EDF Energy Nuclear Generation Ltd

Decommissioning of Hunterston B Nuclear Power Station

Consultation Feedback Report

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1 Introduction

1.1 Purpose of this Report

1.1.1. This Consultation Feedback Report (CFR) has been produced by WSP on behalf of EDF Energy Nuclear Generation Limited (EDF) to present the results of pre-application consultations on the Hunterston B Nuclear Power Station Decommissioning Project, including Round 1 between 8 of August 2022 and 19 September 2022 and Round 2 between 30 May 2023 and 11 July 2023.

1.1.2. This CFR sets out details of the consultation undertaken and provides a summary of the feedback received from specialist, technical and expert bodies, local communities and wider consultees. It also presents EDF's responses to the consultation feedback received, explaining how EDF has had regard to feedback from both rounds in informing the development of the decommissioning proposals.

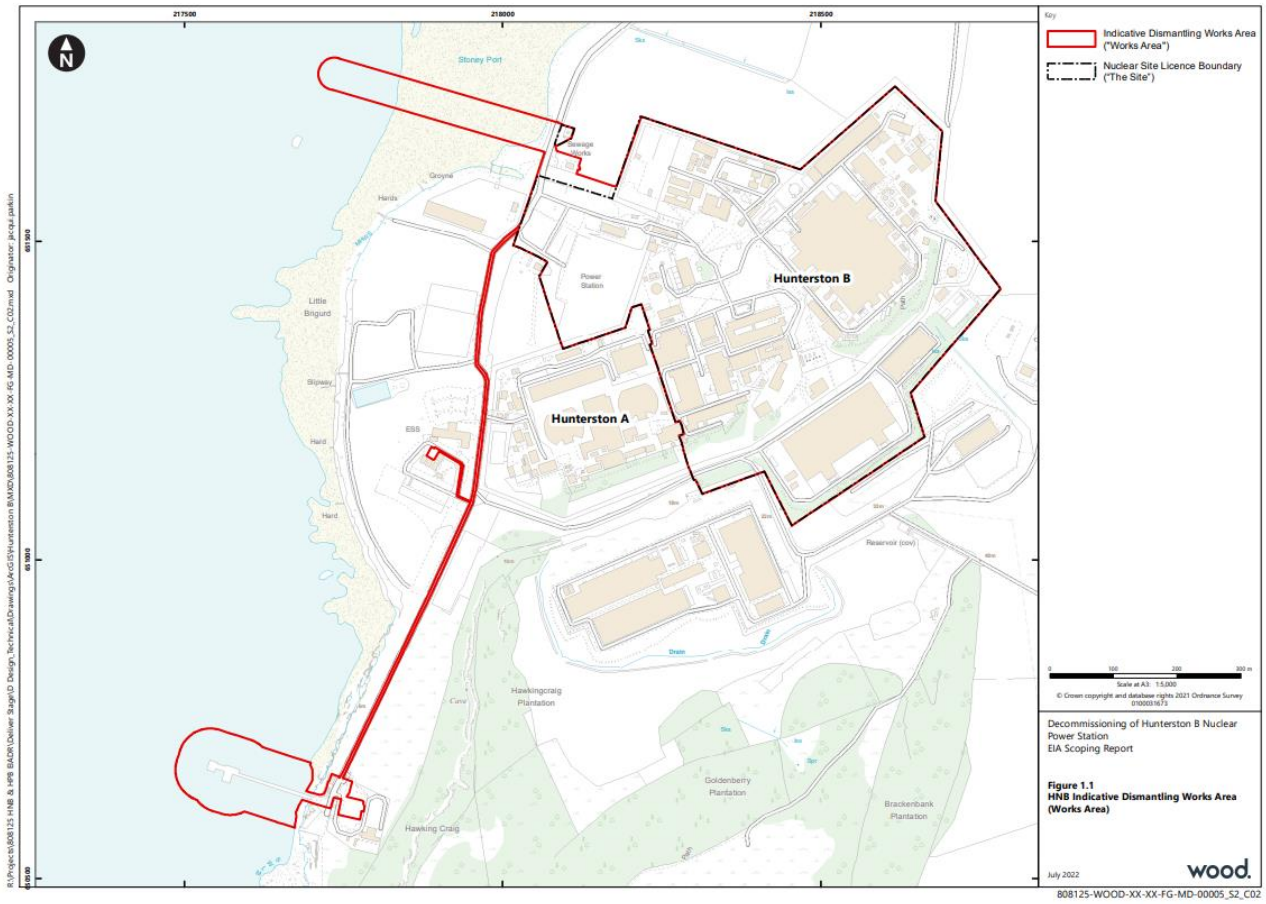
1.1.3. This CFR accompanies the Environmental Statement (ES) submission to the Office for Nuclear Regulation (ONR) under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended) (hereafter referred to as EIADR). Whilst the EIADR do not require that a licensee undertakes consultation prior to the submission of the EIADR application, EDF have nevertheless followed good practice in the consenting of infrastructure projects and, in accordance with ONR Guidance on EIADR, have consulted the public and relevant stakeholders on the decommissioning plans and potential for environmental effects from an early stage.

1.2 Background to the Project

1.2.1. EDF Energy Nuclear Generation Limited is applying for consent from the ONR to decommission the Hunterston B Nuclear Power Station (hereafter referred to as 'Hunterston B' or the 'site'). Decommissioning works at Hunterston B which are subject to consent under EIADR are referred to as the 'Proposed Works'.

1.2.2. The Proposed Works will include the dismantling and deconstruction of buildings and structures that are part of the power station in areas within and outside the Nuclear Site License (NSL) boundary. To assist the identification of these areas for the Environmental Impact Assessment (EIA), an Indicative Dismantling Works Area (hereafter referred to as the 'Works Area') has been identified. The NSL boundary is referred to as the 'Site'. The Site and Works Area boundaries are shown below in **Figure 1-1**.

Figure 1-1 - Hunterston B Indicative Works Dismantling Area (Works Area)



1.2.3. Hunterston B is a twin reactor Advanced Gas Cooled Reactor (AGR) station, which ceased electrical power generation in January 2022 after 46 years of service; defueling of the reactors commenced at the Site and is expected to be ongoing until mid-2025. EDF's proposed approach for decommissioning Hunterston B is to achieve 'Early Safestore', by enclosing the two reactors and debris vaults in a Safestore structure and deferring dismantling of these parts of the power station to a later date. To align with this, the decommissioning process at Hunterston B is planned to be delivered under three phases following defueling which are summarised as follows:

- **Preparations for Quiescence phase** – This phase includes the de-planting, dismantling and deconstruction of all plant and buildings not included within the Safestore structure on-site and the relevant management of waste. In addition, it includes the modification of the existing reactor building to create the Safestore structure.
- **Quiescence phase** – A period of relative inactivity with the Site maintained in a quiescent state to allow further radioactive decay of materials within the Safestore. The duration of this phase is approximately 70 years, with the Site under a regime of continuous monitoring and surveillance, with periodic care and maintenance.

- **Final Site Clearance** – The reactors and debris vaults will be dismantled and removed. Construction and engineering works to prepare for these final dismantling tasks will take place to ensure the provision of the necessary infrastructure, services and facilities. Upon clearance and delicensing of the Site, the land will be released for future re-use.

1.2.4. In 2021, the UK Government and EDF agreed revised arrangements to deliver the decommissioning of the seven Advanced Gas Cooled Reactor (AGR) stations, including HNB. Under the revised arrangements, the AGR stations, including HNB, will transfer to the Nuclear Decommissioning Authority (NDA) following end of generation and the removal of all fuel from the reactors and fuel ponds. The transfer of the AGR stations from ENGL to the Nuclear Decommissioning Authority will be subject to regulatory approvals, with Magnox Ltd (a subsidiary of the NDA) applying to become the Licensee and holder of the Nuclear Site Licence for each of the AGR sites. Thereafter, the NDA and Magnox Ltd will become the responsible parties for implementing the decommissioning programmes.

1.2.5. In light of Magnox Ltd being the responsible party for delivering the majority of the decommissioning works consented by this EIADR, it is important to highlight that EDF and Magnox have worked collaboratively to inform Magnox of plan developments at the AGR sites, including HNB. A review of synergies that could be realised at HNB considering Magnox' delivery and the adjacent site at HNA has been undertaken and has led to changes to the original HNB decommissioning proposals to take advantage of this where relevant. In addition, synergy groups have been set-up between EDF and Magnox to share learning from decommissioning at other UK nuclear sites to help develop EDF's decommissioning proposals as they become more detailed.

1.2.6. In October 2023, Magnox Ltd announced it was rebranding to 'Nuclear Restoration Services' (NRS). The legal name at the time of submission is still Magnox Ltd, and thus, throughout this EIADR submission, references to 'Magnox Ltd' are retained.

1.3 Structure of this Report

1.3.1. This CFR is set out as follows:

- **Approach to consultation** – sets out the role of consultation in the development of the Proposed Works and the Consultation Plan.
- **Round 1 Consultation (August – September 2022)** – sets out who was consulted, and the methods used during the consultation.
  - **Feedback mechanisms** – provides details of the ways consultees could provide feedback and describes how the analysis of feedback was managed.
  - **Analysis of closed questions** – sets out the analysis of responses to closed questions within the questionnaire/feedback form.
  - **Comments received by topic** – presents a summary of the feedback received to open questions by theme.

- **Response to feedback received** – provides EDF's response to issues raised in the consultation.

- **Round 2 Consultation (May – July 2023)** – sets out who was consulted, and the methods used during the consultation.
  - **Feedback mechanisms** – provides details of the ways consultees could provide feedback and describes how the analysis of feedback was managed.
  - **Analysis of closed questions** – sets out the analysis of responses to closed questions within the questionnaire/feedback form.
  - **Comments received by topic** – presents a summary of the feedback received to open questions by theme.
  - **Response to feedback received** – provides EDF's response to issues raised in the consultation.
- **Summary and next steps** – sets out the next steps in the consultation and engagement process.

2 Approach to consultation

2.1 Role of consultation

2.1.1. Whilst there is no provision under the EIADR regulations to consult on the decommissioning strategy, EDF is committed to undertaking consultation, which is derived from best practice and meaningfully informs the development of plans for decommissioning. EDF have followed the ONR Guidance on EIADR which recommends early engagement with the public and for local communities to be involved in the development of the decommissioning programme.

2.2 Consultation Plan

2.2.1. In line with best practice, EDF prepared a Consultation Plan setting out the details of the proposed approach to consultation, with consideration of guidance provided by the Government's Consultation Principles (2018)[1] and the Gunning Principles. The Gunning Principles set out that:

- consultation should be undertaken at a stage when proposals are still at a formative stage, before plans for decommissioning has been finalised;
- consultation should be based on sufficient information to inform responses;
- adequate time must be allowed for consideration and response, complying with statutory requirements and build in time for feedback; and
- all responses must be considered and responses provided.

2.2.2. To gain buy in and feedback on the approaches proposed, EDF discussed their plans for consultation with North Ayrshire Council (NAC) on 20 May 2022. Following this discussion, their feedback was considered in the development of the approach to consultation.

2.2.3. Consultation Zones (**Appendix A**) were defined with the objective of seeking the views of local communities and other parties interested in the decommissioning proposals. Participation was not, however, geographically restricted to respondents in this area. The Consultation Zones were comprised of:

- Core Consultation Zone – 5km from Hunterston B; and
- Outer Consultation Zone – 10km from Hunterston B.

2.2.4. **Table 2-1** sets out a summary of the consultation methods undertaken in pre-application consultation Rounds 1 and 2 and provides evidence on how EDF delivered the consultation.

[1] https://www.gov.uk/government/publications/consultation-principles-guidance

Table 2-1 – Consultation delivery

Approaches outlined in Consultation Plan	Evidence (Round 1)	Evidence (Round 2)
The development of a consultation information leaflet outlining the proposals and providing information on where to find out more information, including a link to a virtual online exhibition. How to respond and contact details will also be sent to residents and businesses within the Core Consultation Zone.	**Paragraph 3.4.23 and Appendix D**	**Paragraph 7.4.21 and Appendix G**
Drafting of letters summarising the proposals and providing details on the physical events and the document deposit locations, how to access the virtual exhibition space and further information, and how to respond. Letters will be sent to all relevant key and statutory stakeholders (including NAC elected members) by email to arrive on the day of the consultation launch.	**Paragraph 3.4.26 and Appendix D**	**Paragraph 7.4.24 and Appendix G**
The development of a consultation document which provides information on the proposals will be made available for the public to view (along with agreed relevant technical documentation) online at the virtual exhibition space, at consultation events and at four deposit locations within the Core Consultation Zone.	**Paragraph 3.4.14 and Appendix C**	**Paragraph 7.4.13 and Appendix F**
Providing opportunities for up to three public consultation events of which a minimum of one will be held at a venue/s within the Core Consultation Zone, and one will be held in a venue within the Outer Consultation Zone.	**Paragraph 3.4.8**	**Paragraph 7.4.7**
The development of community ‘posters’ which will be distributed throughout the Core and Outer Consultation Zones and posted at local information points, post offices and other accessible locations across both zones.	**Paragraph 3.4.25 and Appendix D**	**N/A***
The development of a public notice to be published in two local newspapers (Largs and Millport Weekly News and Ardrossan and Saltcoats Herald) publicising where information on the consultation could be found, and the dates of consultation events.	**Paragraph 3.4.27 and Appendix D**	**Paragraph 7.4.25 and Appendix G**

Approaches outlined in Consultation Plan	Evidence (Round 1)	Evidence (Round 2)
A programme of digital advertising (promoted posts from EDF Energy's social media channels and banner advertising on local newspapers' websites) to raise awareness of the consultation, focused on the start of the consultation period and in the run up to the last 2 weeks of the consultation to publicise the forthcoming deadline for responses.	**Paragraph 3.4.29 and Appendix D**	**Paragraph 7.4.26 and Appendix G**
EDF Energy Nuclear Decommissioning webpage will host information about the decommissioning programme, consultation documents, and include a link to a virtual online exhibition.	**Paragraph 3.4.3 and Appendix C**	**Paragraph 7.4.3 and Appendix F**
The development of an online feedback form to enable stakeholders to provide feedback against an agreed list of open and closed questions. A link provided to the feedback form on the EDF Energy Nuclear Decommissioning website, with hard copies provided upon request.	**Paragraph 3.4.19 and Appendix C**	**Paragraph 7.4.17 and Appendix F**
A freephone telephone information service to support project queries, enable stakeholders to speak to a member of the project team and to make requests for hard copy/alternate format documentation, such as copies of information in different languages, large text format, braille, etc.	**Paragraph 3.4.4**	**Paragraph 7.4.4**
A freepost address for those who want to respond in hard copy, through a hard copy feedback form or other correspondence such a letter/whitemail.	**Table 4-1 – List of feedback mechanisms**	**Table 8-1 – List of feedback mechanisms**
An email address provided on all consultation documents, the website and publicity materials to support stakeholders if they wish to contact EDF Energy to discuss the proposals or the materials that are provided as part of the consultation.	**Paragraph 3.4.6**	**Paragraph 7.4.5**

*Due to the low take-up among poster sites during the Round 1 consultation, posters were exclusively distributed to the document deposit locations for the Round 2 consultation.

2.2.5. In addition to the consultation activities set out in the Consultation Plan, EDF is committed to a programme of additional stakeholder engagement, including ongoing regular meetings with the established Site Stakeholder Group (SSG), monthly station newsletters and specialist interest meetings.

3 Round 1 Consultation (August – September 2022)

3.1 Purpose of this consultation

3.1.1. The purpose of the Round 1 pre-application consultation was to:

- share information with consultees on the proposed approach to decommissioning, including works and activities required;
- obtain feedback on the decommissioning proposals;
- inform and prepare consultees ahead of Round 2 Consultation which was scheduled for Spring 2023; and
- seek comments on any other matters relating to the Proposed Works that consultees consider relevant.

3.1.2. The feedback received to the Round 1 pre-application consultation has informed development of the decommissioning proposals. Further information on the decommissioning proposals was subject to the Round 2 consultation in Summer 2023, which is detailed in Section 7.

3.2 When did it take place?

3.2.1. The Consultation opened on the 8 of August 2022 and closed on 19 September 2022, a period of 42 days (6 weeks).

3.3 Who was consulted?

3.3.1. To ensure that the consultation was open and accessible to all those with an interest in the Proposed Works, a stakeholder mapping exercise was undertaken. This exercise identified groups and stakeholders who were likely to have an interest in the consultation, which comprised:

- local authorities and Community Councils;
- elected officials;
- the Hunterston B SSG;
- EDF staff and contractors operating on site;
- local communities;
- regulatory, expert and specialist bodies;
- adjacent landowners; and
- Local tenants of EDF.

3.3.2. The list of consultees is consistent with the consultation bodies that ONR are required to consult under the EIADR. The list was discussed and agreed with the ONR to facilitate a consistent approach between pre-application consultation undertaken by EDF and statutory consultation undertaken by ONR on the EIADR Scoping Report and, in turn, the EIADR application.

3.3.3. A list of those contacted or notified about the consultation using the methods detailed in Section 3.4 is presented at **Appendix B**.

3.4 Consultation methods and approaches

3.4.1. A range of methods and techniques were used to ensure that the consultees identified above could be involved in the process.

Channels of communication

3.4.2. To ensure the consultation was inclusive and open to all, a number of communication channels were used to allow consultees to access information and members of the Project team. These are set out within paragraphs 3.4.3 to 3.4.12 of this report.

Website

3.4.3. The Hunterston B station page on EDF's website (www.edfenergycom/hunterston) included information on the consultation. This comprised of details of the exhibition events and document deposit location, and hyperlinks to the virtual exhibition space (hosting exhibition boards, consultation materials and an online feedback form), and EIA Scoping Report. Screenshots of the station website are provided in **Appendix C**. Further information on the virtual exhibition space is provided in paragraph 3.4.20.

Telephone information line

3.4.4. A freephone telephone information service was provided to enable stakeholders to ask questions about the Proposed Works, request hard copies of documents and receive guidance on submitting feedback. Answerphone messages were monitored by the Project team, escalated to technical leads if necessary and responded to as soon as practicable where required. During the consultation period, five calls were received, and all requiring response were returned by the Project team.

3.4.5. Enquiries received to the telephone information service included two requests for consultation leaflets and two queries about employment and business opportunities associated with the Proposed Works.

Consultation email address

3.4.6. An email address (HNBDecommissioning@edf-energy.com) was set up to enable stakeholders to contact the Project team to discuss the proposals or the materials provided as part of the consultation. The email address was included on all consultation documents, the website and publicity materials.

3.4.7. During the consultation period, 13 emails were received, and all requiring response were responded to by the Project team. Enquiries received to the email address included queries about employment opportunities and use of site land for a manufacturing facility, and an offer of accommodation for workers.

Public exhibition events

3.4.8. A total of four public exhibition events took place during the consultation period. These were open exhibitions where members of the public could view the proposals, speak to members of the Project team and access hard copies of documents. Venues were selected after discussions with NAC, and then based on their availability, accessibility and proximity to communities who may have an interest in the proposals. All venues were risk assessed to ensure safety to attendees and staff.

3.4.9. Details of the public exhibitions were provided on the Project website, Community Information leaflet (CIL), posters and newspaper advertisements. In total, 80 people attended the public exhibitions. **Table 3-1** provides details of the venue locations, dates, times and number of attendees at each.

Table 3-1 – Round 1 Public exhibition events

Date	Timings	Exhibition Venue	Attendees
13 August 2022	10:00 – 17:00	Millport Development Association Hall, The Garrison, Isle of Cumbrae KA28 0DG	9
16 August 2022	13:00 – 20:00	West Kilbride Village Hall, Arthur Street, West Kilbride KA23 9EN	33
17 August 2022	13:00 – 20:00	Barrfields Theatre (Vikingar), Greenock Road, Largs KA30 8QJ	11
24 August 2022	13:00 – 20:00	Fairlie Village Hall, Main Road, Fairlie, Largs KA29 0AD	27

3.4.10. Members of the Project team were on hand at the events to answer questions from members of the public. These included specialists from a range of technical and non-technical disciplines, including from the Consents, Operations, Engineering, Radioactive Waste and Consultation teams. Exhibition boards explaining the proposals were displayed at all venues.

3.4.11. In addition to the public exhibition events listed above, a further exhibition event was held on 12 August 2022 at the Hunterston B power station. The event was held to enable on-site staff and contractors to view the proposals and provide them the opportunity to ask queries of the attending Project team.

Document deposit locations

3.4.12. Reference copies of consultation documents were available to view free of charge during the consultation period at four libraries within the Core and Outer Consultation Zones (see paragraph 2.2.3). These locations are detailed in **Table 3-2**.

Table 3-2 – Round 1 Document deposit locations

Document deposit location	Address
Fairlie Library	Main Road, Fairlie, Largs KA29 0AD
Millport Library	Garrison House, The Garrison, Millport, Isle of Cumbrae KA28 0DG
Largs Library	26 Allanpark Street, Largs KA30 9AG
West Kilbride Library	Halfway Street, West Kilbride KA23 9EQ

Consultation materials

3.4.13. The following materials were provided during the consultation period. They were available via the Project website, at exhibition events and document deposit locations (see **Table 3-2**) and on request via the telephone information line.

Consultation Document

3.4.14. To ensure accessibility of information to a range of audiences, a Consultation Document was produced, written using non-technical language to enable accessibility. A copy of the Consultation Document can be found at **Appendix C**.

3.4.15. The Consultation Document summarised the background to the Proposed Works and provided non-technical information on the Proposed Works, including the potential phasing of works, management of waste and the approach to environmental assessments. It also included details on how to take part in the consultation and where further information could be found.

3.4.16. This Consultation Document was made available in the virtual consultation room, at deposit locations and at consultation events.

Frequently Asked Questions

3.4.17. A Frequently Asked Questions (FAQs) document was provided at exhibition events and document deposit locations and available online through the virtual consultation exhibition space. The FAQs document outlined likely queries arising regarding the Proposed Works and consultation and provided responses to them. A copy of the FAQs document is included at **Appendix C**.

Environmental information

3.4.18. The HNB EIA Scoping Report was submitted by EDF to ONR in August 2022 as part of a request for a Pre-application Opinion (PAO) from ONR regarding the scope and methodologies of the EIADR Environmental Statement. This Scoping Report was published and made available to view as part of the consultation. This set out the proposed scope of environmental assessments and corresponding methodologies for inclusion in the ES, as well as any likely significant environmental effects to be taken forward for assessment.

Questionnaire/Feedback Form

3.4.19. A feedback form was developed to enable stakeholders and members of the community to provide feedback against a set list of open and closed questions. An online version was provided, hyperlinked from the Project website and virtual exhibition space, to enable consultees to submit their feedback electronically. Hard copies of the feedback form were also made available at the exhibition events and at the document deposit locations. A copy of the feedback form is included at **Appendix C**.

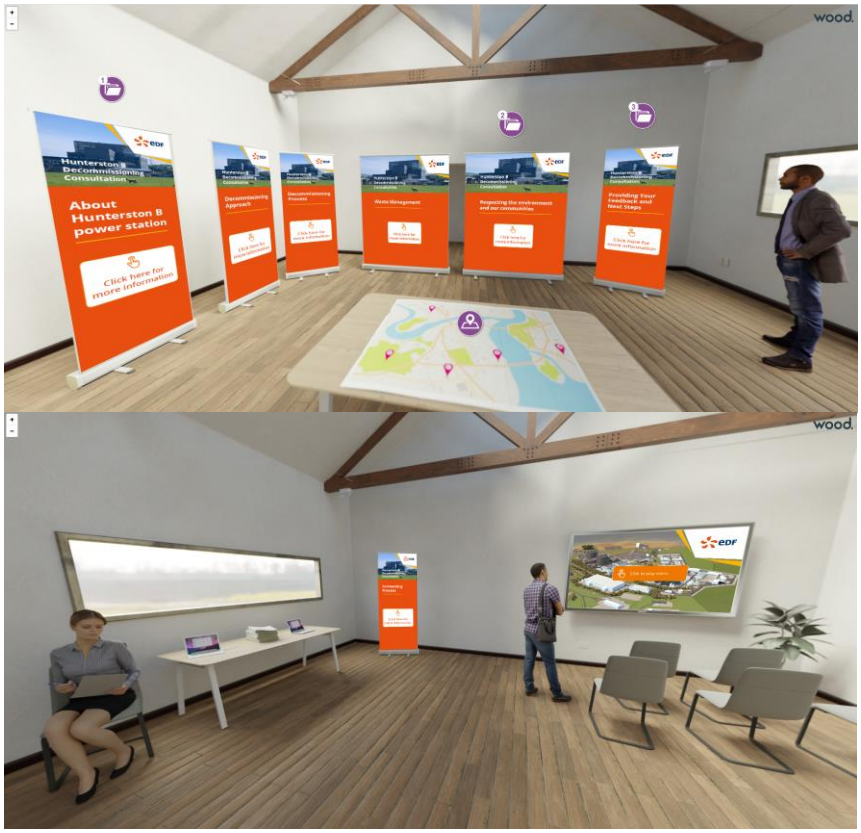
Virtual exhibition space

3.4.20. A virtual consultation exhibition space was provided to mirror and provide a convenient COVID-safe alternative to, the public exhibition events (see **Figure 3-1**). This enabled consultees to view the proposals and provide comment in a familiar environment at their leisure. A link was provided to the virtual space from the station webpage on EDF's website.

3.4.21. The platform allowed users to navigate the exhibition, view and read the Project materials and submit feedback through the online feedback form. A total of 325 unique users visited the virtual exhibition space during the consultation period, with the space accumulating 484 total views.

3.4.22. Copies of the exhibition boards displayed in the virtual exhibition space can be found at **Appendix C**.

Figure 3-1 - Screenshots from the Round 1 virtual exhibition space



Promotion of the consultation

Community Information Leaflet

3.4.23. A Community Information Leaflet (CIL) was produced and distributed to all properties in the Core Consultation Zone. The CIL provided information on:

- an overview of what EDF were consulting on;
- where to access information, including details of the exhibition events; and
- how to respond and the deadline for responses.

3.4.24. Over 5,000 copies of the CIL were distributed by Royal Mail to addresses in postcode sectors covered by the Core Consultation Zone (see paragraph 2.2.3) in the week prior to the start of the consultation period (week commencing 1 August 2022). A copy of the CIL is provided at **Appendix D**.

Posters

3.4.25. Posters notifying local communities of the consultation were distributed to poster sites, such as local notice boards and other accessible locations, across the Core and Outer Consultation Zones (see paragraph 2.2.3). A copy of the poster is provided in **Appendix D** alongside photographs of posters displayed on local notice boards.

Letters to stakeholders

3.4.26. Letters were sent out by EDF to stakeholders who were identified as having an interest in the proposals, listed in **Appendix B**. The letter contained information on the consultation, how to access the information and how to respond. Copies of the letters are provided in **Appendix D**.

Newspaper advertising

3.4.27. In the week prior to the start of the consultation period, a newspaper advertisement was published in two local newspapers - the Largs and Millport Weekly News and the Ardrossan and Saltcoats Herald. The advertisement included an overview of the proposals, the locations and times of the exhibition events, contact details for the Project team, and details of where more information could be found. Copies of the newspaper advertisements are included in **Appendix D**.

Press release

3.4.28. A press release was issued by EDF on 4th August 2022 to notify stakeholders of the upcoming consultation, inviting them to participate in the consultation and submit their feedback. Coverage was provided in local newspaper Largs and Millport Weekly News. A copy of the press release is provided at **Appendix D**.

Digital advertising

3.4.29. Throughout the consultation period, promotion of the consultation took place via EDF's Facebook and LinkedIn pages and through Google Ads. Copies of social media posts promoting the consultation are included at **Appendix D**.

3.4.30. As part of the digital advertising, two videos were created to raise awareness of the consultation. An animation explained how people could get involved in the consultation, while another used live action clips from the station. These were watched in full 49,500 times.

3.4.31. Digital advertisements were served 2.3 million times to social media users, accruing 315,000 video views and 8,300 clicks through to the project website.

3.4.32. Facebook advertisements were used to reach local communities living within 30km of the Proposed Works. These were published 1.9 million times and reached 488,000 people. This resulted in 91,500 views of the videos and 7,100 clicks through to the project website. The Facebook advertisements attracted 490 comments with debate around nuclear power and mixed reactions about the station's closure during the energy crisis.

3.4.33. LinkedIn advertisements were used to reach businesses, government and relevant industry bodies across Scotland. These were published 400,000 times with the videos gaining 224,000 views and generating 1,200 clicks through to the project website.

3.4.34. An advertisement was also served to anyone searching for 'Hunterston' related keywords on Google in Scotland. It was published 8,700 times and led to 536 clicks through to the project website.

3.5 Stakeholder engagement

3.5.1. Alongside the public consultation activities described above, EDF also undertook a series of presentations at meetings of Community Councils in the vicinity of Hunterston B, outlined in **Table 3-3**. The purpose of these presentations was to share information about the consultation and provide an overview of the decommissioning proposals. Community Council meetings were attended by members of the Community Council and members of the public.

3.5.2. Representatives of the Project team were on hand at the meetings for councillors and members of the public to ask questions about the Proposed Works and the consultation.

Table 3-3 – Dates of presentations at Community Council meetings

Date of meeting	Community Council
5 August 2022	Fairlie Community Council
17 August 2022	Largs Community Council
12 September 2022	West Kilbride Community Council

3.5.3. A further presentation was offered to Cumbrae Community Council at their meeting, but this offer was not taken up by the Council before the end of the consultation period.

3.5.4. The HNB Decommissioning Consultation was also added as an agenda item at the SSG meeting on 1 September 2022. At this meeting, a summary of the main feedback from the consultation to date was shared with the SSG members, whilst time was provided to answer specific queries regarding the proposals.

4 Feedback mechanisms

4.1 How could consultees respond?

4.1.1. Stakeholders and members of the community were able to complete a response to the feedback form and/or provide separate comments through one of the response channels set out in **Table 4-1**.

4.1.2. All consultation materials, as well as the website, included the stated consultation deadline (11:59pm on 19 September 2022).

Table 4-1 – List of feedback mechanisms

Feedback method	Details
Online feedback form	Fill in and submit response through the online feedback form, made available on the Project website through the virtual exhibition space.
Hard copy feedback form	Fill in and submit response through the hard copy feedback form to the Freepost address, Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION.
Email	E-mail comments or a completed response form to HNBDecommissioning@edf-energy.com.
Letter	Send comments or a hard copy feedback form to the Freepost address, Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION.

4.2 Number of responses received

4.2.1. A total of 27 pieces of feedback were received to the consultation. All were coded and analysed in line with the approach detailed in Section 4.4 and have all been considered as valid consultation responses within this CFR.

4.2.2. Responses were received from national and local organisations, businesses, local authorities and members of the community. The feedback received comprised:

- Online feedback forms – 15.
- Hard-copy feedback forms – 5.
- Emails – 6.
- Letters and other responses received to the Freepost – 1.

4.3 Profile of feedback from respondents

4.3.1. In addition to being asked for views on the decommissioning proposals, the feedback form asked respondents a series of questions about themselves to help EDF understand the

profile of respondents to the consultation. These questions were optional and did not preclude respondents from answering other questions.

Respondent type

Table 4-2 – Responses to Question 1 'How would you describe your interest in the decommissioning of Hunterston B?'

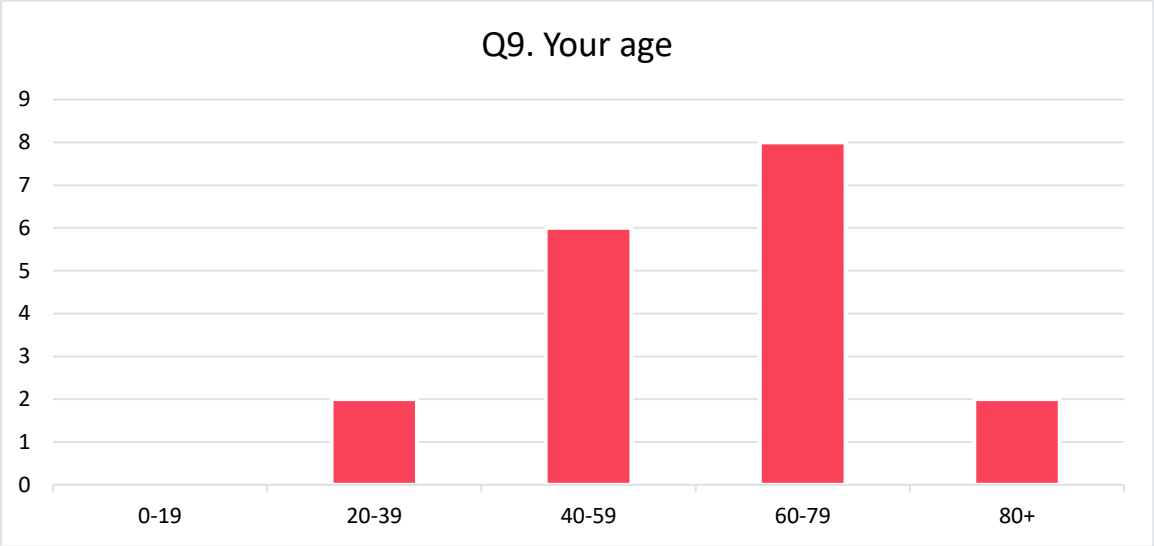
Category of respondent	No. of respondents
Local resident	17
Local representative	2
Other	2
Local interest group	2
Landowner	0
Local business owner	0

4.3.2. Some consultees identified themselves as responding on behalf of an identifiable organisation. These included:

- Fairlie Community Council;
- Health and Safety Executive;
- Katy Clark MSP;
- Largs Community Council;
- Peel Ports;
- RDK Construction Ltd
- RSPB Scotland;
- West Kilbride Community Council; and
- West Kilbride Museum.

Age

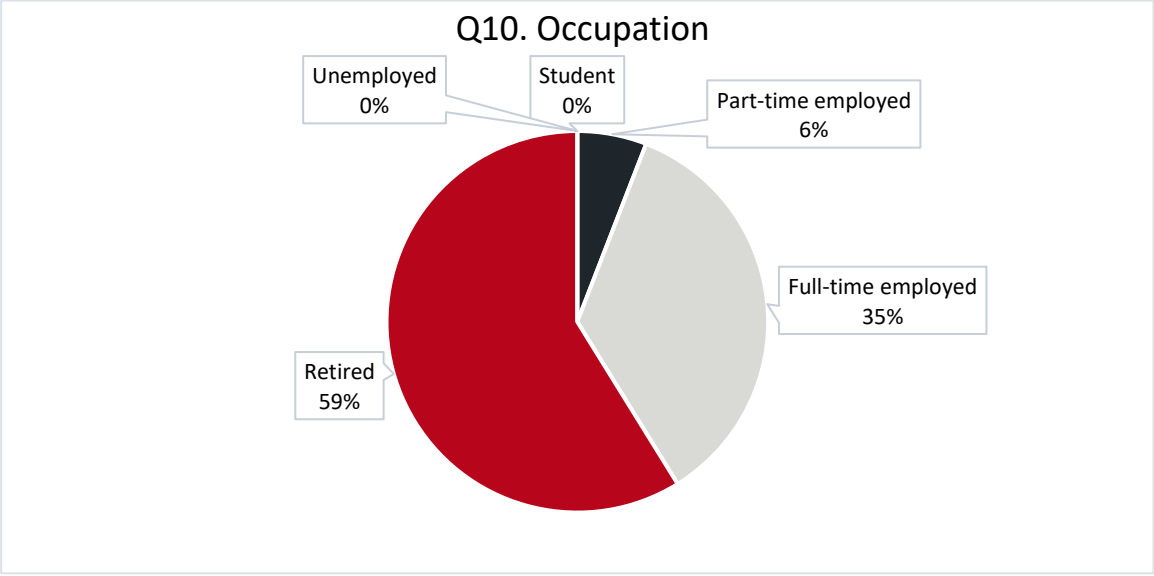
Figure 4-1 – Responses to Question 9 'Your age'



4.3.3. Of respondents who disclosed their age, the largest group represented (44.4%) were between the ages of 60 and 79. 33.3% were aged between 40 and 59. 11.1% of respondents were between the ages of 20 and 39, and another 11.1% were aged 80 or over. No responses to this question were received from consultees identifying that they were between the age of 0 and 19 years of age.[2]

Occupation

Figure 4-2 – Responses to Question 10 'Occupation'



[2] All percentages here have recurring decimals that round down. As a result, these do not total up to 100%.

4.3.4. Of those who responded to the question asking for occupational information, 59% stated that they were retired, while 35% said they were in full time employment. 6% said that they were in part-time employment. No responses to this question were received from consultees identifying that they were students or unemployed.

4.4 Data processing and analysis

4.4.1. All responses received (via online, hardcopy and email channels) were logged with a unique 5-digit identification number, before being uploaded into a coding software platform to allow for analysis of responses to the open questions.

4.4.2. A coding framework was developed to provide a list of topics and themes raised in the consultation feedback. The framework was applied by analysts to all feedback received, to consistently capture and organise the issues raised. The coding framework consisted of the following topics:

- Consultation approach;
- Decommissioning approach;
- Preparations for Quiescence phase;
- Quiescence phase;
- Final Site Clearance;
- General;
- Environment;
- Health and Safety;
- Socio-economics; and
- Waste Management.

4.4.3. Once the coding framework had been applied to the feedback received, similar themes were grouped together and organised into categories. Summaries of the feedback by topic and theme were provided to EDF together with the full consultation responses. This was to enable them to consider feedback and take it into account in the refinement of the decommissioning proposals, assessment and evaluation processes.

4.4.4. All personal data received as part of the consultation was processed in accordance with General Data Protection Regulation (GDPR) 2018.

4.5 Quality assurance

4.5.1. Quality assurance measures were put in place to ensure that responses were accurately captured and analysed. A minimum of 50% of each analyst's coding was quality checked or verified. This was undertaken by double coding a portion of each coder's outputs to ensure consistency in approach.

4.5.2. Team meetings were undertaken, and updates issued to discuss the process and compare working notes to ensure consistency and accuracy of approach.

