implementation of recommendations;
- personal feedback from Company staff; and
- the results of a questionnaire survey of stakeholders.

This paper seeks to build on the Evidence Report by identifying:

- a summary of key points about the value of the Dialogue;
- process-related lessons that have been learnt and applied; and
- process-related issues that need to be explored in more depth.

The purpose of focussing on process-related matters is to identify ways in which the value of the Dialogue can be increased for all stakeholders, as well as being able to share these lessons outside the Dialogue.

2 Value of the Dialogue

The stakeholders who responded to the questionnaire survey in the Evidence Report made it clear that they place considerable value on some of the outputs of the Dialogue, particularly on 'invisible' outcomes (see p29, Q5b).

Overall, the Evidence Report suggests that the value of the Dialogue can be summarised in the following way:

- participants develop an understanding and respect for alternative views;

- participants develop a sharper awareness of the impact or potential impact of wider environmental and social factors on the Company's business;

- it leads to wider environmental and social factors being taken into account in decision-making within the Company;

- explicit consideration is given to uncertainties, contingencies and alternatives through sustained dialogue, particularly using Strategic Action Planning (SAP); and

- it enables a common view to emerge on the validity of key sets of data or information.

[4] Available at www.the-environment-council.org.uk

These outputs are being built on by learning from, and applying, process-related lessons, as outlined below.

3 Increasing the Value of the Dialogue

The following process-related points for discussion can be identified from the Evidence Report:

A Demonstration of influence on the Company
B Stakeholder expectations about the Dialogue
C Collaborative negotiation
D Engagement of stakeholders outside the Dialogue
E The role of Strategic Action Planning
F Information provision within the dialogue

Each of these points is considered in turn, with an outline of where lessons have been learnt and applied, and where issues need to be explored in more depth.

A Demonstration of influence on the Company

A significant mismatch between Company and stakeholder views is discernible in the Evidence Report:

- The Company's statement on evolving strategy lists a number of changes - such as emphasis on legacy wastes and bounding of the Magnox fuel cycle - which are consistent with the thrust of recommendations emerging from the Dialogue. A significant number of comments from Company staff also state that the Dialogue has played a significant part in these changes.

- The questionnaire returns show that the perception of many stakeholders is that although the thinking and actions of individuals has been influenced by the Dialogue, the actions of the Company have not.

This mismatch might arise because many stakeholders are aware of other factors (e.g. regulatory pressure) which have also contributed to changes in Company strategy, or because little weight is placed on the assertions of individual staff members.

Lessons Learnt and Applied

Steps are being taken to improve the monitoring, evaluation and reporting of the influence of the Dialogue on the company. This should help address the mismatch identified above.

The steps include:

- *Establishing on-going links between a working group and the company's decision-making structures, and recording, evaluating and publishing the outputs of the interaction.* A recent example is the link established between the PuWG and the

Company Technical Executive. The outputs of the interaction are reported in the PuWG's Second and Third Interim Reports, and a brief evaluation is contained in the group's Draft Final Report. Discussions are also underway between the Company and BFWG about a link with the Company Executive team. This may involve presentations to the Executive team by BFWG members at important points in the latter's work programme.

- *Ensuring that the company formally consider the final recommendations from a working group, and publish the response.* The PuWG has included a recommendation in its draft Final report to this effect, and it is anticipated that the Company will respond accordingly.

- *Ensuring that working group reports identify milestones against which progress in implementing recommendations can be evaluated over time.* The SFMOWG identified some important milestones. The BFWG proposed work programme contains a commitment to review and monitor the implementation of previous working group recommendations. This will provide a mechanism for reporting progress to the Main Group.

Recommendation

The Coordination Group recommends that improvements to monitoring, evaluation and reporting of the influence of the Dialogue be built into future work programmes wherever possible.

B Stakeholder expectations about the Dialogue

Some comments in the Evidence Report refer to a problem of "unrealistic expectations" on the part of some stakeholders about what the Dialogue can achieve. This can be important, because unrealistic expectations can lead to frustration, disillusion and withdrawal from the Dialogue.

To address this, it might be helpful to clarify the issues where the Dialogue can have most impact.

Lessons Learnt and Applied

The BFWG has sought to do this in formulating its proposed work programme. To assist this process, a sub-group of BFWG met with David Bonser (the 'Dialogue Champion' on the BNFL Board), to identify issues relevant to the development of the Company's business that were most likely to be influenced by the Dialogue. These issues were then considered by the full BFWG and included as *part* of its proposed work programme.

Recommendation

The extent to which the Dialogue should focus on issues judged to be most likely to have a real influence on the Company requires further exploration. The Coordination Group

recommends that this exploration should be undertaken in the further evaluation process proposed in its report to the Main Group.

C Collaborative negotiation

The Environment Council has sought to emphasise that most value will be obtained from a dialogue process when all stakeholders pursue an approach based on collaborative negotiation, rather than positional bargaining. In the former approach, stakeholders are prepared to shift position to reach jointly agreed ways forward. In the latter, stakeholders seek to assert their positions, without being prepared to compromise or modify their views.

An approach based on collaborative negotiation provides a challenge for a variety of reasons. For example, stakeholders are less likely to be able to do this on issues where their organisations or constituencies have well-established policies. In such circumstances, stakeholders are more likely to adopt positional behaviour.

Recommendation

The Coordination Group recommends that ways of encouraging and promoting collaborative negotiation need further exploration, and that this should be done in the further evaluation process proposed in its report to the Main Group.

D Engagement of stakeholders outside the Dialogue

There are a number of stakeholders that have not joined, or that have left, the Dialogue. There can be various reasons for this, including pressure of work, limited resources or cynicism about the value of the process.

In particular, concern about a lack of green NGO involvement is registered in a number of comments in the Evidence Report. The reason for green NGO withdrawals was summarised in the NGO Annex to the WWG update to the last Main Group meeting. This states that withdrawals occurred "on the grounds that the dialogue is not having sufficient impact to justify dedication of scarce resources to the project." This rationale is probably linked to the point made above that some stakeholders entered the Dialogue with unrealistic expectations about what it could achieve.

Lessons Learnt and Applied

The SFMOWG sought to compensate for green NGO withdrawals by initiating some consultation with key players prior to drafting their final report. The working group felt that this process added value to its report.

The PuWG identified a number of key stakeholders that were not members of the working group. These included the Office for Civil Nuclear Security, Nirex and the DTI Division responsible for plutonium management issues. As explained in the PuWG's draft final report, the group sought to establish a two-way flow of information with these stakeholders.

Recommendation

The Coordination Group wishes to encourage more systematic consultation with stakeholders that are either outside the Dialogue, or not members of a specific working group. It considers that the outcome of such consultation should be described in working group reports.

