

Final consultation on GPT – Log of comments and responses (June 2007)			
Organisation	Section/ Page	Comment	CIRIA response
NuLeAF	General	Having read the document NuLeAF doesn't need to add any comments	ok
University of Warwick, Centre for Involvement	2.3.3/ Page 7	1. Regards: Key Considerations in Implementing Options: Stakeholder involvement should be foregrounded rather than access to information	I think the text in sections 2.3.1 and 2.3.2 supports the view that stakeholder involvement should occur from an early stage in the management of decommissioning wastes and items (supported by Table 2). The provision of information following the implementation of options would be part of this on-going stakeholder involvement process.
University of Warwick, Centre for Involvement	General	2. Regards: Good practice tools: We may need to revisit Miller, W and Tooley, J, 2005 (given its use of the term 'assets') and case study (for Dounreay) - given more recent concerns associated with this site.	The SD:SPUR document is a 'living document'. The plan as described in the draft specification for the proposed <i>SD:SPUR Assessment and Comparison of Options Project</i> is to review the guidance following the completion of this work. It may be possible to address the use of the term 'assets' in the meantime, but I would like this to be discussed and agreed at a PSG meeting.
University of Warwick, Centre for Involvement	3.6/ Page 14	3. Regards: WRAP Quality Protocol for Aggregates from Inert Waste: We may need to make more explicit the distinction between normal and potentially rad-contaminated or sourced from nuclear site wastes	I think the description of the WRAP Quality Protocol is accurate, i.e. it applies to inert, non-radioactive wastes on any site.
University of Warwick, Centre for Involvement	4/ Page 15	4. Regards: Possible future developments: We may need to be clear that these may involve the potential for lowering levels in the context of new information	This might be so, but I don't think it is worth speculating in this document. The aim of the Possible Future Developments is to set out work that might be undertaken, not to speculate on the results of the work.

University of Warwick, Centre for Involvement	Table 2/ Page 19	5. Regards: Key Considerations at Stages in the Management of Decommissioning Wastes and Items: In the context of the relative levels of public and community trust in regulation and industrial practices, 'Confidence Levels' may need to take into account the potential for the incorporation of multiple views on rad-risk, and their impact on quantification of confidence limits.	The term 'confidence level' is used here to refer to limitations in measurement (ie detection and sampling) during initial characterisation. The wider question of confidence in all the results of a study of waste management options would be addressed under guiding principles for strategy development and option selection.
University of Warwick, Centre for Involvement	Figure 1/ Page 23	6. Framework in which Site Strategies are Developed: They are also developed in the context of the need for public and community involvement. This should be explicitly taken into account in this diagram	Figure 1 (as described in section 2.1) is there to demonstrate the levels at which strategies for the management of decommissioning wastes and items are developed (national, multi-site, site). The need for stakeholder involvement in the development of strategies is addressed in other sections of the text. See below.
University of Warwick, Centre for Involvement	Figure 2/ Page 24	7. Flow Diagram for Management of Decommissioning Wastes and Items: Ditto	The need for stakeholder involvement is brought out in Table 2 which sets out the key considerations (inc. stakeholder involvement) at each of the stages in Figure 2.
Low Level Radiation Campaign	General	It's quite beyond my resources to check through all the documents cited as Good Practice Tools (though I am somewhat familiar with the CEWG's CoP); given their provenance I have a nagging worry that, by describing them as "good", we are endorsing them.	The term 'good practice tools' has been used because those who developed and use the tools consider them good practice. Each has its particular strengths and weaknesses, which the paper aims to highlight and set within a framework of key considerations (e.g stakeholder involvement or waste inventory)
Low Level Radiation Campaign	General	I note the caveats Paul Dorfman has raised about Miller and Tooley 2005 in connection with both of the draft information papers. Miller and Tooley 2005 is SD:SPUR's own guidance. I'd say it is rather weak on stakeholder involvement, but the present information paper puts a more welcome emphasis on that. I hope this will feed into all aspects of SD:SPUR's work.	Points noted