5 Analysis of closed questions

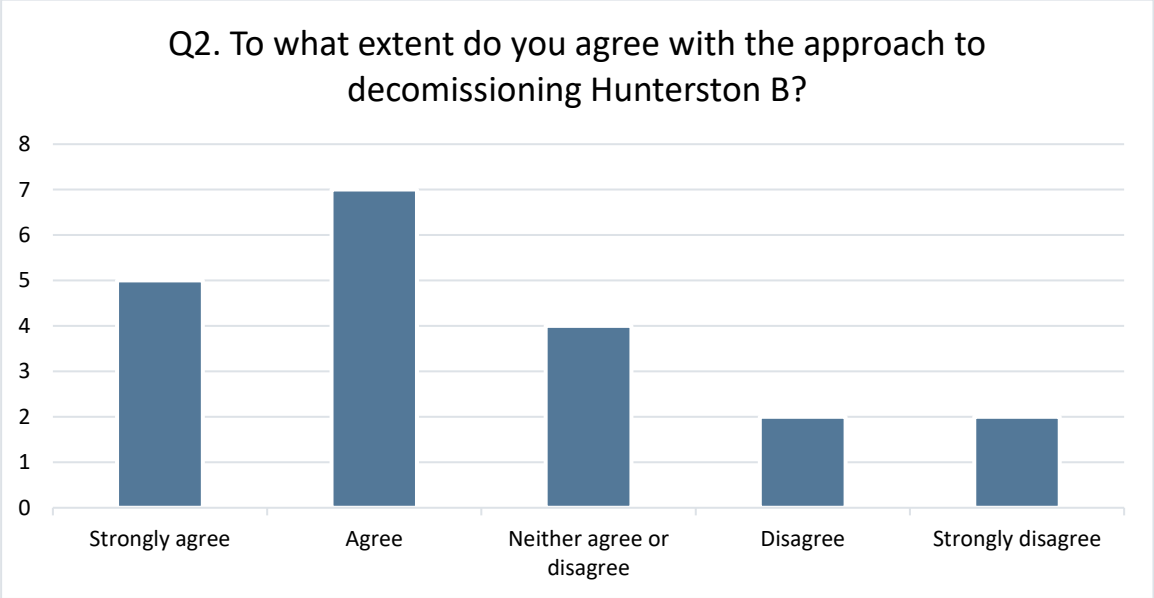
5.1 Approach to decommissioning Q2

Q2. To what extent do you agree with the approach to decommissioning Hunterston B?

5.1.1. Respondents were asked the extent to which they agreed with the proposed approach to decommissioning Hunterston B nuclear power station, on a scale from ‘Strongly agree’ to ‘Strongly disagree’.

5.1.2. 20 responses were received to this question, the results of which are shown on Figure 5-1.

Figure 5-1 - Responses to Question 2 'To what extent do you agree with the approach to decommissioning Hunterston B?'



5.1.3. A majority (60%) of responses either agreed or strongly agreed with the approach to decommissioning Hunterston B. A fifth of respondents (20%) either disagreed or strongly disagreed with the approach, while another fifth (20%) said they neither agreed nor disagreed.

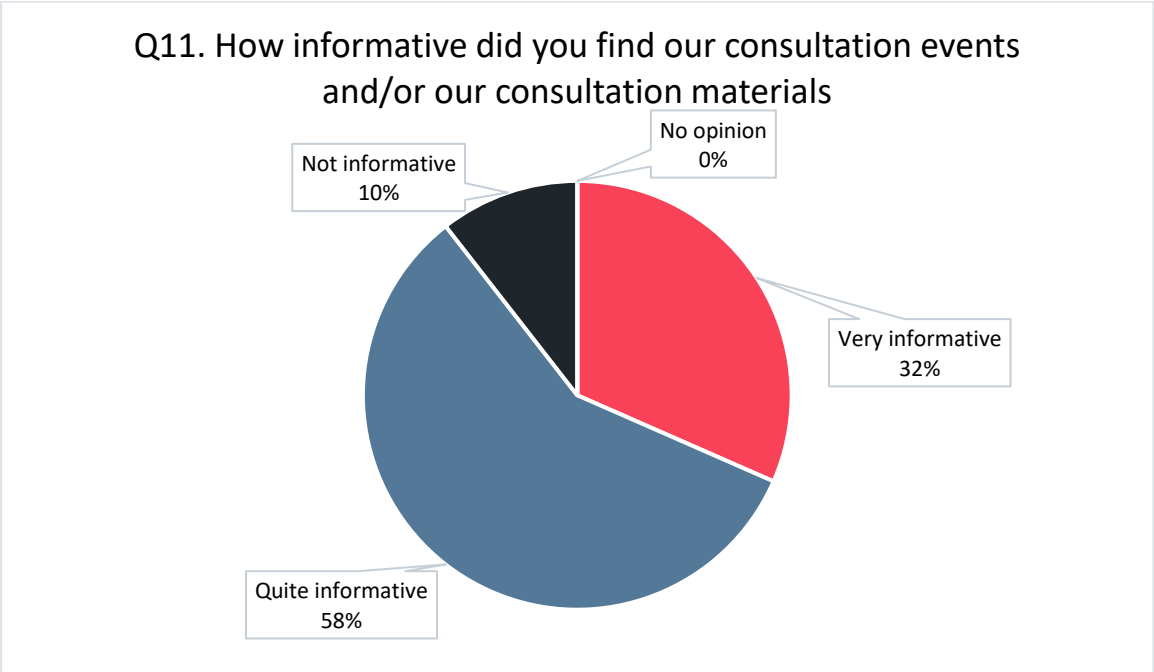
5.2 Feedback on the consultation Q11 and Q12

Q11. How informative did you find our consultation events and/or our consultation materials?

5.2.1. Respondents were then asked how informative they found the consultation events and materials, on a scale from ‘Very informative’ to ‘Not informative’.

5.2.2. 19 responses were received to this question, the results of which are shown on Figure 5-2.

Figure 5-2 - Responses to Question 11 'How informative did you find our consultation events and/or our consultation materials?



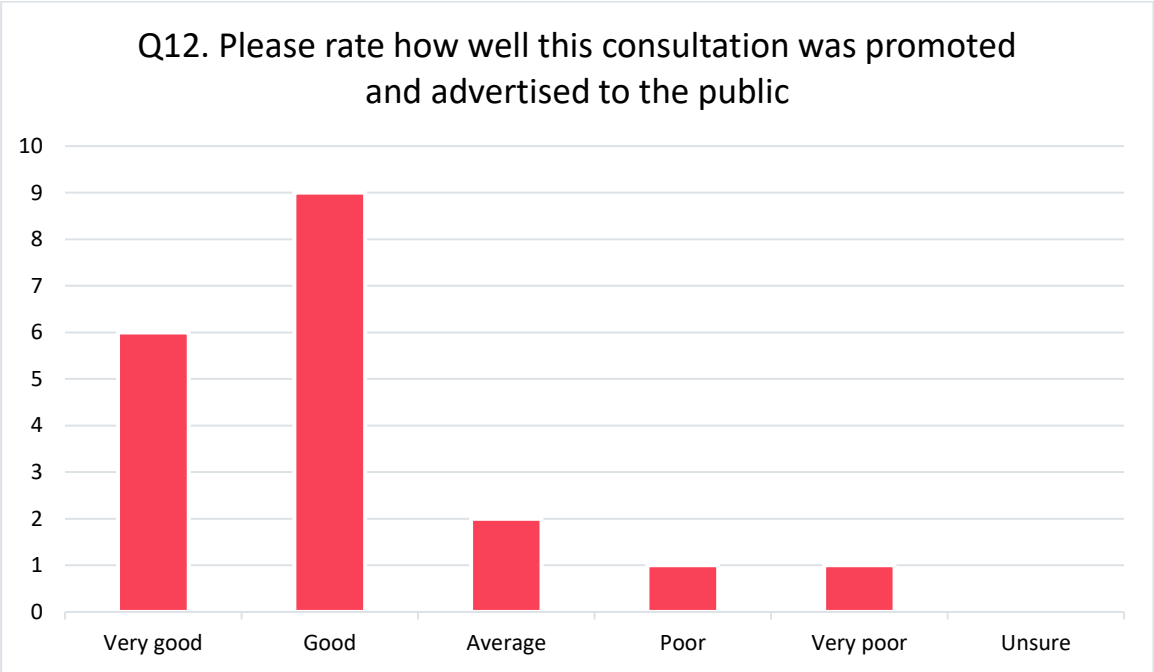
5.2.3. A majority (58%) of responses found the consultation events and/or materials quite informative. Just under a third (32%) found them to be very informative, while 10% found the events and/or materials to not be informative. No responses to this question were received from consultees identifying that they had no opinion about the events or the materials.

Q12. Please rate how well this consultation was promoted and advertised to the public

5.2.4. Respondents were subsequently asked to rate how well the consultation was promoted and advertised to the public, on a scale from ‘Very good’ to ‘Very poor’.

5.2.5. In total, 19 responses were received to this question, the results of which are shown below in Figure 5-3.

Figure 5-3 - Responses to Question 12 'Please rate how well this consultation was promoted and advertised to the public'



5.2.6. Most respondents (78%) rated the promotion and advertising of the consultation as Very good or Good. 11% rated the promotion and advertising as Average, while another 11% rated it as Poor or Very poor. No responses were received to this question from consultees identifying that they were unsure about how well the consultation was promoted and advertised.

6 Comments received by topic

Introduction

6.1.1. This section summarises the representations received from all consultees and response from EDF at the time of writing in autumn 2022. The representations set out below are reported by topic in alphabetical order.

6.1.2. The issues raised are set out in **Appendix E** of this report alongside the response in how they have been considered and responded to by EDF shortly after the close of the consultation.

Consultation

6.1.3. Comments in relation to the consultation broadly fell in to three categories which are set out under the subheadings below.

Consultation events

6.1.4. Fairlie Community Council expressed satisfaction with the consultation events, suggesting that the display materials were informative and that staff at the events were knowledgeable in answering questions.

6.1.5. A member of the public conversely suggested that the consultation events were not effective because staff, while knowledgeable of EDF activities, lacked knowledge of activities happening on the adjacent Magnox Ltd site.

Consultation materials

6.1.6. Largs Community Council said that the consultation materials did not provide sufficient information on topics such as the visual state of the site during the Quiescence Phase and assurance of the site's viability for future use. West Kilbride Community Council raised similar concerns that the materials did not provide information on the requirement for cooling water to be discharged during defueling.

6.1.7. Members of the public considered that the consultation materials did not include information on topics such as hazardous dose rates and treatment, and measures to ensure the safety of transporting flasks by train. Further representations included comments identifying that the aerial maps included in the materials omitted the white colour of Hunterston A. Another member of the public suggested that the consultation brochure was informative.

Stakeholder Engagement

6.1.8. Fairlie Community Council expressed satisfaction with the presentation EDF gave at their Council meeting and the answers provided to their questions.

6.1.9. Largs Community Council requested that the SSG is kept involved for scrutiny at all stages of decommissioning.

6.1.10. Katy Clark MSP suggested that local communities and trade unions be closely involved at every stage of the decommissioning process to ensure that affected residents are listened to.

6.1.11. A member of the public queried how local communities would be kept informed of the progress of the decommissioning Project and works.

Summary of EDF response

6.1.12. EDF were pleased to be able to share their current knowledge of the decommissioning proposals at such an early stage of the development of the proposals and satisfied that the over-whelming response was considered a useful process locally. The focus of the consultation was regarding the scope of HNB decommissioning post defueling, but it was recognised that at future consultation events that more information on HNB defueling and activities at HNA undertaken by Magnox Ltd would be made available. In response to queries regarding a lack of detail, EDF accepted this and highlighted that a second consultation would be provided that would provide greater detail on the decommissioning proposals.

6.1.13. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

Decommissioning approach

6.1.14. Comments in relation to the approach to decommissioning broadly fell in to four categories which are set out under the subheadings below.

Alternate approach suggestions

6.1.15. West Kilbride Community Council highlighted that Magnox Ltd had a proposal with the Department for Business, Energy and Industrial Strategy (BEIS) for the approval of continued decommissioning without the Quiescence phase for the Hunterston A site, which may have implications for the decommissioning proposals for Hunterston B. Largs Community Council supported an approach to decommission the power station as quick as reasonably possible.

6.1.16. Members of the public provided suggestions for the quicker removal of radioactive material from Hunterston B and a prompt dismantling approach. Another member of the public highlighted the use of the US method of using Safestore and the more rapid DECON method. These included justifications that while more rapid decommissioning would place additional pressure on Sellafield, this would provide more business for them.

Programme and phasing

6.1.17. RDK Construction Ltd queried the timescale to complete the decommissioning works.

6.1.18. Fairlie Community Council considered that the Safestore should be built as soon as practicable after defueling to retain skills and jobs.

6.1.19. A member of the public considered that the proposed approach had an excessive timescale and would result in the retention of a large, contaminated site for future generations.

6.1.20. Members of the public queried whether the decommissioning programme would likely extend further than proposed, raising concerns that this could happen because of financial uncertainties. Another member of the public suggested that decommissioning be completed as quickly as possible with materials removed from Hunterston B.

Support for approach to decommissioning

6.1.21. Fairlie Community Council expressed general support for the decommissioning proposals as well-considered and agreed with the assessment of the options for the decommissioning strategy.

6.1.22. Members of the public made comments expressing general support for the proposals for decommissioning.

Summary of EDF response

6.1.23. EDF confirmed that despite Magnox Ltd's ongoing review of site-specific decommissioning strategies at their sites, EDF remain confident following further review that deferred dismantling based around an 'Early Safestore' remains the preferred decommissioning approach for HNB. This approach will however be kept in frequent review firstly by EDF and then by Magnox Ltd post transfer to ensure the most appropriate decommissioning strategy is delivered at the HNB site.

6.1.24. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

Environment

6.1.25. Comments in relation to the environment broadly fell in to seven categories which are set out below.

Air quality and climate change

6.1.26. Members of the public raised concerns about rising sea levels and extreme weather resulting from climate change, impacting on the safety of the decommissioned power station and causing potential leakages and runoff. Further comments shared concern about dust pollution created during deconstruction works and how this would be prevented.

Historic environment

6.1.27. Members of the public offered suggestions for the preservation of the heritage of the power station, including that a power station heritage centre is developed and that the control room be preserved in a science museum.

Landscape and visual impacts

6.1.28. Fairlie Community Council said that the visual impact of the Safestore could be reduced by decreasing the height of the reactor buildings and using cladding which blends in with the surrounding landscape. Largs Community Council said that the proposals did not sufficiently consider the visual impacts of decommissioning and deconstruction. Largs Community Council suggested that the proposals include a landscaping plan to minimise the long-term

visual impact. West Kilbride Museum similarly recommended that the Safestore be clad in a way that can be blended with the surrounding countryside to minimise visual intrusion on the area.

6.1.29. Members of the public frequently said that the visual impact of the Safestore should be as minimal as possible, with some suggesting cladding colours which blend into the landscape and objecting to the use of the same white cladding found on Hunterston A. Some members of the public particularly highlighted the seaward side of the building and commented that white cladding has a large visual impact on views of the coastline. Members of the public also raised concerns about the visual impact of the decommissioning proposals more generally on the local area and character. If a temporary weather coat was applied, similarly to Hunterston A, members of the public considered this to be visually intrusive to the surroundings of Hunterston B.

Marine environment

6.1.30. Members of the public queried how the marine environment (including the shore and seabed) would be protected from any potential incidents of radioactive contamination.

6.1.31. Further comments raised other concerns about the local marine environment, including that marine life can reach the food chain, and identified that a marine Site of Special Scientific Interest is nearby.

Biodiversity Improvement

6.1.32. Largs Community Council suggested that areas of the site that have completed decommissioning be restored to nature as much as possible.

6.1.33. RSPB Scotland supported the commitment to protecting existing biodiversity features during and after decommissioning. They also suggested that there are opportunities for the Proposed Works to deliver habitat and species enhancements and positive effects for biodiversity in line with the draft NPF4.

Mitigation measures

6.1.34. Members of the public raised general concerns about the environmental and amenity impacts of the decommissioning proposals on local communities and queried the measures to mitigate the impacts of climate change and rising sea levels on the decommissioned power station.

Noise and vibration

6.1.35. A member of the public raised concern about noise pollution generated during the dismantling process.

Summary of EDF response

6.1.36. EDF need to get permission from ONR to undertake the decommissioning proposals by submitting and gaining approval for an Environmental Impact Assessment that covers the

lifecycle of the HNB decommissioning project. This assessment will include assessing the potential impact of all the topics highlighted above from decommissioning HNB.

6.1.37. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

Final Site Clearance

6.1.38. Comments in relation to the final site clearance phase of decommissioning broadly fell in to three categories which are set out below.

Decontamination

6.1.39. Fairlie Community Council agreed that the proposals should comply with the Scottish Environment Protection Agency (SEPA) Guidance on Requirements for Release of Sites from Radioactive Substances Regulation. They also suggested that regulators should be stringent in their scrutiny of aerial and liquid discharges from the passive Safestore and decontamination works.

6.1.40. A member of the public said that strict guarantees should be provided that there is no radioactivity present at the site or surrounding areas before any further development on the site.

Future site uses

6.1.41. Members of the public provided suggestions for future use of the site following completion of decommissioning and Final Site Clearance. These included:

- coal energy generation;
- nuclear energy generation;
- renewable energy generation;
- that the site be returned to greenfield; and
- that the site be used for options other than strategic development.

6.1.42. Further comments included queries whether the site was considered for the STEP fusion prototype reactor and suggestions that the site never be used for housing, and that the end layout of the site be devised early to avoid the site falling into misuse and decay.

6.1.43. Fairlie Community Council suggested that the site be left as a brownfield site to enable its re-use, though noting that due to being further in the future this cannot be assumed. The Council also suggested that EDF and Magnox Ltd, and the ONR and SEPA, scrutinise future plans for use of the site or adjacent land to ensure no additional risk to the safety of the decommissioning sites.

6.1.44. Largs Community Council provided suggestions that the decommissioning process is mindful of potential future site use, and they recommended that the proposals should not prevent future use of the site for new nuclear development if Government policy changes. The Council also queried what the restrictions would be on future site use and whether the site could be used again for nuclear generation during Quiescence. They stated that the

removal of grid connections is moved to the end of the decommissioning programme in case of future energy generation on the site.

6.1.45. RDK Construction Ltd queried the process for site handover and whether EDF have discussed the future use of the site as a brownfield industrial site with Magnox Ltd and local and national authorities.

Landscaping

6.1.46. West Kilbride Museum provided a suggestion for landscaping and tree planting following final site clearance as they considered that ground contamination would prevent many potential uses.

Summary of EDF Response

6.1.47. EDF confirmed that the site would continue to be monitored by SEPA throughout the decommissioning works under the Environmental Authorisations (Scotland) Regulations 2018 which would require the site licensee to confirm radioactive emissions to the environment are safe and are regarded as 'Best Practicable Means'.

6.1.48. EDF highlighted that the current assumption is that the site will be made available for use as a brownfield site, but that this would not happen until after Final Ste Clearance. This assumption will be kept under review by the licensee as the decommissioning proposals progress.

6.1.49. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

General

6.1.50. General comments about the Proposed Works broadly fell in to three categories which are set out below.

Consents and licensing approach/policy

6.1.51. Fairlie Community Council supported the need for retaining the NSL area. The Health and Safety Executive identified that Hunterston B is within their land use planning zones for Hunterston A power station and suggested that North Ayrshire Council confirm with them the status of the hazardous substances planning consent. They highlighted that any revocation of this consent would allow removal of the land use planning zones.

Energy Need

6.1.52. Members of the public highlighted the role of nuclear energy generation in meeting energy demands, noting that it is preferable to fossil fuels during a period of high energy costs. These included suggestions that decommissioning does not take place until a replacement nuclear power station is in place. Other comments outlined that the long decommissioning process is evidence of nuclear power not being as environmentally and financially beneficial as portrayed.

Project funding

6.1.53. Members of the public queried the cost of the Proposed Works and raised concerns that the Proposed Works would be more expensive and complicated than planned due to the ambiguity of the proposals. Another consultee suggested that higher costs should be absorbed now in order to avoid leaving ongoing issues to future communities.

Project synergies

6.1.54. Fairlie Community Council suggested that the Project being the first AGR nuclear power station to be defueled and decommissioned alongside an existing decommissioning site presents potential synergies to be explored, as well as additional risks.

Summary of EDF Response

6.1.55. The decommissioning approach outlined has been fully costed with a substantial budget available to account for risks such as increased complexity that may arise during the decommissioning works. Potential synergies that could arise from the co-location of HNA and the ongoing decommissioning programme are being examined to identify opportunities for cost reduction, sustainability and environmental benefits.

6.1.56. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

Health and Safety

6.1.57. Comments in relation to health and safety broadly fell in to three categories, which are set out below.

Local Communities

6.1.58. A member of the Public suggested that local communities needed reassurance that good practice would be followed, and public health would be protected throughout the Proposed Works.

6.1.59. Further comments raised concern that safety advice briefings in case of radiation incident have not been provided to local communities and queried how the impact of decommissioning on the health of local communities had been considered.

Monitoring

6.1.60. Members of the public offered suggestions to ensure the safety of the power station during decommissioning. These included that the health of local communities be monitored by independent experts during the decommissioning process and that radioactivity levels from the site are published regularly. A further member of the public similarly questioned whether there were any radiation monitoring sites around the perimeter of Hunterston B.

Radioactive material

6.1.61. Fairlie Community Council said that the reduction of the Detailed Emergency Planning Zone should be considered and investigated by regulators with a view to develop a joint

Emergency Plan for the sites to reassure local communities in the event of a release of radiation.

6.1.62. A member of the public raised concern about the safety of removing and transporting nuclear waste by road along the A78, which they considered to be busy, narrow, and twisty. A further member of the public expressed concern about the security of the site due to the movement of radioactive material during a period of global instability and ongoing terrorist threats.

Site safety

6.1.63. West Kilbride Community Council raised concern that the current security coverage provided by the Civil Nuclear Constabulary would terminate after defueling and suggested that the site be secured through permanent fencing, supervision and monitoring, and the forbidden use of certain areas of the site, such as reactors and compounds.

6.1.64. Members of the public said that the safety of staff, local communities and the public should be prioritised during the decommissioning process, and that an open culture be created for employees to whistle blow without fear to report concerns. Further comments queried the plans for emergency procedures and informing local communities, including new residents moving to the area, and who would be responsible for policing the decommissioned station.

Summary of EDF response

6.1.65. Safety will remain a key factor in decision making during the further development and progression of the decommissioning proposals. The movement of radioactive waste is subject to specific risk assessment under specific legislation to ensure risk of any safety or exposure is minimal.

6.1.66. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

Preparations for Quiescence phase

6.1.67. Comments in relation to the Preparations for Quiescence phase of decommissioning broadly fell in to three categories which are set out under the subheadings below.

Demolition

6.1.68. Fairlie Community Council provided suggestions for the proposals for the Preparations for Quiescence phase of decommissioning. These included that void filling plans be clarified to ensure its environmental suitability, and that reasoning was not provided for the partial removal of the dry fuel route and reactor building auxiliary plant. Fairlie Community Council also commented that there was no reason not to leave concrete slabs at the base of removed buildings left in situ but that regulators should assess this.

6.1.69. Largs Community Council expressed concern that deconstruction works would contaminate the air, water and land, and suggested that more detailed plans of contaminated areas be provided to ensure transparency and safety of approach.

6.1.70. West Kilbride Community Council expressed concerns that deconstruction details would deviate from the proposals, which they considered to have happened early in the decommissioning of Hunterston A.

6.1.71. Members of the public also provided suggestions for the Preparations for Quiescence phase of decommissioning. These included:

- that removed materials such as fittings be reused locally;
- that as much dismantling is completed within the Preparation for Quiescence phase as possible;
- that unused compounds on the seaward side of the access are demolished and the grounds landscaped; and
- that updates on progress and health and safety are shared with the public.

6.1.72. A further comment queried how much noise and disturbance would be generated during the period, and how it would be minimised.

Enabling works

6.1.73. Fairlie Community Council provided suggestions regarding the new active effluent discharge arrangements. These included that they provide better containment and reduced levels of dispersed radioactivity, and that activities have zero or reduced discharges of radioactivity to the air, sea, and waterways.

Marine assets

6.1.74. Fairlie Community Council raised concerns about the use of explosives for deconstruction in the environment, including whether resulting debris would be removed or left on the seabed.

6.1.75. Fairlie Community Council questioned whether radioactive sediment accumulated around the area of the outfall would be removed and where radioactive liquid or sludge retrieved would be stored or treated. They also said that more information should be provided on leaving tunnels in situ below seabed and on infilling with grout and site won material, including their pros and cons against other options. West Kilbride Community Council advised that the communal discharge drain and discharge pipework to deep water would require significant decontamination.

6.1.76. A member of the public said that further consideration was required to safely manage the offshore cooling system, suggesting that definitive options should be required and analysed.

Summary of EDF response

6.1.77. Further detail on the decommissioning proposals, especially those in the Preparations for Quiescence phase, will be made available at a second consultation and as part of the EIADR submission in 2023. This will include further details regarding environmental impacts, as well as details about the scope and methodology for the decommissioning works.

6.1.78. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

Quiescence phase

6.1.79. Comments in relation to the Quiescence phase of decommissioning broadly fell in to five categories which are set out below.

Landscaping

6.1.80. Largs Community Council said that no environmental landscaping plan had been proposed for the Quiescence phase and suggested that leaving the site with no landscaping to become an unattractive industrial wasteland would be unacceptable. They also recommended that the site be blended back into the natural landscape during the Quiescence phase, and that a full landscaping plan should be produced to support this.

6.1.81. Members of the public provided suggestions that the site be landscaped during the Quiescence phase, particularly with native tree species. A consultee commented that this may allow the site to be used as a nature reserve in the future.

Radioactive decay

6.1.82. A member of the public suggested that the Quiescence phase should be extended if radiation levels remain above background levels after 70 years.

Monitoring and inspection

6.1.83. Fairlie Community Council requested information regarding the anticipated scenarios and responses if a problem arises during the Quiescence phase and suggested that the monitoring team be made available for the public to contact so they can report problems and ask questions.

6.1.84. A member of the public said that constant or regular monitoring should be conducted to ensure there is no radioactive leakage during the Quiescence phase. A further comment received expressed support for the planned approach to security and the monitoring of the site proposed for the Quiescence phase.

Safestore

6.1.85. Fairlie Community Council questioned whether using the Safestore is riskier than using Intermediate Level Waste (ILW) storage facilities at Hunterston A and queried if and how the Safestore would be monitored internally.

Site use

6.1.86. A member of the public proposed that some of the site is used for renewable energy generation, for example, wind or solar power, during the Quiescence phase. A further member of the public said that some of the site should be landscaped and used as a nature reserve during the Quiescence phase, rather than waiting until completion of Quiescence to landscape the site.

Summary of EDF response

6.1.87. The requirement for site landscaping during the Quiescence phase will be identified if necessary from the EIA process to be undertaken on the decommissioning proposals in 2023. Further interim activity on the site will be subject to further consideration at the time, but it is currently assumed that this will not be practicable as it is assumed the entirety of the site will remain under its Nuclear Site Licence until Final Site Clearance.

Socioeconomics

6.1.88. Comments in relation to socioeconomics broadly fell in to three categories which are set out below.

6.1.89. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

Business opportunities/impacts

6.1.90. Largs Community Council recommended that EDF and NDA/Magnox Ltd proactively encourage local suppliers to bid for work. This included suggestions for relaxing conditions that discourage smaller businesses from competing for work and collaborating with local suppliers to ensure they are competitive when compared with larger firms.

6.1.91. RDK Construction Ltd queried whether there was land currently available on site for manufacturing facilities and offices.

Community impacts

6.1.92. West Kilbride Museum highlighted the importance of EDF's support of local clubs and charities and expressed a desire for this to continue.

6.1.93. A member of the public shared concern that local communities were not aware of the long decommissioning process when Hunterston B was first sited and developed. Another queried whether EDF would be subject to an environmental levy during decommissioning to benefit local communities impacted by the Proposed Works.

Employment opportunities/impacts

6.1.94. Fairlie Community Council said that EDF and NDA/Magnox Ltd should retain existing site staff through the site transfer due to the benefits of their extensive knowledge and experience of the site. The Council also advised that relevant bodies should ensure that a scarcity of skilled workers does not hinder decommissioning plans and that any decommissioning jobs created are maintained.

6.1.95. Katy Clark MSP commented that significant investment is needed in North Ayrshire to create skilled jobs due to the area having high unemployment and deprivation and receiving less investment from decommissioning funds. She expressed concern about future job prospects in the local area due to the decommissioning of the power station, which she considered created large numbers of well-paid jobs. She suggested that EDF work with ministers, North Ayrshire Council, and other stakeholders to develop a green jobs plan for North Ayrshire.

6.1.96. West Kilbride Museum suggested that local labour be used where possible.

6.1.97. Members of the public queried where workers would be recruited from, and how many workers would be involved in the Proposed Works.

Summary of EDF response

6.1.98. EDF and Magnox Ltd understand the importance that existing station staff can play in decommissioning and are working together on a people plan for the site for decommissioning. The EIA of the HNB decommissioning works will assess the socio-economic impact of the decommissioning of HNB. The Site will transfer to Magnox Ltd for the delivery of the majority of the decommissioning activities. The NDA is already undertaking significant work to understand the socio-economic impact of nuclear decommissioning works on local communities and is committed to support projects that will help to mitigate this impact.

6.1.99. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

Traffic and Transport

6.1.100. Members of the public shared concerns about the effect of the Proposed Works on local road and rail transport, including the potential for additional traffic on local roads considered to be inadequate. Further concern was raised about the safety of transporting flasks by rail, noting previous remedial works required on the embankments near Ardrossan, the potential for increased rainfall from climate change sustaining the risk of embankment failure, and the additional risk attached to collisions with commuter trains.

6.1.101. Peel Ports highlighted that the proposals are compatible with their activities at Hunterston PARC and offered their assistance, suggesting that Hunterston PARC's deep water berth and rail connectivity could be further utilised by EDF if required.

Summary of EDF response

6.1.102. More information on the scale of traffic movements associated with the decommissioning proposals will be provided at Consultation 2 and in the EIA to enable environmental impacts from decommissioning related traffic to be understood.

6.1.103. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

Waste Management

6.1.104. Comments in relation to management of waste broadly fell in to four categories which are set out below.

Decommissioning waste

6.1.105. Fairlie Community Council expressed support for the use of the Hunterston A ILW store for Hunterston B waste as they considered that this avoids the transportation of waste by road, reducing the impact on the local community. They also shared general support for the approach to assessing, channelling, and processing decommissioning waste.

6.1.106. A member of the public expressed general support for the proposed approach to handling nuclear waste.

Waste facilities

6.1.107. Fairlie Community Council said that they would like to know the ONR's view on both the storage of ILW at Hunterston A and on the proposals for the Operational Waste Processing Facility (OWPF) and the Decommissioning Waste Processing Facility (DWPF). They also expressed support for the use of existing buildings for the DWPF. Fairlie Community Council did however raise concern about the location of new waste facilities, including how vulnerable these new facilities would be to storm surges or sea level rises as well as the close proximity of the waste facilities to the access road.

6.1.108. Fairlie Community Council shared support for the development of a new facility to handle wet ILW from Hunterston B due to the unsuitability of the existing facility at Hunterston A, as well as support for the use of the Hunterston A Solid Intermediate Level Waste Encapsulation Plant to handle solid ILW from Hunterston B. They expressed concern though about the reconfigurations required within the Hunterston A ILW store to accommodate waste from Hunterston B.

6.1.109. Fairlie Community Council objected to the use of the Hunterston A ILW store for radioactive waste from sources other than the Hunterston power stations and objected to any on-site incinerator. They supported the use of the site Stator Shed for additional decommissioning waste storage if suitable.

6.1.110. West Kilbride Community Council said that there is a lack of agreement that the ILW Store at Hunterston A will accept the ILW waste from Hunterston B, as well as suggesting that Scottish Government policy of near surface storage requires that ILW be retrievable and not disposed as proposed.

Waste principles

6.1.111. Fairlie Community Council shared uncertainties regarding the re-use of radioactive waste and that this could either spread radiation across the site or lead to radioactive waste discharge in the air and water.

Waste storage/disposal

6.1.112. Fairlie Community Council queried whether ILW from Hunterston B will be better protected from accidental or intentional damage than ILW from Hunterston A and suggested that the removal of ILW from Hunterston B could be too hazardous until further decay meaning it may be necessary to leave in situ. They noted that there is no mention of the “near site” part of the Scottish Government's Higher Activity Radioactive Waste Policy in the consultation materials and queried whether the current review of the Policy will recommend the near site element is dropped. Fairlie Community Council suggested that regulators scrutinise any practice using radioactive waste for infill.

6.1.113. Fairlie Community Council said that high volumes of High Volume Very Low-Level Waste have been deposited on an area prone to erosion as part of the reclamation of land on the Hunterston A site.

6.1.114. West Kilbride Community Council requested information on whether planning permission is forthcoming for temporary storage of ILW on site and queried whether consideration had been given to the storage of ILW waste from Hunterston B in the vaults beneath the reactors.

Summary of EDF response

6.1.115. The potential vulnerability of the HNB decommissioning proposals to Climate Change will be considered in the EIA to be undertaken in 2023. The specific details regarding the processing and packaging of operational wastes will continue to ensure the chosen approach is Best Practicable Means. EDF can confirm that on-site disposal of radioactive waste does not form part of the existing decommissioning proposals, but any change to this approach would be subject to further consultation with local communities and relevant environmental permissions from SEPA.

6.1.116. Full responses to issues raised in the Round 1 consultation are outlined in **Appendix E.**

7 Round 2 Consultation (May – July 2023)

7.1.1. The purpose of the Round 2 pre-application consultation was to:

- share updated information with consultees on the proposed approach to decommissioning, including works and activities required;
- obtain feedback on the decommissioning proposals and preliminary environmental information;
- inform and prepare consultees ahead of EIADR submission which is scheduled for the end of 2023; and
- seek comments on any other matters relating to the Proposed Works that consultees consider relevant.

7.1.2. The feedback received to the Round 2 pre-application consultation will inform development of the decommissioning proposals.

7.2 When did it take place?

7.2.1. The Consultation opened on 30 May 2023 and closed on 11 July 2023, a period of 42 days (6 weeks).

7.3 Who was consulted?

7.3.1. The list of groups and stakeholders who were likely to have an interest in the consultation, identified prior to the Round 1 consultation, were again contacted or notified to alert them of the forthcoming Round 2 consultation. These stakeholders included:

- local authorities and Community Councils;
- elected officials;
- the Hunterston B SSG;
- EDF staff and contractors operating on site;
- local communities;
- regulatory, expert and specialist bodies;
- adjacent landowners; and
- tenants of EDF.

7.4 Consultation methods and approaches

7.4.1. A range of methods and techniques were used to ensure that the consultees identified above could be involved in the process.

Channels of communication

7.4.2. To ensure the consultation was inclusive and open to all, a range of communication channels were used to allow consultees to access information and members of the Project team. These are set out within paragraphs 7.4.3 and 7.4.11 of this Report.

Website

7.4.3. The Hunterston B station page on EDF's website (www.edfenergycom/hunterston) was updated to include information on the second consultation. This comprised hyperlinks to the virtual exhibition space (hosting exhibition boards, consultation materials and an online feedback form), and Environmental Impact Assessment (EIA) Scoping Report. Screenshots of the station website are provided in **Appendix F**. Further information on the virtual exhibition space is provided in paragraph 7.4.18.

Telephone information line

7.4.4. A freephone telephone information service was provided again to enable stakeholders to ask questions about the Proposed Works, request hard copies of documents and receive guidance on submitting feedback. Answerphone messages were monitored by the Project team, with the view to be escalated to technical leads if necessary and responded to as soon as practicable if required. During the consultation period, no calls were received.

Consultation email address

7.4.5. The project email address (HNBDecommissioning@edf-energy.com) remained in use to enable stakeholders to contact the Project team to discuss the proposals or the materials provided as part of the consultation. The address was included on all consultation documents, the website and publicity materials.

7.4.6. During the consultation period, seven emails were received, and all requiring response were responded to by the Project team. Enquiries received to the email address included requests for extension to provide responses after close of the consultation period and a suggestion that children and young people be consulted on the proposals.

Public exhibition events

7.4.7. Two public exhibition events took place during the consultation period. This was reduced from the four that took place at the Round 1 Consultation, with venues excluded based on attendance numbers from Round 1. These were open exhibitions where members of the public could view the proposals, speak to members of the Project team and access hard copies of documents. Venues were selected on their use at the Round 1 consultation and previous attendance figures. All venues were risk assessed to ensure safety to attendees and staff.

7.4.8. Details of the public exhibitions were provided on the Project website, Community Information leaflet (CIL), posters and newspaper advertisements. In total, 20 people attended the exhibitions. **Table 7-1** provides details of the venue locations, dates, times and number of attendees at each.

Table 7-1 – Round 2 Public exhibition events

Date	Timings	Exhibition Venue	Attendees
7 June 2023	15:00 – 19:00	Fairlie Village Hall, Main Road, Fairlie, Largs KA29 0AD	12
21 June 2023	15:00 – 19:00	West Kilbride Village Hall, Arthur Street, West Kilbride KA23 9EN	8

7.4.9. Members of the Project team were on hand at the events to answer questions from members of the public. These included specialists from a range of technical and non-technical disciplines, including from the Consents, Operations, Radioactive Waste and Consultation teams. A member of Magnox Ltd staff was also in attendance at the Fairlie Village Hall event. Exhibition boards explaining the proposals were displayed at all venues.

7.4.10. In addition to the public exhibition events listed above, a further exhibition event was held on 7 June 2023 at the Hunterston B power station. The event was held to enable on-site staff and contractors to view the proposals and provide them the opportunity to ask queries of the attending Project team.

Document deposit locations

7.4.11. Reference copies of consultation documents were available to view free of charge during the consultation period at four libraries within the Core and Outer Consultation Zones (see paragraph 2.2.3). These locations are detailed below in **Table 7-2**.

Table 7-2 – Round 2 Document deposit locations

Document deposit location	Address
Fairlie Library	Main Road, Fairlie, Largs KA29 0AD
Millport Library	Garrison House, The Garrison, Millport, Isle of Cumbrae KA28 0DG
Largs Library	26 Allanpark Street, Largs KA30 9AG
West Kilbride Library	Halfway Street, West Kilbride KA23 9EQ

Figure 7-1 - Materials on display at West Kilbride Library (left) and Fairlie Library (right)

Consultation materials

7.4.12. The following materials were provided during the consultation period. They were available via the Project website, at exhibition events and document deposit locations (see **Table 7-2**) and on request via the telephone information line.

Consultation Document

7.4.13. To ensure accessibility of information to a range of audiences, a Consultation Document was produced, written using non-technical language to enable accessibility. A copy of the Consultation Document can be found at **Appendix F**.

7.4.14. The Consultation Document summarised the background to the Proposed Works and provided updated non-technical information on the Proposed Works, including how decommissioning plans had developed, and how feedback from the Round 1 consultation had been considered. It also included summaries of preliminary findings of environmental assessments by topic area, details on how to take part in the consultation and how further information could be obtained.

7.4.15. This Consultation Document was made available in the virtual consultation room, at deposit locations and at consultation events.

Frequently Asked Questions

7.4.16. A Frequently Asked Questions (FAQs) document was provided at exhibition events and document deposit locations and available online through the virtual consultation exhibition space. This outlined likely queries arising regarding the Proposed Works and consultation and provided responses to them. A copy of the FAQs document is included at **Appendix F**.

Questionnaire/Feedback Form

7.4.17. A feedback form was provided to enable stakeholders and members of the community to provide feedback against a set list of open and closed questions. An online version was provided, hyperlinked from the Project website and virtual exhibition space, to enable

consultees to submit their feedback electronically. Hard copies of the feedback form were also made available at the exhibition events and at the document deposit locations. A copy of the feedback form is included at **Appendix F**.