E The Role of Strategic Action Planning

Some stakeholders have been disappointed that the SAP approach does not provide more of a challenge to deeply held views, but seeks to accommodate them, and that it does not provide a methodology for identifying 'best' options.

Others value the SAP approach because it provides a systematic approach to enhancing the understanding of uncertainties, contingencies and alternatives, and can be applied to issues which do not fall within the short-term zone of influence on the Company. SAP can also generate recommendations for actions and explorations, which, if acted upon, could enable the viability of contingencies and alternatives to be properly examined.

Lessons Learnt

Questions have also been raised about the timing of a SAP exercise within a working group's programme. In some instances, SAP is used as a 'last resort', when other approaches have failed to provide a productive way forward. In contrast, the draft final PuWG report suggests that a SAP exercise should be undertaken early, particularly if there is scope for recommended explorations to be undertaken within the remainder of a group's programme.

Recommendation

The Coordination Group recommends that working groups give careful consideration to the purpose, role and timing of SAP exercises within their work programme.

F Information provision within the Dialogue

There have been a number of examples where information provision has not matched the expectation of stakeholders e.g. regarding the possible development of Magrox fuel, and cost data on spent fuel and plutonium management options. Constraints on information provision restrict the extent to which option appraisals can be conducted within, or reported to, the Dialogue.

Lesson Learnt

It is clear that the Company will not provide information to the Dialogue which it considers to be commercially confidential, or that it considers will be used at some stage in the future for 'business as usual' campaigning purposes.

Recommendation

Notwithstanding the lesson learnt above, the Coordination Group recommends that the Company strives to be open and transparent and meet legitimate Dialogue needs for information. When this is not possible, the Company should provide the earliest possible explanation of why this is the case.

4 Summary and Recommendations

This paper has reviewed the Evidence Report to provide:

- a summary of the value of the Dialogue; and

- an outline of what process-related lessons have been learnt and applied, and what process issues require further exploration.

As a result, the Coordination Group recommends that in order to increase the value of the Dialogue:

- improvements to monitoring, evaluation and reporting of the influence of the Dialogue be built into future work programmes wherever possible;

- more systematic consultation with stakeholders that are either outside the Dialogue, or not members of a specific working group, be undertaken and reported;

- working groups give careful consideration to the purpose, role and timing of SAP exercises within their work programme; and

- the Company strives to be open and transparent and meet legitimate Dialogue needs for information and, when this is not possible, the Company should provide the earliest possible explanation of why this is the case.

The Coordination Group has also identified two specific issues that require further exploration: the extent to which the Dialogue should focus on issues judged to be most likely to have a significant influence on the Company; and ways of encouraging and promoting collaborative negotiation within the Dialogue. The Coordination Group recommends that these issues be included in the further evaluation process proposed elsewhere in its report.

Appendix 3 - Recommendations from Working Group Reports

Discharges Working Group Reports

Report	Rec	Recommendation and Response	Theme
DWG 28/08/00	***1***	*We were unable to agree the meaning of the details of the OSPAR strategy implementation but did agree that it implied substantial reduction of discharges. We recognise that BNFL's indicative reduction profiles potentially provide a good first step in achieving the OSPAR recommendations. We recommend that BNFL show a very clear commitment to timescales where plant closures are involved and also show that they are striving to the utmost to secure discharge reductions over and above their pre-OSPAR plans*	*2*
Developments		**The closure programme for the Magnox stations and B205 announced. The closure programme is proceeding e.g. Bradwell closure end March 2002**	1,2
Addendum *10/11/00*	***1a***	*The May 23rd announcement has set out BNFL's commitment to plant closure timescales. Although the closure date for B205 is towards the end of the range given in Table 7 of the Interim Report, the decision has firmed up BNFL's indicative discharge profile (see Appendix A3). The group recognised that the Magnox closure decision does not address all the aspirations of all members of the Group*	*1,2*
Developments		**The production throughput of B205 and other issues were addressed in the Magnox Task Group and appropriate SAP work to deal with uncertainties fed into the SFMOWG work. The Magnox closure programme continues to be implemented and performance of the overall Magnox system is being monitored.**	1,2
Addendum *31/01/02*		*Recommendation 1 made reference to OSPAR. None of the changes reviewed are likely to change the OSPAR recommendations, but might increase the rate at which discharges to the environment are reduced between now and 2020.*	*2*
DWG 28/08/00	***2***	*We recognise that other factors, principally socio-economics, cost and safety, may produce a pressure against discharge reductions. We did not have time to discuss and evaluate these factors and we recommend that suitable studies should be commissioned*	*2,4*

Developments		**The ERM report was jointly commissioned and presented to the Main Group. Although the ERM report has not had a direct impact upon the DWG recommendations, the socio-economic report and its recommendations are being used by the local authorities in regional planning and have been referred to the Government**	4, 6
DWG *28/08/00*	***2a***	*The DWG welcomes the work of the socio-economic sub-group and looks forward to seeing the consultants report in the New Year. Information about socio-economic pressures in Norway and Ireland, which argue in favour of discharge reductions will be provided to the sub-group following correspondence initiated by KIMO (See Appendix A10*	*4*
Developments		**See comments about the ERM report above**	4
Addendum *31/01/02*		*Recommendation 2 dealt with the need for improved socio-economic information. The publication of the socio-economic report commissioned by the SFMO WG, has gone a long way to fulfilling this need but there is no direct impact on the work of the DWG.*	*1,4*
DWG *28/08/00*	***3***	*Notwithstanding our inability to quantify the above factors, we recommend on a qualitative basis, that BNFL should reduce its discharges within a region of optimisation between continuing business scenarios D1 plus/D2 minus and D3 plus*	*2,4*
Addendum *10/11/00*	***3a***	*Although some members of the group were disappointed that the anticipated improvement in throughput at B205 will mean an increase in discharges, the graph in Appendix A3 shows that BNFL's discharge profile is still within the region of optimisation, provided that efforts to develop Tc-99 are successful*	*1,2*
Developments		**Whilst the annual discharges may increase on a year to year basis as B205 performance improves, the total lifetime activity discharged from these operations has now effectively been capped by the station lifetime announcement. Most changes since the DWG have moved towards the bottom end of the region of optimisation. Bringing forward the closure date of Calder Hall has reduced the total amount of fuel to be reprocessed.**	1,2
Addendum *31/01/02*		*Recommendation 3 urged BNFL to work within the region of optimisation for discharges profiled in the DWG report. Most of the changes discussed move the discharges profile towards the lower end of the region of optimisation. Actions by BNFL and the regulators similarly move the discharges profile downwards.*	*2*
DWG *28/08/00*	***4***	*Tc-99 liquid discharges are specifically referred to in the Sintra statement and as such are a 'special case'. We therefore recommend BNFL make utmost endeavours and be seen to be doing so to achieve Tc-99 reductions by 2005. We also recommend that liquid discharges of C-14, Sr-90, Ru-106 and Pu/Am are addressed as 'second tier' priorities*	*2*
Addendum *10/11/00*	***4a***	*The May 23rd announcement does not impact on this recommendation. We note that BNFL is continuing work on Tc-99 discharge abatement and that Tc-99 discharges will be the subject of a forthcoming*	*2*

