

Paper 46: Key principles discussion paper

Introduction

This paper has been produced to prompt discussion at PSG meeting 8 on the development of the SD:SPUR Key Principles (see work plan, Task 1). At the project team / working group meeting held in May 2006 the process for developing the key principles was discussed and the following steps were proposed:

1. CIRIA with the help of the project team/ working group members to produce a list of principles - broadly based on those for SAFEGROUNDS - for discussion at the next PSG meeting.
2. CIRIA to arrange a stakeholder workshop to introduce and discuss the principles.
3. CIRIA to review and amend the principles in line with the comments received at the workshop.
4. CIRIA to circulate the principles for wider web consultation.
5. PSG to review and finalise the principles ahead of their publication.

In-line with step 1 above, the project team have provided some initial thoughts on the relevance of the SAFEGROUNDS principles to SD:SPUR, highlighting those aspects that could be retained, deleted, added or amended.

SAFEGROUNDS Key principles for the management of contaminated land

The SAFEGROUNDS project has identified five key principles for the management of all contaminated land on nuclear and defence sites. They are an integral part of the SAFEGROUNDS guidance documents. The principles have been established through a consultation process in which representatives of variety of stakeholder groups were involved. The principles are non-overlapping and complementary and should be applied together, and form a central part of the SAFEGROUNDS ethos. The key principles are as follows:

Comments on introductory text:

- Introduce the aim/mission statement of the SD:SPUR Learning Network
- Introduce the scope of the work (clean, exempt and low activity wastes)
- Retain information on the consultation processes used to establish the principles
- Aim for key principles that 'are non-overlapping and complementary'
- Describe how the principles will be applied e.g. through the SD:SPUR guidance and its supporting documents
- Introduce the wider sustainability agenda e.g. consideration of environmental, social and economic impacts of resource use and disposal.

Principle 1: Protection of people and the environment

The fundamental objective of managing contaminated land on nuclear-licensed sites and defence sites should be to achieve a high level of protection of people and the environment, now and in the future.

Comments on principle 1:

- Relevant
- Change 'contaminated land' to 'assets and decommissioning wastes' or equivalent

Principle 2: Stakeholder involvement

Site owners/operators should develop and use stakeholder involvement strategies in the management of contaminated land. In general, a broad range of stakeholders should be invited to participate in decision-making.

Comments on principle 2:

- Relevant
- Change 'contaminated land' to 'assets and decommissioning wastes' or equivalent
- Could also include the 'up-streaming' of stakeholder involvement activities

Principle 3: Identifying the preferred land management option

Site owners/operators should identify their preferred management option (or options) for contaminated land by carrying out a comprehensive, systematic and consultative assessment of all possible options. The assessment should be based on a range of factors that are of concern to stakeholders, including health, safety and environmental impacts and various technical, social and financial factors.

Comments on principle 3:

- Relevant
- Change 'contaminated land' to 'assets and decommissioning wastes' or equivalent
- Could amend to "Identify a range of optimal waste management options"

Principle 4: Immediate action

Site owners/operators should take measures immediately to monitor and control all known (or suspected) contamination and continue such measures until an acceptable management option has been identified and implemented.

Comments on principle 4:

- Not relevant

Principle 5: Record-keeping

Site owners/operators should make comprehensive records of the nature and extent of contamination, the process of deciding on the management option for the contaminated land and the findings during the implementation and validation of the option. All records should be kept and updated as necessary.

Comments on principle 5:

- Relevant
- Change 'contaminated land' to 'assets and decommissioning wastes' or equivalent

The key principles apply primarily to options for the long-term management of contaminated land. The extent to which some of the principles are to be applied depends on the scale of the contaminated land problem.

Other considerations

Other comments:

- Include something about sustainability – that allows consideration of the impacts of the entire waste management lifecycle
- "To be consistent with all relevant laws (and regulatory guidance)"
- "To treat waste in a BPEO fashion, having regard for all stakeholder views"
- Something about the incorporation of a legitimately representative range of views, and how this impacts on managing wastes at site level.