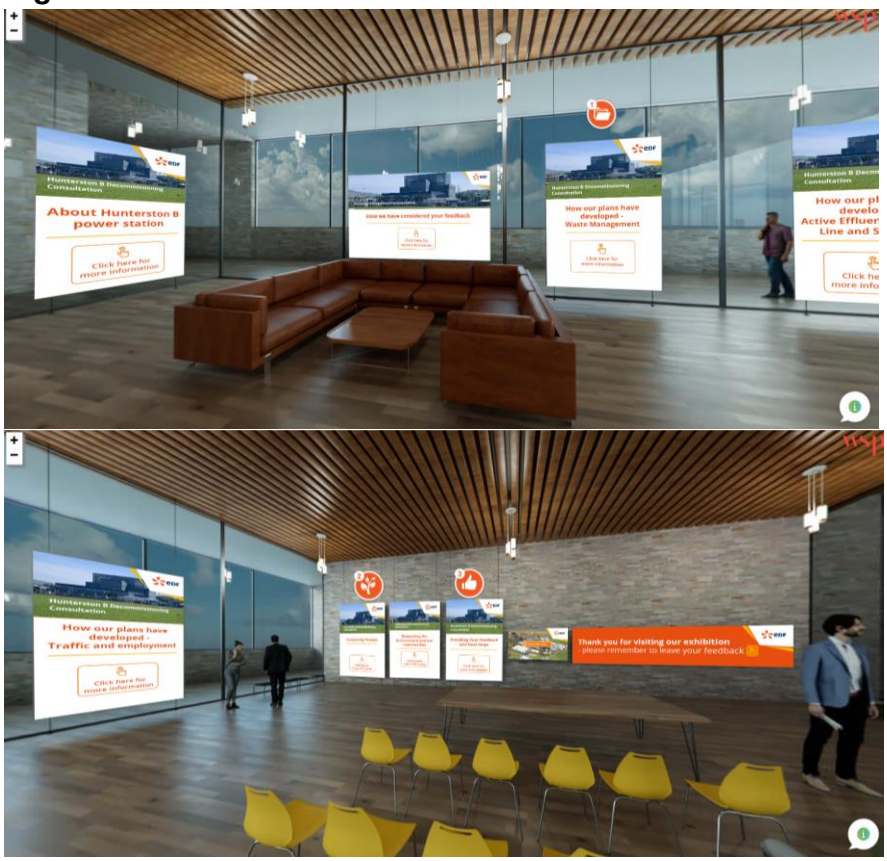
Virtual exhibition space

7.4.18. A virtual consultation exhibition space was provided to mirror and provide a convenient alternative to the public exhibition events (see **Figure 7-2**). This enabled consultees to view the proposals and provide comment in a familiar environment at their leisure. A link was provided to the virtual space from the station webpage on EDF's website.

7.4.19. The platform allowed users to navigate the exhibition, view and read the Project materials and submit feedback through the online feedback form. A total of 108 unique users visited the virtual exhibition space during the consultation period, with the space accumulating 185 total views.

7.4.20. Copies of the exhibition boards displayed in the virtual exhibition space can be found at **Appendix F**.

Figure 7-2 - Screenshots from the Round 2 virtual exhibition space



Promotion of the consultation

Community Information Leaflet

7.4.21. A CIL was produced and distributed to all properties in the Core Consultation Zone. The CIL provided information on:

- an overview of what EDF were consulting on;
- where to access information, including details of the exhibition events; and
- how to respond and the deadline for responses.

7.4.22. Over 5,000 copies of the CIL were distributed by Royal Mail to addresses in postcode sectors covered by the Core Consultation Zone (see paragraph 2.2.3) in the week prior to the start of the consultation period (week commencing 22 May 2023). A copy of the CIL is provided at **Appendix G**.

Posters

7.4.23. Posters notifying local communities of the consultation were distributed to document deposit locations identified in **Table 7-2**. A copy of the poster is provided in **Appendix G** alongside photographs of posters displayed on local notice boards.

Letters to stakeholders

7.4.24. Letters were sent out by EDF to stakeholders who were identified as having an interest in the proposals, listed in **Appendix B**. The letter contained information on the consultation, how to access the information and how to respond. Copies of the letters are provided in **Appendix G**.

Newspaper advertising

7.4.25. In the week prior to the start of the consultation period, a newspaper advertisement was published in two local newspapers - the Largs and Millport Weekly News and the Ardrossan and Saltcoats Herald. The advertisement included an overview of the updated proposals, the locations and times of the exhibition events, contact details for the Project team, and details of where more information could be found. Copies of the newspaper advertisements are included in **Appendix G**.

Digital advertising

7.4.26. Throughout the consultation period, promotion of the consultation took place on EDF's Facebook and LinkedIn pages. Copies of social media posts promoting the consultation are included at **Appendix G**.

7.4.27. As part of the digital advertising, two videos were created to raise awareness of the consultation – one with a voiceover, another text-based. These were watched in full 60,463 times.

7.4.28. Facebook advertisements were used to reach local communities living within 40km of the Proposed Works. These gained 2.3 million impressions and resulted in 8,191 views of the videos and 1,227 clicks through to the project website. LinkedIn advertisements were used to reach local communities and key stakeholders. These gained 251,000 impressions and resulted in 52,000 views of the videos and 1,142 clicks through to the project website.

7.4.29. Google advertisements were also served to 8,000 users which resulted in 500 clicks through to the project website.

7.5 Stakeholder engagement

7.5.1. EDF presented at the SSG meeting on 1 June 2023 to share information about the consultation and provide an overview of the updated decommissioning proposals. The led to further discussion on the following topics:

- EDF's responsibility for decommissioning, and interfaces and collaboration with Magnox Ltd.
- Consent for use of Hunterston A's waste facilities.
- Waste categorisation.
- The outflow tunnel for the discharge pipe and associated discharges.

7.5.2. Alongside the public consultation activities described above, in addition, EDF also held a video meeting with the West Kilbride, Fairlie and Cumbrae Community Councils on 13 June 2023 to provide an update on the decommissioning proposals and answer any questions raised by attendees.

8 Feedback mechanisms

8.1 How could consultees respond?

8.1.1. Stakeholders and members of the community were able to complete a response to the feedback form and/or provide separate comments through one of the response channels set out in **Table 8-1**.

8.1.2. All consultation materials, as well as the website, included the stated consultation deadline (11:59pm on 11 July 2023).

Table 8-1 – List of feedback mechanisms

Feedback method	Details
Online feedback form	Fill in and submit response through the online feedback form, made available on the Project website through the virtual exhibition space.
Hard copy feedback form	Fill in and submit response through the hard copy feedback form to the Freepost address, Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION.
Email	E-mail comments or a completed response form to HNBDecommissioning@edf-energy.com.
Letter	Send comments or a hard copy feedback form to the Freepost address, Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION.

8.2 Number of responses received

8.2.1. A total of 15 pieces of feedback were received to the consultation. All were coded and analysed in line with the approach detailed in Section 8.4 and have all been considered as valid consultation responses within this CFR.

8.2.2. Responses were received from national and local organisations, regulatory and specialist bodies, and members of the community. The feedback received comprised:

- Online feedback forms – 3
- Hard-copy feedback forms – 5
- Emails – 7

8.3 Profile of feedback from respondents

8.3.1. In addition to being asked for views on the decommissioning proposals, the feedback form asked respondents a series of questions about themselves to help EDF understand the

profile of respondents to the consultation. These questions were optional and did not preclude respondents from answering other questions.

Respondent type

Table 8-2 – Responses to Question 1 'How would you describe your interest in the decommissioning of Hunterston B?'

Category of respondent	No. of respondents
Local resident	5
Local representative	1
Other	2
Local interest group	0
Landowner	0
Local business owner	0

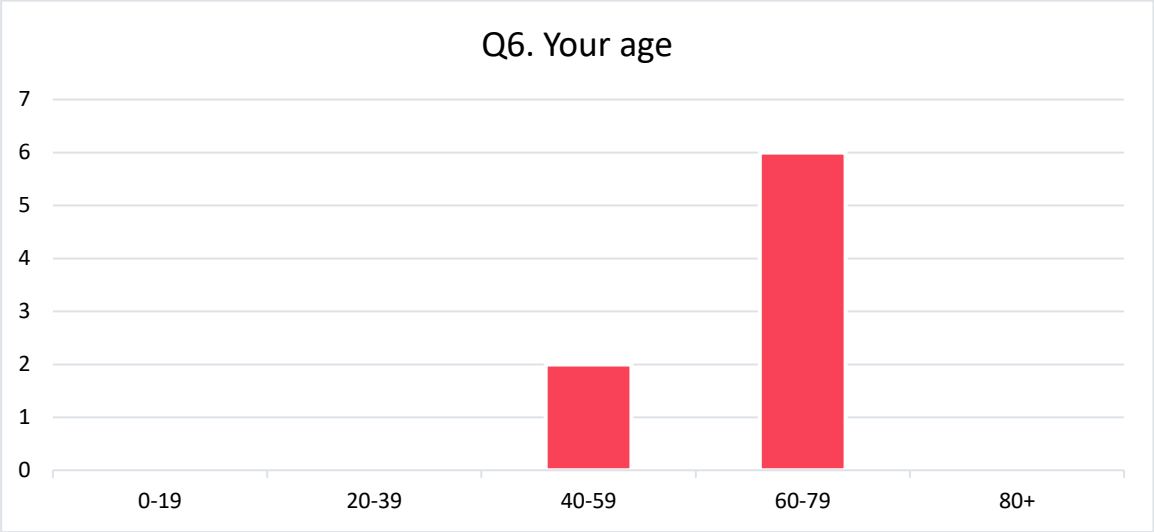
8.3.2. Of those who answered 'Other', these respondents identified themselves as occasionally resident or resident of the broader Ayrshire area.

8.3.3. Some consultees identified themselves as responding on behalf of an identifiable organisation. These included:

- Fairlie Community Council (as a Councillor);
- Ministry of Defence;
- NatureScot;
- NHS Ayrshire and Arran;
- SEPA; and
- Transport Scotland.

Age

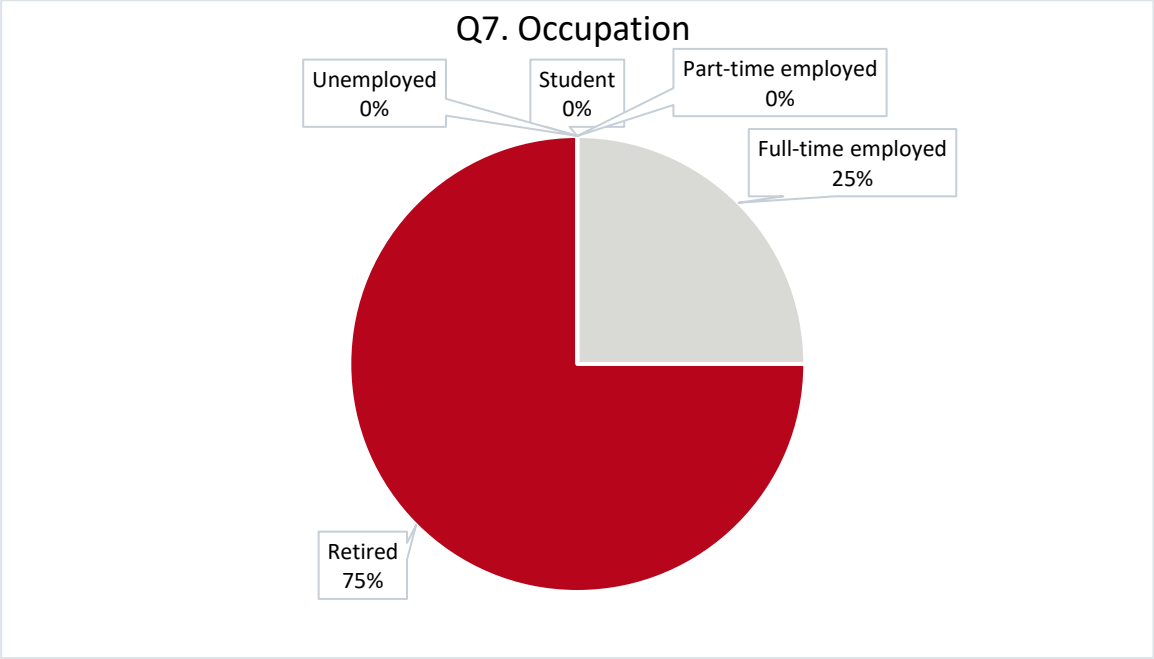
Figure 8-1 – Responses to Question 6 'Your age'



8.3.4. Of respondents who disclosed their age, the largest group represented (75%) were between the ages of 60 and 79. 25% were aged between 40 and 59. No responses to this question were received from consultees identifying that they were between the ages of 0 and 39 or aged 80 or over.

Occupation

Figure 8-2 – Responses to Question 7 'Occupation'



8.3.5. Of those who responded to the question asking for occupational information, 75% stated that they were retired, while 25% said they were in full time employment. No responses to

this question were received from consultees identifying that they were students, unemployed, or in part-time employment.

8.4 Data processing and analysis

8.4.1. All responses received (via online, hardcopy and email channels) were logged with a unique 7-digit identification code, before being uploaded into a coding software platform to allow for analysis of responses to the open questions.

8.4.2. A coding framework was developed to provide a list of topics and themes raised in the consultation feedback. The framework was applied by analysts to all feedback received, to consistently capture and organise the issues raised. The coding framework consisted of the following topics:

- Consultation;
- Decommissioning approach;
- Environment;
- General;
- Health and Safety;
- Safestore;
- Socioeconomics;
- Traffic and Transport; and
- Waste Management.

8.4.3. Once the coding framework had been applied to the feedback received, similar themes were grouped together and organised into categories. Summaries of the feedback by topic and theme were provided to EDF together with the full consultation responses. This was to enable them to consider feedback and take it into account in the refinement of the decommissioning proposals, assessment and evaluation processes.

8.4.4. All personal data received as part of the consultation was processed in accordance with General Data Protection Regulation (GDPR) 2018.

8.5 Quality assurance

8.5.1. Quality assurance measures were put in place to ensure that responses were accurately captured and analysed. A minimum of 50% of each analyst's coding was quality checked or verified. This was undertaken by double coding a portion of each coder's outputs to ensure consistency in approach.

8.5.2. Team meetings were held, and updates issued to discuss the process and compare working notes to ensure consistency and accuracy of approach.

9 Analysis of closed questions

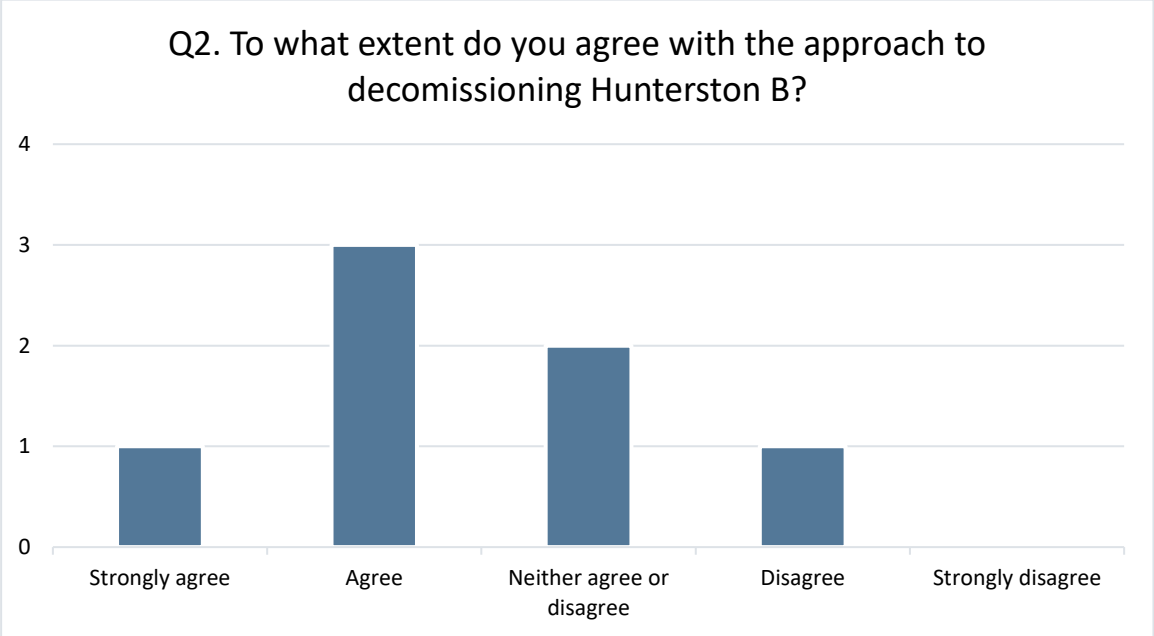
9.1 Approach to decommissioning Q2

Q2. To what extent do you agree with the approach to decommissioning Hunterston B?

9.1.1. Respondents were asked the extent to which they agreed with the proposed approach to decommissioning Hunterston B nuclear power station, on a scale from ‘Strongly agree’ to ‘Strongly disagree’.

9.1.2. 7 responses were received to this question, the results of which are shown on Figure 9-1.

Figure 9-1 - Responses to Question 2 'To what extent do you agree with the approach to decommissioning Hunterston B?'



9.1.3. A majority (57%) of responses either agreed or strongly agreed with the approach to decommissioning Hunterston B. A minority of respondents (14%) disagreed with the approach, while under a third (29%) said they neither agreed nor disagreed.

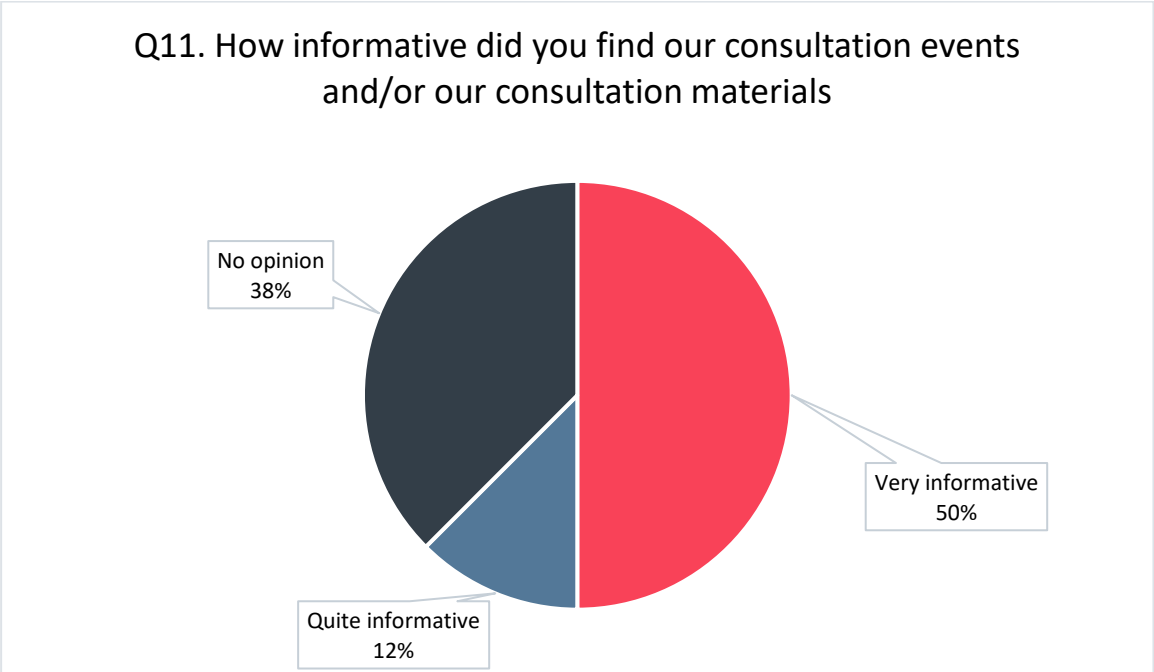
9.2 Feedback on the consultation Q8 and Q9

Q8. How informative did you find our consultation events and/or our consultation materials?

9.2.1. Respondents were then asked how informative they found the consultation events and materials, on a scale from ‘Very informative’ to ‘Not informative’.

9.2.2. 8 responses were received to this question, the results of which are shown on Figure 9-2.

Figure 9-2 - Responses to Question 8 'How informative did you find our consultation events and/or our consultation materials?



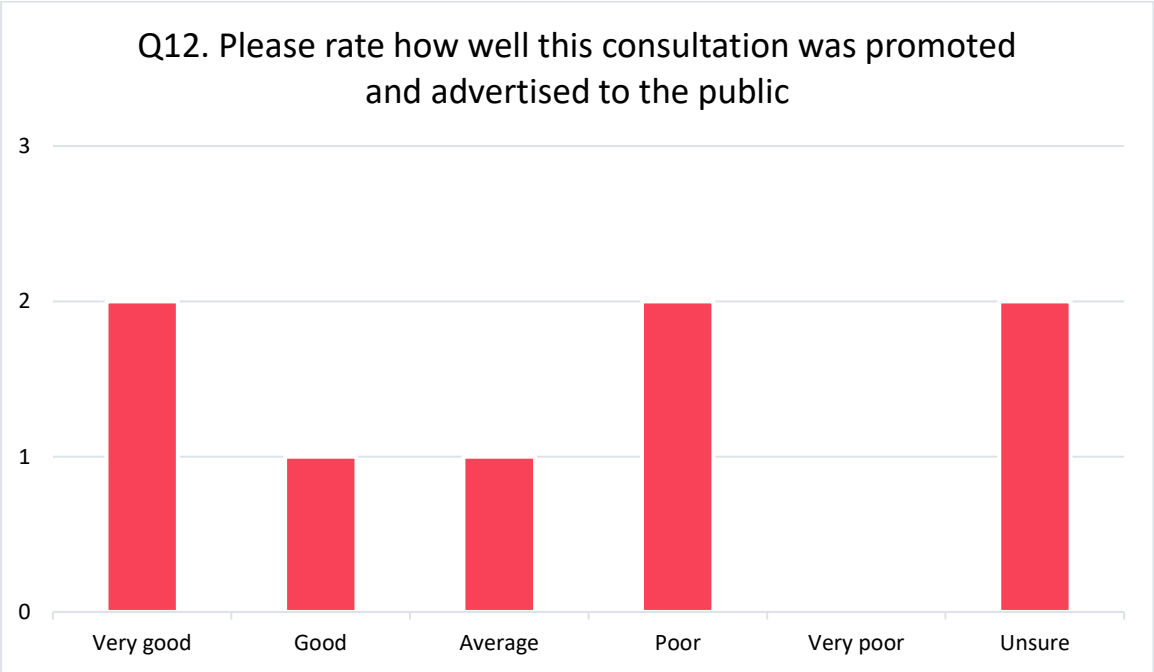
9.2.3. Half (50%) of responses found the consultation events and/or materials very informative. Just over a tenth (12%) found them to be quite informative, while 38% stated that they had no opinion. No responses to this question were received from consultees identifying that they found the events and/or materials to not be informative.

Q9. Please rate how well this consultation was promoted and advertised to the public

9.2.4. Respondents were subsequently asked to rate how well the consultation was promoted and advertised to the public, on a scale from ‘Very good’ to ‘Very poor’, with an option for ‘Unsure’.

9.2.5. Eight responses were received to this question, the results of which are shown below in Figure 9-3.

Figure 9-3 - Responses to Question 12 'Please rate how well this consultation was promoted and advertised to the public'



9.2.6. Over a third of respondents (38%) rated the promotion and advertising of the consultation as Very good or Good. A quarter of respondents (25%) rated the promotion and advertising as Poor, while another quarter (25%) said they were unsure. 13% rated the promotion and advertising as Average.

9.2.7. No responses to this question were received from consultees rating the promotion and advertising as very poor.

10 Comments received by topic

Introduction

10.1.1. This section summarises the representations received from all consultees. The representations set out below are reported by topic in alphabetical order.

10.1.2. The issues raised are set out in **Appendix H** of this report alongside how they have been considered and responded to by EDF.

Consultation

10.1.3. Members of the public provided comments suggesting the continuation of project information and public consultation, including via Community Councils and SSG meetings. Further comments expressed satisfaction with the consultation events and suggested that children and young people be engaged on the proposals due to the extensive timeframes involved.

10.1.4. The Ministry of Defence stated that they require further consultation as the decommissioning process progresses to further stages. SEPA said that the consultation documents were high level on matters relating to environmental permits and the impact of works on existing CAR authorisations[3] for the discharge of sewage effluent, trade effluent and surface water from the site. NHS Ayrshire and Arran similarly considered the consultation documents to have provided limited information on site resilience from climate change impacts and suggested that plans for waste storage and disposal be shared for review once decisions are made.

Summary of EDF Response

10.1.5. EDF acknowledges the responses received suggesting that EDF continues to provide local communities and technical experts with further information as the decommissioning process continues. The Site Licensee will continue to engage with local communities and stakeholders via the Site Stakeholder Group, which includes local community councils, local councillors, and North Ayrshire Council. There will also be future opportunities for engagement on the decommissioning proposals.

10.1.6. Full responses to issues raised in the Round 2 consultation are outlined in **Appendix H.**

Decommissioning approach

10.1.7. Comments received regarding the approach to decommissioning Hunterston B included suggestions that dismantling take place later and that, lessons learnt from the decommissioning of Hunterston A be considered.

[3] Under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended).

10.1.8. The Ministry of Defence commented that the deployment and heights of cranes for decommissioning works require consideration to avoid impacting or entering the path of the Clyde/Faslane microwave link. NHS Ayrshire and Arran requested information on the removal of sewage treatment works relating to the site.

Summary of EDF Response

The Site Licensee will continue to review the decommissioning plans for Hunterston B to ensure the correct approach is taken. The deferred dismantling approach is currently considered to be the preferred approach considering recent review of the proposals. EDF and Magnox Ltd have set-up collaborative synergy working groups to enable the sharing of Magnox Ltd' experience obtained from decommissioning undertaken at sites across the UK.

10.1.9. Full responses to issues raised in the Round 2 consultation are outlined in **Appendix H.**

Environment

10.1.10. Concerns were raised by members of the public about the environmental effects of the decommissioning works on the local area.

10.1.11. Representations received from NatureScot included comments highlighting opportunities for biodiversity enhancement, management or restoration on-site as part of the Proposed Works, or jointly with other initiatives or projects. These included a nearby battery storage scheme, the Hunterston Circle initiative, the Carbon Neutral Islands project, and the North Ayrshire Nature Network.

10.1.12. NatureScot suggested that the EIA consider the 2022 baseline natural capital assessment for the Hunterston Strategic Development Area and that the Hunterston PARC approach to the Landscape Specification Document be followed. They noted their agreement with the ONR on the need for an accurate definition of the site baseline status to be agreed and defined to support the EIA and land use assessment processes.

10.1.13. NHS Ayrshire and Arran provided comments on the EIA, including suggestions that it consider radiological incidents during road transport movements, that it should detail adaptation measures for significant risks to climate resilience, and that it aligns with Civil Contingencies Act definitions and Preparing Scotland guidance.

10.1.14. NHS Ayrshire and Arran advised that local and national policies and guidance relating to environmental hazards be reviewed throughout the decommissioning process. They also expressed support for the inclusion of decommissioning hazards within the EIA scope and suggested that the reference to the Detailed Emergency Planning Zone be corrected. NHS Ayrshire and Arran shared concerns that additional on-site air quality monitoring was not planned for demolition and that uncertainties remained around potential impacts and mitigations for some EIA areas.

10.1.15. NHS Ayrshire and Arran also commented on the flooding and drainage issues, including suggestions for the review of previous heavy rain periods to identify flooding and runoff issues, and of flood risk from the sea considering the deep-water seaport and the infilling of

tunnels. They also considered that modelling of rises in sea levels or increased severity of extreme weather events that may impact radioactive storage during the Quiescent phase be undertaken.

10.1.16. SEPA provided suggestions that groundwater assessments consider soils and groundwater as both standalone receptors and pathways to other receptors and consider the influence of climate change on the hydrogeological regime. They also recommended that suitability for use criteria for the re-use of on-site waste materials consider potential risks to soil and groundwater. SEPA similarly suggested that the soils, geology and hydrogeology assessment consider potential interdependencies with other related topics.

Summary of EDF Response

10.1.17. EDF notes the concern for potential environmental effects as a result of the decommissioning process. An Environmental Impact Assessment (EIA) has been prepared in accordance with the Environmental Impact Assessment or Decommissioning Regulations 1999 (EIADR). The EIA assesses the likely significant effects of the Proposed Works on the environment and identified the measures to mitigate these effects where required.

10.1.18. Full responses to issues raised in the Round 2 consultation are outlined in **Appendix H.**

General

10.1.19. Members of the public expressed general support for the decommissioning plans and provided suggestions that tours be provided at the station to make use of the visitor centre and that an additional nuclear power station be developed during the decommissioning programme. A further comment was received sharing concern about whether local authorities were providing the EDF decommissioning team with the information they require.

Summary of EDF response

10.1.20. EDF acknowledges that suggestions were received for an additional nuclear power station to be developed during the decommissioning timeframe. The comments are noted; however it is not in line with current Scottish Government policy.

10.1.21. Full responses to issues raised in the Round 2 consultation are outlined in **Appendix H.**

Health and Safety

10.1.22. Comments received regarding health and safety suggested that public health information be shared and considered living near to the station was not a risk factor, offering that this could help establish the safety of nuclear power. A further representation received shared dissatisfaction with the existing Offsite Emergency Plan and suggested that EDF work with North Ayrshire Council to improve it.

10.1.23. NHS Ayrshire and Arran provided comments on the communication of health and safety information. These included suggestions that plans should address communications for major incidents, that active community engagement at each stage can mitigate health and

wellbeing impacts. They also queried how controlled explosions for pontoons and the removal of marine structures would be communicated to local residents.

10.1.24. NHS Ayrshire and Arran provided further comments suggesting that hazards could arise from decommissioning that may significantly impact on health and wellbeing and advised that safety and risk management measures be prioritised on-site, including for non-radiological hazards. They also expressed concern about the potential for contaminants from decommissioning entering the food chain through nearby agricultural land.

Summary of EDF Response

10.1.25. In response to comments received suggesting that public health information relating to radiation does is shared, the Applicant has confirmed that doses to members of the public in the UK are tightly controlled and regulated to within safe levels as recorded annually in the Radioactivity in the Food and the Environment (RIFE) reports. Doses to the environment during decommissioning, following the removal of 99% of radioactive material from the Hunterston B site, are likely to be lower.

10.1.26. The Applicant has considered a wide range of accident scenarios and evaluated the risk and hazards to local communities with recommendations then being made to North Ayrshire Council on arrangements for emergency planning. North Ayrshire Council judged that as the risk rating for the site remains very low, only a small number of households will continue to receive information.

10.1.27. Full responses to issues raised in the Round 2 consultation are outlined in **Appendix H.**

Safestore

10.1.28. A member of the public expressed concern about the height of the proposed Safestore. NHS Ayrshire and Arran welcomed the consideration of the reduced height option for the Safestore in the consultation information.

Summary of EDF Response

10.1.29. It is assumed for the purposes of the assessment in the EIADR that the Safestore structure will remain the highest building on-site at 66.5m until the Final Site Clearance phase, and it would be a similar colour (grayscale/blue) to that currently on the existing facades. Further works are ongoing to understand whether the height of the building will be reduced below this when the works to create the Safestore are undertaken.

10.1.30. Full responses to issues raised in the Round 2 consultation are outlined in **Appendix H.**

Socioeconomics

10.1.31. A member of the public shared concern about the long-term employment prospects in the local area as a result of decommissioning.

10.1.32. NHS Ayrshire and Arran raised questions about the impact of the closure of the operating power station, as a major employer, on the health and wellbeing of local communities. They

advised that local and regional stakeholders be involved to address the consequent socioeconomic impacts. NHS Ayrshire and Arran further suggested that decommissioning align with local investment to provide alternate routes for staff and that workforce changes be gradual and communicated in advance. They considered that the knowledge and experience of existing staff should be used as far as possible and requested confirmation of the external workforce to be brought in.

10.1.33. NHS Ayrshire and Arran commented on the communication of staffing changes, highlighting a need for engagement with the workforce and wider community noting the role of community engagement in strengthening community identity and mitigating job concerns. They also shared concern about EDF's withdrawal from community initiatives and organisations, given previous support for these, which they considered could compound wider impacts on local communities.

Summary of EDF Responses

10.1.34. The Applicant will continue to work with Magnox Ltd closely to understand the staffing requirements for deconstruction following the end of defueling, with the staff to be retained where practicable due to their knowledge of the site. EDF and Magnox Ltd will work together to ensure that the right people with the right skills are transferred to Magnox Ltd.

10.1.35. The NDA and Magnox Ltd operate socio-economic programmes at each of their sites. As part of this programme, Magnox Ltd operates a good neighbour scheme where individual projects up to £2,000 can be supported.

10.1.36. Full responses to issues raised in the Round 2 consultation are outlined in **Appendix H.**

Traffic and Transport

10.1.37. A member of the public shared concern regarding the cumulative traffic impact of traffic serving the Proposed Works alongside that serving local housing developments.

10.1.38. NHS Ayrshire and Arran provided suggestions for the planning and management of decommissioning traffic to reduce traffic levels and impacts on local communities. These included recommendations that technological developments be exploited, and a sustainable travel plan be established for staff commuting.

10.1.39. Transport Scotland provided comments on the assessment of traffic and transport effects in the EIA. Comments included agreement with the scoping out of the A78(T), A71 and A77(T) and confirmation that further assessment was not required if thresholds stipulated in the Scoping Report would not be exceeded. They requested that the assessment quantify a number of areas, including the scale of movements, the suitability of access to the A78(T) and measures to minimise construction movements. They further suggested the use of updated traffic count data, including from their count site on the A78(T), and that low growth factors from the National Road Traffic Forecast be used to factor base traffic to the peak design year.

10.1.40. Transport Scotland also commented on the Abnormal Indivisible Loads required for decommissioning, including suggestions that routing studies and a swept path analysis be undertaken and that an Abnormal Loads Assessment identify pinch points on the trunk road network. They further highlighted their need to be satisfied that loads sizes can navigate the selected route and advised that proposed changes to the trunk road network require discussion and approval from their Area Manager.

Summary of EDF Responses

10.1.41. The Traffic and Transport assessment has been undertaken on the worst-case scenario. Transport Scotland have also confirmed they are content that no further assessment is required, providing thresholds are not exceeded. A CTMP will however be produced to manage the movement of materials, waste, and staff during the decommissioning works.

10.1.42. Full responses to issues raised in the Round 2 consultation are outlined in **Appendix H.**

Waste Management

10.1.43. Members of the public raised concerns about the removal of waste produced by de-planting by road rather than rail, citing that local roads were unsuitable for the level of traffic required for this.

10.1.44. NHS Ayrshire and Arran welcomed the consideration of recycling of on-site material as much as possible and the reduction in volume of waste to be transported off-site.

10.1.45. SEPA advised that the Environmental Authorisations (Scotland) Regulations 2018 currently only apply to radioactive substances activities. They also suggested that waste generated on-site be reused in agreed ways and disposed to a suitable licensed facility, and that material be quantified and assessed prior to final use or disposal.

Summary of EDF Responses

The worst-case traffic flow has been assessed taking account all potential movements of waste and materials to site. The conclusions of this assessment are provided in the **Environmental Statement Chapter 16: Traffic and Transport**. Waste will be segregated to allow for the recycling of wastes where practicable in line with good practice. For the purposes of assessment, it has been assumed that these wastes will largely go to landfill as this would be the ‘worst case’ from an assessment perspective.

10.1.46. Full responses to issues raised in the Round 2 consultation are outlined in **Appendix H.**

11 Summary and next steps

11.1.1. This CFR demonstrates the pre-application consultation undertaken by EDF to inform its proposals to decommission Hunterston B nuclear power station.

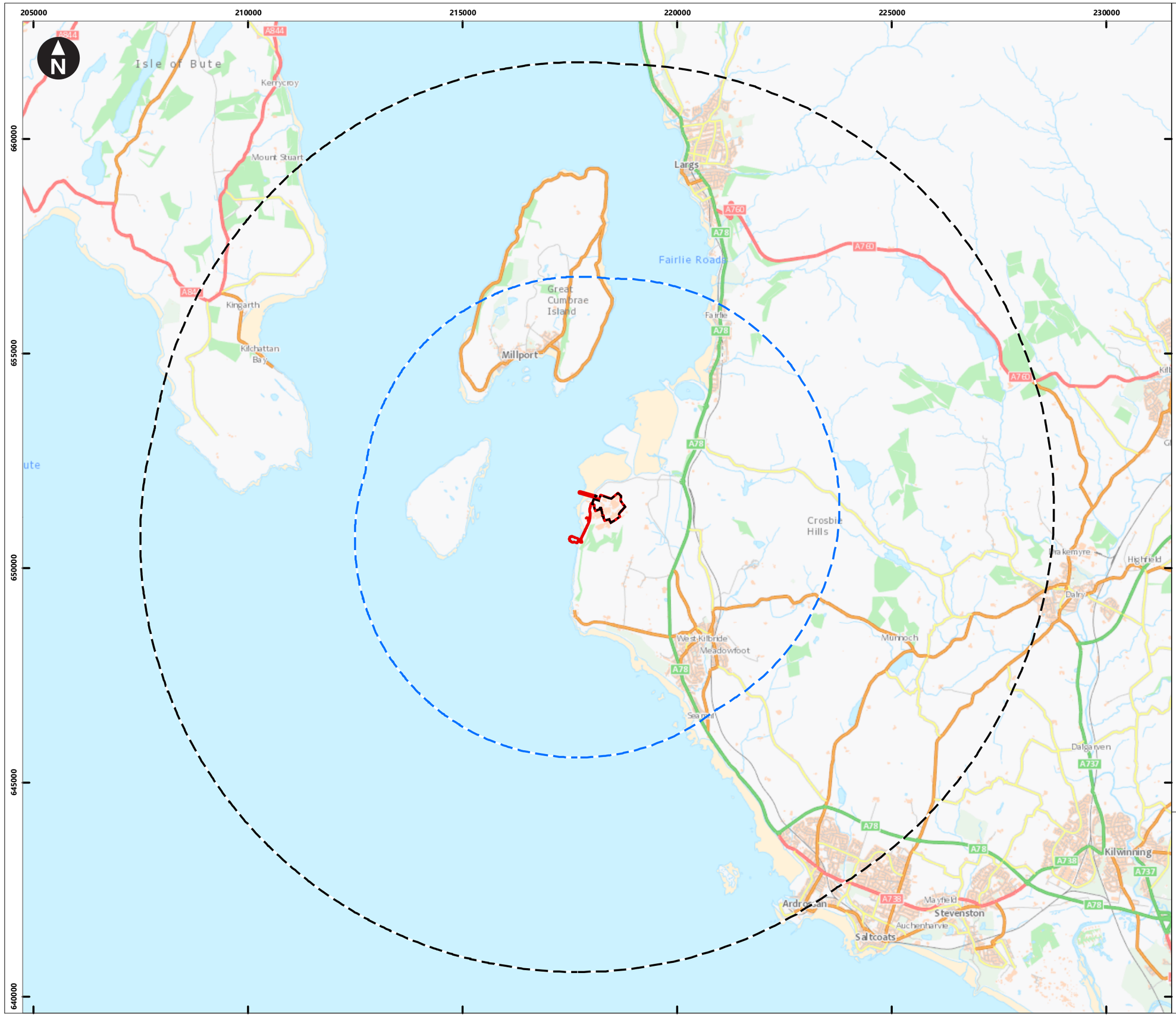
11.1.2. It demonstrates the methods employed to reach as many people as possible, culminating in the Round 1 consultation events and online virtual exhibition in August and September 2022. Important issues were raised by local communities and stakeholders as part of the consultation, and these have been addressed through development and environmental assessment work. Responses to the issues raised are set out in **Appendix E**.