		consultation by the Environment Agency when this issue will get a further airing	
Addendum *31/01/02*		*Recommendation 4 dealt with the need to reduce Tc99 discharges as a priority. The EA decision document on Tc99 currently with the Secretary of State, recommends an early reduction of Tc99 discharges, subject to BNFL development and getting agreement to the use of a suitable technology. The decision is very much in line with the recommendation made in the original DWG report.*	*2*
DWG *28/08/00*	***5***	*We recommend that the current indicative timetable for shutdown of the Calder reactors should be implemented. We see this as the only effective means of reducing Ar-41 gaseous discharges. [Table 7 of the Interim Report said Calder Hall is likely to close around 2006-10*	*2*
Addendum *10/11/00*	***5a***	*We note that BNFL is committed to closure of the Calder reactors well within the previously indicated time-scales. [NB The 23rd May announcement gives a range of dates for the closure of both Calder Hall and Chapelcross. This is because each station has four reactors with the first reactor closing at the beginning of the range (i.e. for Calder 2006) and the fourth closing at the end of the range (ie2008)]*	*2*
Developments		**The closure programme for the Magnox stations continues to be implemented and reviewed. Concerns about performance of the Magnox business overall including performance of B205 and the reactors were addressed in the Magnox Task Group and appropriate SAP work to deal with uncertainties fed into the SFMOWG work**	2
Addendum *31/01/02*		*Recommendation 5 dealt with the closure of the Calder reactors as the only means of reducing Ar41 discharges. As there has been no change to the original closure date, the recommendation stands as written in the original report.*	*2*
DWG *28/08/00*	***6***	*We recommend that uncertainty on predicted critical group dose arising from gaseous discharges of I-129 be resolved*	*2*
Developments		**The impact of aerial I-129 emissions continues to be significantly below model predictions. The Calder reactor closure date has been brought forward.**	2
DWG *28/08/00*	***7***	*We recommend that in parallel with resolution of uncertainties in critical group dose for I-129, BNFL formulate by 2002 appropriate abatement strategies for the reduction of I-129 aerial discharges*	*2*
Addendum *10/11/00*	***6a &7a***	*We note work is ongoing on these two recommendations (See Appendix A7). We note that work is ongoing to look at whether the models need revising. However, we also note that BNFL are seeking to reduce I-129 aerial discharges.*	*2*
Developments		**The "Street 3 Scrubber" is now operational contributing to the reduction of aerial I-129 reductions.**	2

Addendum *31/01/02*		*Recommendations 6 & 7 dealt with the uncertainty surrounding the dose arising from discharges of I-129. These uncertainties remain. However the Group notes that I-129 concentrations in the environment continue to be much below the levels predicted by some models. This remains valid for Thorp related discharges as well as Magnox.* *The reconvened DWG further notes that BNFL are working to resolve the issue of uncertainty and as importantly taking action to reduce I-129 emission e.g. Thorp iodic acid trials and the commissioning of the Street 3 Scrubbers.*	*2*
DWG *28/08/00*	***8***	*We recommend that a subsequent working group should examine in detail all the issues associated with prolonged dry storage of spent Magnox fuel, in order to properly determine whether earlier cessation of Magnox reprocessing is feasible and appropriate; if so, to consider what further reductions in discharges might be achieved*	*1*
Addendum *10/11/00*	***8a***	*SFMOWG is looking at a range of spent fuel management options including Magnox dry storage*	*1*
Developments		**The work undertaken by SFMOWG took on the SAP work recommended by the Magnox Task Group. This fully identified uncertainties in the Magnox fuel cycle**	1
Addendum *31/01/02*		*Recommendation 8 was that a subsequent group should examine in detail issues associated with the prolonged dry storage of Magnox fuel. The reconvened DWG group is pleased to see this issue has been taken up by the SFMO WG and we look forward to their final report.*	*1*
DWG *28/08/00*	***9***	*We recommend BNFL conducts further studies on the impact of future decommissioning operations on the discharge profile*	*2,3*
Addendum *10/11/00*	***9a***	*This recommendation is not affected by the Magnox announcement*	*2,3*
Developments		**Refocused efforts towards dealing with the legacy wastes at Sellafield, including decommissioning activities will be reflected in the Business Futures Group dealing with discharges from legacy wastes**	2,3
Addendum *31/01/02*		*Recommendation 9 was that BNFL conducts further studies on the impact of future decommissioning operations on the discharge profile. The reconvened DWG notes and welcomes the fact that BNFL has created a Sellafield Historic Waste Management project. It is expected that this group will in time provide quantitative data on the impact of decommissioning operations on discharges. The reconvened DWG recommends that the BF WG monitor progress being made by the BNFL project team.*	1,2,3
DWG *28/08/00*	***10***	*We recommend that BNFL should use a methodology similar to that described in this report to develop a strategy for discharge reduction at each of its sites in the UK*	1
Addendum	***10a***	*Further work is required on the strategy for other sites, although the Magnox announcement will impact*	1

10/11/00		*on every other BNFL site, including Springfields*	
Developments		**UK Discharge strategy affects all BNFL sites. Discharges from reactor sites will be limited by the declared closure dates. Springfields discharges will decrease significantly around 2006 when Magnox fuel production and conversion activities cease**	1
Addendum *31/01/02*		*Recommendation 10 was that BNFL develop a strategy for discharge reductions at each of its UK sites. The reconvened DWG noted that some of the changes have resulted in decreases in discharges at other BNFL sites, notably:* • *Reduction in discharges at Springfields due to the closure of the Magnox fuel production line, a consequence of the reactor closure programme announced by BNFL.* • *The EA Decision documents on discharges from Magnox reactor sites reduce limits for a significant number of radionuclides.* *The group also notes that while it has not seen the publication of discharge reduction strategies at other BNFL sites, the fact that BNFL and others are involved in the development of the UK strategy for the reduction of radioactive discharges, must inevitably lead to the production of site specific plans.*	1,2
DWG *28/08/00*	***11***	*We recommend that the government and regulators are urged to set criteria for the acceptability of waste forms which should inspire confidence that they will lead to best practicable environmental options being adopted. Consideration should be given to reviewing those criteria and their application to remove unnecessary barriers to the achievement of reduction objectives*	5, 6
Addendum *10/11/00*	***11a***	*We note that there has been no progress on this recommendation and urge the Government and the Regulators to take steps to bring all the parties together within the time-scale of the Tc-99 consultation. The re-convened DWG recommends that the Main Group writes to the DETR to this effect*	1, 6
Developments		**The Defra waste management consultation is still underway. BNFL continues to review Technetium discharges and options for their reduction, including a trial for the use of TPP. This is related to the Discharge Authorisation review which is with Defra Ministers for decision**	1
Addendum *31/01/02*		*Recommendation 11 dealt with the need for government and regulators to set criteria for the acceptability of waste forms.* *The reconvened group notes that there has been no real progress on this recommendation.* *Despite this lack of progress, the group noted that BNFL are developing proposals for a trial of the TPP process (Tc99 abatement option) which they will discuss with the regulators shortly. The reconvened DWG hopes that the discussions will lead to a way forward on setting criteria for the acceptability of waste forms.*	5, 6
DWG *28/08/00*	***12***	*We recommend that the main group should make the results of our work to date available to the UK government, as a contribution to the government's development of the UK OSPAR strategy*	2, 6

