

## Comments log for consultation on the first full draft of the SD:SPUR good practice tools paper

Organisation	Sub-section	Sub-section paragraph	Page	Comment
<b>GENERAL</b>				
CIRIA				The three most important components of the document are (i) Figure 2, as it provides the structure; (ii) Table 2, as it sets out the key considerations at each stage; and (iii) Appendices A1 to A6, as they summarise the scope and key features of the tools covered. As it stands, I think this valuable information is not as easy to get to as it could be. I would therefore support the suggestions in the draft cover note to remove some of the repetition between the text, tables and figures (maybe bringing more into the main text) and replacing sections 3.1 to 3.6 with sections A1 to A6.
CIRIA				Use of the term 'potentially reusable items'. As you're aware concerns were raised with the use of this term. It was proposed at the last PSG meeting that the term 'constructions, fabrications and assemblies' be used instead. However, this might be seen by some as industry jargon and I think it would be preferable to use a term like "buildings, plant and equipment".
CIRIA				I thought it might be useful to include a reference to the regulatory framework paper. I appreciate that there is some risk, because this doc hasn't been finalised, but it seems like a useful link to make. Not sure where best to do this.
WRAP				I have read this paper with specific emphasis on the WRAP Quality Protocol, SWMPs and the Demolition Protocol and confirm that I have no changes to make. It looks good to me!!
University of Warwick				Further to my slightly more detailed comments before - just to note again, that although we have discussed issues surrounding the waste hierarchy at length the issue is, at present, unresolved in the context of SDSPUR documents for publication. In this context, my strong recommendation is that, for the time being, the term should not be employed or recommended by SDSPUR. This, may also impact on other oblique recommendations of the waste hierarchy contained in other docs referred to by SDSPUR in this info paper.
CEWG				Are the descriptions of the existing tools fair and accurate (especially those in the Appendix)? I can only really comment on that for the CEWG CoP – I think what is written is a reasonable reflection.
CEWG				Is the paper too long? I think it's fine – people will dip in and out as appropriate. If the answer to the last question is yes, which of the following ways to shorten the paper would be best: in Section 2, removing some of the repetition between the text, tables and figures (eg coCIRIAine and shorten Sections 2.1 and 2.2) replacing Sections 3.1 to 3.6 with Sections A1 to A6 from the Appendix (hence removing the need for the appendix).
<b>SUMMARY</b>				
CIRIA		Opening sentence		I think it would be good to state in the summary that "This paper covers six good practice tools identified by the SD:SPUR Learning Network as central (?) to the management of decommissioning wastes on nuclear and defence sites....." rather than using the term 'main'. I think it would also be good to acknowledge that other tools exist (e.g. 32 listed on the WRAP website), but that it was never the papers intention to cover all of these.
CIRIA		List of tools		"ICE/ WRAP" I think that there should be some separation between the Demolition Protocol produced for the ICE and the WRAP 'targeted audience brochures' for specific stakeholders.
<b>CONTENTS</b>				
CIRIA				See comments on "ICE/WRAP demolition protocol"
<b>SECTION 1 - INTRODUCTION</b>				
CIRIA			3	I think it would be useful to make clear the audience for the report in the introduction and probably also in the summary i.e. primarily waste managers and strategy developers on sites, but recognising that the document will provide useful information for other interested stakeholders.
<b>SECTION 2 – DEVELOPMENT AND IMPLEMENTATION .....</b>				
NDA	2.1	1st	3	May need to consider wording on multi site strategies as current language could be misleading.
NDA	2.1	2nd	3	Should recognise multi site SLC's (Magnox Electric, UKAEA etc.)
NDA	2.1	2nd	3	These requirements are generally requirements at site or facility level for licensees and authorisation holders. Whether they are relevant to multi site strategies is dependant on a number of factors.
NDA	2.1	4th	4	Need reference to new LLW Policy re IWS. Also important to be clear that NDA Specification and guidance while developed in partnership with regulators are customer requirements not regulatory guidance.
NDA	2.2	3rd	4	See above comments re multi site strategies ALSO Need to update re LLW policy
CIRIA	2.1 & 2.2		3 & 4	Although this is useful context (and consistent with the proposed contents), I think these sections could be shortened or combined, especially given the primary audience. Could the information even be moved to the appendix? I'm also not sure if Figure 1 adds much more to the bullet point list and text in section 2.1 (repetition).

CIRIA	2.3		4	In terms of the final design of the document, it feels as if Fig 2 should be moved into the main text to make cross reference easier.
CIRIA	2.4.2	List of example principles	6	Guiding principles. Are the example principles outlined, actually stated as 'principles' in the good practice tools covered, or are they just key themes/ drivers which could be adopted as guiding principles? You'll be aware that we are currently developing SD:SPUR key principles.
<b>SECTION 3 - GOOD PRACTICE TOOLS</b>				
CIRIA	3	All		I think it would be better to replace sections 3.1 to 3.6 with A1 to A6 (see comment above) - avoid repetition
NDA	3.2	1st	8	Deleted: 'intended to' , 'the' and 'for which the NDA is responsible and other nuclear sites.
NDA	3.2	4th	8	Seems to duplicate previous paragraph. Deleted: stakeholder involvement, establishing guiding principles and consistency between decommissioning, waste management and contaminated and strategies
CIRIA	3.7			I wonder whether it might be worth providing an example that demonstrates how the tools complement each other to back up the statement. I appreciate that this might not be that simple.
CEWG				Is it sufficiently clear which tools can help in which situations (see Section 3 and Table 3)? YES
<b>SECTION 4 - DEVELOPMENT OF NEW TOOLS</b>				
NDA	4.2.2	2nd	11	This may be addressed by draft NII guidance. Would be keen to discuss further.
CEWG				Are the comments about future developments correct and appropriate for this paper (see Section 4)? Yes, for my own area of knowledge
<b>SECTION 5 - REFERENCES</b>				
NDA	5.1	Table 1	14	See previous comments re multi site strategies – also as written operator requirement.
NDA	5.1	Table 2	16	May be worth describing further as many types of strategic optioneering approaches are developed.
NDA	5.1	Table 3	17	Deleted: 'stakeholder', 'involvement', 'guiding principles' and 'consistency'
CEWG	5.1		14+	In summary, I think the document is a usefully review of relevant information, and where it all fits in. Well done Marion.