11.1.3. Further opportunity for stakeholders to feed into the development of the final proposals was subsequently provided through a further round of pre-application consultation (Round 2) from May to July 2023. Important issues were also raised by local communities and stakeholders as part of the consultation, and responses to these issues raised are set out in **Appendix H**.

11.1.4. EDF is committed to an ongoing process of engagement with the community and stakeholders ahead of, during, and after submission of the ES to the ONR in 2023 to obtain EIADR consent for decommissioning.

Appendix A

Consultation Zones



Key

- Indicative Dismantling Works Area ("Works Area")
- Nuclear Site Licence Boundary ("The Site")
- Core Consultation Zone
- Outer Consultation Zone

0 1,000 2,000 3,000 4,000 5,000 m

Scale at A3: 1:85,000

Decommissioning of Hunterston B Nuclear Power Station
Consultation Feedback Report

Appendix A
Consultation Zones

September 2022

wood.

808125-WOOD-XX-XX-FG-MD-00021_S2_C01

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Appendix B

List of Stakeholders

Hunterston B Decommissioning Consultation Stakeholder List

Local Authority Officers	
North Ayrshire Council	Planning Officer
North Ayrshire Council	Environmental Health Officer
North Ayrshire Council	Transport Officer
Inverclyde Council	Senior Planning Officer
Renfrewshire Council	Development Management Team
East Renfrewshire Council	Head of Environment/Chief Planning Officer
East Ayrshire Council	Head of Planning and Economic Development
South Ayrshire Council	Planning Team
Argyll and Bute Council	Head of Planning and Regulatory Services

North Ayrshire Councillors	
Councillor Eleanor Collier	North Coast, Scottish National Party (SNP)
Councillor Ian Murdoch	North Coast, Independent
Councillor Todd Ferguson	North Coast, Conservatives
Councillor Alan Hill	North Coast, SNP
Councillor Tom Marshall	North Coast, Conservatives
Councillor Anthea Dickson	Garnock Valley, SNP
Councillor Donald L. Reid	Garnock Valley, Independent
Councillor Ronnie Stalker	Garnock Valley, Conservatives
Councillor John Bell	Garnock Valley, Labour
Councillor Margaret Johnson	Garnock Valley, SNP
Councillor Tony Gurney	Ardrossan, SNP
Councillor Amanda Kerr	Ardrossan, Labour
Councillor Stewart Ferguson	Ardrossan, Conservative
Councillor Timothy Billings	Arran, Conservatives
Councillor Jean McClung	Saltcoats and Stevenston, SNP
Councillor Jim Montgomerie	Saltcoats and Stevenston, Labour
Councillor Davina McTiernan	Saltcoats and Stevenston, SNP
Councillor John Sweeney	Saltcoats and Stevenston, Labour
Councillor Cameron Inglis	Saltcoats and Stevenston, Conservatives
Councillor Joe Cullinane	Kilwinning, Labour and Co-operative Party

Hunterston B Decommissioning Consultation Stakeholder List

Councillor Scott Davidson	Kilwinning, SNP
Councillor Donald Reid	Kilwinning, Labour and Co-operative Party
Councillor John Glover	Kilwinning, Conservatives
Councillor Shaun Macaulay	Irvine West, SNP
Councillor Scott Gallacher	Irvine West, Conservatives
Councillor Chloe Robertson	Irvine West, SNP
Councillor Louise McPhater	Irvine West, Labour
Councillor Marie Burns	Irvine East, SNP
Councillor Nairn McDonald	Irvine East, Labour and Co-operative Party
Councillor Angela Stephen	Irvine East, Conservatives
Councillor Christina Larsen	Irvine South, SNP
Councillor Robert Foster	Irvine South, Labour
Councillor Matthew McLean	Irvine South, Conservatives

MPs and MSPs	
Patricia Gibson MP	MP for North Ayrshire and Arran, SNP
Kenneth Gibson MSP	MSP for Cunningham North, SNP
Ruth Maguire MSP	MSP for Cunningham South, SNP
Neil Bibby MSP	MSP for West Scotland, Labour
Katy Clark MSP	MSP for West Scotland, Labour
Russell Findlay MSP	MSP for West Scotland, Conservatives
Pam Gosal MSP	MSP for West Scotland, Conservatives
Jamie Greene MSP	MSP for West Scotland, Conservatives
Ross Greer MSP	MSP for West Scotland, Scottish Green Party
Paul O'Kane MSP	MSP for West Scotland, Labour

Community Councils	
West Kilbride Community Council	
Fairlie Community Council	
Cumbrae Community Council	
Largs Community Council	

Hunterston B Decommissioning Consultation Stakeholder List

Regulators, Experts and Specialist Bodies	
Scottish Environmental Protection Agency	Senior Planning Officer
Scottish Environmental Protection Agency	Radioactive Substances Specialist
Nature Scotland	Operations Officer, Strathclyde & Ayrshire
Nature Scotland	
Glasgow Council/West of Scotland Archaeology Service	Service Manager
The Health and Safety Executive	
Office for Nuclear Regulation	
Historic Environment Scotland	
Scottish Water	
RSPB Scotland	
Scottish Wildlife Trust	
Police Scotland	
Clyde Muirshiel Regional Park	
National Air Traffic Services	
Glasgow Airport	Head of Planning and Development
Glasgow Prestwick Airport	Operations Director
Ministry of Defence	
National Grid (Systems Operator)	
Scottish Ambulance Service	
Ayrshire and Arran NHS Board	
Civil Aviation Authority	
Scottish Fire & Rescue Service	
Transport Scotland	

Adjacent Landowners	
Peel Ports	
Scottish Power (Systems Owner)	Head of Planning & Design, Ayrshire & Clyde South
EDF Tenants	

Hunterston B Decommissioning Consultation Stakeholder List

Other Stakeholders	
Hunterston Site Stakeholder Group	Members
EDF Staff	
EDF Contractors	Contractors operating on site

Appendix C

Round 1 Consultation Materials

Project Website

Hunterston B power station

Hunterston B is a nuclear power station on the west coast of Scotland.

Public consultation on proposals for decommissioning Hunterston B

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years EDF will remove the used fuel from the reactors and prepare for the decommissioning of the nuclear power station.

Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site and will be carried out by Magnox, which is part of the Nuclear Decommissioning Authority.

Find out more about the **decommissioning process.**

Whilst future uses of the site will not be achieved for many decades, the decommissioning proposals are a stepped approach to dismantling and decontamination towards an end state, allowing for safe radioactive decay, prior to final site clearance.

These proposals for decommissioning are subject to further development. We are holding this consultation now to get your views to inform the decommissioning proposals that will be submitted to the Office for Nuclear Regulation (ONR) for approval before decommissioning can proceed.

Our consultation will run from 8th August 2022 to 19th September 2022. Your views are important to us, and we encourage you to provide feedback. You can view all the consultation materials at our **online exhibition space** or one of our public events.

During the consultation period there will be four public events where members of the community can come along, find out about the proposals, talk to representatives from EDF and give their views.

If you would like to find out more about the consultation or request copies of the documents, you can get in contact by phone on **0800 915 3249**, by email at **HNBDecommissioning@edf-energy.com** or by filling in our **online feedback form.**

We have recently submitted our EIA Scoping Report to Office for Nuclear Regulation (ONR) setting out the proposed scope of the EIA to be undertaken for the Hunterston B decommissioning proposals. This document has been submitted to request a scoping opinion from the ONR which will confirm the scope of the assessment required under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended). You can find the scoping report in the links below:

- **HNB EIA Scoping Report**
- **HNB EIA Scoping Report Appendices**
- **HNB EIA Scoping Report Figures**

Consultation public events

Millport – Saturday, 13th August, 10am-5pm
GA Hall, Howard St, Isle of Cumbrae, KA28 0A

West Kilbride – Tuesday, 16th August, 1pm-8pm
West Kilbride Village Hall, 1 Arthur St, West Kilbride KA23 9EN

Largs – Wednesday, 17th August, 1pm-8pm
Barnfields Pavilion/ Vikingar Theatre, Greenock Rd, Largs KA30 8QJ

Fairlie – Wednesday 24th August, 1pm-8pm
Fairlie Village Hall, Fairlie, Largs KA29 0AB

Hard copies of the documents will also be available to view at the following locations (opening times can be found on the **North Ayrshire Council website**):

- Fairlie Library
- Millport Library
- Largs Library
- West Kilbride Library

Since 1976 **Hunterston B** has generated low carbon electricity for **77.9 million homes**

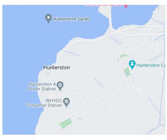
Avoiding **101.5m tonnes of CO_2 emissions***

Like taking **every car** off Scotland's roads for more than **19 years**

*when compared to direct emissions of combined cycle gas turbines | all figures rounded to the nearest hundred thousand

About Hunterston B

- **Station Director:** Joe Struthers
- **Total supply to the national grid:** 965MW
- **Reactor type:** 2 Advanced Gas-cooled Reactors
- **Coolant:** Carbon dioxide gas (CO2)
- **Start of construction:** 1968
- **Start of generation:** 1976
- **Start of defuelling:** 2022
- **People:** Approximately 520 full time EDF employees plus over 250 full time contract partners



Graphite in nuclear power

At Hunterston B we have been conducting the most extensive investigation programme ever undertaken on the graphite core of our reactors.

Find out more about the role of graphite in our reactors, and the results of our inspections.

The role of graphite in reactors

Find out more about Hunterston B

Safety and reporting

Our number one priority is safety. Find out about EDF Energy's commitment to Zero Harm.

Find out about safety and reporting

Community

EDF and the Nuclear Decommissioning Authority hold regular joint meetings (Site Stakeholder Group or SSG) with local people, the media, council and emergency services representatives and local politicians to maintain regular communications about the nuclear site. This meeting is independently chared.

Read the latest community report

Contact Hunterston

Address:
EDF Hunterston B power station
West Kilbride
Ayrshire KA23 9QX

Reception:
+44 (0)1294 826000

Media requests:
Fiona McCall
fiona.mccall@edf-energy.com
+44 (0)1355 846281

Community requests:
Nikki Thomson
nikki.thomson@edf-energy.com
+44 (0)1294 826157

Latest news and community updates

Tuesday, May 17, 2022

Defueling officially underway at Hunterston B

Hunterston B power station in North Ayrshire has reached another significant milestone as operators started the job of removing spent nuclear fuel from the reactors.

Read more

Tuesday, March 15, 2022

Hunterston B makes £10k end of generation donation to charities

Two Ayrshire-based charities have benefited from Hunterston B's end of generation milestone.

Read more

You may also be interested in...

How do you decommission a nuclear power station?

By 2030 all seven of EDF's AGR nuclear power stations are expected to have ended power generation and be at various stages of decommissioning.

Decommissioning a power station

How we generate our power

As Britain's **biggest generator of zero carbon electricity**[1] we generate power from **wind + nuclear + solar.**

Generating power

Jobs at EDF

Interested in working at EDF? Find out about our graduate programmes, apprenticeships, internships and current vacancies.

Visit our careers pages

Notes

1. **UK Fuel Mix disclosure information, published by Government Department BEIS**, recognises electricity from wind, solar and nuclear fuel produces zero carbon dioxide emissions at the point of generation.

The zero-carbon electricity purchased is supplied to the National Grid. Customers receive electricity via the National Grid, not directly from zero-carbon generators.

The below table summaries zero-carbon generation by company demonstrating EDF generating 32.4%. The data supporting the table below and the % values is sourced from a mixture of industry settlement data and the UK government renewable obligation database.

ZERO CARBON GENERATION SUMMARY BY COMPANY		2020	2020
Supplier name	**zero-carbon**	**GWh of zero-carbon electricity generation**	**% of overall zero-carbon electricity generation**
EDF	zero-carbon	37,958	32.4%
CENTRICA	zero-carbon	9,101	7.8%
RWE	zero-carbon	5,060	4.3%
E.on	zero-carbon	2,195	1.9%
SSE	zero-carbon	5,424	4.6%
ScottishPower	zero-carbon	4,364	3.7%
Drax	zero-carbon	-	-
Orsted	zero-carbon	9,523	8.1%
EPH	zero-carbon	-	-
Equinor	zero-carbon	1,182	1.0%
Vattenfall	zero-carbon	1,783	1.5%
Fred Olsen Renewables	zero-carbon	1,100	0.9%
Macquarie	zero-carbon	3,504	3.0%
Verteant Energy	zero-carbon	562	0.5%
Statkraft	zero-carbon	370	0.3%
Enecs	zero-carbon	316	0.3%
Falck Renewables	zero-carbon	251	0.2%
RES	zero-carbon	320	0.3%
SGRE	zero-carbon	245	0.2%
Greencoat	zero-carbon	318	0.3%
Community Windpower	zero-carbon	329	0.3%
OTHER	zero-carbon	33,243	28.4%
TOTAL	zero-carbon	118,805	100%

Consultation Document

Public

Hunterston B Nuclear Power Station Decommissioning

Consultation Document

8th August 2022 to
19th September 2022

Introduction

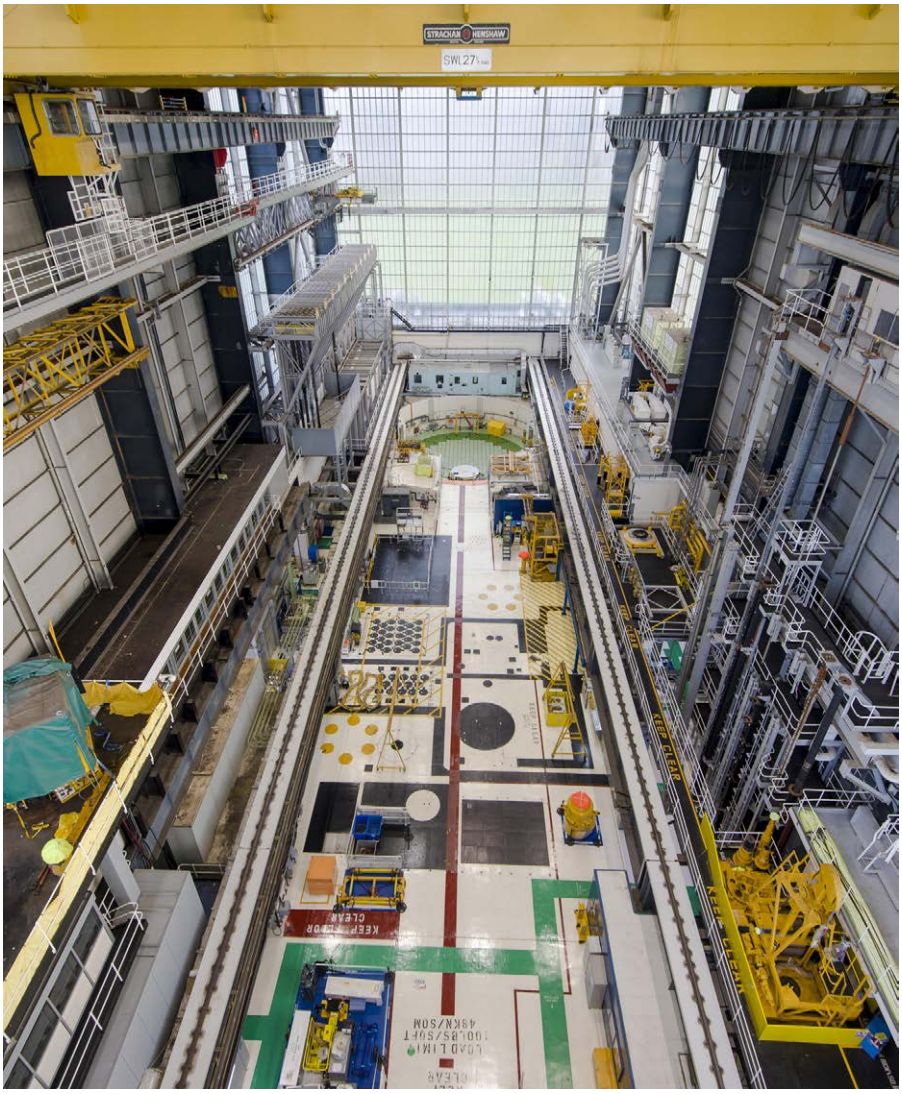
EDF is preparing proposals to decommission the Hunterston B nuclear power station in North Ayrshire.

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years EDF will remove the used fuel from the reactors and prepare for the decommissioning of the nuclear power station. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site.

It is anticipated that decommissioning will start in 2025/26 and will take many decades to complete. The majority of buildings, with the exception of the reactor buildings, will be demolished over a period of around 12 years. Following a long period of inactivity, around 70 years, when the reactor buildings are maintained in a safe, quiescent state, the remaining site will be decommissioned. Whilst future uses of the site will not be achieved for many decades, our decommissioning proposals are a stepped approach to dismantling and decontamination towards an end state, allowing for safe radioactive decay, prior to final site clearance.

These proposals for decommissioning are subject to further development. We are holding this consultation now to get your views to inform the decommissioning proposals that will be submitted to the Office for Nuclear Regulation (ONR) for approval before decommissioning can proceed.

Our consultation will run from **8th August 2022 to 19th September 2022**. This consultation document provides an overview of our proposals for decommissioning, including information on the currently proposed decommissioning process, how we propose to manage waste, and how we will respect the environment and local communities. Your views are important to us and we encourage you to provide feedback. You can find out more online at www.edfenergy.com/hunterston or by visiting one of our in-person events.



"It was originally thought Hunterston B would run for 25 years but investment in the plant and the people who work here mean we've been able to safely extend that to 46 years. This is an incredible achievement and everyone here is proud of what the station has accomplished. We are looking forward to the future. It will take time to defuel and we will be working closely with the NDA and Magnox to develop our proposals for decommissioning".

Joe Struthers, Station Director

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Hunterston B Power Station

Hunterston B power station produced enough electricity to power all of Scotland's homes for 31 years continuously. It employed hundreds of long-term skilled jobs for local communities in Ayrshire and beyond.

Hunterston B under construction (1968)

1968 Construction works start on the Hunterston B Nuclear Power Station.

1976 Construction works complete, and the power station starts generating low carbon electricity. It was expected that the power station would run for 25 years.

1980 Hunterston B is officially opened.

1990 Neighbouring Hunterston A power station begins decommissioning.

2007 Planned operations at Hunterston B extended by 5 years to 2016.

2012 Generating life of the station extended to March 2023, with a +/- 2 years proviso.

2017 Reactor 4 achieves the station's longest period of generation (495 days)

2020 EDF decides to bring the station's end of generation date forward by 14 months to January 2022. The decision is taken on the basis of inspections of the graphite cores and the ability to secure further safety cases.

2021 Reactor 3 is shut down by the station's operations staff along with Howard Weetman, who worked at the station for 23 years and was control room supervisor on the day Hunterston B first provided electricity to the national grid.

2022 Reactor 4 is shut down ending 46 years of zero-carbon generation.

Commencement of a programme of work to remove the used fuel from the reactors.

Since 1976 Hunterston B has generated low carbon electricity for **77.9 million homes**

Avoiding **101.5m tonnes of CO_2 emissions***

Like taking **every car** off Scotland's roads for more than **19 years**

*when compared to direct emissions of combined cycle gas turbines | all figures rounded to the nearest hundred thousand

Our focus is now to safely deliver the station into the decommissioning process, ultimately restoring the site of the power station for future reuse. Over the next three and a half years EDF will safely remove the used fuel from the reactors, which represents over 99% of the radioactive material from the site.

After defuelling, in accordance with an agreement EDF has made with UK Government, the Hunterston B site will be transferred to the Nuclear Decommissioning Authority (NDA), subject to regulatory approvals, with Magnox becoming the new Site Licence Company and undertaking the decommissioning activities.

The decommissioning proposals presented here are our latest assumptions, informed by our experience in operating and refuelling the reactors since 1976, knowledge of the reactor and generating technology, and preparations for decommissioning over many years. Further development of the decommissioning proposals is underway, working closely with NDA and Magnox to ensure that decommissioning works can start promptly following transfer. Your feedback, and ongoing work with Magnox to align our thinking and arrangements for decommissioning, and to explore the potential opportunities resulting from collaboration and transfer, will shape the development of decommissioning proposals for Hunterston B. The decommissioning proposals will be subject to ongoing engagement and approvals from the ONR and the Scottish Environmental Protection Agency (SEPA).

How will the decommissioning of Hunterston B be undertaken?

What will be happening over the next few years?

EDF's objective over the next few years is the safe and effective delivery of 'fuel free' reactors, ready to be decommissioned.

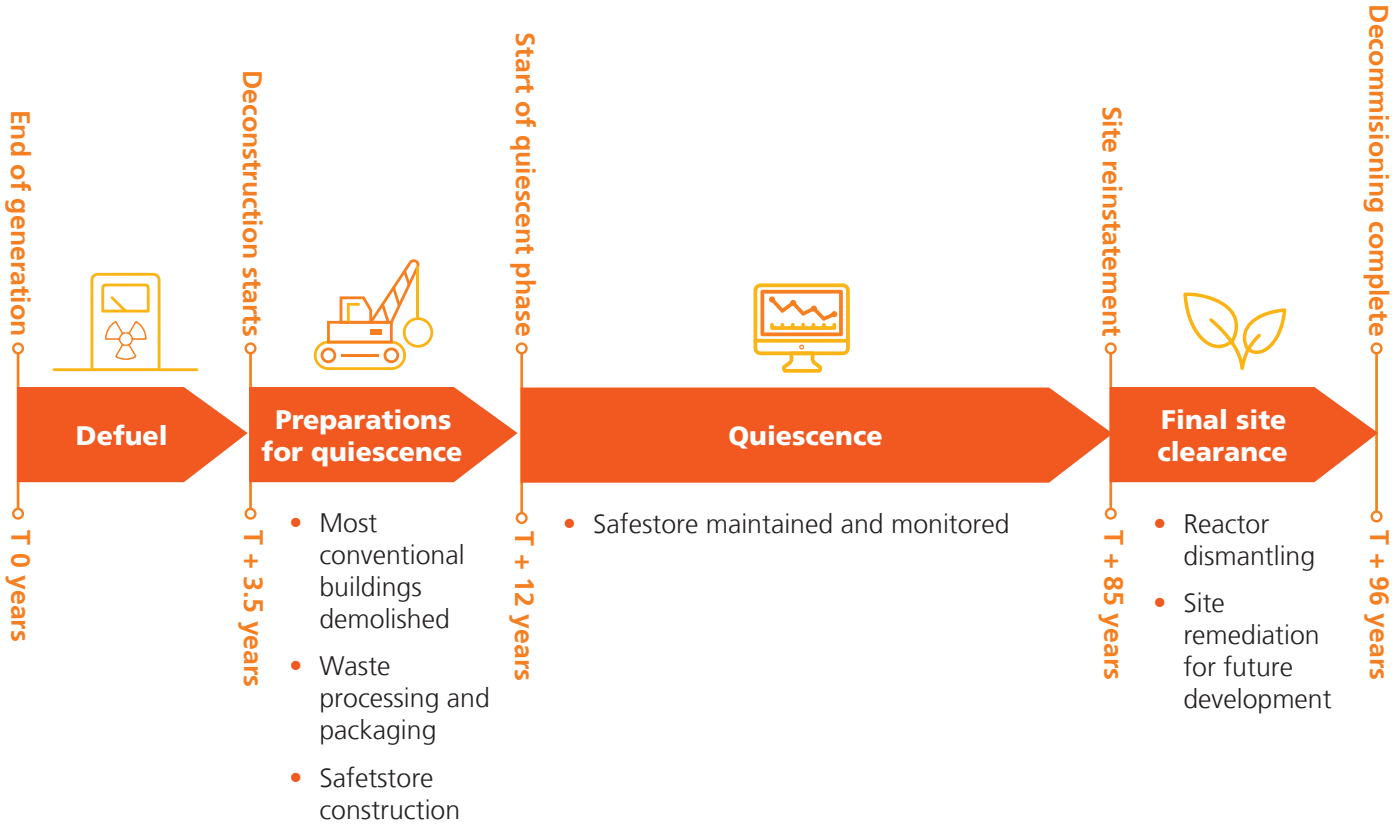
- There are around 300 fuel channels in each reactor, all of which need to be carefully emptied.
- A fuelling machine removes the fuel assembly from a channel and each fuel element is transferred to a cooling pond where it stays for a minimum of 90 days.
- Once cooled, the fuel is removed from the pond, packaged, and loaded into a container called a flask. The flask is transported by train to Sellafield in Cumbria where it is further cooled and stored until it can be disposed of.
- During the defueling phase, an average of three flasks a week will be transported by rail to Sellafield from Hunterston B. This phase will take around 3 and a half years to complete.

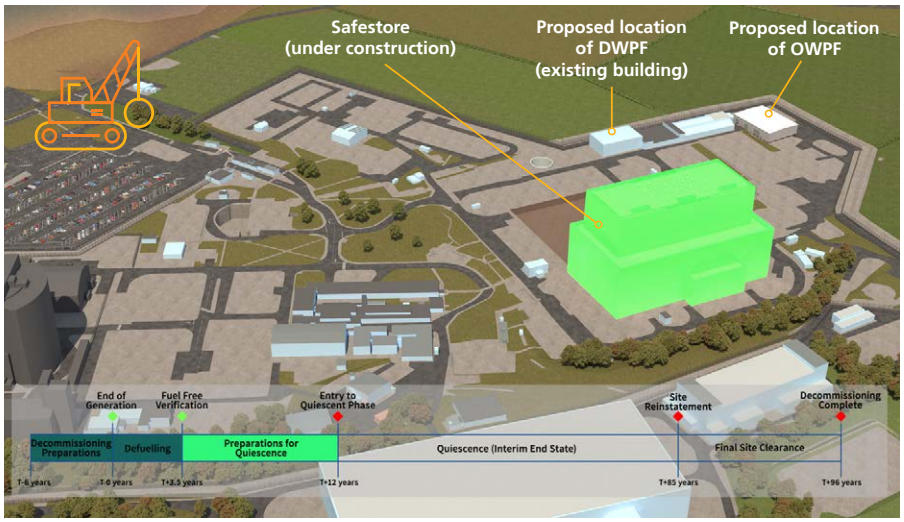
Once the spent fuel has been removed from the reactors, decommissioning can start. Over the next few years we will continue to work closely with NDA and Magnox to develop the proposals for decommissioning. To date, different options for decommissioning have been considered including:

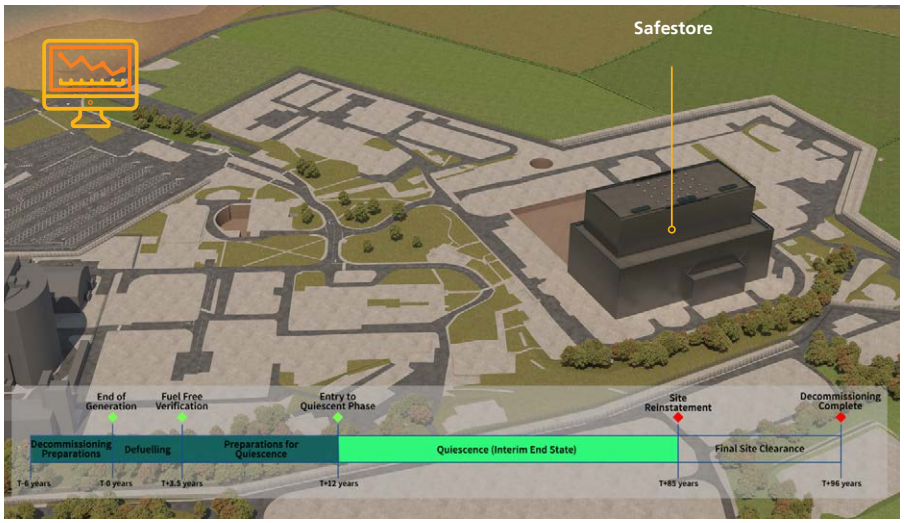
- **In-situ decommissioning**, where the power station is entombed or mounded and left for a 300-year period. This option was discounted by studies in the 1990s due to potential risks to the public and the environment, the long timescales and constraint on re-use of the site.
- **Prompt dismantling**, where the reactor and associated radioactive material is dismantled and removed early from the site. Initial studies into AGR decommissioning discounted this option due to hazardous dose rates during earlier reactor dismantling, significantly higher volumes of radioactive waste, and significantly higher costs.
- **Deferred dismantling**, the current approach proposed for the decommissioning of Hunterston B, involves the removal of radioactive mobile wastes and redundant buildings and equipment in the early stages of decommissioning. Only the reactor buildings are retained to enable the decay of radioactive material in a Safestore for a surveillance period, after which the remaining structures are dismantled, and radioactive waste removed.

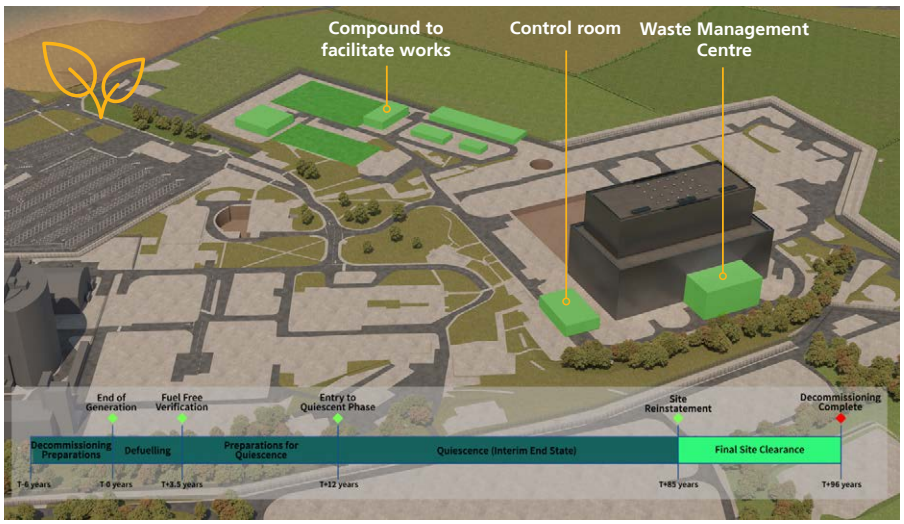
Timeline of decommissioning activities

Below is an indicative timeline of the works and activities required to decommission Hunterston B, over the following 3 stages.









The deferred dismantling process is described further below.

Preparations for Quiescence Phase

Current proposals indicate that within 12 years of the end of generation, the majority of conventional buildings on site are demolished. It is expected that after the removal of plant, demolition is carried out using conventional methods. The exact method to be used will be determined with the appointed contractor at the time. It is likely that standard mobile cranes will be used. These proposals are the subject of ongoing review with Magnox and NDA to ensure that opportunities to take latest practices and thinking are considered.

Buildings and structures are demolished to ground level. Basement areas and tunnels backfilled and regraded using material produced from the decommissioning process on the site. The reactor buildings will remain on site and will be clad and enclosed within a Safestore, to enable the decay of residual radioactive materials to a level that is safe for final deconstruction and removal.

Offshore, in the Firth of Clyde, the power station's cooling water infrastructure will also be decommissioned. It is proposed that the intake and jetty are removed to seabed level and that the tunnels are left below the seabed. The method for undertaking these works is subject to further consideration.

Some new construction may be required for waste management, processing and packaging. Existing buildings, on either the Hunterston A or B sites, will be refurbished for this purpose where appropriate. It is currently assumed that during this period the more active radioactive wastes that require long-term storage will be safely packaged, and moved for storage within the existing storage facility on the adjacent Hunterston A site. This will be subject to the approval of the ONR and SEPA.

Quiescence Phase

Hunterston B will then enter a passive, dormant state for approximately 70 years, to allow for the decay of radioactive materials within the Safestore. The site will be monitored, maintained, and inspected throughout.

The Safestore building will be designed to have a life of approximately 100 years. The exact height and footprint of the Safestore is subject to further feasibility work to determine the extent to which plant can be removed and how much of the reactor building structure can be used as part of the Safestore. It is currently anticipated to be no higher than the existing reactor building (66.5 metres above ground level).

'Quiescence' refers to the safe, passive period during which the reactor buildings will be left within the Safestore so that the remaining radioactive materials can safely decay in the reactor core. A regime of continuous monitoring, surveillance and maintenance will be in place during this period.

Final Dismantling and Site Clearance

In the final decommissioning phase, the Safestore and reactors are planned to be dismantled. An on-site Waste Management Centre will be constructed for the processing of reactor and debris vault wastes, and other facilities set up to process demolition materials.

Some further works may be required during this phase to de-contaminate land in order to reach the 'end state' and allow the site to be de-licensed (no longer licensed for nuclear use). SEPA will only release the site from the Radioactive Substances Regulations if they are satisfied that the disposal of radioactive waste has been completed, and the site has been left in such a state that ensures the protection of people and the environment.

Near the end of site clearance, final landscaping will be considered. Because Hunterston is designated as a 'Strategic Development Area' in national and local planning policy, it is likely that it will be left as a brownfield site for use for future development. Once the site is de-licensed, fencing will be removed, and the land made available for use.

We would welcome your views on proposals to decommission Hunterston B

Waste management

Principles for waste management

During decommissioning, radioactive and non-radioactive waste will be produced. Waste will be managed in accordance with government policy and legislation, in a way that protects people and the environment, and in accordance with the principles of a waste hierarchy to minimise waste, re-use and recycle. EDF have a developed understanding of the inventory of waste likely to be generated which is informing the planning and preparation for waste management.

Facilities for waste management

Works undertaken during the deconstruction and Preparation for Quiescence phase will produce Low Level Waste (LLW), as well as limited quantities of more active radioactive material classed as Intermediate Level Waste (ILW). To process this waste, we will require an Operational Waste Processing Facility (OWPF) and a Decommissioning Waste Processing Facility (DWPF) on site.

Operational Waste Processing Facility

We are still undertaking studies to confirm whether a new building is required for an Operational Waste Processing Facility to manage and process ILW generated during the Preparations for Quiescence phase, or whether it can be processed at existing Magnox facilities at Hunterston A, or within the DWPF described on the right.

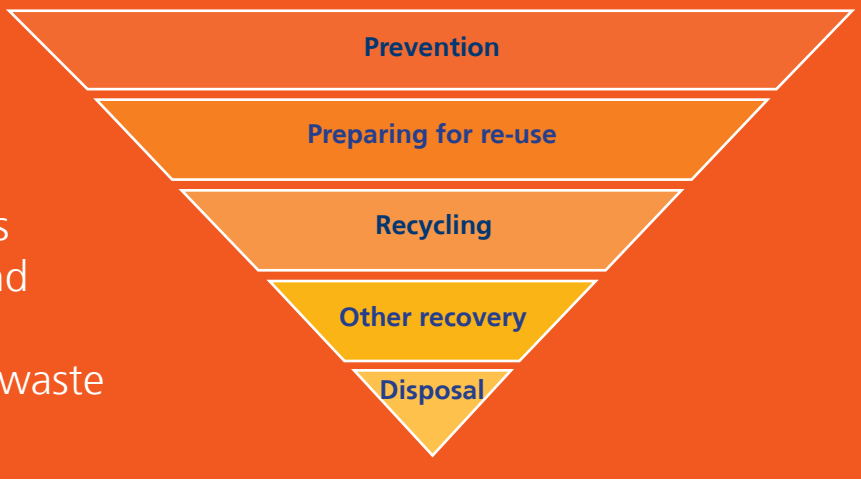
Should a new building be required, a preferred location in the north-east of the Hunterston B site has been identified. The new building would likely be a cladded steel frame structure, with a similar appearance to a warehouse building, around 15 metres tall, with a maximum floorspace of 1,200 square metres. It would be subject to the submission of a planning application to North Ayrshire Council. The building would only be required during deplanting and deconstruction activities and so could be demolished prior to the long period of Quiescence.

Decommissioning Waste Processing Facility

A DWPF will be needed to manage and process LLW to enable the removal of ILW from the site. It is proposed that this will be located within existing buildings at Hunterston B currently used for processing potentially contaminated wastes. These buildings are located to the north of the reactor building and turbine hall. The buildings proposed for this may require refurbishment to accommodate the new facility. Waste processed in the facility will be sorted according to their physical and chemical characteristics and then treated, packaged and disposed of as appropriate and in accordance with legislation at the time of the disposal.

Metallic waste will be treated and recycled where possible. Other wastes may be sent for incineration or disposal. Once the Preparations for Quiescence phase has been completed, and the DWPF is no longer required, it will be decommissioned and deconstructed.

The waste hierarchy is a ranking of waste management options by which is best for the environment. It prioritises the prevention, re-use and recycling of waste above recovery and disposal of waste where possible.



Storage of ILW

Until appropriate disposal facilities are available to accept certain types of Intermediate Level Waste, this waste type must be packaged and stored in a manner which is safe and secure. In developing the approach to the storage of ILW, options either to construct and operate a new ILW storage facility on the Hunterston B site, or to use the existing ILW store on the neighbouring Hunterston A site have been considered.

Based upon current assumptions, the existing Hunterston A ILW store has capacity to store ILW that is likely to be generated during the decommissioning of Hunterston B and it is feasible to do so. As a shared ILW store would reduce costs, and have lesser environmental effects than building a new ILW store, work on a new ILW store at Hunterston B has been halted. NDA, Magnox and EDF are working together to develop the proposals to use the existing ILW store on Hunterston A and to obtain the necessary regulatory approvals to enable this to happen. This approach now forms the basis of work planning assumptions for EDF Energy and Magnox Ltd.

Long term disposal of ILW

Disposal is the final stage of the waste management process and will only be required when all other options have been exhausted. Where the disposal of ILW generated during final site clearance is unavoidable, the current assumption is that it will be transferred to a near surface facility in accordance with Scottish Government's Higher-Activity Radioactive Waste Policy and Implementation Strategy.

Low Level Waste refers to radioactive waste that contains lower levels of radioactivity and may not need the full suite of measures, typically used on more radioactive waste, to protect the public and the environment. Intermediate Level Waste refers to waste that contains higher amounts of radioactivity, thereby needing extra measures for shielding and handling.

Respecting the environment and our communities

In order for Hunterston B power station to be decommissioned the ONR has to grant consent under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (EIADR). As the site licensee, EDF will submit an Environmental Impact Assessment (EIA) of the decommissioning proposals. EDF are continuing to gather the environmental information that will allow us to identify the potential impacts of the decommissioning proposals and develop measures to avoid or reduce them. This information will inform the EIA.