Addendum *10/11/00*	***12a***	*This recommendation was carried out, but we note with regret that the DETR's UK Discharges Strategy quoted selectively from the Interim Report and created a false impression of work by the Group. Representations have been made to the DETR about this by The Environment Council. We now recommend that the main group should make this Addendum available to the UK Government as a contribution to the DETR UK Discharge Strategy Consultation and the upcoming Waste Management Consultation*	2, 6
Developments		**DWG notes that their recommendations regarding reporting were carried out. The Defra waste management consultation is still underway. Defra are also reviewing submissions made during the consultation on the UK Strategy for Radioactive Discharges 2001-2020 (June 2000).**	6
Addendum *31/01/02*		*Recommendation 12 was that Government should make use of the work done by the DWG. The reconvened group believes this had happened.*	6

Waste Working Group reports

Report	Rec	Recommendation and Response	Theme
WWG *28/02/00* Addendum *23/11/01*	***1***	*This report summarises the progress made by a sub-group of 15 stakeholders from the overall group of 80, in providing guidance for BNFL's waste management strategy. It aims to provide a framework on which future work can build, and should be viewed as a 'work in progress' status report of one aspect of the overall Stakeholder Dialogue*	*1*
Developments		**On 23 Nov 01, the Waste Working Group was reconvened in order to review the status of work in progress, as part of the overall stakeholder dialogue**	*1*
WWG *28/02/00*	***2***	*The WWG urges all stakeholders party to the dialogue process to accept the following principles, statements and positions, and to use these to inform and refine the task of making a final set of recommendations to the company through which it can improve its environmental performance:*	*1, 5*
		All existing waste and waste arisings must be packaged in passively safe, monitorable and retrievable interim storage in the shortest possible time	*5*
		Subject to satisfactory performance and safety review, interim storage offers a feasible management option for 50 years and beyond but research must continue into long term storage and the possibility of disposal. The Company cannot rely solely on others: it must be actively involved in research	*5*
		Within the next 50 years existing and future planning and regulatory controls will make it necessary to periodically revisit the adequacy of interim stores as consents expire, control regimes are improved or alters or as waste management policy is redefined The opportunity to revisit research, advancing technology, waste minimisation and compaction, against the background of changing values must be accepted	*5*
		The Company must continue to successfully embrace change. The nine scenarios developed by the WWG provide a preliminary framework within which strategic options can be considered objectively. This framework could therefore be adopted and developed for use in all research and analysis conducted in connection with the BNFL Stakeholder Dialogue	*1,5*
Addendum *10/11/00*	***2a***	*There has been positive progress on many of the areas of recommendation. The scenarios put forward by the WWG have in fact been utilised in the current working groups (Para 8.2 page 21), and will continue to be used as updated by this note*	*1,5*

Developments Addendum *23/11/01*		Specific examples of an increased emphasis on progressively moving from mobile to non-mobile wastes and passive storage presented to the reconvened WWG were: • Investment in R&T • Management of HAL stocks at Sellafield • The establishment of a dedicated company project to address the issues of Historic Waste Management • The retrieval of Plutonium Contaminated Material stored at Drigg site The WWG recognised this is a long-term goal which required further work in defining "passivity" and measurement of progress with time. The BFG could commission work in these areas. The scenarios and framework adopted by WWG were taken up by SFMOWG and Pu.	1,5
WWG *28/02/00*	***3***	*The work of the WWG has been limited to evaluation and comparisons which could be performed within the waste area. Real decision-making on future scenarios requires the evaluation of factors in other areas, for example, safety, discharges, stored products, generation and practicalities of the management of raw waste, hazards, social factors, transport and the like. These comparisons will be central to the work of future groups, and the methodology by which this is achieved will be the major challenge of this work*	1,2,5
Developments Addendum *23/11/01*		**The work of the SFMOWG considered a range of factors as part of the MADA evaluation. WWG believed that developing a measure of passivity would link many of these issues and that BFG should consider this**	2, 5
WWG *28/02/00*	***4***	*The different scenarios:* • *will have different discharge implications which need to be taken into account* • *produce different amounts types and forms of stored waste which may give differing risks and hazards* • *will affect Company income streams and therefore the ability to fund action* • *will produce differing amounts of potentially reusable Pu and U which would have implications if waste policies change or these materials were to be managed in an equivalent regime* • *will give different occupational doses which needs to factored into decision making* • *could give differing or continuing needs for transport* • *will give differing socio-economic effects which must be evaluated* • *will have differing public and political acceptability aspects over the range of stakeholders* • *will give differing regulatory considerations* **will have safeguards, proliferation implications and institutional control aspects that need to be taken into consideration*	1,2,5,6
Developments		**These factors were considered as part of the MADA and SAP work undertaken by the SFMOWG. PuWG is looking at the safeguards and proliferation aspects. WWG considered that the scenarios**	*1,5,6*

Addendum *23/11/01*		**PuWG is looking at the safeguards and proliferation aspects. WWG considered that the scenarios could be affected by the Energy review, Defra consultation on waste management, any outcome of definitions of passivity and the development of the LMA**	
WWG *28/02/00*	***5***	*With time the weight attached to each of the factors will change and this must be acknowledged by the Company and future Working Groups*	*1,5*
Developments		**Different time frames were considered when evaluating options as part of the MADA and SAP work undertaken by SFMOWG**	
Addendum *10/11/00*	***4a &5a***	*The need for holistic and balanced solutions (Paras 8.4, 8.5) is also being taken forward in the current working groups*	*1,5*
Developments		**An issue which is being considered within BF WG**	*1,5*
WWG *28/02/00*	***6***	*Socio-economic effects are accepted as crucial to the development of nuclear waste management. However there is a paucity of empirical data upon which to base evaluation. Research must be commissioned by the Company in partnership with stakeholders to model socio-economic effects. The study should look primarily but not solely at West Cumbria and should be conducted through a mutually acceptable process*	*4*
Developments Addendum *23/11/01*		**The ERM report was jointly commissioned and presented to the Main Group. WWG welcomed the report as a sound starting point for necessary future work, both inside and outside the Dialogue process. The report and its recommendations are being used by the local authorities in regional planning and have been referred to the Government. WWG noted that the report had not been intended to cover the socio-economic aspects of Magnox station decommissioning**	*4*
Addendum *10/11/00*	***6a& 8a***	*Socio-economic factors were emphasised as being important (Paras 8.6, 8.8) and a Socio-economic study is now in progress under the direction of a sub-group of the Stakeholder Dialogue*	*4,5*
Developments		**See comment above about ERM report**	*4,5*
WWG *28/02/00*	***7***	*The WWG did not consider timing of decommissioning but this must involve an overall evaluation, but this should be addressed in future work.*	
Developments		**An issue which is being considered within BF WG**	*4,5*
WWG *28/02/00*	***8***	*Whatever the complexion of future working groups as decided by the stakeholders at the November meeting, the WWG is of the opinion that the recommendations and findings associated with the scenarios examined in its work, together with the recommendations from the DWG, should form an information bank against which future discussions and examinations can be set*	*1*
Developments		**The range of scenarios examined informed and were reflected in the work of the SFMOWG**	*2*
WWG *28/02/00*	***9***	*As indicated above, we believe that the kernel of the work still to be carried out in the second round working groups will be the socio-economic impacts of the scenarios considered above*	*4*

Developments		**The ERM report was jointly commissioned and presented to the Main Group. The report and its recommendations are being used by the local authorities in regional planning and have been referred to the Government**	*4,6*
WWG *28/02/00*	***10***	*As will be evident by much of the above, there is a fundamental divergence of views within the group on the role and appropriateness of reprocessing. For the guidance of future work on this topic, the Company's views are given in Appendix 3, and the NGOs have summarised their views in the document '"NGO Views on Reprocessing Following BNFL Documentation", attached as Appendix 4*	*5*
Developments Addendum *23/11/01*		**The NGO paper on reprocessing was reviewed in the light of work undertaken by SFMOWG and the socio-economic report and was appended to the WWG addendum of 23/11/01.**	*2,4,5*
WWG *28/02/00*	***11***	*Process observation: The failure to mention the Magrox possibility during the initial scenario setting raised considerable concerns amongst NGO representatives. It was accepted that the scenarios examined in this document were proposed in order to examine the range of options and outcomes. The implications on waste volumes from the Magrox scenario are within this range. However the impact of Magrox on extended Magnox lifetimes could be significant and therefore it is very important that the company finds ways of discussing and examining any alternatives at an appropriate early stage as part of the stakeholder dialogue*	*1*
Addendum *10/11/00*	***11a***	*As already mentioned, the necessity for Magrox to be properly examined (Para 8.11) has been taken on board, and the quantities given in Appendix 2 will be taken on board by the current working groups*	*1,2*
WWG *28/02/00*	***12***	*While there will doubtless be challenging discussions , the WWG sincerely hope that after the full and exhaustive conclusion of the work of future working groups, the stakeholders will be in a position to make a set of balanced, realistic and self-evident recommendations to the company which will significantly enhance its stated desire to improve its environmental performance*	*1*
Developments		**The Magnox Task group was established to address the concerns expressed. The ensuing SAP work was fed into the SFMOWG. The Magrox option has been ruled out**	*1*

Plutonium Working Group Reports

Report	Rec	Recommendation and Response	
Pu WG 1st interim report *10/11/00*	***1***	*We note that the current storage arrangements for separated plutonium are long established and are considered to be adequately safe and secure for the short and medium term - that is, for about the next 25 years. Most of the group share this view. This is of course conditional on the maintenance of robust security and safeguards arrangements, and also on the maintenance to a high standard of the storage facilities, the repackaging facilities, and all the associated operational procedures. Some of the group consider that safety and security arrangements can never be made sufficiently robust. Notwithstanding these mixed views about short term safety and security, most of the Group consider that storage of plutonium as plutonium dioxide powder in its present form does not meet the standards of 'passive safety' which would be required for long term storage. Therefore, an alternative approach to the management of plutonium stocks needs to be developed. (Section 3.2)*	
Developments		***The Company has initiated a programme of work to examine alternative approaches to the management of plutonium stocks***	
	2	*It is important that any change to the current storage arrangements for existing separated plutonium stocks should be carefully considered and should be substantiated by a comprehensive analysis covering the short, medium and long terms. However, we are aware that significant investigation and development, in addition to the design and construction of new facilities, may be required, and that lead times may be in excess of 10 years. (Also see recommendations 8 and 9) (Section 3.2)*	
Developments		***Included in the agreed programme of work being undertaken by the Company (and reviewed via the CTE and PuWG***)	
	3	*We recommend that the end point of any viable option for the management of separated plutonium should be the conversion of plutonium into a 'passively safe' form, suitable for long term storage. Most of the group also consider that the converted plutonium should be readily amenable to disposal because this is a management strategy which may ultimately be implemented. However, some question the ultimate viability of disposal. (Section 3.3.1)*	
Developments		***The issue of "end point" material is being addressed in the company work programme***	

	4	*We agree that any management strategy for BNFL's separated plutonium stocks must provide a very high level of verifiable assurance that plutonium cannot be diverted for use outside the current international non-proliferation safeguards. We could not agree on whether achievement of the 'spent fuel standard' should be an essential requirement for management of BNFL's separated plutonium stocks, or indeed exactly what compliance with such a standard should entail. (Section 3.3.1)*	
Developments		**Discussed in the securities sub-group.**	
	5	*We consider that plutonium management options involving transmutation, or novel fuel cycles such as thorium/plutonium fuels, should not be considered as means of dealing with BNFL's current stockpiles of separated plutonium. This is because the technology required is far too immature and the options cannot be implemented within the timescale which we consider appropriate (that is, around 25 years). As a result, no discussion under other criteria took place. (Section 3.3.1)*	
	6	*We consider that plutonium management options involving transmutation, or novel fuel cycles such as thorium/plutonium fuels, should not be considered as means of dealing with BNFL's current stockpiles of separated plutonium. This is because the technology required is far too immature and the options cannot be implemented within the timescale which we consider appropriate (that is, around 25 years). As a result, no discussion under other criteria took place. (Section 3.3.1)*	
	7	*We consider that options involving the use of Mixed Oxide fuel in gas-cooled reactors, fast reactors, or heavy water reactors should be excluded from consideration. (Section 3.3.4)*	
Developments nos 5,6,7		**Recommendations accepted by Company Technical Executive**	
	8	*Our limited analysis indicates that a range of options spanning immobilisation of plutonium in ceramic form, with or without the addition of a radiological barrier, and the use of plutonium as a fuel in existing or advanced light water reactor designs, merit further investigation as long term management strategies for BNFL's plutonium stocks, although strongly held differences of opinion remain within the PuWG on their relative pros and cons. More information on all criteria, especially business viability, and safety and environmental performance, would be necessary to make clearer choices between the remaining options*	
Developments		**The Company programme of work has begun to generate some of the necessary information**	
	9	*We recommend that BNFL should promptly produce proposals for generating such information and for analysis covering all criteria. In doing so, BNFL should have full regard to information which is available from international plutonium disposition programmes, especially immobilisation. These proposals should identify the work that must be done, and give an indication of timescales. (Sections 3.2 and 3.5)*	
Developments		**The Company produced proposals for generating the information. These led to the programme of work referred to above. This programme is taking account of international research and development**	