EDF has submitted an EIA Scoping Report to ONR to scope the potential environmental impacts of our decommissioning proposals, and the methodology for how they will be assessed. A copy of the EIA Scoping Report can be viewed at www.edfenergy.com/hunterston. Once the ONR has issued its Scoping Opinion, EDF will begin to undertake the EIA. EDF will consult on the findings of the EIA, including any environmental impacts and measures required to avoid or reduce the effects of the proposals, in a further period of public consultation.

Summary of environmental assessment

The table below summarises what environmental assessment of the decommissioning proposals will be undertaken.

Air Quality	The potential effects on air quality resulting from the decommissioning proposals, including emissions of dust from site and the effects of emissions from traffic associated with the works at receptors adjacent to the local highway network.
Climate Change	The carbon footprint of the decommissioning proposals. This includes estimating the emissions of construction, demolition and waste management processes on-site, as well as emissions generated from the worker travel and the transport of materials and waste.
Terrestrial Ecology	The potential effects of the decommissioning proposals on land-based species and habitats, as well as the potential effects on designated sites in the locality of the site.
Marine Ecology	The potential effects of activities in the marine environment on marine based animals, plants and designated sites.
Coastal Management and Water Quality	The potential effects of the decommissioning proposals on the coastal management regime, designated sites which are dependent on existing coastal processes and the water quality of coastal waterbodies.
Surface Water and Flood Risk	The potential effects on the aquatic environment, water use and risk of flooding from on-site decommissioning activities.
Soils, Geology and Hydrogeology	The potential effects of the decommissioning proposals on soils, geology and hydrogeology (groundwater) including an assessment of the potential for the works to disturb and mobilise existing ground contamination.

Historic Environment	The decommissioning works will not directly effect designated historic assets such as scheduled monuments, listed buildings, conservation areas, historic landscapes. We will assess any direct effects on non-designated historic assets and the effects on the setting of scheduled monuments, listed buildings, conservation areas, historic landscapes and other features of note.
Landscape and Visual Impact Assessment (LVIA)	The potential landscape effects during the main phases of decommissioning. In addition, we will assess the visual impacts on communities and public right of way routes next to the proposed project including the Ayrshire Coastal Path.
Noise and Vibration	The potential effects of noise generated during the decommissioning activities on-site and the impact of noise generated from traffic associated with the decommissioning proposals on the wider highway network at neighbouring residential, community and business properties.
Traffic and Transport	Traffic required to undertake the decommissioning proposals and effects on access, journey delays, pedestrian journeys and safety on the highway network.
Socio-economics	The potential effects of changes in staffing levels on the local economy, demand for housing and local services, education, demographic changes and skills availability.
Major Accidents and Disasters	The potential for major accidents and disasters (including natural occurrences) as a result of the decommissioning works.
Waste (Conventional and Radioactive)	The effect of the conventional (non-hazardous) and radioactive waste generated from the decommissioning proposals on the capacity of existing waste management facilities.
Cumulative Effects	The potential cumulative effects of our proposals on all of the topics above and any cumulative effects associated with other developments in the local area.

Safety and security

During the decommissioning of Hunterston B, nuclear safety will remain the overriding priority. The approach to safety will be maintained in accordance with the relevant license conditions and safety regulations and will be appropriate to the risks at each stage of decomissioning of the power station. The site will remain a nuclear licensed site, subject to the provisions and requirements of the nuclear site licence and to regulation by the ONR and SEPA.

Appropriate site security arrangements will be maintained at all times during decommissioning in accordance with the relevant nuclear security regulations, and based upon advice provided by the ONR Civil Nuclear Security & Safeguards (CNSS) group. Emergency arrangements, covering both safety and security related incidents, will be maintained in accordance with the relevant licence condition and security regulations and appropriate to the risks at each stage of decommissioning.

Consenting Process

Our decommissioning proposals require approval from the ONR, prior to commencement of decommissioning activities under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999. Under these Regulations, we are required to submit an Environmental Statement to the ONR. ONR will then make a decision whether to give permission for decommissioning to commence based on the findings of the Environmental Statement.

The ONR will do this following consultation with statutory and regulatory bodies, local communities, and other interested parties. Members of the public and interested third parties will have the opportunity to comment on the decommissioning proposals and the supporting Environmental Statement during the EIADR consenting process as well as commenting on the proposals through this consultation process.

Planning

New buildings, structures and engineering works that are required to enable decommissioning may also require planning permission from North Ayrshire Council. These applications may need to be accompanied by their own EIAs which will assess the impacts of the development being proposed. Members of the public and interested third parties will be able to comment on these proposals via the planning process.

Environmental permitting

In order to manage and store certain waste materials, authorisation from the Scottish Environment Protection Agency (SEPA), under the Environmental Authorisations (Scotland) Regulations 2018, is required. SEPA is Scotland's principal environmental regulator responsible for authorising and overseeing activities that could impact environmental or human health, including enforcing compliance where necessary.

The Hunterston B site already holds multiple permits on site from the operational period of the power station. Some of these permits may need to be varied as the site progresses through the decommissioning process, whilst some new permits may also be required. The site licensee will liaise with SEPA and other Regulators as required to ensure the delivery of these permits to facilitate the decommissioning works.

Marine licenses

Decommissioning works within the marine environment will require a marine licence consent from Marine Scotland under the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009. These applications may need to be accompanied by an EIA and will be subject to further consultation.


Small group
Purell
eDF
Welcome to
Hunterston B
Power Station

Providing Your Feedback and Next Steps

Outline programme further consultation and engagement

We plan to submit the Environmental Statement to the ONR in Autumn 2023. In advance of this, your feedback, planned further assessment, and the ongoing work with NDA and Magnox, will shape the proposals for decommissioning.

- **Round 1 Consultation:** August 2022 to September 2022.
- **Consideration of feedback from stakeholders to inform assessment work:** Autumn 2022 to Spring 2023.
- **Round 2 Consultation:** April 2023 to May 2023.
- **Consideration of feedback from stakeholders and finalisation of environmental assessment work:** Summer 2023 to Autumn 2023.
- **Submission of EIA Report to the ONR:** Autumn 2023.

Your feedback will help refine the decommissioning proposals. The period for responding to our consultation is open from **9:00am on the 8th August 2022 to 11:59pm on the 19th September 2022**.

You can submit your feedback through the questionnaire on our website at: www.edfenergy.com/hunterston

Alternatively, you can email your feedback to HNBDecommissioning@edf-energy.com or post it to Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

Any personal data received as part of the consultation will be stored and protected as per relevant data protection requirements as set out in the General Data Protection Regulation (GDPR). No personal details will be used or published in any materials, though feedback received will be analysed and reported on in a Consultation Feedback Report.

Alongside this and future consultation, we will continue to engage on our decommissioning proposals with the Site Stakeholder Group (SSG) for Hunterston, managed by the NDA. The SSG is an independently chaired forum for communications between the NDA, nuclear site operators Magnox and EDF, and local communities.

Public events

We are holding four public events to help people understand and comment on our proposals. At our events, you can view our proposals, examine documents and speak to our team who will be on hand to answer any queries you may have.

We are running a virtual exhibition for those who may not be able to attend one of our events. You can access it, along with downloadable copies of documents, on our website here: www.edfenergy.com/hunterston

scan QR code to access website

Event venue	Address	Date and Time
Millport Development Association Hall	The Garrison, Millport, Isle of Cumbrae KA28 0DG	13th August 2022, 10am to 5pm
West Kilbride Village Hall	Arthur Street, West Kilbride KA23 9EN	16th August 2022, 1pm to 8pm
Barrfields Theatre (Vikingar)	Greenock Road, Largs, KA30 8QJ	17th August 2022, 1pm to 8pm
Fairlie Village Hall	Main Road, Fairlie, Largs KA29 0AD	24th August 2022, 1pm to 8pm

Document deposit locations

If you wish to read our documentation but are unable to attend one of our public events or access our website, we are providing reference copies of our documents for inspection at local libraries. Please visit our website for further information.

How you can get in touch

If you would like more information about our proposals, or require alternative formats for documents (e.g. in Braille or other languages), you can contact us directly.

Call our freephone number:
0800 915 3249

Email us at:
HNBDecommissioning@edf-energy.com

Contact details:

Call our freephone number: 0800 915 3249

Email us at: HNBDecommissioning@edf-energy.com

www.edfenergy.com/hunterston

scan QR code to access website

FAQs Document

Frequently Asked Questions

Why is Hunterston B power station being decommissioned?

Hunterston B has generated low carbon energy for 46 years, outperforming expectations at the time of its construction that it would only operate for 25 years. Due to the age of the station, and to give certainty to our staff, we decided in August 2020 that Hunterston B would cease generation in January 2022 before moving into the defueling and decommissioning processes.

What is the schedule for defueling and transferring Hunterston B to the NDA?

We anticipate that defuelling will be completed over the next three and half years. Once 'fuel free' the buildings and infrastructure to be decommissioned will transfer to the NDA and Magnox, subject to the appropriate regulatory arrangements being agreed and in place.

Why is EDF not carrying out the full decommissioning of Hunterston B power station?

EDF made an agreement with the UK government in June 2021 to a phased transfer of all 7 AGR Power Stations to NDA following the completion of defueling. This makes best use of EDF's and the NDA's expertise and provides the best and most cost-effective solution for decommissioning. Defueling is, in effect, an extension of operations and the EDF team has the expertise and experience to do that most efficiently.

The NDA is the nation's nuclear decommissioning body and has extensive experience in this area, being responsible for decommissioning the rest of the UK's ex-nuclear research and generation estate through its subsidiary Magnox. Transfer to NDA / Magnox provides the UK government with the best opportunity to integrate the decommissioning of all UK nuclear sites into the most cost-effective solution for the tax payer. It is decommissioning experience and expertise that Magnox will bring to undertaking the decommissioning programme as Hunterston B's new Site Licence Company, following completion of defueling by EDF.

What is the timing of each stage of decommissioning?

Defueling begins when a reactor formally stops generating. It involves removing all fuel from the reactors and fuel ponds, which represents 99% of the radioactive material on site. This is expected to take approximately 4 years from the end of generation.

The first stage of our decommissioning proposals for HNB is referred to as the Preparations for Quiescence phase. Our proposals intend to complete the first stage of decommissioning around 12 years from the end of generation. The majority of conventional buildings will be demolished and a Safestore will be constructed around the reactors and associated structures during this phase. Thereafter, there is the 'Quiescence' phase of around 70 years to allow for radioactive decay within the Safestore. This is followed by the 'Final Site Clearance' phase. This is expected to take approximately 10 years to undertake and includes the dismantling of the Safestore and works required to release the site for future development.

What are the plans for future development of the site?

There is much decommissioning work to be planned and undertaken before the site can be de-licensed and released for future development. When the time comes, the NDA will work with local stakeholders to identify credible options for the beneficial re-use of land at Hunterston B and plan to leave the site in an appropriate end state. Any future development will require a planning application, which will be determined in accordance with the relevant national and local planning policies at that time. Currently, the Hunterston A and B stations, along with Hunterston Port, are designated as a 'Strategic Development Area' in national and local planning policy, recognising its importance as an energy hub and deep water port and potential for employment uses including renewable energy, industrial, commercial, and research and development.

What is 'defueling'? And where does the used fuel go?

Defueling is the process of removing and carefully emptying the used fuel channels from each reactor and placing it into a storage pond within the reactor buildings to cool for a minimum of 90 days. The fuel channels are then removed from the pond, loaded into a flask, and transported by rail to Sellafield. They are then safely stored in a cooling pond for up to 70 years, after which they would be transferred to the UK's planned geological disposal facility.

What is 'Quiescence'?

'Quiescence' refers to the safe, passive period during which the Safestore will be left to provide time for remaining radioactive materials to safely decay prior to Final Site Clearance.

What measures are in place during the Quiescence Phase to ensure the safety of the Hunterston B site while radioactive materials decay in the reactor core under the Safestore?

The Quiescence Phase will be accompanied by a programme of continuous remote monitoring and surveillance. The Site Licensee will undertake periodic visits to inspect and monitor the site surrounding area, including visual inspections, radiological and environmental monitoring, and general grounds maintenance. During this period, there may also be a need for refurbishment or replacement of building and cladding materials.

How will waste produced by the decommissioning works be managed?

During decommissioning, radioactive and non-radioactive waste will be produced. Waste will be managed in accordance with government policy and legislation, in a way that protects people and the environment, and in accordance with the principles of a waste hierarchy to minimise waste, re-use and recycle.

EDF have a developed understanding of the inventory of waste likely to be generated which is informing the planning and preparation for waste management. A new building may be required for radioactive waste management, processing and packaging. NDA, Magnox and EDF are working together to develop the plans for using an existing ILW store on the Hunterston A site and to obtain the necessary regulatory approvals to enable this to happen.

ILW generated during final site clearance will be transferred to a near surface facility, in accordance with Scottish Government's Higher-Activity Radioactive Waste Policy and Implementation Strategy.

How can I provide further feedback as the proposals develop?

Feedback to this consultation will inform the development of the decommissioning proposals for Hunterston B. We will carry out a further stage of public consultation in Spring 2023 on our preferred decommissioning strategy, the identified environmental effects of our decommissioning proposals, and our proposed measures to mitigate these effects. Once the EIADR application has been submitted to the Office for Nuclear Regulation, members of the public and other interested parties will have the opportunity to make representations.

Further consents are likely to be required through planning applications to North Ayrshire Council, Marine Licence applications to Marine Scotland and environmental permit applications to SEPA as the site progresses towards and into deconstruction. These consenting processes will also provide an opportunity for you to provide comment on these parts of our proposals.

Who will make the final decision on the decommissioning proposals?

The Office for Nuclear Regulation, the UK's independent regulator of the nuclear industry, will make the decision on whether to grant consent to the decommissioning project. We will submit an EIADR application to them, including an Environmental Statement assessing the environmental impacts of the decommissioning proposals. Approvals through other consenting regimes for other parts of the project, such as waste management and the removal of marine infrastructure, will be required before the decommissioning proposals are finalised.

Feedback Form

Have your say on our plans to decommission Hunterston B nuclear power station

Consultation feedback form

EDF is consulting on its proposals for decommissioning Hunterston B power station, North Ayrshire.

Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site.

This consultation is your opportunity to express your views on our proposals as they are under development and prior to submitting the plans to the Office for Nuclear Regulation in 2023.

We want as many people as possible to share their views on our proposals as part of this consultation.

How to respond to this consultation

This questionnaire is designed to help you give us your feedback on the proposals. You can respond to the consultation by:

- Completing this questionnaire online: **https://forms.office.com/r/YKqRgtgTV7**
- Completing this questionnaire and returning it to **Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION**
- Completing this questionnaire and sending it by email to **HNBDecommissioning@edf-energy.com**

Responses must be received by 19th September 2022.

1. How would you describe your interest in the decommissioning of Hunterston B?

Please tick all that apply

- ☐ Local resident
- ☐ Local representative
- ☐ Landowner
- ☐ Local business owner
- ☐ Local interest group (if so please name) _____
- ☐ Other _____

2. To what extent do you agree with the approach to decommissioning Hunterston B?

Please tick one

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly Disagree

---

3. Do you have any comments on the proposals for decommissioning Hunterston B?

Potential environmental effects

Do you have any comments on the potential environmental effects of our proposals...

4. During deconstruction of buildings on site (a period of around 12 years when there would be a phased demolition of the majority of buildings on site)?

5. During the period of quiescence (a period of approximately 70 years when only the Safestore remains on site)?

6. Final end state (when the Safestore is removed and the site released for future development)?

Further comments

7. Please use this space to provide any further comments

Optional information

8. If you would like to be kept updated on this project, please provide your contact details below (name, address, phone number, e-mail address)

9. Your age

Please tick one

- ☐ 0-19
- ☐ 20-39
- ☐ 40-59
- ☐ 60-79
- ☐ 80+

10. Occupation

Please tick one

- ☐ Student
- ☐ Part-time employed
- ☐ Full-time employed
- ☐ Retired
- ☐ Unemployed

Our consultation process

11. How informative did you find our consultation events and/or our consultation materials?

Please tick one

- ☐ Very informative
- ☐ Quite informative
- ☐ Not informative
- ☐ No opinion

12. Please rate how well this consultation was promoted and advertised to the public

Please tick one

- ☐ Very good
- ☐ Good
- ☐ Average
- ☐ Poor
- ☐ Very Poor
- ☐ Unsure

And finally...

Any comments received will be analysed by EDF and any of its appointed agents. Copies may be made available in due course to the Office for Nuclear Regulation and other relevant statutory authorities so that feedback can be considered as part of the process.

We will request that any personal details are not placed on public record and will be held securely by EDF and its agents in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent application to the ONR and, except as noted above, will not be passed to third parties.

Responses may also form the basis of a Consultation Report that will accompany the application to the Office for Nuclear Regulation. Therefore, in providing any comment, it should be borne in mind that the substance of it may also be communicated to others as part of the Consultation Report. Names and personal contact information would not be shared as part of this process.

THANK YOU

Virtual Exhibition Boards

About Hunterston B power station

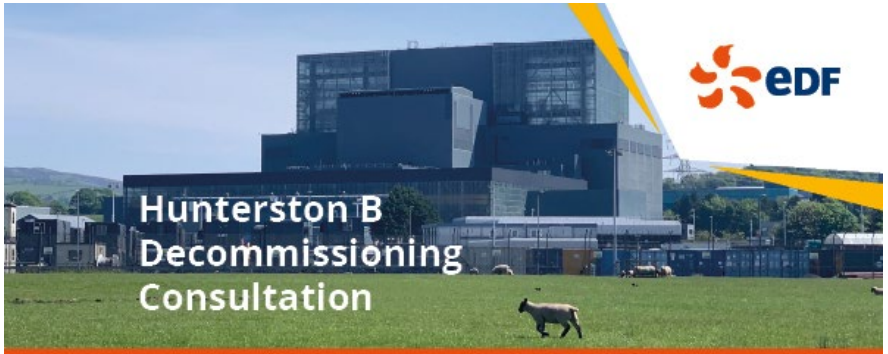
Click here for more information

Decommissioning Approach

Click here for more information

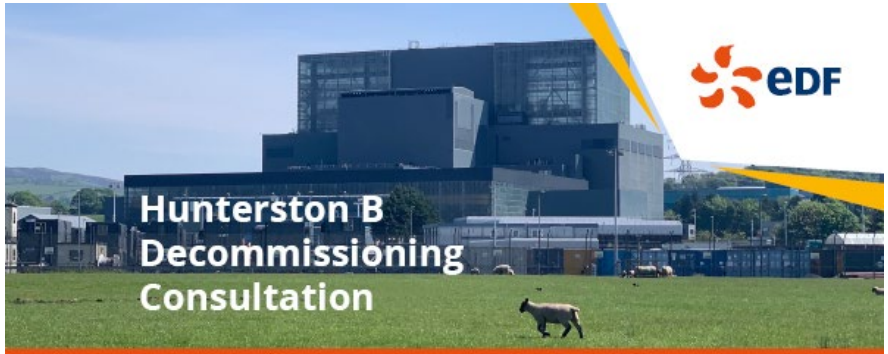
Decommissioning Process

Click here for more information



Waste Management

Click here for more information



Respecting the environment and our communities

Click here for more information

Providing Your Feedback and Next Steps

Click here for more information

Consenting Process

Click here for more information

Appendix D

Round 1 Promotional Materials

Community Information Leaflet

Have your say on our plans to decommission Hunterston B nuclear power station

8th August 2022 to 19th September 2022

Hunterston B nuclear power station stopped generating electricity in January 2022 after 46 years of service. Over the next few years EDF are working with the Nuclear Decommissioning Authority and their subsidiary Magnox, to prepare for the decommissioning of the nuclear power station. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site. Before we finalise our plans, we are consulting with communities and stakeholders to get your views to inform the decommissioning proposals. These proposals will be submitted to the Office for Nuclear Regulation for approval before decommissioning can proceed.

Your views are important in shaping the plans for decommissioning, which will take many decades to complete.

Decommissioning Hunterston B

It is anticipated that decommissioning will start in 2025/26 and will take many decades to complete. The majority of buildings, with the exception of the reactor buildings, will be demolished over a period of around 12 years. Following a long period of inactivity, around 70 years, when the reactor buildings are maintained in a safe, quiescent state, the remaining site will be decommissioned. Whilst future uses of the site will not be achieved for many decades, our decommissioning plan is a stepped approach to dismantling and decontamination towards an end state, allowing for safe radioactive decay, prior to final site clearance.

Respecting the environment and our communities

Before deconstruction can start the Office for Nuclear Regulation has to consider the environmental effects of the decommissioning proposals and ensure that appropriate measures are in place to protect the environment and communities. EDF are continuing to gather the environmental information that will allow us to identify the potential impacts of the decommissioning proposals and develop measures to avoid or reduce them. You can find out more about what environmental assessment we are doing as part of this consultation.

Public events

You can come along to any of our public events to find out more about our plans and speak to our team, who will be on hand to answer any queries you may have.

Event venue	Address	Date and Time
Millport Development Association Hall	The Garrison, Millport, Isle of Cumbrae KA28 0DG	13th August 2022, 10am to 5pm
West Kilbride Village Hall	Arthur Street, West Kilbride KA23 9EN	16th August 2022, 1pm to 8pm
Barrfields Theatre (Vikingar)	Greenock Road, Largs, KA30 8QJ	17th August 2022, 1pm to 8pm
Fairlie Village Hall	Main Road, Fairlie, Largs KA29 0AD	24th August 2022, 1pm to 8pm

Document deposit locations

If you wish to read our consultation documents but are unable to attend one of our public events or access our website, we are providing reference copies of our documents for inspection at local libraries. Please visit our website for further information.

You can also find out more about our proposals and view our virtual exhibition at www.edfenergy.com/hunterston

scan QR code to access website

Provide your feedback

You can find more information about this consultation on our website www.edfenergy.com/hunterston, and at our public events and document deposit locations.

Your feedback will help inform the decommissioning proposals that will be submitted to the Office for Nuclear Regulation in Autumn 2023 for approval before decommissioning can proceed.

The deadline for submitting feedback is **11:59pm** on **19th September 2022**

Responding to the consultation:

scan QR code to access website

Online using the questionnaire on our website www.edfenergy.com/hunterston

Complete a paper questionnaire, available at events or on request using the contact details provided below:

Email us at HNBDecommissioning@edf-energy.com

Write to us at Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

Get in touch with the project team, or request alternate formats for documents (e.g. in Braille or other languages):

Call our Freephone number 0800 915 3249

Email us at HNBDecommissioning@edf-energy.com

Write to us at: Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

Posters

Have your say on our proposals to decommission Hunterston B Power Station

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years EDF will remove the used fuel from the reactors and prepare for the decommissioning of the nuclear power station. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site.

We are holding a public consultation from **8th August 2022 to 19th September 2022** to get your views to inform the decommissioning proposals that will be submitted to the Office for Nuclear Regulation (ONR) for approval before decommissioning can proceed.

Learn about our proposals and have your say at **www.edfenergy.com/hunterston** or at our public events:

Millport Development Association Hall, The Garrison, Millport, Isle of Cumbrae KA28 0DG
13th August 2022, 10am to 5pm

West Kilbride Village Hall, Arthur Street, West Kilbride KA23 9EN
16th August 2022, 1pm to 8pm

Barrfields Theatre (Vikingar), Greenock Road, Largs, KA30 8QJ
17th August 2022, 1pm to 8pm

Fairlie Village Hall, Main Road, Fairlie, Largs KA29 0AD
24th August 2022, 1pm to 8pm

If you would like more information you can contact us directly on **0800 915 3249** or email **HNBDecommissioning@edf-energy.com**

If you wish to read our documentation but are unable to attend one of our public events or access our website, we are providing reference copies of our documents for inspection at local libraries. Please visit our website for further information.

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19-20 AUGUST 2022
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For more information on the Club, and details of our membership rates for adults and young people, see :
www.clubspark.lta.org.uk/WestKilbrideTennis.
E-mail secretary@westkilbridetennis.org.uk and we can show you around and arrange for you to have a hit before joining.
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Have your say on our proposals to decommission Hunterston B Power Station
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Letters to Stakeholders

From: HNB Decommissioning <HNBDecommissioning@edf-energy.com>
Sent: 05 August 2022 08:48
To: [redacted]
Cc: [redacted]
Subject: HNB Decommissioning Consultation
Attachments: Letter to Community Councils .pdf

Dear Sir/Madam,

As you are likely aware, Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will be working closely with the Nuclear Decommissioning Authority and Magnox to develop proposals for decommissioning. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site. We are holding a public consultation from **8 August to 19 September 2022**, seeking the views of Community Councils, other stakeholders and the public to help inform the decommissioning proposals. The attached letter invites you to take part in this consultation, includes details on consultation events, where to find out more, and how to provide feedback.

Kind regards,

Tom Tremlett PIEMA
EIA Co-ordinator
Nuclear Decommissioning

[redacted]

Nuclear Decommissioning

edfenergy.com

4th August 2022

Dear Stakeholder

Re: Hunterston B Power Station Decommissioning Consultation

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will be working closely with the Nuclear Decommissioning Authority and Magnox to develop proposals for decommissioning. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site.

We are holding a public consultation from 8 August to 19 September 2022, seeking your views to help inform the decommissioning proposals. These proposals will require the approval Office for Nuclear Regulation before decommissioning can proceed[1].

Public exhibitions providing information about the decommissioning proposals will be held as follows:

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Fairlie Village Hall	Main Road, Fairlie, Largs KA29 0AD	24th August 2022, 1pm to 8pm

We are running a virtual exhibition for those who may not be able to attend one of our events that will be accessible from our website www.edfenergy.com/hunterston.

You can provide feedback to the consultation through the following channels:

- Online using the feedback form on our website www.edfenergy.com/hunterston
- Completing a paper feedback form, available at events and document deposit locations or on request using the contact details on this letter
- Emailing us at HNBDecommissioning@edf-energy.com
- Write to us at Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

[1] An application to the Office for Nuclear is required under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended)

Please ensure that you have provided your feedback by **11:59pm** on **19 September 2022**.

We hope that you will find the information useful. I am aware that my colleague has already been in contact to set-up a meeting to discuss the proposals. Should you have any queries related to the consultation prior to or post this arranged meeting, please contact us on 0800 915 3249 or email us at the above address.

Yours sincerely,

Clare Hennessey

EDF Nuclear Decommissioning, Consents and Statutory Engagement Manager

From: HNB Decommissioning <HNBDecommissioning@edf-energy.com>
Sent: 04 August 2022 21:51
To: Katy.Clark.MSP@parliament.scot
Subject: HNB Decommissioning Consultation
Attachments: HNB Decommissioning Consultation Letter.pdf

Dear Katy,

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will be working closely with the Nuclear Decommissioning Authority and Magnox to develop proposals for decommissioning. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site. We are holding a public consultation from **8 August to 19 September 2022**, seeking your views to help inform the decommissioning proposals. The attached letter invites you to take part in this consultation, includes details on consultation events, where to find out more, and how to provide feedback.

Kind regards,

Tom Tremlett PIEMA
EIA Co-ordinator
Nuclear Decommissioning

[redacted]

Nuclear Decommissioning

edfenergy.com

4th August 2022

Dear Stakeholder

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You can provide feedback to the consultation through the following channels:

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- Write to us at Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

[1] An application to the Office for Nuclear is required under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended)

Please ensure that you have provided your feedback by **11:59pm** on **19 September 2022**.

We hope that you will find the information useful. If you have any questions about this letter or the consultation, please contact us on 0800 915 3249 or email us at the above address.

Yours sincerely,

Clare Hennessey

EDF Nuclear Decommissioning, Consents and Statutory Engagement Manager

From: HNB Decommissioning <HNBDecommissioning@edf-energy.com>
Sent: 05 August 2022 08:39
To: STRATHCLYDE_AYR_ADMI@nature.scot; Strathclyde_Ayrshire@nature.scot
Cc: Hennessey Clare
Subject: HNB Decommissioning Consultation
Attachments: Stakeholder Letter EIADR consultation .pdf

Dear Sir/Madams,

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will be working closely with the Nuclear Decommissioning Authority and Magnox to develop proposals for decommissioning. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site. We are holding a public consultation from **8 August to 19 September 2022**, seeking your views to help inform the decommissioning proposals. The attached letter invites you to take part in this consultation, includes details on consultation events, where to find out more, and how to provide feedback.

Kind regards,

Tom Tremlett PIEMA
EIA Co-ordinator
Nuclear Decommissioning

[redacted]

Nuclear Decommissioning

edfenergy.com

4th August 2022

Dear Stakeholder

Re: Hunterston B Power Station Decommissioning Consultation

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will be working closely with the Nuclear Decommissioning Authority and Magnox to develop proposals for decommissioning. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site.

Under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations[1] (the EIADR), an application (an 'EIADR application') must be made to and approved by the Office for Nuclear Regulation prior to carrying out the dismantling or decommissioning work in any nuclear power station.

Prior to the submission of the EIADR application, EDF intend to undertake two rounds of consultation. The first round of consultation will be held from **8 August to 19 September 2022**, seeking views to help inform the decommissioning proposals. This will be a public consultation with both in person and virtual exhibitions, details for which will be accessible from our website www.edfenergy.com/hunterston.

As your organisation are likely to be consulted by the ONR when the EIADR application is submitted by EDF to the ONR (anticipated to be towards the end of 2023), we would very much welcome any early views on the decommissioning proposals set out in the attached Consultation Document. Please note that in parallel we have submitted a request for a pre-application opinion as to the content of the environmental statement. This is available on the ONR website www.onr.org.uk. The ONR may consult your organisation separately on this request if you have been identified as a consultation body under the EIADR.

You can either provide feedback to this pre-application consultation through the channels listed below or if you would prefer a meeting, our team is happy to provide further details on the proposals and answer any queries you may have, either in person or via videocall/Teams.

:

- Use the feedback form on our website www.edfenergy.com/hunterston
- Complete a paper feedback form, available at events and document deposit locations or on request using the contact details below
- Email us at HNBDecommissioning@edf-energy.com

[1] The Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 as amended.

- Write to us at Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

The pre-application consultation will close **11:59pm** on **19 September 2022**.

If you have any questions about this letter or the consultation, please contact us on 0800 915 3249 or email us at the above address.

Yours sincerely,

Clare Hennessey

EDF Nuclear Decommissioning, Consents and Statutory Engagement Manager

Newspaper Advertisements

Climate experts predict new school could be 'underwater' by 2040

BY ROSS HANVIDGE

Chief Reporter

ross.hanvidge@newsquest.co.uk

ARDROSSAN'S new super school - part of the £150 million redevelopment of the town's North Shore - could be underwater by the time some of its new pupils are teenagers, according to a recent study.

However, council bosses have stood firm on their decision to build the campus at the potentially vulnerable shorefront site.

A 'risk map' produced by Climate Central - an independent organisation of leading scientists and journalists who research climate change and its impact on the public - shows swathes of Ayrshire's coastline submerged in rising sea water within decades.

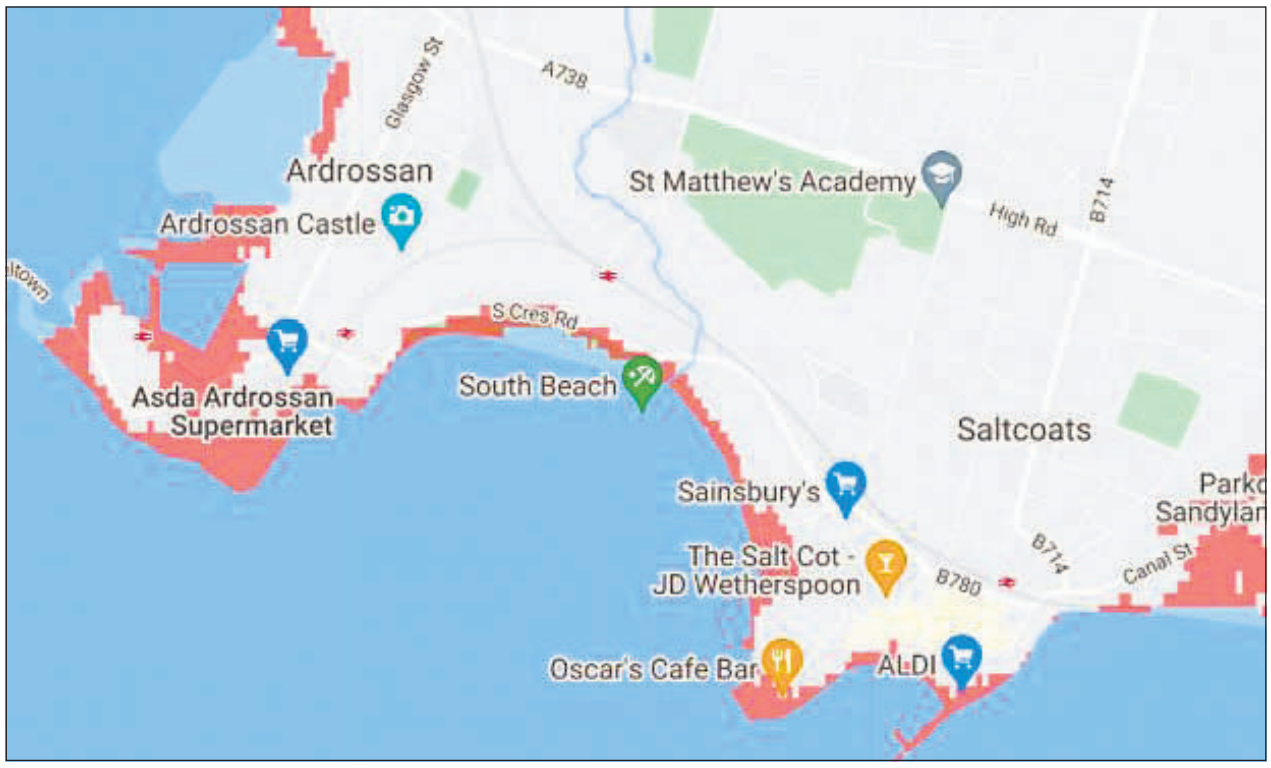
The environmental study projects much of Ardrossan Harbour - including the ferry terminal, railway station and Asda supermarket - to be underwater by 2080.

South Beach and Stevenston beach are also - unsurprisingly - expected to be affected, while the former outdoor pool in Saltcoats could be consumed by rising sea levels by the end of this decade.

But it is the location of the new education and community campus at the former Shell Oil site on the North Shore that should be of most concern to Three Towns residents.

Last month, the **Herald** exclusively revealed that work on the new school has been delayed, with North Ayrshire Council confirming it is now "unlikely [to] open on its previously-expected date of August 2025".

Remediation work was due to start this summer, to enable construction of the new campus to begin in 2023. However, a near-£23 million tender for the initial enabling works has yet to be awarded.



Ardrossan and Saltcoats sea level predictions for 2040

> "We all have a part to play in minimising the impact of the climate crisis"
>
> North Ayrshire Council

In response to the recent Climate Central study, a spokesperson for North Ayrshire Council said: "Current predictions are that by the 2090s, the sea level in the Firth of Clyde could rise by a maximum of around 0.55m in a medium greenhouse gas emissions scenario.

"Scotland has introduced a risk-based flood risk management plan which is renewed every six years and identifies issues and attempts to address them based on the benefits of protecting 'at risk' assets.

"The Ayrshire Shoreline Management Plan recommends a long-term policy of 'holding the line' within Ardrossan and Saltcoats. The significant coastal defences that are already present will continue to be maintained.

"Over the longer term, extending and improving the existing defences could be considered to protect properties and roads from coastal flooding and erosion.

"We all have a part to play in minimising the impact of the climate crisis on our communities."

Climate Central admits the calculations may include "some error".

NHS campaign warns of Lyme disease rise

AN NHS campaign that aims to help people deal with bug bites has released advice as Lyme disease cases rise across Scotland.

The Hello Summer campaign hopes to encourage people to be aware and cautious of Lyme disease, a bacterial infection that can be spread to humans through bites from infected ticks.

Symptoms include a circular rash around the infected bite, a high temperature, feeling hot and shivery, headaches, muscle and joint pain, tiredness, and loss of energy and can typically last for a few weeks.

Usually, symptoms appear one to four weeks after infection begins, but will sometimes appear up to three months after one is bitten.

Occasionally, people who are infected will still have symptoms such as tiredness, aches, and loss of energy years after their diagnosis which can have a severe impact on their quality of life.

To avoid tick bites and Lyme disease it is advised that you cover your skin while walking outdoors, tuck trousers into socks, use insect repellent containing DEET on clothes and skin, stay on clear paths where possible, and wear light-coloured clothing.

If you are bitten by any insect and experience a serious allergic reaction, call 999.

Free wood giveaway

NORTH Ayrshire Council are offering residents an opportunity to collect free wood and wood chip from their Dreghorn recycling centre next week.

The woodchip can be used to spruce up gardens by using it for landscaping, pathways and surfacing play areas while the wood logs can be used for a variety of projects.

Those wishing to collect a share of the free wood on offer can do so from the former Dreghorn recycling centre on Wednesday, August 10 from 10am-2pm or Thursday, August 11 from 5-8pm.

The event forms part of the council's focus on sustainability. By giving away the wood they have collected for local reuse, the council can avoid the environmental impact and costs of transporting and processing the wood for recycling or energy recovery.

Councillor calls for a dedicated cycle path on Prom

A NEW consultation on Largs Prom needs to get 'wheely serious' about providing a dedicated cycle path according to a local councillor.

Tom Marshall has spoken out after study was carried out by North Ayrshire Council to improve the current layout of the seafront to enhance the 'user experience'.

Stantec have been appointed as lead consultancy to assist the council in gauging public opinion - with an online survey now underway.

However, Cllr Marshall is concerned that a large number of the town's elderly population don't engage with social media and has called for more ways for local people to make themselves heard.

The area being looked at is the prom stretch from Yacht Haven to Aubery Park, which is approximately four kilometres long.

Council chiefs say they want to create a 'safer, more attractive and more accessible prom' which will encourage more people to get out walking.

An online survey will run until September 9 and the public's feedback will be key to the future concept design.

The consultation is asking the public to identify challenges faced by those walking, cycling and wheeling along the promenade.

Cllr Marshall added: "There is a drive on from the Scottish Government and the council for 'active travel' but many people don't really understand what this means. Effectively active travel is not using private transport and using public modes of getting around if possible, such as walking, cycling or running. This is in effect is what they are pushing.

"If they want to promote using the prom for wheeling or cycling, they really need a dedicated lane for it.

"I use the prom every day when walking the dog and it can be quite dangerous if cyclists come from behind and don't use their bells. Over the last couple of days I've also seen electric scooters there going at 20mph, which could be a hazard.

"People must remember that electric scooters are currently illegal to use on public roads and pathways.

"The council is employing outside consultants to carry out the survey and they will face a steep learning curve when it comes to gaining local knowledge of the area, so the public needs to play its part in informing them of their views."

Cllr Marshall also ruled out a 'park and ride' facility due to cost.

He said: "It is a non-starter - it would cost a fortune. The council produced a paper which assessed the situation realistically this is not an option going forward."

The online consultation is available at *tinyurl.com/LargsPromenadeATStudy*

By Calum Corral
Calum.Corral@newsquest.co.uk

Eatery to open Sunday

LARGS' newest restaurant will open its doors to the public on Sunday.