	10	*We request that the Main Group approve, in principle, a continuation of the PuWG's work. We recommend that the PuWG should be initially reconvened in December 2000 to review BNFL's proposals. At that stage, the PuWG will take a view on its future involvement, which might include monitoring, reviewing and participating in the analysis. Following this December 2000 meeting, the PuWG will make a recommendation on the way forward to the Co-ordinating Group*	
	11	*We recommend that the Main Group should authorise the Co-ordinating Group to decide whether the PuWG proceeds with any work which it proposes to undertake in the light of its December 2000 meeting*	
Overall comments		**All recommendations have been addressed, principally through BNFL's response to recs. 8 and 9. A detailed programme of work was proposed, as requested, in December 2000 and is progressing towards a July 2002 end date**.	
Pu WG *2nd Interim report*	***3.3.1***	*We ask that at the earliest possible date BNFL should make available to the PuWG information on their assessment of reactor-based plutonium management options.*	
Developments		**Preliminary information has been provided.**	
	3.3.2	*We recommend that BNFL should include within its assessment those options which involve the earlier use of SMP for plutonium immobilisation than is currently anticipated by the Company. This assessment should include consideration of how the SMP might be used in the event that either the authorisation to operate the plant is not granted, or that the order book for the production of MOX falls short of BNFL's current expectations*	
Developments		**Now included in Company's list of options.**	
	3.3.3	*We recommend that the above consideration should include the option of immobilising plutonium in the form of low specification MOX, as in Option 3 of our November 2000 draft interim report*	
Developments		**Now included**	
	3.3.4	*We recommend that BNFL should subject the benefits and disadvantages of radiation barriers (taking account of security and proliferation issues) to a comprehensive assessment at an early stage, so that if it is concluded that radiation barriers should or may form part of the preferred plutonium management options, plans can be developed to ensure the appropriate phasing of Pu immobilisation and HAL stock management*	
Developments		**Being discussed by the securities sub-group**	
	3.3.5	*We recommend that BNFL should include in their assessment Option 9 from our November draft report – that is , immobilisation of plutonium as low specification MOX followed by emplacement of the MOX*	

		assemblies in a storage container along with irradiated fuel assemblies	
Developments		**Accepted by CTE**	
	3.3.6	*We recommend that dose uptake to workers should be assessed as an attribute of all the options considered, and included as one of the criteria or sub-criteria in the final detailed BPEO assessment*	
Developments		**Accepted by CTE**	
	3.3.7	*We recommend that BNFL should concentrate its resources for further work on plutonium immobilisation options on those options which involve a ceramic matrix 9including low specification MOX) rather than on options which involve a glass or vitrified matrix*	
Developments		**Accepted by CTE**	
	3.3.8	*We ask that, in future reports on its work to the PuWG, BNFL should include clearer and more detailed referencing of information used to support its assumptions and also a clearer indication of the recommendations for future direction. We also ask BNFL to produce an updated version of its report as discussed at our June meeting which includes such referencing and which, ideally, is in a form BNFL would feel suitable for release into the public domain. If possible, we would like to have this updated version by mid July but in any event it should be available for our next meeting in September*	
Developments		**References received and included in the PuWG second draft interim report**	
	3.3.9	*We recommend that BNFL should use the assessment criteria set out in our November draft interim report as a starting point in the development of their own final BPEO assessment. We also recommend that BNFL should engage with the PuWG both in developing the assessment methodology and in carrying out the assessment, particularly in respect of bringing stakeholder perspectives on preferences and weights into the assessment*	
Developments		**PuWG has moved focus from BPEO to SAP approach and recommended this to the CTE. This transition has led to some uncertainty as to the role of any BPEO assessment in the Company's current programme of work**	
Pu Third Interim report	***6.1–6.3***	*We ask the Main Group to note the progress we have made so far, and we would welcome their feedback.* *We ask that the Main Group authorise us to continue with our role of monitoring, review and steering of BNFL's work on the management of plutonium stocks through to the production of a final report by us in the autumn of 2002.* *At this stage we do not feel it appropriate to publish this report outside the Dialogue, principally because it contains material from BNFL which we have not, as yet, discussed as a group. We therefore ask the Main Group for permission to delay a decision on publication until our next meeting in April and, if we so decide, to proceed with publication on the authority of the Co-ordination group.*	

	7	*The Main Group endorsed the recommendations in section 6 above. At our subsequent meeting on 17/18 April we discussed the publication of this report, as indicated in recommendation 6.3.* *We made a number of observations on the annexes which had been provided by BNFL:* *Annex 5 refers to the Transport sub-Group considering issues connected with the transport of MOX. At the Main Group, it was agreed that the PuWG should consider transport issues within its SAP analysis, and we shall do so.* *Some comments in Annex 5 suggest that BNFL may be regarding the SAP analysis as, in part, an option evaluation and comparison process. This is not the case; SAP will draw out the uncertainties associated with implementation of all of the options considered, together with investigations which would be necessary to resolve those uncertainties, and/or the contingencies which would be available if the uncertainties could not be satisfactorily resolved. As such, SAP is complementary to processes of option evaluation and comparison but does not replace them.* *Regarding the comment on identification of the 'optimum' product for 'final Pu disposal' in Annex 5, we consider it should be possible to develop a product which is suitable for long term, safe and passive storage and for which there is reasonable assurance as to disposability, before the details of any final disposal route are decided.* *Regarding Annex 6A, paragraph 6, we anticipate being able to make some recommendations on economic assessment methodologies but we do not expect to undertake the economic assessment of options for the management of plutonium stocks.* *Having recorded these observations, we now wish to publish this report in the normal way and seek the permission of the Coordinating Group to do so.*	

Spent Fuel Management Options Working Group Reports

Report	Rec	Recommendation and Response	
SFMO WG *10/11/01*	***5***	*The SFMOWG strongly recommends to the main stakeholder meeting in November that it supports a continuation of the Group's work for a further seven months as set out in the proposed forward programme. It will provide a progress report in March 2001 with a full report of its findings by the summer of 2001 in a final draft report to a specially convened main stakeholder meeting.*	1
Developments		**The Main Group agreed the SFMOWG could continue. A Draft Final Report will be presented to the Main Group meeting in March.**	1
SFMOWG July 2002	***6.1***	*The Group commends this report to BNFL and to other decision makers in the Spent Fuel Management Options study area, including its use as an input to the process of the development and role definition of the Liabilities Management Authority.*	1,6
	6.2	*In this context BNFL should seek guidance from the Government on the availability of public funds to underpin the costs involved if SF1 early closure scenarios are chosen*	1,6
Developments		**The Main Group's comments were included in the Spent Fuel Report. The LMA White Paper reaffirmed the operational lifetime dates for the Magnox stations and B205. Ongoing commercial operations of Thorp and SMP are also covered.**	1
	6.3	*The SAP's contain the scenario-based conclusions of the Group and should be studied (Appendix 12). Key milestones from this process are given in Section 7 of this Summary.*	1
	6.4	*BNFL should ensure that its Strategic Planning takes adequate account of the issues and recommendations raised in this report, and in particular the identified contingency planning needs, is transparent in its identification of how the conflicting needs of the environmental aspects and the socio-economic aspects have been taken into account*	1
Developments		**Responses to the SAP conclusions are given below**	1

	6.5	*BNFL should match the projected lifetime arisings of spent Magnox fuel as closely as possible to the performance of B205 without compromising reactor operations. In the event of sudden or terminal failure of B205 the objective is to ensure that there is a minimum amount of Magnox fuel remaining in ponds. No plans should include long term storage of wetted Magnox fuel*	1,2
Developments			
	6.6	*BNFL should ensure that, within whichever scenario is adopted by the company, every effort is transparently made to reduce discharges and minimise waste at the earliest opportunity and that the achievement of early passivity is a defined target**.***	1,2
Developments			
	6.7	*In the light of the ERM report, BNFL and other relevant stakeholders should develop mitigation plans to counter the adverse socio-economic effects which all options involve.*	1,4
Developments			
	6.8	*The Group recommends that the Business Futures Group, if it is constituted, should use the work of the Spent Fuel Management Options Working Group as a basis for further advance rather than revisit matters already covered.*	1
Developments			
	6.9	*BFWG may wish to consider whether there are any alternative uses for Thorp after the termination of whichever current option is adopted.*	1
Developments			
	6.10	*BNFL should consider the need for, and benefit of, a future group to:* • *Refine this report's contingency plan conclusions, and* • *Review the Discharge and Waste Working Group report's conclusions.*	1,2
Developments			
	6.11	*Any future dialogues should employ jointly agreed procedures, with the application of joint fact finding, selection of contractors, agreed terms of reference and joint monitoring where appropriate.*	
Developments			
	6.12	*Future working Groups may wish to consider building formal peer review into their report production process*	
Developments			

	6.13	*BNFL is asked to consider the value of this report and forward this report, when finalised, to appropriate Government Minister(s) for consideration in the light of previous Working Group reports and the ongoing Government consultation on radioactive waste and their considerations on a national discharge strategy.*	6
Developments			

Appendix 4 - Monitoring and Evaluation Options: by Richard Harris, October 2002

1. The Purpose of Evaluation

The purpose of evaluating a stakeholder involvement process is to ensure that the process can be assessed in order to help everyone who has an interest see and make judgements about such issues as:

- Process strengths and weaknesses
- Use of resources
- Evidence of impact/change
- Unexpected consequences
- Lessons and future applications

Broadly, there are four sets of people who will have an interest in an evaluation process and the results it may produce, we might consider them to be stakeholders in the evaluation process:

(i) Participants - those directly involved in the process
(ii) Sponsors/Funders
(iii) Facilitators/Convenors
(iv) Interested others – those not involved in the process

Each has their own needs and each will be motivated for a variety of reasons which might include: better understanding the process they have experienced, assessing success, justifying time and costs committed, confirming lessons for application elsewhere or later and so on.

2. Current and Past Approaches to Evaluation in the Dialogue

In the BNFL National Stakeholder Dialogue the existing experience of evaluation can be summarised as:

1. Regular, simple evaluations as part of Main Group meetings and as part of discussions in Working Groups.
2. A stakeholder survey and working group review, carried out as part of the "Consolidation" stream of work, undertaken by the Co-ordination Group in the period running up to the Main Group in March 2002

Evaluation to date has been focused on serving process management needs, the intention being to gather valuable information for the design and management of the next stages of the dialogue. We might regard this a necessary, integral part of any dialogue process during the course of its operation. However, this approach does not provide for any wider needs in terms of lessons learnt or possible applications at other times, in other places, for example in other stakeholder engagement processes. In particular, the existing approach to evaluation does not meet the needs of "Interested Others", outside the dialogue.

3. Evaluation – Future Options

As the BNFL National Stakeholder Dialogue process enters into the latter stages of its *envisaged* life as a dialogue (after which time it may well continue in some form or other, yet to be decided), it is essential that some thought is given to what will be in place at the "end". What will be the net "legacy" of the dialogue? What difference will all the effort, expense and heartache have made? An evaluation process should help us generate some answers and needs to be carried out for both the content (i.e. the tangible products of the dialogue) and process (i.e. the intangible products). As with dialogue itself, the quality of the process will determine the quality of the outcome.

So, the questions are...What sort of evaluation process is needed? Who is it for and what are their needs? How will it be managed? Who will do it? Who will resource it?

Some simple options present themselves:

A. An internally managed evaluation process
B. An evaluation process independently managed by a third party
C. A Joint Fact Finding approach (such as the Socio-economic report and the JASM project, although not on the same scale) delivered by a third party, but designed, steered and overseen by the Co-ordination Group.

If the BNFL National Stakeholder Dialogue were a run-of-the-mill stakeholder involvement project none of this would matter very much and an internally focussed or managed evaluation would be quite adequate. However, there can be little doubt that this dialogue is unique in the U.K. There is nothing else quite like it, nor has there been.

The accumulated experience and learning carried by those who have been involved has significance beyond the individuals and their organisations. It extends beyond the nuclear sector into just about any area of public policy making (or policy making in public) where there is challenge and controversy. All this deserves closer examination, not because the approach taken is wholly right or perfect, but because something new has been attempted, something that needs proper consideration by people who were not there.

The consequence of not undertaking an evaluation for wider consumption is fairly obvious; those who were not there will remain entirely ignorant of what has/has not been achieved, or perhaps worse, they will make their own judgements, however ill-informed.