Riviera Largs has taken over the site of the former Bean and Leaf Café and will bring a Parisian feel to Gallowgate Street. The restaurant is opening on Sunday, but will host an exclusive launch night in the days before.

The new business is the latest venture from Allegria owner Maria Timis.

Kelburn hosts new market

AN exciting artisan makers market is coming to Kelburn Castle and estate in September.

The event will see over 30 stalls packed with hand-crafted goods and locally produced food and drink.

It takes place from 10am until 4pm on September 24 and 25 and will be free to enter, with a £5 fee for the car park.

For more information go to *www.kelburnestate.com*

Press Releases

Public consultation taking place on Hunterston B decommissioning proposals

EDF, the operator of Hunterston B nuclear power station is gathering views on proposals for decommissioning the North Ayrshire site.

The site stopped producing electricity in January after 46 years of zero-carbon generation and defueling is now well underway.

Defueling, which is expected to take around 3.5 years, involves the removal of all the spent nuclear fuel from the reactors. It is packaged up and sent by train to Sellafield for processing and storage.

Once that job is complete EDF will transfer the site to the Nuclear Decommissioning Authority for its subsidiary, Magnox, to continue with decommissioning, including the dismantling and demolition of plant and buildings on the site.

Over the next few years EDF will be working with the NDA and Magnox to prepare for this stage.

Before those proposals are finalised EDF is holding a six week public consultation, from 8th August to 19th September.

Station Director Joe Struthers said: "We understand that now generation has ended people will have questions about what will happen next at the site. We want to take this opportunity to try and answer some of those questions and to hear from people in nearby communities. These views will help to inform the decommissioning proposals which will be submitted to the Office for Nuclear Regulation for approval before decommissioning can proceed.

"We want to make this consultation as accessible as possible so as well as a series of community events and the ability to respond by post, we also have a virtual exhibition which people can visit to view all of the relevant documents and to feed back."

Public events are taking place during August in Millport, West Kilbride, Largs and Fairlie.

You can find full details on at edfenergy.com/hunterston

Notes to editors:

Full details of public events:

Event venue	Address	Date and Time
Millport Development Association Hall	The Garrison, Millport, Isle of Cumbrae KA28 0DG	13th August 2022, 10am to 5pm
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Fairlie Village Hall	Main Road, Fairlie, Largs KA29 0AD	24th August 2022, 1pm to 8pm

For more information contact:

Fiona McCall – Senior External Affairs Manager – fiona.mccall@edf-energy.com

Or call EDF's media line on 01452 652233 and a member of the team will respond.

About EDF

EDF is helping Britain achieve Net Zero by leading the transition to a cleaner, low emission electric future and tackling climate change. We are Britain's biggest generator of zero carbon electricity – from our nuclear power stations and more than thirty wind farms – meeting around one-fifth of the country's demand. In addition to being one of the largest suppliers to British homes and businesses, we're a leading supplier of innovative energy solutions that are helping our customers become more energy efficient and independent. We continue to invest in the UK's low carbon energy infrastructure, constructing the first new nuclear power station in a generation at Hinkley Point C, leading the development of plans for Sizewell C in Suffolk, and construction, planning and development across a range of technologies including onshore and offshore wind, solar and battery storage.

EDF is part of EDF Group, the world's biggest electricity generator. In the UK we employ around 11,000 people.

To download photos and see all EDF news please visit our media centre:
www.edfenergy.com/media

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Hunterston B is a nuclear power station on the west coast of Scotland.
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If you haven't already given us your views on the #decommissioning strategy for #Hunterston B #nuclear power station in North #Ayrshire, make sure you check out our virtual exhibition and give us your feedback! The deadline for responses is Sunday 19 September.

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This week we launched a public consultation on our decommissioning plans for #Hunterston B in North #Ayrshire, which this year ended its incredible 46-year run of generating #zerocarbon ⚡ electricity.

You can give us your views on the #decommissioning strategy, by either:

👩💼 Attending one of our local in-person events
💻 Visiting our virtual exhibition, and providing feedback online

The consultation will be open until 19 September 2022, and you can find out more here 👉
http://ow.ly/ayvq50KfWkV

53 · 4 Comments

Like Comment Share

Mark Craven. TMIET (Eng Tech) 1mo
Gas Turbine Lifecycle Engineer, Rolls Royce Bristol

And this is why Nuclear is so expensive, it still needs manning and managing for 40 years without generating a single Mw.
The 3 C's in Nuclear stand for Cooling, Containment, and Control. The 3 C's we need to consider are Carbon Capture Coal. The cheapest and greenest form of energy production on the planet. And the jobs it would create in this country alone, especially if we open up some mines, would be 10 fold what New Nuclear will bring. You know it makes sense.

Like · Reply

Martin Connolly 1mo
Owner of Advanced Lifting & Rigging Solutions

Just a Reminder the ALRS Advanced Lifting & Rigging Solutions are on hand to assist with the defuelling and decommissioning process. We are an EDF approved Contract Partner.
www.advancedliftingsolutions.co.uk

Like · Reply | 2 Reactions

Fábio Cardoso 1mo
Production Engineer

Amazing materials to explain all decommissioning steps.

Like · Reply | 1 Reaction

Jamie Black 1mo
Experienced Business Change and Transformation Consultant

Euan Caskie FYI

Like · Reply

See more comments

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Appendix E

Response to Feedback Received - Consultation Round 1

ID	Respondent	Issue Raised	Response from EDF
Consultation			
CN01	Largs Community Council	Concern that the consultation materials do not provide sufficient information on the visual state of the site during the Quiescence phase.	Consultation materials were developed at an early stage in the development of the Proposed Works to give consultees opportunity to shape the proposals. Consultation materials outlined that the height of the Safestore that would be retained throughout the Quiescence period would be a maximum height of the existing reactor building (66.5 m) and that all other buildings on-site would be removed during the Preparations for Quiescence phase.
CN02	Largs Community Council	Concern that the consultation materials do not provide sufficient information on how the site's viability for future use will be ensured.	Future use of the site will not be achieved for many decades. EDF first need to defuel the reactors over the next four years and prepare for the commencement of decommissioning. Thereafter, the NDA and Magnox Ltd will take on the responsibility for decommissioning and, in time, will undertake further stakeholder engagement on how to optimise the re-use of the site.
CN03	Local Community	Satisfied that the consultation brochure was informative.	We note this comment and welcome the support for the consultation brochure.
CN04	Local Community	Suggestion that the consultation events were ineffective as EDF staff lacked knowledge about Magnox Ltd activities.	EDF and Magnox Ltd have been working together to develop the decommissioning proposals for Hunterston B. To date we have made good progress including taking a joint decision to use the existing ILW store on Hunterston A site to store ILW retrieved from Hunterston

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			B. Work to explore further opportunities and synergies continues.
CN05	Katy Clark MSP	Suggestion that local communities and trade unions be closely involved and listened to at every stage of decommissioning.	EDF, NDA and Magnox Ltd have been engaging with local communities and trade unions and will continue to be engaged throughout the decommissioning process through established fora such as the Hunterston Site Stakeholder Group.
CN06	Fairlie Community Council	Satisfied that the materials displayed at consultation events were informative.	We note this comment and welcome the support for the materials displayed at the consultation events.
CN07	Fairlie Community Council	Satisfied that staff at consultation events provided informative answers to questions.	We note this comment and welcome the support for the answers provided by staff at the consultation events.
CN08	Fairlie Community Council	Satisfied that EDF gave an informative presentation at the Fairlie Community Council meeting and answered the Council's questions.	We note this comment and welcome the support for the presentation delivered at the Fairlie Community Council meeting.
CN09	Local Community	Concern that aerial maps provided at the consultation omitted the white colour of Hunterston A.	The 3D images of the Hunterston B site were provided to aid understanding of the existing layout of the Hunterston B site and the different phases of decommissioning. In order to distinguish between the works to decommission Hunterston B from the decommissioning works on the

ID	Respondent	Issue Raised	Response from EDF
			adjacent site, the Hunterston A buildings were shaded grey.
CN10	Local Community	Query as to how the public would be kept informed of the decommissioning process.	Following the first round of consultation, a second round of consultation was undertaken with further information about the decommissioning proposals. The established Hunterston Site Stakeholder Group, with representation from local Community Councils, local Councillors, and North Ayrshire Council, will continue to be kept up to date on the decommissioning process.
CN11	Local Community	Concern that the consultation materials do not include information on measures to ensure no incidents during the removal of flasks by train.	The focus of the consultation was on our developing plans for decommissioning rather than the process of defueling and therefore flask transport management. The transport of radioactive waste is overseen by the Office for Nuclear Regulation including inspection and enforcement. The transport of flasks by train is undertaken by the NDA's subsidiary Nuclear Transport Solutions Direct Rail Services who, operating under stringent safety and security measures, have a 100% nuclear safety record.
CN12	Local Community	Concern that consultation materials do not provide information on hazardous dose rates and treatment.	Doses to members of the public in the UK are tightly controlled and regulated to within safe levels. The total dose from all pathways and sources of radiation was 0.0006 mSv in 2021, 0.6% of the dose limit. Discharges during decommissioning, following the removal of 99% of radioactive material from the Hunterston B site, are likely to be lower.

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			Further information can be found in the Radioactivity in food and the environment (RIFE) reports which can be found here: https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports
CN13	West Kilbride Community Council	Concern that the consultation materials do not include information on the requirement for cooling water to be discharged.	Consultation materials for Consultation 1 were developed at an early stage in the development of the Proposed Works to give consultees opportunity to shape the proposals. Changes to and arrangements for the management of cooling water discharge will be considered. The Cooling Water Pumps are anticipated to remain in use at site until a new Active Effluent Discharge Line has been constructed as part of the decommissioning works.
Decommissioning approach			
DA01	Largs Community Council	Support for the approach to decommissioning.	We note this comment and welcome the support for our decommissioning approach.
DA02	Largs Community Council	Suggestion that the SSG remain involved during decommissioning to provide scrutiny.	The Hunterston Site Stakeholder Group is a standing forum for communications between the NDA, site operators and the local community and the development of decommissioning proposals will continue to be informed by the views of this forum.
DA03	Local Community	Suggestion that radioactive material be removed from the	Work continues on developing the right decommissioning plan for Hunterston B. The deferred dismantling

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		site as quickly and safely as possible.	approach is currently considered the preferred approach to decommissioning HNB due to: • Lower dose rates – the deferral of Higher Activity Waste, allows time for radioactive decay, reducing dose rates in line with regulatory principles; • Lower Higher Activity Waste volumes, resulting in reduced processing, packaging and reduced need for interim waste storage facilities in the absence of a long term management solution in-line with Scottish policy; and • Lower overall decommissioning cost associated with disposal of lower volumes of Higher Activity Waste.
DA04	Local Community	Suggestion to follow the US DECON method of rapid decommissioning.	Work continues on developing the right decommissioning plan for Hunterston B. The deferred dismantling approach is currently the preferred approach to decommissioning for reasons provided above (see response to DA03).
DA05	Local Community	Suggestion that decommissioning works be completed as quickly as possible.	
DA06	Local Community	Query as to whether the decommissioning programme may extend or if it is fixed.	Consultation materials were developed at an early stage in the development of the Proposed Works to give consultees opportunity to shape the proposals.

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DA07	Local Community	Concern that the decommissioning programme will likely extend.	The indicative programme for the decommissioning of Hunterston B is based on our best understanding of what will be required to reach final site clearance and is underpinned by years of planning and feasibility work and knowledge of the AGR fleet. However, defueling and decommissioning will be a complex job over a long period of time and as such the indicative programme may be subject to change.
DA08	Largs Community Council	Suggestion that the decommissioning process be mindful of potential future site use.	Future use of the site will not be achieved for many decades. EDF first need to defuel the reactors over the next four years and prepare for the commencement of decommissioning. Thereafter, the NDA and Magnox Ltd will take on the responsibility for decommissioning and, in time, will undertake further stakeholder engagement on how to optimise the re-use of the site.
DA09	RDK Construction Ltd	Query as to whether the site is handed back to Magnox Ltd after EDF completes the decommissioning of the power station.	EDF will transfer the site to the NDA after EDF has finished the defueling stage which is currently anticipated to complete in 2025. NDA will utilise their subsidiary Magnox Ltd to manage the decommissioning of the site.
DA10	RDK Construction Ltd	Query as to the timescale for completion of works before EDF hands the decommissioned site to Magnox Ltd.	Following defueling (expected to take approximately 3.5 years from the end of generation), in accordance with an agreement EDF has made with UK Government, the Hunterston B site will be transferred to the NDA, subject to regulatory approvals, with Magnox Ltd becoming the new Site Licence Company and undertaking the decommissioning activities.

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DA11	Local Community Fairlie Community Council	General support for the decommissioning proposals.	We note this comment and welcome the support for our decommissioning proposals.
DA12	Fairlie Community Council	Support for the assessment of options for decommissioning approaches.	We note this comment and welcome the support for our approach to considering the options for decommissioning strategies.
DA13	Fairlie Community Council	Suggestion that Early Safestore strategy could help retain skills and jobs.	Work continues on developing the right decommissioning plan for Hunterston B. The deferred dismantling approach is currently the preferred approach to decommissioning for reasons provided above (see response to DA03). We also understand that the workforce at Hunterston A and B will be key to the successful delivery of decommissioning now and in the future. EDF and Magnox Ltd are working together to understand the staffing requirements for deconstruction. The combined AGR and Magnox Ltd decommissioning missions affords the NDA group a wider focus on skills and job retention.
DA14	Local Community	Suggestion that local communities need reassurance that best practice is being followed during the decommissioning process and that public health will be protected.	Decommissioning will be undertaken in accordance with government policy and legislation, in a way that protects people and the environment. This is regulated by the ONR and SEPA through the requirements of the Nuclear Site Licence and environmental permits that control and manage our operations and decommissioning.

ID	Respondent	Issue Raised	Response from EDF
DA15	Local Community	Support for prompt dismantling approach due to shortened decommissioning length.	Work continues on developing the right decommissioning plan for Hunterston B. The deferred dismantling approach is currently the preferred approach to decommissioning for reasons provided above (see response to DA03).
DA16	West Kilbride Community Council	Suggestion that Magnox Ltd/NDA have a proposal with BEIS for approval of continued decommissioning without the period of quiescence, contrary to the proposals.	Having reviewed different options for decommissioning the AGR stations and Hunterston B specifically, a period of quiescence to allow for radioactive decay is judged to be technically the best approach for Hunterston B at this time. In line with NDA and Magnox Ltd's move to site specific decommissioning strategies work is underway to consider whether there is a case to progress decommissioning either as a continuous process to site end state or with a shorter period of deferral.
DA17	West Kilbride Community Council	Concern that the defueling timescale does not account for potential delays, such as due to lack of flasks from Sellafield and necessary maintenance and repairs.	The timescale estimated for the defueling phase (approx. 3 years following end of generation) has been carefully calculated and is underpinned by our experience of defueling and performance during the operation of Hunterston B; efficiencies and investment made in our defueling plant and processes; and agreement with Sellafield on the capacity for receiving flasks.
DA18	West Kilbride Community Council	Suggestion that a breakdown of the defueling timetable be provided.	Updates on defueling progress are provided via the Hunterston Site Stakeholder Group.

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Environment			
EN01	Local Community	Suggestion that the Safestore be designed to blend in with surroundings.	The design of the Safestore is yet to be determined and will be subject to a planning application, involving further public consultation on materials and appearance, in due course. The choice of materials will have regard to the visual impact of the Safestore building, functionality and long-term maintenance.
EN02	Local Community West Kilbride Museum	Suggestion that the seaward side of the Safestore be landscaped to mitigate visual impacts.	
EN03	Local Community	Suggestion that the Safestore be designed to blend in with surroundings.	
EN04	Local Community	Concern about the visual impact of the Safestore on the coastline.	
EN05	Local Community	Suggestion that structures be made less visible, unlike Hunterston A.	This feedback will be fed into the ongoing studies looking into the options for the Safestore at Hunterston B.
EN06	Local Community	Suggestion that a heritage centre about the power station be developed.	We will seek further thoughts on this with relevant stakeholders as we continue to develop our decommissioning proposals to gain greater understanding of public interest of the heritage value of the power station.
EN07	Local Community	Suggestion that the control room be preserved in a science museum.	

ID	Respondent	Issue Raised	Response from EDF
EN08	Local Community	Concern about the safety impacts of climate change and rising sea levels on the decommissioned power station.	The Safestore structure is being designed with ongoing safety in mind, including the potential for increased severity of inclement weather and flooding. As part of the Environmental Statement under the EIADR, the potential for flooding over the lifecycle of the decommissioning proposals will be assessed. This assessment will incorporate the increased flood risk scenarios and sea level rise associated with Climate Change.
EN09	Local Community	Query as to the measures in place to mitigate the safety impacts of climate change and rising sea levels on the decommissioned power station.	
EN10	Largs Community Council	Concern that the proposals do not adequately consider the visual impacts of decommissioning and deconstruction.	The visual impacts of the decommissioning proposals during each phase of the decommissioning process will be considered within the Environmental Statement to be submitted to ONR under the EIADR.
EN11	Largs Community Council	Suggestion that a landscaping plan be created to minimise long-term visual impacts.	The potential use of landscaping to mitigate visual impacts of the decommissioning proposals will be given further consideration as part of the assessment of visual impacts in the Environmental Statement.
EN12	Largs Community Council	Suggestion that decommissioned areas of the site be restored to nature as much as possible.	Land surrounding Hunterston B is designated as an area for future industrial and commercial growth in both local policy and draft national policy. With this in mind, the current assumption is that the site will be decommissioned to a level where it is suitable to re-use as a brownfield site, rather than returned to nature/greenfield.

ID	Respondent	Issue Raised	Response from EDF
EN13	Fairlie Community Council	Suggestion that aerial and sea discharges be minimised.	Whilst discharges from the site are likely to compare to the operation of the power station, some discharges will still be required during decommissioning. To satisfy the conditions of the required permit for discharges, waste will be managed utilising Best Practicable Means (BPM) in order to minimise the volume and radioactivity of radioactive waste discharges to the environment. This permitting regime therefore ensures that effects from radioactive discharges and disposals to the environment are tolerable and acceptable.
EN14	Fairlie Community Council	Suggestion that regulators retain rigorous scrutiny of additional aerial and liquid discharges over the course of decommissioning.	Regulators will continue to have oversight and regulatory control over activities at Hunterston B throughout decommissioning.
EN15	Fairlie Community Council	Query as to the future discharge route and method planned for active liquid discharges after the decommissioning of Hunterston B seawater pumps.	The discharge location of active effluent will remain the same through the Preparations for Quiescence phase. To facilitate this, a new pipe is required to be installed within the CW Outlet Tunnel between the end point of the existing AEDL at the Seal Pit and the Cooling Water Outfall within the CW Outlet tunnel. The existing EASR 18 permit will be varied in due course prior to any discharges made under these new arrangements. Under this varied permit, the site operator would still need to demonstrate discharges are Best Practicable Means (BPM) the levels of pollutant are ALARP and are acceptable to the local environment.

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EN16	Fairlie Community Council	Suggestion for no radioactive discharges into waterways as a result of changes to routes and methods for active liquid discharges due to waterways now being used by locals and visitors for recreational purposes.	Whilst discharges from the site will reduce compared to the operation of the power station, some discharges to the marine environment will still be required during decommissioning. To satisfy the conditions of the required permit for discharges, waste will be managed utilising Best Practicable Means (BPM) in order to minimise the volume and radioactivity of radioactive waste discharges to the environment. This permitting regime therefore ensures that effects from radioactive discharges and disposals to the environment are tolerable and acceptable.
EN17	Fairlie Community Council	Suggestion that the Safestore reduce the height of the reactor buildings and be clad to minimise visual impacts on Fairlie and Cumbrae.	The exact height and footprint of the Safestore is subject to further feasibility work to determine the extent to which plant can be removed. The cladding of the Safestore is yet to be determined and will be subject to a planning application, involving further public consultation on materials and appearance, in due course. The choice of materials will have regard to the visual impact of the Safestore building, functionality and long-term maintenance. For the purposes of the assessment in the Environmental Statement, a full height Safestore has been assessed which is grayscale/blue in colour.
EN18	Local Community	Concern about the environmental impact of decommissioning works on local communities.	To gain approval for the decommissioning to proceed, EDF will undertake an Environmental Impact Assessment that will be submitted to the ONR and will require their approval prior to the commencement of

ID	Respondent	Issue Raised	Response from EDF
			decommissioning works. This EIA, in the form of an Environmental Statement, will detail the impact of the decommissioning proposals on local communities as receptors within the local environment.
EN19	Local Community	Concern about the visual impact of the temporary weather coat of Hunterston A.	Noted. This feedback from the community has been passed on to Magnox Ltd for their awareness.
EN20	Local Community	Concern that the temporary weather coat used on Hunterston A could be applied to Hunterston B, and that this would have adverse visual impacts.	Feedback from this consultation is being fed into ongoing studies regarding the Safestore at Hunterston B. The design of the Safestore will be subject to a planning application, involving further public consultation on materials and appearance, in due course. The choice of materials will have regard to the visual impact of the Safestore building, functionality and long-term maintenance.
EN21	Local Community	Concern about the visual impact of the decommissioning proposals on the local area and character.	By the end of the Preparations for Quiescence phase, it is anticipated that all site buildings except for the 'Safestore' will be removed from the Hunterston B site. The Safestore will itself be no taller than the existing reactor building and will be located on a smaller footprint than the combined existing reactor building and turbine hall. EDF are aware of comments received during this consultation regarding the cladding of the Safestore structure. This feedback will inform ongoing optioneering studies regarding the Safestore.

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EN22	Local Community	Concern that the local marine environment contains marine life capable of inclusion in the food chain.	The total dose from all pathways and sources of radiation was 0.006 mSv in 2021, 0.6% of the dose limit which was 0.1% increase on 2020. Further information on dose rates from Hunterston and other UK nuclear facilities can be found in the Radioactivity in food and the environment (RIFE) reports: https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports
EN23	Local Community	Query as to how the marine environment will be protected from radioactive contamination.	To discharge to the environment, the site is required to have an environmental permit regulated by the Scottish Environmental Protection Agency (SEPA) under the Environmental Authorisations (Scotland) Regulations 2018. This permit, which has been in place during the operational period and will also be required for decommissioning require the site to demonstrate that Best Practicable Means (BPM) in order to minimise the volume and radioactivity of radioactive waste discharges to the environment have been utilised. This permitting regime therefore ensures that effects from radioactive discharges and disposals to the environment are tolerable and acceptable.
EN24	Local Community	Query as to how the seabed and shore would be decontaminated in the event of radioactive contamination.	As outlined in the response to EN22, the likelihood of radioactive contamination from our activities are low due to the requirement to follow BPM to reduce the volume and radioactivity for all discharges under the requirements of our environmental permits. Emissions of radioactive discharges are likely to reduce as a result of

ID	Respondent	Issue Raised	Response from EDF
			decommissioning on the site compared to the operational state.
EN25	Local Community	Query as to how air contamination from demolition works would be prevented.	The Environmental Statement will assess the potential for dust pollution and emissions from traffic as a result of decommissioning activities. This will identify suitable mitigation measures required to prevent significant effects from the works at residential, business and ecological receptors. These mitigation measures will be brought into the Environmental Management Plan for the site as appropriate to mitigate effects which will then govern how the works are managed on site.
EN26	Local Community	Concern about dust pollution during the dismantling process.	See response to EN25.
EN27	Local Community	Concern about noise pollution during the dismantling process.	The potential effects of noise generated during the decommissioning activities on site, and the impact of noise generated from traffic associated with the decommissioning works will be assessed as part of the Environmental Statement. Construction and deconstruction activity will be undertaken in accordance with the relevant British Standard to prevent significant effects at local receptors. Management measures will be set out in an Environmental Management Plan which will be maintained and updated during decommissioning.
EN28	Local Community	Concern about potential leakage and runoff to the surrounding area due to	We are currently developing our understanding of existing pollutant contamination on-site so we can better understand the potential risks of existing contamination

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		extreme weather events caused by climate change.	on site to the local environment, and the impact of our decommissioning activities. The impact of our works on existing site contamination will be assessed in the Environmental Statement under the Soils and Geology chapter of the Environmental Statement. The Environmental Statement will also assess the potential impact of increased severity of rainfall and sea level rise associated with climate change on flood risk on the site.
Final Site Clearance			
FS01	Local Community	Suggestion that the site be retained for use for nuclear power following final site clearance.	Future use of the site will not be achieved for many decades. EDF first need to defuel the reactors over the next four years and prepare for the commencement of decommissioning. Thereafter, the NDA and Magnox Ltd will take on the responsibility for decommissioning and, in time, will undertake further stakeholder engagement on how to optimise the re-use of the site. Plans for any future development will be developed through the local plan process and in accordance with national policy in place at that time.
FS02	Local Community	Suggestion that the substations be used for alternative power sources.	This will be a matter for Scottish Power Transmission and Scottish Power Energy Networks as the responsible body for maintenance and investment in the transmission network.
FS03	Local Community	Query as to whether the site was considered for the STEP	The Hunterston B site was not shortlisted for the STEP Fusion protype by the UK Government.

ID	Respondent	Issue Raised	Response from EDF
		fusion prototype reactor due to existing geographic and staffing advantages.	
FS04	Local Community	Suggestion that the site should never be used for housing following final site clearance.	See response to FS01.
FS05	Local Community	Suggestion that the site be used for coal or nuclear power station following final site clearance.	See response to FS01.
FS06	Local Community	Suggestion that strict guarantees be made that no radioactivity is present following final site clearance before further development.	Future use of the site will not be achieved for many decades and will be planned in accordance with legislation and policy in place at that time. However, based on current legislation and policy, it is envisaged that the site will continue to be regulated by SEPA who have a duty to protect the public and the environment from harm by radioactive substances. SEPA only release the site from regulation once the site operator has met all safety standards, demonstrated through an environmental safety case. The site operator is required to keep the risk of radiation exposure to people as low as reasonably practicable, taking into account costs, potential future uses of the site, and wider environmental effects

ID	Respondent	Issue Raised	Response from EDF
FS07	Largs Community Council	Query as to what restrictions there would be on future uses of the site.	See response to FS01.
FS08	Largs Community Council	Query as to whether the site could be used again for nuclear generation during the Quiescence phase.	During the Quiescence phase, following plant dismantling, it will not be possible for the site to be used for generation.
FS09	Largs Community Council	Suggestion that the nuclear site license should not prevent it being used for industrial purposes or future nuclear energy generation.	See response to FS01.
FS10	Largs Community Council	Suggestion that the site could be used for new nuclear development in Scotland and proposals should ensure they do not prevent this use if policy is changed.	See response to FS01.
FS11	Largs Community Council	Suggestion that the removal of high voltage grid connections be moved to the end of decommissioning in case of future energy generation on site.	This will be a matter for Scottish Power Transmission and Scottish Power Energy Networks as the responsible body for maintenance and investment in the transmission network.

ID	Respondent	Issue Raised	Response from EDF
FS12	RDK Construction Ltd	Query as to whether EDF have discussed the future use of the site as brownfield industrial land with Magnox Ltd, NAC and the Scottish Government.	See response to FS01.
FS13	Fairlie Community Council	Suggestion that future uses of the site and adjacent land be scrutinised by EDF, Magnox Ltd and regulatory authorities to ensure no additional risk to the safety of working sites during defueling.	Future uses of the site are not planned during defueling and indeed for many decades. Future use or development of adjacent land would be subject to the submission of planning applications to North Ayrshire Council, and in consultation with EDF (as the current adjacent land owner and Magnox Ltd as the future land owner) and the relevant regulatory bodies.
FS14	Fairlie Community Council	Support for compliance with SEPA's Guidance on Requirements for Release of Sites from Radioactive Substances Regulation.	Noted.
FS15	Fairlie Community Council	Suggestion that the site be left as a brownfield site to enable its re-use.	Plans for any future development will be developed through the local plan process and in accordance with national policy in place at that time. Hunterston is currently designated as a Strategic Development Area in national and local planning policy and as such it is the
FS16	Local Community	Suggestion that the site be returned to greenfield following Final Site Clearance.	

ID	Respondent	Issue Raised	Response from EDF
FS17	Local Community West Kilbride Museum	Suggestion for landscaping and tree planting following Final Site Clearance.	current working assumption that the site would be left as a brownfield site to enable re-use.
FS18	Local Community	Suggestion that an end state layout plan of the site be devised early to ensure the site does not fall into decay and misuse.	The site, including all plant, buildings and infrastructure will be managed and appropriately maintained during the decommissioning process to ensure site safety and security.
FS19	Local Community	Suggestion that the site be used for purposes other than strategic development.	Future use of the site will not be achieved for many decades. The NDA and Magnox Ltd will take on the responsibility for decommissioning and, in time, will undertake further stakeholder engagement on how to optimise the re-use of the site. Plans for any future development will be developed through the local plan process and in accordance with national policy in place at that time.
General			
GE01	Local Community	Query as to how much the Proposed Works would cost.	The cost for the whole fleet is approximately £20 bn (this includes defueling and the longer term costs of decommissioning). The cost to decommission Hunterston B will be a portion of this. The decommissioning of the EDF's eight nuclear stations will be paid for by the Nuclear Liabilities Fund. You can find out more about the Fund and it's financing here: https://www.nlf.uk.net/about-us/our-purpose

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GE02	Local Community	Suggestion that coal and nuclear power is needed to meet energy demand.	Proposals to increase the contribution that coal and nuclear power make to meeting energy demand would not accord with the current Scottish Energy Strategy.
GE03	Local Community	Suggestion that decommissioning should not take place until a replacement nuclear power station is in place.	EDF have a responsibility to decommission Hunterston B following the decision to end generation. There is no obligation to replace the power station. Moreover, a proposal for a new nuclear power station using existing technologies would be opposed by current Scottish Government policy.
GE04	Local Community	Concern that the Proposed Works will be more complicated and expensive than planned due to the vagueness of the proposals.	EDF have been preparing for decommissioning for a number of years, with plans underpinned by feasibility studies, knowledge of the station plant, and waste characterisation. However, this is a long term project, forecasting work plans over a 100 year period is challenging, and best practice in decommissioning will continue to develop. The site will transfer to the NDA and managed by their subsidiary Magnox Ltd following the completion of defueling at the site. Magnox Ltd are already working collaboratively with EDF regarding the further development of the decommissioning proposals to share their substantial decommissioning experience.
GE05	Local Community	Query as to how much the Proposed Works would cost.	See response to GE01.
GE06	Local Community	Concern about the reliance on renewable energy despite storage issues.	Noted. However, this feedback is outside the scope of what can be considered in developing the decommissioning plans for Hunterston B.

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GE07	Local Community	Suggestion that nuclear energy is a good alternative to fossil fuel generation at a time of high energy costs.	Noted. However, this feedback is outside the scope of what can be considered in developing the decommissioning plans for Hunterston B.
GE08	Local Community	Suggestion that the decommissioning process is evidence that nuclear power is not as low-cost and environmentally friendly as portrayed.	The costs of decommissioning, approximately £20 bn across the seven AGR stations are published and well reported. Over the course of their generating lives the UK's nuclear fleet has generated more than 2000TWh of zero-carbon electricity, enough to power every UK home for 18.5 years. The Nuclear Industry Association estimates that the carbon saved by the fleet's output (versus an historic mix of coal and gas fired power) has a value of around £110bn based on estimated carbon savings of 1.4bn tonnes.
GE09	Local Community	Suggestion that renewables and storage development should be the focus of energy development.	Noted. However, this feedback is outside the scope of what can be considered in developing the decommissioning plans for Hunterston B.
GE10	Health and Safety Executive	Suggestion that the site is located within HSE land use planning zones which are based on hazardous substances planning consent for Hunterston A, which North Ayrshire Council needs to confirm with HSE if still in place.	Noted.

ID	Respondent	Issue Raised	Response from EDF
GE11	Health and Safety Executive	Suggestion that North Ayrshire Council considers the hazardous substances planning consent granted to Hunterston B in 2013 and inform HSE whether it has been revoked.	Noted.
GE12	Fairlie Community Council	Suggestion that Hunterston B being the first AGR decommissioned alongside an existing decommissioning site provides potential synergies and extra risks.	NDA, Magnox Ltd and EDF are working together to develop the decommissioning plans with a view to realising opportunities for synergies such as shared buildings and infrastructure and utilising skills and capabilities across both sites. Risks within each site along with risks associated with cross site synergies are being managed.
GE13	Fairlie Community Council	Support for the retention of the NSL area.	We note this comment and welcome the support for the retention of the NSL area.
GE14	Local Community	Suggestion that higher costs be absorbed now to avoid future issues.	Key drivers for the decommissioning proposals are risk and hazard reduction and reducing lifetime costs. This starts with the removal of spent fuel from the site, removing 99% of radioactive material.
Health and Safety			
HS01	Local Community	Concern that safety briefings and advice in case of radiation incident has not been provided to local communities.	EDF have considered a wide range of accident scenarios and evaluated the risk and hazards to local communities. Recommendations have been made to North Ayrshire Council on arrangements for emergency planning. North

ID	Respondent	Issue Raised	Response from EDF
			Ayrshire Council have judged that as the risk rating for the site remains very low, that only a small number of households will continue to receive information.
HS02	Local Community	Query as to whether there are any radiation monitoring stations around the power station.	EDF undertakes environmental monitoring that provides a very good understanding of radiological background around the HNB site. The results of the monitoring are published by SEPA in the Radioactivity in Food and the Environment (RIFE) annual report.
HS03	Local Community	Suggestion that radioactivity levels be published.	See response to HS02. Site security arrangements will be maintained at all times during decommissioning appropriate to the risks at each stage of decommissioning, in accordance with security regulations and the advice of the ONR Civil Nuclear Security & Safeguards group. EDF are required under the Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR) to conduct an evaluation of hazards that could cause a radiation emergency, assess the potential consequences, and identify appropriate protective actions. EDF provides the results of these assessments to North Ayrshire Council in a Consequences Report. Informed by the Consequences Report, North Ayrshire Council are required to determine the extent of detailed emergency planning required.
HS04	Local Community	Query as to who would be responsible for policing the decommissioned power station.	
HS05	Fairlie Community Council	Suggestion that the reduction of the Detailed Emergency Planning Zone be considered by regulators with a view to develop a joint site Emergency Plan to assure the public in the event of radiation release.	

ID	Respondent	Issue Raised	Response from EDF
			EDF submitted an updated Consequences Report to North Ayrshire Council in 2022 to reflect the changes in hazard assessment now that the station has ceased generating electricity and there has been a change in the risks associated with station activities. Ceasing generation activities reduces some hazards and eliminates others and therefore the Consequences Report suggests a reduction in the detailed emergency planning zone and changes to protective measures. North Ayrshire updated the DEPZ to 1.08 km.
HS06	Local Community	Suggestion that an open culture should be created for employees to report incidents.	EDF adopt a culture of openness where incidents are reported freely; identification of cause is undertaken in a transparent, fair and just manner; and the identification, documentation of improvement actions are tracked through to implementation.
HS07	Local Community	Suggestion that the safety of staff and local communities be prioritised.	The safety of staff and local communities is prioritised and will continue to be a priority throughout decommissioning.
HS08	Local Community	Concern about the safety of transporting nuclear waste by road along the A78.	We have been refuelling at the site and moving spent fuel away from the station since 1984 using the Hunterston railhead, and all flasks have been safely dispatched to Sellafield. Defueling is an extension of this, and the process and the checks carried out before flasks leave site will remain the same as when the site was generating regulated by the Office for Nuclear Regulation. Following defueling, the majority of wastes transported of the site will be conventional waste.

ID	Respondent	Issue Raised	Response from EDF
			Radioactive waste will however be required to be transported by road, but this will be transported safely in accordance with regulatory requirements, best practice and a travel plan for the site.
HS09	Local Community	Query as to how the health of local communities as a result of decommissioning has been considered.	Throughout decommissioning appropriate monitoring will continue to ensure that any effects and impacts on the environment and local community are carefully considered and managed. The impact of the decommissioning proposals on human health will be considered in the Environmental Statement.
HS10	Local Community	Suggestion that the health of local communities be monitored by independent experts during decommissioning.	During decommissioning the site will continue to be independently regulated by the Office for Nuclear Regulation and SEPA.
HS11	Local Community	Query as to the plans for emergency procedures and informing local communities.	See response to HS05.
HS12	Local Community	Query as to how new residents will be informed of emergency procedures.	See response to HS05.
HS13	Local Community	Concern about the security of the site from geopolitical and terrorist risks.	Post defueling, the site will remain a licensed nuclear site, and as such is legally obliged to maintain an approved Nuclear Site Security Plan (NSSP) by ONR.

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			The plan will be informed by a full security risk assessment including terrorist threats. This risk assessment is undertaken in-line with the requirements set by the ONR.
HS14	West Kilbride Community Council	Concern that the site would not be secured by the Civil Nuclear Constabulary following the removal of fuel from the site.	Post defueling, the site will remain a licensed nuclear site, and as such is legally obliged to maintain an approved Nuclear Site Security Plan (NSSP) by ONR. The plan will be informed by a full security risk assessment including terrorist threats. This risk assessment is undertaken in-line with the requirements set by the ONR. The outcome of the full security risk assessment based on the residual risks upon the removal of fuel will inform the decision on whether the presence of the Civil Nuclear Constabulary (CNC) on-site is still required. Any decision on the removal of the CNC from site will be approved by the ONR based on the potential level of harm to the environment and the public.
HS15	West Kilbride Community Council	Suggestion that the site be secured through permanent fencing, monitoring and forbidden use of some areas of the site.	During decommissioning the site will continue to be bounded by security fencing and managed with regular monitoring and surveillance. There will be no unauthorised public access to the site.
Preparations for Quiescence			
PQ01	Local Community	Suggestion that as much dismantling be completed as	All conventional buildings will be demolished during the Preparations for Quiescence phase. The reactor

ID	Respondent	Issue Raised	Response from EDF
		possible during the Preparations for Quiescence phase.	buildings and particular adjoining structures will remain on site during the Quiescence phase to allow the residual radioactivity to decay within the Safestore. A period of quiescence to allow for radioactive decay is judged to be technically the best approach for Hunterston B at this time.
PQ02	Local Community	Suggestion that deconstruction progress and health and safety updates be publicly shared.	Regular reporting on activity on site will continue through the Hunterston Site Stakeholder Group, which can be attended by members of the public and/or minutes of meetings viewed online via the NDA/Magnox Ltd hosted website.
PQ03	Local Community	Suggestion that removed materials be reused locally if possible.	Waste will be managed in accordance with the principles of the waste hierarchy prioritising the avoidance of waste generation and re-use and recycling of waste above the recovery and disposal of waste.
PQ04	Local Community	Query as to how much noise would be generated during demolition and how this would be minimised.	The potential effects of noise generated during the decommissioning activities on site, and the impact of noise generated from traffic associated with the decommissioning works will be assessed as part of the Environmental Impact Assessment and measures to manage impacts will be identified. Findings from this assessment will be shared as part of the next round of consultation. Construction and deconstruction activity will be undertaken in accordance with the relevant British Standard. Management measures will be set out in an Environmental Management which will be maintained and updated during decommissioning.