If the product of an evaluation process is wholly, or partly, to be aimed at successfully reaching "Interested Others"; their needs will have to be taken into account in the design and management of the evaluation process. One of their more predictable needs will be for sufficient objectivity in analysis and consequent conclusions such that they might be assured of seeing a clear picture, free of inappropriate interference or undisclosed bias; only then are they likely to value its content.

Each of the simple options above carry their own advantages and disadvantages. However, Option C seems to offer the best way forward. It is relatively innovative, consistent with practice developed elsewhere in the dialogue and should be straight forward to manage and resource efficiently.

Appendix 5 - JASM Recommendations to BNFL National Dialogue Main Group (through the coordination group)

The Jointly Agreed Sampling and Monitoring (JASM) Working Group at its meeting on the 25th April 02, came to the following conclusions and recommendations which it wishes the Main Group of the BNFL National Stakeholder Dialogue (NSD) to consider via the offices of The Environment Council.

1) The experience of the method of working employed by JASM has been instructive and positive and should be used by the BNFL NSD, along with the socio-economic study commissioned by SFMOWG & PuWG, as a template for future co-operative fact finding work. (see attached learning).

2) The Coordination Group of the BNFL NSD, via TEC, should send a copy of the JASM report to DTLR with a covering letter which impresses upon DTLR that the process by which this study was prosecuted represents 'best practice' and is an exercise from which DTLR may learn in the discharging of their monitoring obligations.

3) While the JASM Working Group agree that their work has finished and that the group should be disbanded, the issue of independent monitoring of contamination from spent nuclear fuel transport has not. In that respect, further work to verify and compare findings of the Willesden report with other sites may need to be carried out within the remit of the BNFL NSD or without it.

4) The JASM Working group, therefore, ask the Main Group of the BNFL NSD, via The Environment Council, to determine if it feels there is an over-riding need for this work to continue in support of its remit of 'informing BNFL's decision making process about the improvement of its environmental performance in the context of its overall development' in which case JASM will review its position. Should the BNFL NSD decline to request further work to be carried out on its behalf either directly or via a working group wishing to investigate transport/ contamination aspects, it will fall to the members of the JASM Working Group to pursue verification and comparative work in another form should they so decide.

5) If the BNFL National Dialogue Coordination Group has any other contacts or recommendations where they think the Stanger report should be sent the JASM group would appreciate this information along with the most suitable form of approach.

Learning Points from JASM Process

The following is a list prepared by the members of the JASM working group. It is intended to be an aid to any parties wishing to carry out a similar joint fact finding exercise and who may wish to benefit from the learning gained by the JASM group. The components included are those which the JASM group either used to make sure their joint fact finding exercise was a success or which they feel, in hindsight, could have improved their work.

Throughout

- Be open and transparent

Pre Planning Stage

- Criteria for membership included commitment to attendance & to joint working
- Membership balanced across the stakeholder sectors
- Working group members mandated by a larger group
- Independent facilitation
- Agreement on sources of funding
- Joint funding
- Agreed groundrules
- Agreed objectives
- Need for support/ feedback from constituents
- Agreed general review mechanism at the beginning

Planning stage

- Agreed type of outputs required -kept this simple – data only, not interpretation
- Agreed criteria for consultants' appointment (e.g. independence)
- Joint interviewing and assessment of consultants
- Joint methodology development with consultant
- Agreed detailed review mechanism with consultant
- Contract signed by convenor on behalf of the group
- Purse held by convenor
- Research choice not driven by 'lowest cost'
- Proceed by consensus only
- Need to identify all variables in advance and plan for changing circumstances

Follow up stage

- Consensus-based commentary by group on consultants' report
- Agree about dissemination of results

Appendix 6 - Draft Communications Strategy for the BNFL Dialogue

Context:
In the initial phases of the Dialogue it was essential to build trust between the participants without the pressure of media interventions or wider publicity.

Now that the Dialogue has reached a much more mature state and significant outputs are being generated it is appropriate to promulgate the work of the dialogue in a more proactive way. However, it is essential, for the continued well-being of the Dialogue, not to compromise the trust-based way in which the Dialogue is conducted.

This strategy can be updated as and when necessary. It has been developed to provide guidelines for working groups who can adapt it according to their own communications needs. Working groups should be able to devise objectives and key messages which will be appropriate for their target audiences.

Objectives

1. To promote the work of the BNFL Stakeholder Dialogue as part of the process of informing BNFL's environmental decision-making
2. To publicise reports produced by the main group to target audiences

Key messages

1. The BNFL Stakeholder Dialogue is an inclusive process which enables stakeholders, including central and local government, NGOs, academics, community groups and other interested parties to engage with BNFL to determine possible solutions to issues facing the company.
2. The work of the Dialogue is very comprehensive, taking into consideration economic, social, environmental and scientific factors.

Publicising the Dialogue process:
Any media enquiries or suggestions for publicity relating to the day-to-day operation of the BNFL National Stakeholder Dialogue shall be referred to The Environment Council and resolved in accordance with the currently agreed Dialogue 'Ground Rules'.

Stakeholders can have an input as well if they decide to share their experience in the Dialogue with the media. They should be able to do that as long as they respect the 'Ground Rules'.

Outputs from Working Groups:
During the final stages of agreement by working groups of reports (interim or final) the group should give consideration to the promotion of their report. The group should also consider if they want to communicate ongoing work which is being developed, that could encompass either the dialogue process or its content (or both). Reports (interim or final) should be signed off by the main group.

The audiences for either exerting influence regarding the findings or content of the reports and for promoting of the dialogue process itself may be different and the working group should be encouraged to consider how either purpose would best be served.

Attempting to influence policy or government thinking would require circulation to selected audiences. These typically but not exclusively might be from the following:

- Civil servants
- Politicians
- Academics
- NGO's not represented in the Dialogue
- Nuclear industry and its communities
- The wider public

The groups should consider means of reaching other audiences both concerning the output of their working group and of the Stakeholder Dialogue itself, should either or both objectives be deemed timely and appropriate. These may include:

- Mailings
- Web sites
- Requests for meetings/presentations
- Conference papers
- Third party evaluation
- Trade press
- Popular media

Planning

Planning is essential to produce effective results and all communications activities should be planned well in advance. Having a complete plan, including objectives, strategy, target audiences, key messages, tactics, evaluation and timescale will enable the group to deliver effective communications and achieve the desired outcomes.

Communications sub-Group:

Prior to publication of the working group report the group shall draft a proposal for publicity and submit it to the National Stakeholder Dialogue Communications sub-Group which will ensure that the proposal is consistent with dialogue ground rules and with other publicity initiatives.

Members of the communications sub-group will be available to help and support the working groups in drafting their proposals

The sub-group may also suggest changes and additionally publicity opportunities. When a proposal is agreed, the sub-group will ensure that appropriate resources are available to deliver the publicity objectives successfully.

The group will be responsible for media relations, including drafting and distributing news releases.