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PQ05	Largs Community Council	Concern that deconstruction works would contaminate the air, waterbodies, and land.	The potential effects of decommissioning works on land, air and water bodies will be assessed as part of the Environmental Statement which will identify measures to manage impacts. Management measures will be set out in an Environmental Management Plan which will be maintained and updated during decommissioning.
PQ06	Largs Community Council	Suggestion that more detailed plans of contaminated areas be provided to ensure transparency and safety of approach.	A comprehensive land quality assessment of the site has been undertaken and the risk posed by any areas of contamination considered. The potential effects of the decommissioning works on soils, groundwater and surface water, including an assessment of the potential for the works to disturb and mobilise existing ground contamination, will be considered as part of the Environmental Impact Assessment.
PQ07	Fairlie Community Council	Suggestion that void filling plans be clarified to assure its position as the most environmentally friendly option.	It is our current assumption that suitable infill material generated from the demolition activities will be used to fill voids on-site. However, it is anticipated that there will be a deficit between the size of the voids created through decommissioning and the availability of site derived material suitable for use as infill. It is currently assumed that infill material will not be imported from off-site to fill voids created during the Preparation for Quiescence phase. Further work will be undertaken as the decommissioning proposals develop to validate this assumption.

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PQ08	Fairlie Community Council	Suggestion that there is no reason to leave concrete slabs of removed buildings in situ.	The current assumption is that buildings will be demolished to ground level with concrete bases remaining in situ. Structures and infrastructure will be made safe and only removed where necessary having first explored opportunities for re-use.
PQ09	Fairlie Community Council	Query as to what basement areas and tunnels would be regraded as.	Large voids are anticipated to be filled using site won infill material where available. It is our current assumption that underground tunnels can be abandoned following decommissioning of the Cooling Water system.
PQ10	Fairlie Community Council	Query as to whether basement areas and tunnels would be regraded as LLW or VLLW pits.	The on-site disposal of radioactive waste is currently not part of the decommissioning proposals. However, in accordance with Government policy and guidance, EDF is required to consider decay storage, re-use and recycling of Low Level Waste prior to considering disposal. An options assessment will be undertaken in due course to identify the preferred option for LLW and VLLW management including using basement and other terrestrial voids.
PQ11	Fairlie Community Council	Support for deplanting everything outside the Safestore footprint.	We note this comment and welcome the support for deplanting everything outside the Safestore footprint.
PQ12	Fairlie Community Council	Suggestion that reasoning was not provided for partial removal of the dry fuel route plant and reactor building auxiliary plant.	The dismantling strategy is under development and the assumptions for what plant can be removed prior to quiescence is subject to further review.

ID	Respondent	Issue Raised	Response from EDF
PQ13	Fairlie Community Council	Suggestion that more information be provided on the pros and cons of leaving of tunnels in situ below seabed, including information on the integrity of tunnels and likelihood of collapse.	Prior to the start of works to decommission the cooling water infrastructure, an options assessment will be undertaken in due course which will consider the pros and cons of leaving the tunnels in situ having regard to a number of considerations including the physical condition of tunnels. Our working assumption for the purposes of the EIADR application is that tunnels will be left in situ.
PQ14	Fairlie Community Council	Concern about the use of explosives for deconstruction in the marine environment.	The use of explosives for decommissioning marine infrastructure has now been ruled out for the purposes of EIADR.
PQ15	Fairlie Community Council	Concern about whether debris from use of explosives in the marine environment would be removed or left on seabed.	
PQ16	Fairlie Community Council	Query as to whether radioactive sediment accumulated around the outfall would be removed.	Surveys and appropriate managements arrangement would be undertaken and put in place prior to any works around the outfall that would disturb any existing contamination.
PQ17	Fairlie Community Council	Query as to where radioactive liquid or sludge is to be retrieved for storage or treatment.	Liquid operational wastes that require processing during the Preparations for Quiescence phase will be treated within plant housed within an Operational Waste Processing Facility which is anticipated to be delivered by refurbishment of existing buildings on-site.
PQ18	Fairlie Community Council	Suggestion that more information be provided on the	Prior to the start of works to decommission the cooling water infrastructure, an options assessment will be

ID	Respondent	Issue Raised	Response from EDF
		pros and cons of infilling with grout and site won material in comparison to removal of the outfall structure after dewatering.	undertaken which will consider the pros and cons of various decommissioning approaches for the cooling water system. For the purpose of EIADR, it is assumed that a concrete plug will be created in the Cooling Water Tunnel adjacent to the Cooling Water Outlet Land Shaft, with the wider CW tunnel being abandoned at this point.
PQ19	Fairlie Community Council	Request that new active effluent discharge arrangements should have zero discharges of radioactivity to the waterway or reduced discharges to air and sea.	In preparation for and during decommissioning, discharge arrangements will be reviewed with some systems switched off and other reconfigured for different (typically lower) rates of discharge. EDF are required to undertake an assessment of Best Practicable Means (BPM) to ensure that the volume and radioactivity of radioactive discharges to the environment are minimised. This assessment will form part of an application to SEPA to vary the permit under the Environmental Authorisations (Scotland) Regulations 2018. A permit can only be approved if SEPA consider that appropriate controls are in place proportionate to the nature of the activity and associated risks to human health and the environment. New active effluent discharge arrangements are required for decommissioning. This will be provided through the insertion of a new pipe within the CW Outlet tunnel from the Seal Pit to the Outfall (the existing discharge point) to carry active effluent directly to the sea without relying on cooling water to flush the effluent from the CW Outlet tunnel.

ID	Respondent	Issue Raised	Response from EDF
PQ20	Local Community	Suggestion that unused compounds on the seaward side of the access road be demolished and the area landscaped.	The potential use of landscaping to mitigate visual impacts of the decommissioning proposals will be given further consideration as part of the assessment of visual impacts in the Environmental Statement.
PQ21	Local Community	Concern that options to manage the offshore cooling system have not yet been considered.	Prior to the start of works to decommission the cooling water infrastructure, an options assessment will be undertaken which will consider the pros and cons of leaving the tunnels in situ. Our working assumption for the EIADR application is that seaward tunnels will be demolished to sea bed level and abandoned. A plug will be installed adjacent to the intake and outlet land shafts on the seaward side of the CW tunnels. The landward tunnels behind this point will be sealed and abandoned indefinitely.
PQ22	West Kilbride Community Council	The communal discharge drain will require significant decontamination as part of the defueling works. The discharge pipework to deep water will also have to be decontaminated.	Prior to the start of works to decommission the cooling water infrastructure and discharge drainage, surveys of contamination will be undertaken, and contaminants found will be controlled under the appropriate environmental regulations and in accordance with an environmental management plan for the site. It is our current assumption that the Cooling Water Tunnels are not contaminated to a level that would be subject to regulation under the EASR 18.
PQ23	West Kilbride Community Council	Concern about potential deviations from planned decommissioning works, as is	The indicative programme for the decommissioning of Hunterston B is based on our best understanding of what will be required to reach final site clearance and is

ID	Respondent	Issue Raised	Response from EDF
		considered to have occurred at Hunterston A.	underpinned by years of planning and feasibility work and knowledge of the AGR fleet. However, defueling and decommissioning will be a complex job over a long period of time and as such the indicative programme may be subject to change.
Quiescence Phase			
QP01	Local Community	Suggestion that there is sufficient space within the security fence for landscaping around new buildings.	There are no new buildings proposed during the quiescence phase. The potential use of landscaping to mitigate visual impacts of the decommissioning proposals, including the Safestore, during quiescence will be given further consideration as part of the assessment of visual impacts in the Environmental Statement.
QP02	Local Community	Suggestion that the site be landscaped with native tree species during the Quiescence phase to allow for future use as a nature reserve.	
QP03	Local Community	Suggestion that the site be landscaped with native tree species during the Quiescence phase.	See response to QP01.
QP04	Local Community	Suggestion that areas of the site be used for renewable energy generation during the Quiescence phase.	Any interim use on the site during the Quiescence phase would need to be compatible with subsequent decommissioning activities and the maintenance of the Nuclear Site Licence.

ID	Respondent	Issue Raised	Response from EDF
QP05	Local Community	Suggestion that the site be used for a nature reserve during the Quiescence phase.	The Site planned end-state is to make the land available for future industrial development. Creating a nature reserve would have the likely requirement of additional demolition activities during the Preparations for Quiescence phase to create suitable land area, additional cost and would potentially mis-align with the current approach to end state for the site. Opportunities for biodiversity enhancement will however be investigated as part of the development of a biodiversity plan to be created for the Site in the future.
QP06	Local Community	Suggestion that the Quiescence phase should be extended if radiation levels remain above background level after 70 years.	The current assumption, underpinned by knowledge of the waste and materials present in the reactor buildings, is that levels of radioactivity will meet the test of being as low as reasonably practicable within 70 years. This assumption will be kept under review as the decommissioning plans progress. Under the terms of the Nuclear Site Licence condition for decommissioning, the operator is required to rigorously justify to ONR the timing of decommissioning having regard to factors including radionuclide decay, worker and public health and safety. A Safety Case submitted by the operator for the approval of the ONR will include measures to maintain the site in a safe condition.
QP07	Local Community	Suggestion for constant or regular monitoring to avoid radioactive leakage during the Quiescence phase.	The site will be monitored, maintained and inspected throughout the quiescence period.

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QP08	Largs Community Council	Concern that an environmental landscaping plan has not been proposed for the Quiescence phase.	The potential use of landscaping to mitigate visual impacts of the decommissioning proposals will be given further consideration as part of the assessment of visual impacts in the Environmental Statement. The site will be monitored, maintained and inspected throughout the quiescence period. The potential use of landscaping to mitigate visual impacts of the decommissioning proposals and opportunities for managing biodiversity will be given further consideration as part of the assessment of impacts in the Environmental Statement. The potential use of landscaping to mitigate visual impacts of the decommissioning proposals will be given further consideration as part of the assessment of visual impacts in the Environmental Statement.
QP09	Largs Community Council	Suggestion that leaving the site to become an overgrown industrial wasteland during the Quiescence phase would be unacceptable.	
QP10	Largs Community Council	Suggestion that plans be made to blend the site back into the landscape during the Quiescence phase due to the site's siting near to an SSSI and site of natural beauty.	
QP11	Largs Community Council	Suggestion that a full landscaping plan be created for the Quiescence phase.	
QP12	Fairlie Community Council	Query as to whether the Safestore incorporating both reactor buildings and the vault is riskier than using ILW storage facilities at Hunterston A.	The debris vaults are within the reactor building and therefore within the Safestore structure. This is assessed to be the right approach to containment of radioactive material and waste management.

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QP13	Fairlie Community Council	Request for clarification on the anticipated scenarios and responses if a problem arises during the Quiescence phase.	During the quiescence period most of the nuclear hazard will have been removed from the site. The remaining risk and consequences will be assessed in accordance with the relevant emergency planning regulations in place at that time. It is anticipated that the residual risk would be very low as the site would be in a quiescent state with no active operations or reservoirs of stored energy and therefore no foreseeable incidents that would require an immediate emergency response.
QP14	Fairlie Community Council	Suggestion that the monitoring team made contactable so local communities can report problems and ask questions.	The Hunterston Site Stakeholder Group will continue to be the prime interface between the local community, the site operators and the NDA. It provides the forum for questioning the operators and regulators and to review performance in safety and the environment. Regular engagement will continue outside of Site Stakeholder Group meetings and rapid responses to queries and requests for information will continue.
QP15	Fairlie Community Council	Query as to whether and how the Safestore would be monitored internally.	Monitoring is likely to include passive fire detection systems, monitoring of the integrity of internal structures and aspects of the internal environment that could affect those structures (e.g. temperature and humidity) and monitoring of air movements in and out of the Safestore. Our current proposals are for a ‘central hub’ to receive this information for Hunterston B from where any necessary actions can be initiated as a result of the monitoring data.

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			The internal monitoring regime will be supplemented by periodic internal site inspections.
QP16	Fairlie Community Council	Suggestion that the Safestore height be a reduction on the existing reactor buildings.	The exact height and footprint of the Safestore is subject to further feasibility work to determine the extent to which plant can be removed and how much of the existing reactor building structure can be used as part of the Safestore.
QP17	Local Community	Support for the approach to security and monitoring.	We note this comment and welcome the support for our approach to security and monitoring.
Socioeconomics			
SE01	Local Community	Query as to how many workers would be involved in the Proposed Works.	The workforce at Hunterston B is key to the successful delivery of the work at the site now and in the future. EDF and Magnox Ltd are working together closely to understand the staffing requirements for deconstruction following the end of defueling. Further information regarding the assumptions regarding employment at HNB through the decommissioning works will be in the Environmental Statement.
SE02	Local Community	Query as to how and where workers would be recruited from.	Where practicable, it is our intention to retain existing staff as this will ensure knowledge of the station is maintained through transfer of the site to Magnox Ltd. Necessary skills may be required from outside of the immediate locality considering the specific nature of the works.

ID	Respondent	Issue Raised	Response from EDF
			The assessment in the Environmental Statement will assume these workers would principally travel to the site via private car.
SE03	Local Community	Concern that local communities were not aware of the long decommissioning process when the power station was first sited and developed.	Noted.
SE04	Local Community	Query as to how many workers would be involved in the Proposed Works.	See response to SE01
SE05	Local Community	Query as to how where workers would be recruited from.	See response to SE02
SE06	Largs Community Council	Suggestion that EDF and NDA/Magnox Ltd proactively encourage local suppliers to bid for work, including relaxing conditions that discourage smaller businesses from competing for work.	In developing plans for the supply chain and procurement of contracts to undertake the decommissioning work, EDF, NDA and Magnox Ltd will work with North Ayrshire Council and the LEP to develop the potential of the local supply chain. Recognising the value that small businesses can contribute to UK growth and local economies, the NDA have a target to achieve a third of procurement spend with small businesses (across the NDA business).

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SE07	RDK Construction Ltd	Query as to whether there is land available on site now for manufacturing facilities and offices.	The current decommissioning proposals would not de-license the site until the Final Site Clearance phase. Therefore, there would be no land available within the Hunterston B site for manufacturing facilities and offices.
SE08	Peel Ports	Suggestion that the proposals are compatible with Peel's uses at Hunterston PARC.	Noted.
SE09	Peel Ports	Suggestion that Hunterston PARC's deep water berth and rail connectivity can be further utilised by EDF if required.	It is not currently envisaged that either the volumes of construction materials and waste materials or nature of materials to be transported off-site will require either the use of the deep water berth or the rail head.
SE10	Katy Clark MSP	Suggested that significant investment is needed in North Ayrshire to create skilled jobs due to the area having high unemployment and deprivation and receiving less investment from decommissioning funds.	EDF, NDA and Magnox Ltd will align with local and regional economic strategies and support the Ayrshire Growth Deal vision for the transformation of Hunterston. This includes supporting the education, retraining and skills development of local communities.
SE11	Katy Clark MSP	Concern about future job prospects in the local area due to the decommissioning of the power station, which created large numbers of well-paid jobs.	

ID	Respondent	Issue Raised	Response from EDF
SE12	Katy Clark MSP	Suggestion that EDF work with ministers, North Ayrshire Council and other stakeholders to develop a green jobs plan for North Ayrshire.	EDF will support any efforts made by the Scottish Government and/or North Ayrshire Council to create a green jobs plan for the area. A just transition for our people is important and EDF has already engaged the Scottish Government on this on a number of occasions, both directly with the Cabinet Secretary for Net Zero, Energy and Transport and during a Scottish Government workshop on the subject. Company representatives are also in regular dialogue with other businesses and agencies in the area about future jobs and skills requirements.
SE13	Fairlie Community Council	Suggestion that EDF and NDA/Magnox Ltd retain existing site staff through to transfer due to the benefits of retaining knowledge and experience.	EDF and Magnox Ltd are working together closely to understand the staffing requirements for deconstruction following the end of defueling with the aim to retain staff where practicable. We are aiming to have a high-level people plan established by the end of the year to share with our people. EDF will be working hard with the appropriate unions to understand what employee aspirations are for the future – whether that is remaining at the site, moving elsewhere or leaving the business. EDF and Magnox Ltd will be working together to ensure that the right people with the right skills are transferred into Magnox Ltd. It is essential that it is established what skills, knowledge and experience are needed for deconstruction and that all relevant people are

ID	Respondent	Issue Raised	Response from EDF
			transferred. This will be achieved through consultation with EDF employees and Trade Union partners.
SE14	Fairlie Community Council	Suggestion that relevant bodies ensure that scarcity of skilled workers do not hinder decommissioning plans.	EDF and Magnox Ltd are working together to ensure that the required skills and resource are in place to undertake decommissioning as soon as reasonably practicable.
SE15	Fairlie Community Council	Suggestion that decommissioning jobs in the area be maintained.	See response to SE13.
SE16	Local Community West Kilbride Museum	Suggestion that local labour be used where possible.	See response to SE13.
SE17	Local Community West Kilbride Museum	Suggestion that EDF continue to support local clubs and charities during decommissioning.	During defueling, EDF will continue to support local clubs and charities. During decommissioning, the NDA/Magnox Ltd will provide grant funding, as they do currently in relation to Hunterston A for community initiatives. Funding will be allocated on an assessment of local needs and on the basis of a competitive process to projects and organisations meeting local needs. Since 2012, £1,241,999 has been awarded to Hunterston projects over £10k under the Magnox Ltd Socio Economic Scheme. A further £250k has been awarded directly by NDA to projects local to Hunterston.

ID	Respondent	Issue Raised	Response from EDF
SE18	Local Community	Query as to whether EDF would be subject to an environmental levy during decommissioning to benefit local communities.	Impacts associated with visual amenity, traffic, and noise will be assessed as part of the Environmental Impact Assessment that will accompany planning applications and the application to the ONR to determine the decommissioning process. Appropriate mitigation will be proposed and agreed with the ONR in consultation with North Ayrshire Council.
Traffic and Transport			
TR01	Local Community	Concerns over additional traffic on local roads.	The Environmental Statement will assess the impact of the decommissioning proposals on the local road network in the Traffic and Transport chapter.
TR02	Local Community	Concerns about the safety of transporting flasks by rail due to possible collisions with commuter trains, remedial works on embankments in Ardrossan, and increased rainfall from climate change.	The transporting of spent fuel flasks by rail to Sellafield has been undertaken safely at Hunterston B for more than 40 years. Flask transport is strictly regulated by the ONR and undertaken by trained and qualified operatives. Train paths are booked in advance. Flasks are designed to contain the radioactive material even if there is an accident and have undergone extreme testing to demonstrate robustness in the event of a collision. The transporting of spent fuel flasks by rail will cease when the station has completed defueling in approximately 3 years.
TR03	Local Community	Concern about decommissioning adversely	The impact of the decommissioning proposals on traffic and transport receptors will be assessed within the

ID	Respondent	Issue Raised	Response from EDF
		affecting road and rail infrastructure in the local area.	Environmental Statement to be submitted to ONR under the EIADR.
Waste Management			
WM01	Fairlie Community Council	Query as to whether the ILW in the Hunterston B debris vaults would be better protected from accidental or intentional damage than if it were stored in the ILW from Hunterston A ILW store.	The retention of ILW currently in the debris vaults at Hunterston B has been assessed as the right approach at this stage. These debris vaults will remain within the Safestore structure until Final Site Clearance so materials within them can benefit from additional radioactive decay prior to further processing.
WM02	Fairlie Community Council	Suggestion that the removal of ILW from Hunterston B could be too hazardous until further decay meaning it may be necessary to leave in situ.	See response to WM013.
WM03	Fairlie Community Council	Suggestion that the location of new waste facilities be scrutinised due to concerns that storm surge or sea level rise could result in flooding the access road.	The DWPF will re-use existing buildings on the Hunterston B site. An OWPF, will likewise be delivered via refurbishment of existing buildings on-site. Both of these waste facilities are expected to be demolished at the end of the Preparations for Quiescence phase. With this in mind, it is unlikely sizeable sea level rise will have occurred compared to the existing baseline within this timescale. An assessment of flood risk on-site will be undertaken as part of the Environmental Statement. This assessment will include the impact of rising sea levels associated with

ID	Respondent	Issue Raised	Response from EDF
			climate change on flooding on the site in line with SEPA Guidelines.
WM04	Fairlie Community Council	Concern about the siting of waste facilities close to the access road due to the potential for the road to flood during storm surge or sea level rise.	See response to WM04 above
WM05	Fairlie Community Council	The Wet Intermediate Waste Retrieval and Encapsulation Plant (WILWREP) at Hunterston A is probably not adequate/ suitable and there may need to be a new facility to deal with the HNB Wet Intermediate Level Waste.	The potential use of HNA facilities for the processing of operational wastes is still under consideration. The OWPF will be delivered on the HNB site through refurbishment of existing buildings.
WM06	Fairlie Community Council	Hope that the Intermediate Level Waste Encapsulation Plant (SILWE) is fit for purpose and can be made use of by B station.	We are still undertaking studies to confirm whether the SILWE can be used for the encapsulation of ILW retrieved from Hunterston B.
WM07	Fairlie Community Council	No objection to the use of the Hunterston A. ILW store for Hunterston B ILW waste to avoid transportation of waste by road.	Noted.

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WM08	Fairlie Community Council	Concern about the reconfigurations required within the Hunterston AILW store to accommodate Hunterston B waste.	Whilst further underpinning studies and regulatory approvals are required to enable the storage of Hunterston B waste at the existing Hunterston A ILW Store, Magnox Ltd and EDF are confident that any works will not cause any safety or environment issues.
WM09	Fairlie Community Council	Objection to the use of the Hunterston A ILW store for radioactive waste from sources other than the Hunterston power stations.	Noted.
WM10	Fairlie Community Council	Agreement in principle to proposals for waste management but would like to see the ONR response to the DWPF and OWPF proposals.	Noted.
WM11	Fairlie Community Council	Objection to an on-site incinerator.	There are no plans to incinerate waste on site. Wastes that can be incinerated will be sent for incineration off-site.
WM12	Fairlie Community Council	Query as to whether the current review of the Scottish Government's Higher Activity Radioactive Waste Policy is going to recommend the near-site element be dropped, due to the omission of this from the consultation materials.	EDF are required to comply with Scottish Government's Higher Activity Radioactive Waste Policy that is currently in place. Anticipation of what policy changes may occur in the future is a matter for Scottish Government.

ID	Respondent	Issue Raised	Response from EDF
WM13	Fairlie Community Council	Request that plans for using infill containing VLLW are scrutinised by Regulators, and we see valid justification for this practice.	Any proposal for using radioactive waste as infill will be regulated by SEPA and will only be undertaken if it is identified as Best Practicable Means (BPM). Operators (EDF and subsequently Magnox Ltd) are required to produce a waste management plan and a site wide environmental safety case to ensure that the condition of the site meets SEPA's standards for the protection of people and the environment. EDF (and then Magnox Ltd) will undertake engagement with local communities on any proposal to use infill containing low levels of radioactivity setting out justification and consideration of environment effects including potential benefits.
WM14	Fairlie Community Council	Support for the use of the site Stator Shed for additional decommissioning waste storage if suitable.	Works to demolish the Stator Shed have commenced following feasibility studies identifying the shed was not suitable in its current condition. A Town and Country Planning Act planning application is expected in 2024 to consent the construction of a small building on the site of the stator shed to provide interim storage of LLW prior to consignment off-site.
WM15	Local Community	Support for the proposed approach to handling radioactive waste.	We note this comment and welcome the support for our approach to handling radioactive waste.
WM16	West Kilbride Community Council	Suggestion that there is a lack of agreement that the ILW Store at Hunterston A will	NDA, Magnox Ltd and EDF have agreed that ILW retrieved during the Preparations for Quiescence phase

ID	Respondent	Issue Raised	Response from EDF
		accept the ILW waste from Hunterston B.	that requires storage will be stored at Hunterston A ILW Store subject to regulatory approvals.
WM17	West Kilbride Community Council	Query as to whether consideration has been given to the storage of ILW waste from Hunterston B in the vaults beneath the reactors.	The debris vaults are not considered to be best location for all ILW. The ILW store at Hunterston A has been purpose built and designed to store suitably processed and packaged ILW and has capacity.
WM18	West Kilbride Community Council	It is assumed that planning permission regarding any temporary storage of ILW on site would be forthcoming in the near future.	An application to vary the existing planning permission for the Hunterston A ILW store to enable the storage of waste retrieved from HNB will be required in due course.
WM19	West Kilbride Community Council	Suggestion that Scottish Government policy of near surface storage requires that ILW be retrievable and not disposed as proposed.	To clarify, the current assumption is that ILW retrieved during the decommissioning of HNB will be transferred to a near surface facility, in accordance with Scottish Government's Higher Activity Radioactive Waste Policy and Implementation Strategy. All waste management options including disposal are to be reviewed and will be a matter for Scottish Government.

Appendix F

Round 2 Consultation Materials

Project Website

Hunterston B power station

Hunterston B is a nuclear power station on the west coast of Scotland.

Public consultation on proposals for decommissioning Hunterston B

Hunterston B stopped generating electricity in January 2022 after 46 years of service. At the moment EDF is removing the used fuel from the reactors in preparation for the decommissioning of the nuclear power station.

Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site and will be carried out by Magnox, which is part of the Nuclear Decommissioning Authority.

The first phase of decommissioning, the Preparations for Quiescence phase is anticipated to start at the end of defuelling in 2025 (with formal handover of the site to Magnox expected in 2026). This first phase will involve the removal of all buildings and plant from the site, with the exception of the reactor buildings and some adjoining structures which will be modified to create a Safestore structure. This Safestore is designed to maintain the reactor buildings in a safe state through the Quiescence phase of around 70 years. Following this, the Final Site Clearance phase will involve the removal of the reactors and debris vaults housed in the Safestore structure, making the site available for future use. Whilst future uses of the site will not be determined for many decades, our proposals are a stepped approach to dismantling and decontamination towards an end state. This allows for safe radioactive decay, prior to Final Site Clearance.

Find out more about the **defueling process.**

Consultation – Round 2

We first consulted on the overall decommissioning approach in August and September 2022. Since then we have further developed the plans and made progress in the Environmental Impact Assessment process. We are holding a second round of consultation between 30 May and 15 July 2023. We are using this second round to feedback on the views expressed during last year's consultation. We are also giving more detail on some of the proposals, including projections on transport movements and waste volumes. Views given during the second round of consultation will inform our planned submission later this year of an Environmental Statement to the Office for Nuclear Regulation (ONR) under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended) which requires approval before decommissioning can proceed. To find out more please visit our **online exhibition space**.

Environmental Impact Assessment Scoping Report

We submitted our Environmental Impact Assessment (EIA) Scoping Report to the ONRstating out the proposed scope of the EIA to be undertaken for the Hunterston B decommissioning proposals in August 2022. This document requests a scoping opinion from the ONR which will confirm the scope of the assessment required under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended). You can find the scoping report in the links below:

- **HNB EIA Scoping Report**
- **HNB EIA Scoping Report Appendices**
- **HNB EIA Scoping Report Figures**

We received a Pre-application Opinion (PAO) from the ONR in October 2022 which provided feedback on the proposed scope and methodology of our EIA for Hunterston B and the decommissioning proposals. This PAO was created by ONR following its own consultation with key statutory and regulatory consultees and can be found on the **ONR Website**.

Since 1976 **Hunterston B** has generated low carbon electricity for **77.9 million homes**

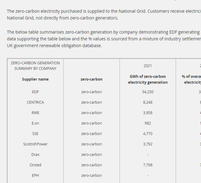
Avoiding **101.5m tonnes of CO_2 emissions***

Like taking **every car** off Scotland's roads for more than **19 years**

*when compared to direct emissions of combined cycle gas turbines | all figures rounded to the nearest hundred thousand

About Hunterston B

- **Station Director:** Joe Struthers
- **Total supply to the national grid:** 965MW
- **Reactor type:** 2 Advanced Gas-cooled Reactors
- **Coolant:** Carbon dioxide gas (CO2)
- **Start of construction:** 1968
- **Start of generation:** 1976
- **Start of defuelling:** 2022
- **People:** Approximately 520 full time EDF employees plus over 250 full time contract partners



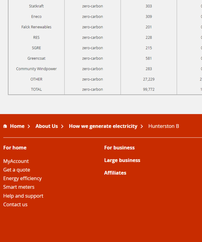
Graphite in nuclear power

At Hunterston B we have been conducting the most extensive investigation programme ever undertaken on the graphite core of our reactors.

Find out more about the role of graphite in our reactors, and the results of our inspections.

The role of graphite in reactors

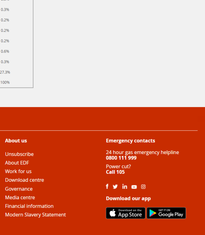
Find out more about Hunterston B



Safety and reporting

Our number one priority is safety. Find out about EDF Energy's commitment to Zero Harm.

Find out about safety and reporting



Community

EDF and the Nuclear Decommissioning Authority hold regular Joint meetings (Site Stakeholder Group or SSG) with local people, the media, council and emergency services representatives and local politicians to maintain regular communications about the nuclear site. This meeting is independently chained.

Read the latest community report

Contact Hunterston

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Community requests:
Nikki Thomson
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+44 (0)1294 826157

Latest news and community updates

Wednesday, October 5, 2022

Team Hunterston take on charity run for Ayrshire Cancer Support

A team from Hunterston B power station has helped to raise more than £5,500 for a local cancer charity by running Scotland's largest half marathon.

Read more

Tuesday, May 17, 2022

Defueling officially underway at Hunterston B

Hunterston B power station in North Ayrshire has reached another significant milestone as operators started the job of removing spent nuclear fuel from the reactors.

Read more

You may also be interested in...

How do you decommission a nuclear power station?

By 2030 all seven of EDF's AGR nuclear power stations are expected to have ended power generation and be at various stages of decommissioning.

Decommissioning a power station

How we generate our power

As Britain's **biggest generator of zero carbon electricity**[1] we generate power from **wind + nuclear + solar**.

Generating power

Jobs at EDF

Interested in working at EDF? Find out about our graduate programmes, apprenticeships, internships and current vacancies.

Visit our careers pages

Notes

1. **UK Fuel Mix disclosure information, published by Government Department BEIS**, recognises electricity from wind, solar and nuclear fuel produces zero carbon dioxide emissions at the point of generation.

The zero-carbon electricity purchased is supplied to the National Grid. Customers receive electricity via the National Grid, not directly from zero-carbon generators.

The below table summarises zero-carbon generation by company demonstrating EDF generating 34.3%. The data supporting the table below and the % values is sourced from a mixture of industry settlement data and the UK government renewable obligation database.

ZERO CARBON GENERATION SUMMARY BY COMPANY		2021	2021
Supplier name	**zero-carbon**	**GWh of zero-carbon electricity generation**	**% of overall zero-carbon electricity generation**
EDF	zero-carbon	94,299	34.3%
CENTRICA	zero-carbon	8,240	8.3%
RWE	zero-carbon	3,958	4.0%
E.on	zero-carbon	982	1.0%
SSE	zero-carbon	4,770	4.8%
ScottishPower	zero-carbon	3,792	3.8%
Drax	zero-carbon	-	-
Orsted	zero-carbon	7,756	7.8%
EPH	zero-carbon	-	-
Equinor	zero-carbon	1,018	1.0%
Vattenfall	zero-carbon	1,468	1.5%
Red Chain Renewables	zero-carbon	698	0.7%
Macquarie	zero-carbon	2,926	2.9%
Vertient Energy	zero-carbon	482	0.5%
Statkraft	zero-carbon	303	0.3%
Greco	zero-carbon	309	0.3%
Falck Renewables	zero-carbon	201	0.2%
RES	zero-carbon	228	0.2%
SGRE	zero-carbon	215	0.2%
Greencoat	zero-carbon	581	0.6%
Community Windpower	zero-carbon	283	0.3%
OTHER	zero-carbon	27,229	27.3%
TOTAL	zero-carbon	95,772	100%

Consultation Document

Public

Hunterston B Nuclear Power Station Decommissioning

Consultation Document

30th May 2023 to 11th July 2023


LAYDOWN AREA
LOAD LIMIT
100LBS/SQFT
4SKN/SQM

Introduction

EDF is progressing with proposals to decommission the Hunterston B nuclear power station in North Ayrshire.

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will remove the used fuel from the reactors and prepare for the decommissioning of the nuclear power station. Decommissioning will involve dismantling and demolition of the plant and buildings on the Hunterston B site.

Defueling activities at Hunterston B are progressing well. Since defueling commenced in May 2022, we have safely removed more than 60% of the spent fuel stringers from the first reactor and onward transferred many flasks to Sellafield. All these operations have been carried out safely and with improving efficiency.

After defueling, in accordance with an agreement EDF has made with UK Government, the Hunterston B site will be transferred to the Nuclear Decommissioning Authority (NDA), subject to regulatory approvals, with Magnox becoming the new Site Licence Company and undertaking the decommissioning activities.

The decommissioning proposals presented within this document are our latest assumptions. The proposals are informed by our experience in operating and refuelling the reactors since 1976, knowledge of the reactor and generating technology, and preparations for decommissioning over many years. Our proposals have been developed further following consultation in 2022 with local communities, ongoing environmental assessments, and working closely with NDA and Magnox to ensure that decommissioning works are un-affected by the site transfer and can start promptly following the end of defueling. Your feedback, and ongoing work with Magnox will shape the development of decommissioning proposals for Hunterston B. The decommissioning proposals will be subject to ongoing engagement with, and approvals from the Office for Nuclear Regulation (ONR) and the Scottish Environmental Protection Agency (SEPA).

The first phase of decommissioning, the Preparations for Quiescence phase, is anticipated to start at the end of defueling in 2025. This first phase will involve the removal of all buildings and plant from the site, with the exception of the reactor buildings and some adjoining structures which will be modified to create a Safestore structure. This Safestore is designed to maintain

the reactor buildings in a safe state through the Quiescence phase of around 70 years. Following this, the Final Site Clearance phase will involve the removal of the reactors and debris vaults housed in the Safestore structure. Whilst future uses of the site will not be achieved for many decades, our proposals are a stepped approach to dismantling and decontamination towards an end state. This allows for safe radioactive decay, prior to Final Site Clearance.

What has happened since the last consultation?

Since our previous consultation with stakeholders and local communities in August and September 2022, we have continued to develop the decommissioning plans for Hunterston B and have begun environmental assessment work. The first consultation helped us gain a better understanding of stakeholders' interests. We have reviewed this feedback, undertaken further work, and can now provide additional information in your key areas of interest.

We submitted our Environmental Impact Assessment (EIA) Scoping Report to the ONR prior to the first consultation in 2022. The Scoping Report outlined our proposed scope of the assessments that will be provided in the Environmental Statement (ES).

The ONR provided EDF with a Pre-application Opinion which outlined their response to the Scoping Report taking into account the comments they received from their consultees.

You can view a copy of the Pre-Application Opinion on the ONR's website at: www.onr.org.uk/sites/hunterston-b.htm

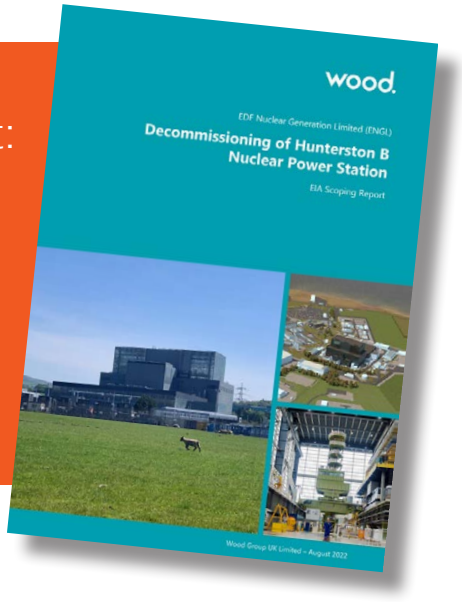
This Pre-application Opinion generally confirmed that the proposed scope and methodology for the assessments put forward in the Scoping Report was acceptable.

Why we are consulting again

We are holding this consultation now to gain your views on the decommissioning proposals before they are submitted to the ONR at the end of 2023 seeking approval to commence decommissioning. This document provides an overview of the proposals for decommissioning. It includes information on how our proposals have developed, how we have listened to the feedback from our previous consultation, and how potential effects from the work will be managed.

Our consultation will run from **30th May 2023 to 11th July 2023**. Your views are important to us and we encourage you to provide your feedback. You can submit your feedback through our questionnaire, freepost or via email. You can find out more online at: www.edfenergy.com/hunterston or by visiting one of our in-person events.

You can view a copy of our Scoping Report on our website at: www.edfenergy.com/hunterston



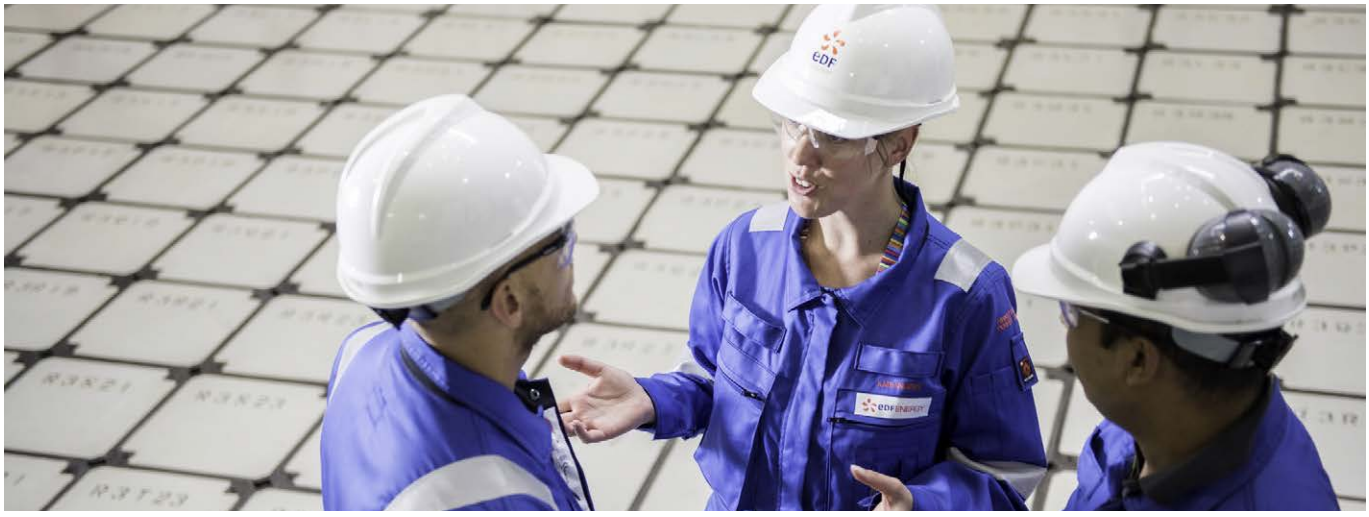
How we have considered your feedback

We received a total of 27 responses to our previous consultation from Community Councils, local businesses and communities.

80 people attended our in-person exhibition events, and 325 users visited our virtual exhibition space. We thank you for your participation and have considered your feedback which has assisted us with the development of the decommissioning proposals and provided focus for further environmental survey and assessment work. The key matters which were raised at the last consultation and our responses to themes are provided below.

Safestore	
You said	**Our response**
The visual impact of the Safestore should be minimised.	The final design of the Safestore is yet to be determined and will be subject to a planning application. This will involve further public consultation on building height and cladding materials. The height of the building is dependent on the feasibility of safely removing plant and machinery that is within the existing buildings. The choice of materials will consider the visual impact of the Safestore building, functionality and long-term maintenance requirements. Further detail on the progression of work on the Safestore is provided on page 14.
Employment and jobs	
You said	**Our response**
The skills and site knowledge of existing staff should be retained. The potential impact of a scarcity of skilled workers on implementing the decommissioning plan should be considered.	The workforce at Hunterston B is key to the successful delivery of work during defueling and into the future. We are working closely with Magnox to understand staffing requirements after defueling, working with employees and trade unions to understand people's aspirations for the future. We are aiming to have a people plan to share with our staff by the end of the year.

Nuclear Safety	
You said	**Our response**
Emergency planning arrangements to cover both Hunterston A and B must be in place to protect local communities.	The Hunterston site will continue to be subject to regulations for radiological protection and emergency preparedness. EDF have evaluated the risk and hazards of a radiation emergency to local communities now that the station has ceased generating electricity and there has been a change in the risks associated with station operation. Ceasing generation activities reduces some hazards and eliminates others and therefore EDF has identified a reduction in the minimum technical distance for detailed emergency planning zone from 2km to 1.08km from the site centre. As a result, the Detailed Emergency Planning Zone has been reduced by North Ayrshire Council following a redetermination process. EDF will update the hazard evaluation again in advance of the preparations for Quiescence phase. The evaluation will consider whether arrangements and processes can be simplified in line with a reduction in hazard following the removal of fuel from the site. Magnox experience will be taken into account in the review of arrangements and processes. Again, any changes to the Detailed Emergency Planning Zone or protective actions will be determined by North Ayrshire Council. Existing emergency planning arrangements for Hunterston A will remain in place.
Programme	
You said	**Our response**
The programme for defueling may be subject to delay.	Defueling at Hunterston B is currently progressing well. More than half of the spent fuel has been removed from the first reactor and we remain confident that adequate arrangements are in place to meet the programme to defuel on schedule by mid-2025.
The programme for decommissioning of Hunterston B may change in light of proposals for continuous decommissioning of Hunterston A.	The indicative programme for decommissioning Hunterston B is based on our current understanding of what will be required to achieve Final Site Clearance and is underpinned by years of planning and feasibility work, and knowledge of the Advanced Gas-Cooled Reactor fleet. However, defueling and decommissioning will be complex with activities extending over a long period of time. A review of the synergies and approach to decommissioning Hunterston A and B stations is underway by Magnox and therefore the indicative programme may be subject to change.




Respecting the Environment and our Communities
Consenting Process

Waste and Materials Management	
You said	**Our response**
The storage of Intermediate Level Waste (ILW) within the Hunterston A ILW store is supported as it minimises transport movements.	This support is acknowledged, and work continues with Magnox to progress these arrangements and ensure regulatory support.
The choice of location for the new waste management facilities should consider risk associated with sea level rise and storm surge.	The Hunterston B site will still be subject to maintaining a safety case during the decommissioning works on the site as a requirement of the Nuclear Site License. Works are progressing on the development of the safety case for the decommissioning works. This will consider the potential impacts from sea level rise and storm surge on the waste management facilities utilised during decommissioning.
Is retaining ILW in the debris vaults, within the Safestore structure, a better alternative to removing the ILW earlier? Could all ILW be stored in the debris vaults?	The retention of ILW currently in the debris vaults at Hunterston B has been assessed as the most appropriate approach at this stage. These debris vaults will remain within the Safestore structure until Final Site Clearance to allow for radioactive decay prior to further processing. The integrity of containment and any risk of water ingress will be monitored and managed during the Quiescence period. ILW produced during routine operations and defueling that is not contained within the debris vaults will be processed and packaged during the Preparations for Quiescence phase within the Operational Waste Processing Facility (OWPF). This would then be stored in the Hunterston A ILW store until a long-term disposal facility in-line with Scottish Higher Activity Radioactive Waste Policy becomes available.
Demonstration is required that filling voids with site won material would be the best environmental option and that Very Low Level Waste (VLLW) is managed appropriately.	Waste will be managed in accordance with government policy and legislation at the time in a way that protects people and the environment, and in accordance with the waste hierarchy to minimise waste, re-use and recycle. The Preparations for Quiescence phase is expected to produce very small amounts of Low Level Waste (LLW) that would potentially be suitable for on-site disposal and therefore on-site disposal of LLW is not currently expected within this phase. Larger amounts of material that may be suitable for on-site disposal will be produced from reactor dismantling activities during Final Site Clearance. In line with government policy and SEPA guidance, all practicable options for managing soil and rubble contaminated with VLLW and LLW across all stages of the decommissioning programme will be considered including reuse on-site, for example in necessary landscaping and void filling. Any decision to progress with on-site disposals would require appropriate authorisations in accordance with the legislation and guidance at the time. Current legislation and guidance require the demonstration of the suitability of the material intended for re-use on the site and the site end state with SEPA. This process also requires a Site Wide Environmental Safety Case and Waste Management Plan to be produced to demonstrate that people and the environment will be protected from radiological and non-radiological hazards.

How our plans have developed

We have made progress to further develop the decommissioning plans and we are now able to provide more information on topics raised during our first consultation.

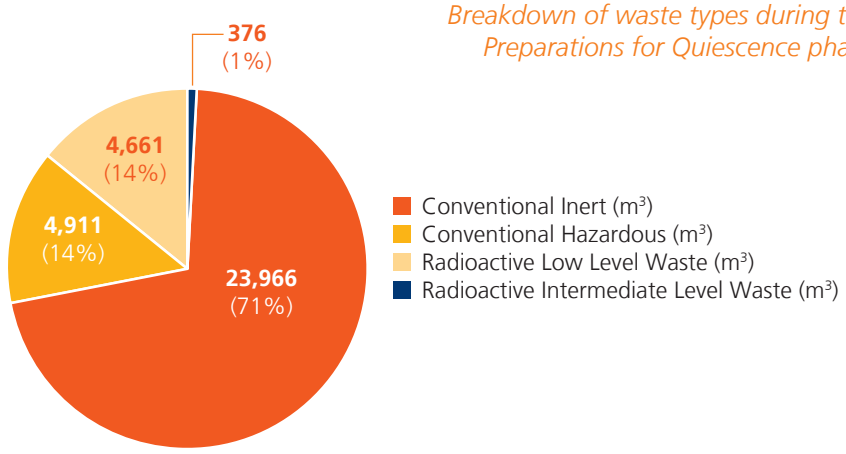
Materials and waste management

The majority of material and waste produced during decommissioning is non-radioactive or 'conventional' waste. This conventional waste includes items such as metals, glass, plastics and other miscellaneous wastes similar to waste arising from the demolition of industrial buildings. Conventional waste will be sorted and managed in accordance with the principles of the waste hierarchy to prevent unnecessary waste. For example, the decommissioning plan is to avoid excavation below ground across the majority of the site where possible, thereby preventing associated waste generation.

Deplanting refers to the removal of machinery, equipment and apparatus known as 'plant'

The decommissioning plan has also carefully considered opportunities for how materials generated from demolition activities on-site could be re-used on-site. It is expected that enough rubble material will be generated from demolition and deplanting activities on-site during the Preparations for Quiescence phase to fill the voids created by the dismantling of the Cooling Water system (excluding the cooling water tunnels). Despite re-using this material, it is likely that a large void beneath the Turbine Hall will remain. The demolition of the Safestore during Final Site Clearance will also lead to the creation of rubble material, which may be used to fill additional smaller voids on-site. To minimise traffic movements, carbon emissions and costs, work is ongoing to explore the feasibility of retaining the void beneath the Turbine Hall during the Quiescence phase. As this remains an option, this forms the basis of the assumption for various assessments, whilst the traffic related assessments consider the possibility of these voids being filled by off-site material during the Preparations for Quiescence phase to ensure a robust worst-case assessment.

Breakdown of waste types during the Preparations for Quiescence phase



Where waste cannot be avoided or re-used on-site, waste will be sent off-site for treatment for recycling, or disposal if recycling is unviable. Due to the age of the buildings and the plant they contain, the demolitions will generate some hazardous wastes, such as asbestos and lagging, that will require special management during removal to protect both workers and the environment.

Radioactive waste

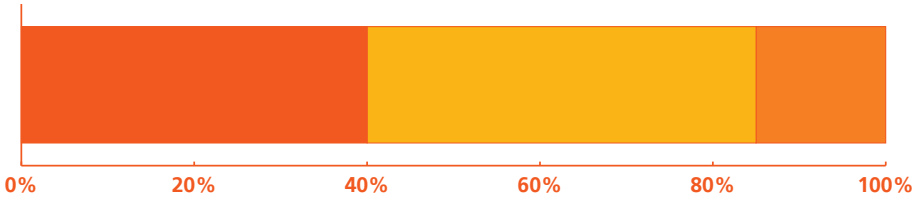
Every three years, EDF estimate and publish in the UK Radioactive Waste Inventory the amount of radioactive waste and materials at Hunterston B and likely arisings which provide a baseline to develop plans for managing radioactive waste and plan for safe storage and disposal. This has been undertaken during the operation of the power station and will continue through the defueling and then decommissioning phases of the station's lifecycle. The UK Radioactive Waste Inventory is based on our understanding at the time of possible waste arisings, and how they will be processed and packaged. However, each waste stream will continue to be analysed to confirm the Best Practicable Means (BPM) by which it can be packaged, stored and disposed of with the aim to reduce the amount of waste going to storage/disposal. This is likely to lead to changes in some of the processing and packaging solutions outlined in the UK Radioactive Waste Inventory 2022.

EDF last contributed to the UK Radioactive Waste Inventory regarding waste from Hunterston B in 2022.

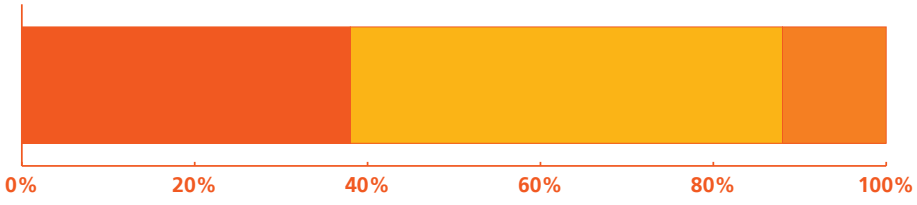
Low Level Waste

LLW will arise from deplanting and demolitions in the active area, as well as secondary wastes from the processing and packaging of LLW and ILW during the Preparations for Quiescence phase. A low amount of LLW may be produced during the Quiescence phase from routine monitoring and maintenance activities. Further LLW will be generated during the Final Site Clearance phase from deplanting and waste processing activities. Current estimated volumes of LLW and proposals for management and disposal are outlined below.

Total estimated LLW arisings during Preparations for Quiescence (PfQ) phase



Total estimated LLW arisings during Final Site Clearance (FSC) phase

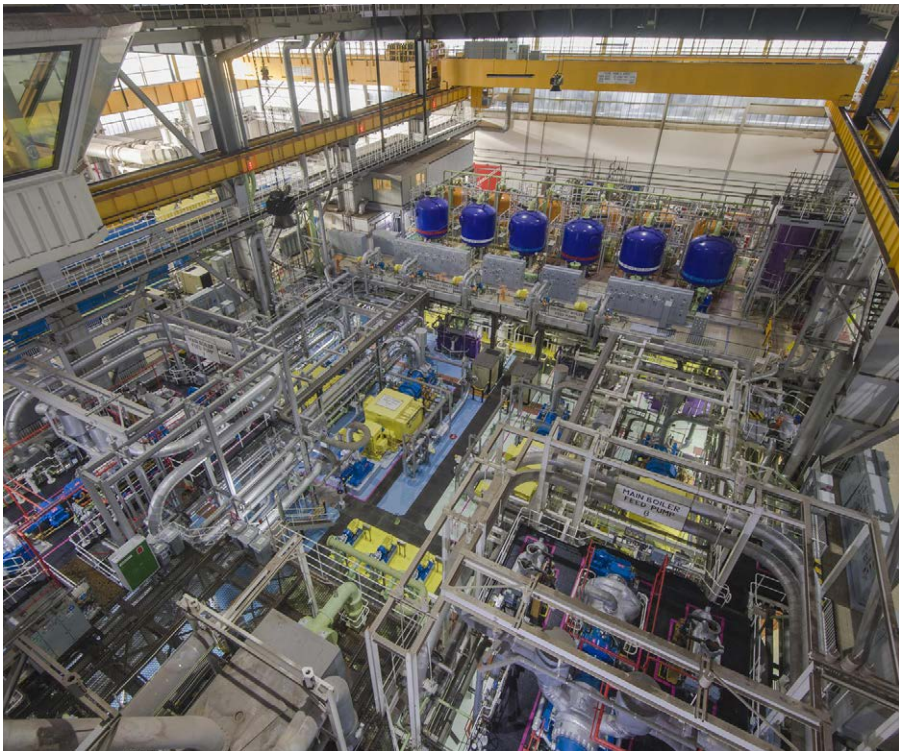


All volumes and percentages are taken from the UK Radioactive Waste Inventory 2022. Wastes are subject to further characterisation and waste packaging assessments which may affect the values highlighted.

In 2018, SEPA, Environment Agency and Natural Resources Wales produced joint guidance regarding the release of sites from the Radioactive Substances Regulations. This includes guidance regarding the on-site disposal of LLW on nuclear licensed sites. Whilst on-site disposal does not currently form part of our decommissioning proposals at the site, studies are ongoing to understand the feasibility of on-site disposals during the Final Site Clearance phase as it may have technical, cost and environmental advantages to the exportation of LLW material off-site. Should on-site disposals become part of the plans at the site in the future, the site operator will be required to assess the change in environmental effects of this change in approach and obtain the necessary permits to undertake these works.

Intermediate Level Waste

Some of the ILW generated during the operation and defueling of the power station will be processed and packaged on-site prior to being stored for an interim period in the Hunterson A ILW Store subject to regulatory agreement. Packaged ILW will ultimately be transferred to a Near Surface Management facility in line with Scottish Policy when it comes available. ILW located in the debris vaults below ground-level will be retained within the Safestore structure until Final Site Clearance. During Final Site Clearance, the reactor will be dismantled and the arising ILW will be processed and packaged and sent to the Near Surface Management facility.



Decommissioning Waste Processing Facility

A Decommissioning Waste Processing Facility (DWPF) will be required to manage, process and package primarily LLW, enabling its removal from the site. Wastes processed in the facility will be sorted according to their physical and chemical characteristics and then processed, packaged and sent off-site for further treatment or disposal at appropriate permitted facilities in accordance with legislation at the time.

As outlined at the consultation in 2022, it is intended that existing buildings on-site will be refurbished to provide the necessary facilities. Further work to understand how the waste facility will operate has identified the requirement for a new small storage facility for empty waste containers and another new building to provide interim storage of LLW packages to allow for the consolidation of transport movements offsite. These two buildings will be contained within the existing site boundary, are expected to be of a modular construction and will require planning permission from North Ayrshire Council under the Town and Country Planning Act (Scotland) 1997. We plan to submit a planning application for these buildings in 2024.

Operational Waste Processing Facility

The OWPF will principally process and package the limited quantities of ILW wastes which were produced during the operational period of the power station and that require removal during the Preparations for Quiescence phase. Optioneering studies are still ongoing to understand whether this facility can be sited within existing buildings on the Hunterston B site or whether a new build facility is required.

Should a new building be required for the OWPF, it would be subject to planning permission from North Ayrshire Council under the Town and Country Planning Act (Scotland) 1997.

Active Effluent Discharge Line

During operations and defueling, treated radioactive effluent is released into the cooling water tunnel and discharged at the cooling water outfall along with cooling water from the station. This process is regulated by SEPA under an Environmental Authorisations (Scotland) Regulations 2018 (EASR18) permit and all discharges are required to be assessed as ALARA (As Low as Reasonably Achievable).

The Cooling Water Outfall tunnel is the tunnel that discharges water used to the cool the power station back out into the Firth of Clyde

New arrangements for the management of treated radioactive effluent will be required when the cooling water pumps have been turned off and decommissioned. Rather than constructing a new pipeline with the associated environmental effects of doing so, it is currently intended that a new discharge pipeline would be installed within the existing cooling water tunnel to the cooling water outfall. Optioneering work is ongoing to confirm the best routing and installation time for this pipe. A variation of the EASR18 Permit will be required prior to the commencement of discharges under this new arrangement, and discharges will still be required to demonstrate they are ALARA.

We would welcome your views on our approach to managing waste at Hunterston B

Traffic movements

During our first consultation in August and September 2022 we received requests from respondents for further information about traffic movements associated with decommissioning at Hunterston B and listened to concerns that all waste and materials would be transported by road.

We have developed our understanding of the likely volumes of material to be transported to site and to be taken off site during decommissioning. Where practicable, Heavy Goods Vehicle (HGV) movements will be minimised by utilising suitable material from other demolition activities on-site as infill rather than bringing material to site, and by managing voids in the long-term through the Quiescence phase of decommissioning.

During the Preparations for Quiescence phase, we currently estimate that there will be less than 10 additional HGV movements a day on average for the first few years. Assuming the worst-case assumption that material needs to be imported to site to fill voids after the dismantling and decommissioning of the cooling water system and turbine hall, additional HGV movements will peak at 25 HGV movements a day for the middle period of the Preparations for Quiescence phase. This is then likely to drop to less than 10 HGV movements a day in the final years of the Preparations for Quiescence phase as the construction of the Safestore is completed and the final buildings are removed from site.

Employment and jobs

Since our first consultation in August and September 2022, we have undertaken further work to understand how the workforce will change throughout the Preparations for Quiescence phase. Across the period, there will be a core permanent workforce, with the total workforce numbers on-site flexing to meet the changing needs of the works happening at any given time.

Whilst the types of jobs at Hunterston B during decommissioning will be different to those during the Operating and Defueling stages, it is recognised that embedded site knowledge should be retained within the workforce during the Preparations for Quiescence phase. Work is ongoing with Magnox to define the workforce profile, to assist our decommissioning planning and to provide further information and clarity to our staff. EDF and Magnox are committed to supporting the retraining and up-skilling of existing Hunterston B employees and contractors as an enabler for the decommissioning of the station and are working closely together to develop a robust employment plan.

During the Quiescence phase, it is expected that employment at the site will reduce, with the ultimate aim being for a remotely monitored and un-manned site through the Quiescence phase. We anticipate that the Final Site Clearance phase will lead to an uplift of employment on the site, with worker numbers being similar to the levels in the Preparations for Quiescence phase.

The impact of the workforce profile throughout decommissioning will be assessed as part of the ongoing EIA and will be reported in the ES.

Demolition phasing

Further work has been undertaken to identify the phasing of demolitions on the Hunterston B site. Sequencing has been developed to efficiently remove environmental and safety hazards from the site and to deliver the site into the Quiescence phase as soon as practicable. The sequencing is shown in a video which is available to view on our website at: www.edfenergy.com/hunterston.

Safestore

In light of feedback from consultation on the appearance of the Safestore, further study has been undertaken to understand the difference in visibility between a full height Safestore (66.5m) and a reduced height option (35m). The results of this study are shown in **Figure 1**. The difference in height of the Safestore does not make a substantial change to the wider visibility of the Safestore from key receptors due to the presence of existing topography and landform.

At this stage, the optioneering process has identified potential benefits of a reduced height structure including reduced maintenance costs, reduced carbon emissions and slightly reduced visibility. However, work is underway to understand the technical feasibility of removing plant and machinery that would enable a lower height Safestore.

Whilst the optioneering process is still ongoing, studies currently indicate that an aluminium cladding is the preferred option due to its longevity and stability. The works to modify and re-clad the reactor building to create the Safestore will require a planning application and permission under the Town and Country Planning Act (Scotland) 1997 (TCPA) from North Ayrshire Council and will be subject to further consultation at that time.

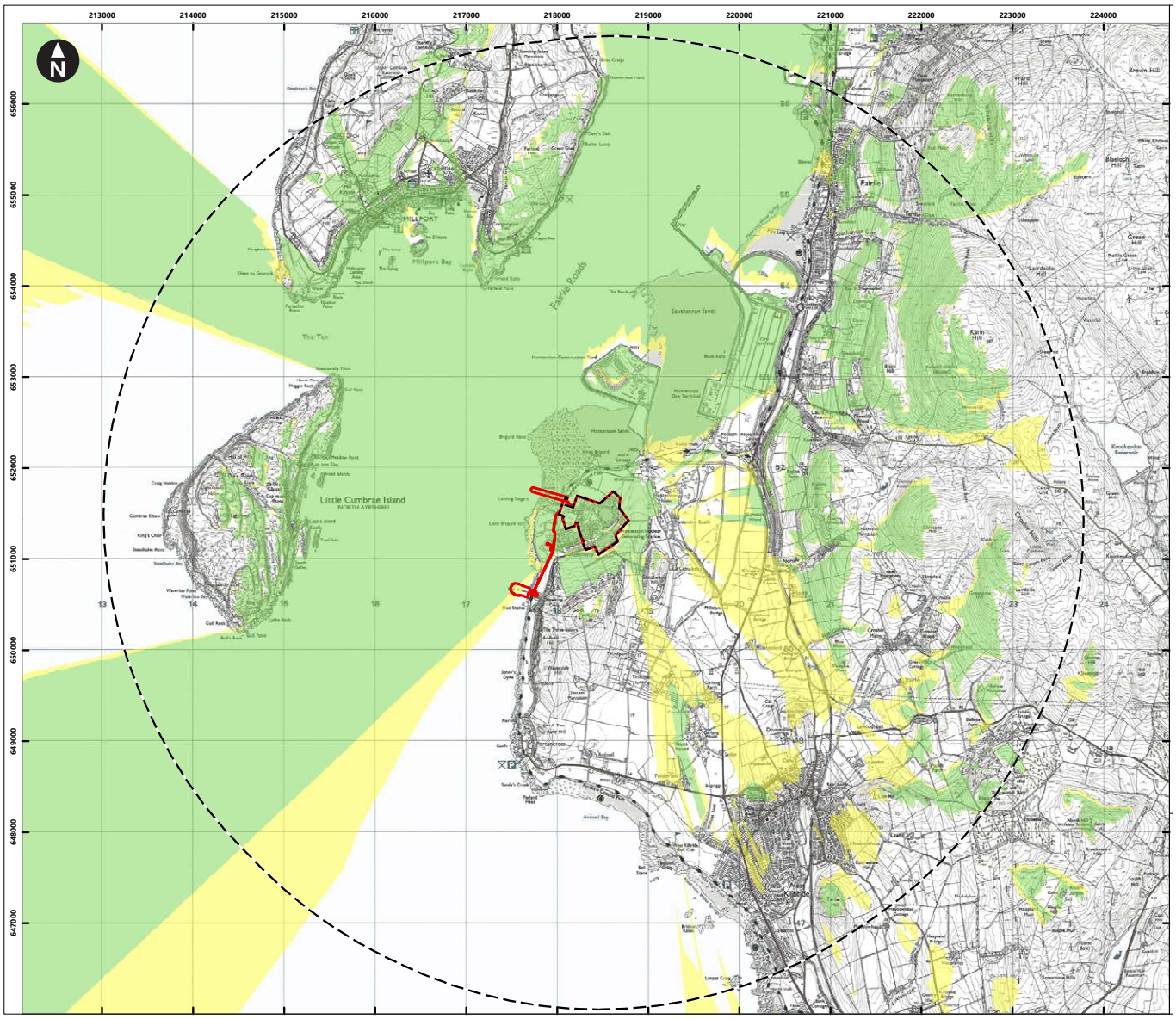


Figure 1 Zone of Theoretical Visibility for full height Safestore (yellow) and reduced height (green)

Key

- Indicative Dismantling Works Area ("Works Area")
- Nuclear Site Licence Boundary ("The Site")
- Landscape and Visual Study Area
- Combined theoretical visibility of the reactor building (at maximum height 36m & 66m)
- Theoretical visibility of the reactor building (at maximum height 66m)

Notes:
The ZTV does not take into account the screening effects of buildings.

Woodland exclusion zones have been created using OS Vectormap District boundary data and modelled at a generic height of 12m.

The ZTV has been modelled using OS Terrain 5 height data.

0 500 1,000 1,500 2,000 m

Respecting the environment and our communities

We have completed most of the environmental surveys required to inform the EIA of the decommissioning proposals, with the remaining surveys due to be completed by Q2 2023.

Taking into account the feedback from the previous consultation held in August and September 2022, and the ONR's Pre-Application Opinion on the proposed scope and methodology, we have commenced the EIA and begun to develop measures to avoid or reduce any potentially significant effects. These measures will be presented in an Environmental Management Plan (EMP), which will consist of a set of environmental mitigation, management and monitoring commitments that Magnox will apply during the decommissioning of Hunterston B. The EMP for Hunterston B will be maintained and treated as a live document that is revised annually by Magnox and shared with ONR to formally evaluate the adequacy of any commitments and account for any revisions to the decommissioning proposals.

The preliminary findings of environmental assessments are summarised below.

Climate Change (Carbon Emissions and Climate Adaptation)

With Hunterston B decommissioning being a long-term project, there is potential for changes in the existing environment caused by climate change to alter the potential impacts that may be experienced. The environmental assessment will therefore consider the impact of the decommissioning proposals with the effects of climate change.

A carbon assessment will quantify CO_2 emissions as a result of the decommissioning activities using the latest professional guidance and outline this in comparison to the various set carbon budgets set by national policy which are working towards decarbonisation. The impact of the decommissioning proposals on decarbonisation at regional and local levels will also be considered.

The reduction of carbon emissions from decommissioning activities is a key consideration in decisions relating to void management, ILW storage, on-site disposals of material and Safestore design.

Terrestrial Ecology and Ornithology

The majority of the site is hard standing and buildings, with some areas of amenity grassland, small blocks of plantation woodland and scattered trees. Beyond the site there is predominantly agricultural land, hedgerows, further industrial development and mixed woodland.

Baseline ecology survey work within the site and surrounding area has been undertaken, covering habitats and protected species including otter, badger, bats and birds. This work has been supported by targeted desk studies and data-gathering from relevant sources, including site-specific annual conservation and monitoring reports. Based on preliminary assessment, only two statutory sites designated to protect natural habitat are potentially affected by the decommissioning work. These are the Southannan Sands Site of Special Scientific Interest (SSSI) and the Portencross SSSI which are within 200m of the site. Southannan Sands SSSI incorporates ones of the best examples of intertidal sandflats habitat on the Clyde coastline. Portencross Woods SSSI is one of the best examples of semi-natural coastal woodland in North Ayrshire.

Surveys of the site identified limited evidence of legally protected species, including otter activity on the coast to the west of the power station and bat activity within the site and perimeter areas. No bat roosts were identified but buildings within the site and bat boxes in the surrounding area provide potential bat roost habitat. There was no evidence of badger activity within 100m of the Works Area identified during the surveys.

All bird species are afforded legal protection. A total of 27 bird species were identified breeding within 100m of the site, six of which are national conservation priorities in Scotland, including dunnock, herring gull, house sparrow, linnet, reed bunting and song thrush. A total of 80 bird species were recorded within 500m of the site outside of the breeding season. A total of 20 of the bird species recorded outside the breeding season are national conservation priorities: bar-tailed godwit, black-headed gull, bullfinch, dunlin, dunnock, golden plover, herring gull, house sparrow, kestrel, lapwing, linnet, peregrine, red-throated diver, redwing, reed bunting, skylark, song thrush, starling, twite and whooper swan.

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

An assessment of the potential effects of the decommissioning works is underway. This includes consideration of the risk of loss of habitat or reduction in quality of habitat to occur, as well as disturbance of species through increased noise, vibration, visual presence of the works and altered lighting.

Under the site EMP, working practices and precautions will be put in place to manage disturbance-related effects and avoid or reduce potential impacts on species and habitat including, but not necessarily limited to:

- Best practice dust management such as dampening of work areas, sheeting of stockpiles, and vehicle washing;
- Use of directional lighting for deconstruction activities to reduce lightspill; and
- Undertaking surveys to identify the presence of any protected species in advance of earthworks and/or demolition, obtaining any requisite Protected Species Licenses and implementing measures to mitigate effects on these species.

Marine Ecology

Relevant works within the marine environment include the decommissioning and removal of the Hunterston B cooling water intake, cooling water outfall and jetty.

The shoreline adjacent to the Hunterston B site comprises a variety of coastal habitats, including shingle, grasslands and cobbled shores, with the sandflats of the Southannan Sands SSSI located to the north of the site. No priority marine features (PMF), protected species or other notable flora and fauna were identified during intertidal surveys. However, some kelp and seaweed communities which would be classed as the PMF were identified in the wider subtidal area in other surveys.

Within the wider Firth of Clyde, over 60 fish species have been recorded, including sea trout, Atlantic salmon, European eel, twaite shad, river lamprey and sea lamprey which are migratory species included within the Scottish Biodiversity List that frequent both marine and freshwater environments. Relatively low numbers of marine mammals have been recorded in the Firth of Clyde including harbour porpoise, northern bottlenose whale, and minke whale. There are no known resident marine mammal populations or breeding or nurseries in the marine environment adjacent to the site. Basking shark are regularly recorded further away from the site in the outer Firth of Clyde.

The assessment of potential effects on marine ecological receptors is ongoing and will assess the potential effects of habitat loss, sediment disturbance and underwater noise generation. Measures to reduce these effects are currently being explored. This may include altering the timing of works to ensure the jetty demolition is undertaken at low tide to minimise marine disturbance. The works will be undertaken with adherence to standard policies and protocols, to avoid pollution in the marine environment. These measures will be outlined in the EMP and utilised to control activities on the site.

Coastal Management and Water Quality

The existing coastal defences at Hunterston comprise a revetement, broadly ranging in height from 4 to 5.88m above sea level. The shoreline adjacent to Hunterston B is predominantly composed of hard or artificial material. There are natural buffers of shingle and vegetated marshlands to the north. In line with North Ayrshire Council's objectives and policy for coastal management set out in the Ayrshire Shoreline Management Plan, the long-term plan is to extend and improve the existing defences with maintenance and upgrades to protect the station as required.

Baseline surveys of marine water quality adjacent to the Hunterston B site have been undertaken and concluded that water temperature, salinity, dissolved oxygen, nutrients, metals and suspended solids were within the expected parameters for a coastal site.

Potential effects being considered within the assessment on coastal management include potential changes to the seabed and sediment transport due to the decommissioning of the cooling water infrastructure and the jetty, and surface run off from the works on-site. Potential changes in water quality in the local marine environment will be assessed including potential sediment-laden or contaminated run-off being released from the works onshore, or from disturbance of the seabed.

It is unlikely that there would be significant effects on water quality as the decommissioning works will be undertaken with adherence to standard policies and protocols to avoid water pollution. Potential mitigation measures include compliance with standard environmental protection measures, which will be outlined within an EMP.

Surface Water and Flood Risk

There are no significant watercourses in the immediate surroundings of Hunterston B, however, there are a series of drainage ditches to the north and south of the site. The absence of significant watercourses means that Hunterston B is not at significant risk of fluvial flooding. The closest area associated with fluvial flooding is a tributary of the Burn Gill, some 620m to the east. Despite its proximity, this source is not hydrologically connected to Hunterston B and thus poses no risk. Some parts of the Hunterston B site are susceptible to surface water flooding, however, all surface water runoff from Hunterston B is managed within via an internal surface water drainage system which discharges to sea. As a consequence, there is no hydrological connection between the site drainage systems and surrounding watercourses.

The assessment will consider the impacts on water quality locally, which may arise from sediment-laden or contaminated run-off being released from the decommissioning works. It will also consider whether the decommissioning proposals or new buildings, retention of hardstanding and treatment of voids increase the likelihood of surface water and tidal flooding on the site and on adjacent land considering scenarios adapted for climate change.

Soils, Geology and Hydrogeology

Hunterston B has hosted a range of industrial processes over many years and there is therefore the potential for contaminants to be present in soil and groundwater within the site. To ensure continued regulatory compliance and to monitor the presence and distribution of potential contaminants, EDF has undertaken a groundwater monitoring and surveillance programme over a long period of time and has completed some focused ground investigations at the site. Most recently, a comprehensive land quality report (2020) has identified areas of the site where there is either known or potential contamination.

The ES will consider the potential for the decommissioning works to result in contamination of soils and groundwater or to affect any existing contaminant distribution and behaviour.

Measures to manage identified contamination hazards will be included in the EMP such as the use of spill kits and bunded areas supported by risk assessment and appropriate remediation in line with industry standard guidance.

Historic Environment

The historic environment baseline has been established through a combination of desk-based research, a site survey and visits to designated heritage assets within a 5km Study Area to consider the intervisibility between the site and these features.

The Hunterston B site is located within the historical estate of the Hunter Clan, with older evidence of human activity at the site being the Hunterston Brooch, discovered in 1826, and probably made ~700AD at Dunadd, Argyll. Within the site, the power stations of Hunterston A and Hunterston B are identified within the West of Scotland Archaeology Service Historic Environment Record (WoSAS HER), and there are further, non-designated historic records in the locality. However, as works necessary to construct the power stations would have previously disturbed any remains within developed areas, it has been assumed that no archaeology will be disturbed as a result of the decommissioning works.

The effects of the demolition of buildings and construction of the Safestore on the setting of the following designated heritage assets will be assessed:

- Millport Conservation Area;
- The Robertson Building, Millport Field Centre;
- The Millport Conservation Area and its associated listed buildings along the south coast of Great Cumbrae;
- Hunterston House;
- Hunterston Castle;
- Hunterston walled garden;
- The scheduled Little Cumbrae Lighthouse; and
- The scheduled Little Cumbrae Castle.

No significant effects on the visual setting of designated assets, following from the end of the Preparations for Quiescence phase are anticipated.

Landscape and Visual Impact Assessment (LVIA)

There are no national landscape designations (National Parks and National Scenic Areas) within the LVIA Study Area. There is one regional designation, the Clyde Muirshiel Regional Park, which is located approximately 2km to the north-east of Hunterston B and

which covers an area of 265 sq. km. Special Landscape Areas include the islands of Little Cumbrae and Great Cumbrae to the west, and to the north-east the rising hills and coastline. Key recreational routes include the Ayrshire Coastal Path, one of Scotland's Great Trails, which follows the coastline through the Study Area, passing to the immediate west and north of the site.

The landscape surrounding Hunterston B is varied and comprises lowland coastal mudflats, transitioning to higher elevations inland, with key features including Goldenberry Hill and Campbelton Hill. Settlement patterns reflect the isolated nature of the coastal landscape and the rising inland topography. Small villages are present along the coastal fringes of the mainland including the towns of West Kilbride and Fairlie. Hunterston Port lies to the north-east and there is an aim, as outlined in the North Ayrshire Adopted Local Development Plan, to regenerate this site into an industrial and economic hub.

Further studies to inform the LVIA assessment are progressing to understand the difference in visibility between a full height (66.5m) and a reduced height (35m) Safestore. Figure 1 shows that the difference in height of the Safestore does not make a substantial change in the visibility from key receptors due to the existing topography and landform. As technical studies into the removal of plant and machinery within the reactor building have yet to conclusively prove that a reduction in Safestore height is practicable, the full height a Safestore will be assessed in the ES.

An Interim Landscape Management Plan will be implemented following completion of decommissioning activities during the Preparations for Quiescence phase. This will aim to reduce the landscape and visual effects during the Quiescence phase for receptors such as users of the Ayrshire coastal path.

Traffic and Transport

There are several road access routes to Hunterston B, with four key routes from the M8 and Glasgow and a further two key routes from the south. Our engagement with the Highways Authorities has identified 10 main roads that have been included in the Study Area for the assessment: A78, A71, A77, A737, A738, B714, B780, B781, Kilrusken Road and Power Station Road.

The assessment of potential effects associated with an increase in traffic resulting from the decommissioning of Hunterston B is underway and consultations have been undertaken with the Highways Authorities to agree the assessment scope and methodology. The assessment work to date has been informed by a site visit, traffic flow surveys and a desk study which has provided details such as existing traffic flows and accident records on the road network.

The assessment considers the forecast worst-case year for increased traffic movements on the road network during the Preparations for Quiescence phase, which is considered to be Year 5 of this phase. It is currently estimated that there will be an additional 25 daily HGV movements on the road network in this year which is an average of approximately 3 additional HGV movements per hour across an 8-hour working day, at the peak of activity. This small increase in HGV movements is less than 10% of existing traffic flows on the road network and therefore, under guidance, it is not considered that traffic resulting from decommissioning activities will result in significant effects.

Air Quality

North Ayrshire Council has not declared any Air Quality Management Areas. This indicates that there are no locations within the relevant jurisdiction area where air quality standards are unlikely to be achieved. Background concentrations of pollutants (NO2, PM10 and PM2.5) are reported to be well below the respective annual mean Air Quality Objectives.

In respect of road traffic emissions, the traffic and transport section above identifies that the decommissioning of Hunterston B is predicted to generate approximately 3 additional HGV movements on the road network per hour (assuming an 8 hour working day) at the peak of activity. Since this predicted increase is small, it does not exceed the relevant criteria thresholds presented in the Institute of Air Quality Management (IAQM) best practice guidance and hence significant road traffic emission effects are not expected to occur.

The effects of dust emissions from site during the works on human health and designated biodiversity sites are not anticipated to be significant with good management practices in place. The assessment of dust emissions using the IAQM best practice guidance will inform the definition of site-specific mitigation, which will be recorded in the EMP.

Noise and Vibration

Existing noise levels in the locality of Hunterston B are influenced by noise from Hunterston A, activities at Hunterston Port, road traffic on the A78 to the east and nearby local roads (including the access road to Hunterston A and Hunterston B), local agricultural activities, and natural sources such as wind moving vegetation and waves breaking on the shoreline. Although it is noted that there have been some sources of ground and/or airborne vibration at Hunterston B in the past, there appears to be no evidence to suggest that noise or vibration from the operation of Hunterston B has caused a nuisance.

The Hunterston B site is relatively remote from residential receptors, with three residential properties approximately 450m from the Works Area and the next nearest approximately 850m from the site. The deplanting and demolition activities on-site will include some noisy activities and the ES will include an assessment of the potential effect of these activities within a radius of approximately 2km, at identified noise sensitive receptors. These representative receptors been agreed in consultation with North Ayrshire Council.

In respect of road traffic noise, the traffic and transport section above identifies that the decommissioning of Hunterston B is predicted to generate approximately 3 additional HGV movements on the road network per hour (assuming an 8 hour working day) in the peak year. Since this increase is small and a change of less than 10% when compared to existing traffic flows on the road network, it is concluded that there is no potential for significant road traffic noise effects to arise.

To reduce any demolition and deplanting noise effects, the EMP will include best practice measures such as the setting of core working hours to minimise disturbance, reducing the propagation of noise (use of acoustic screens, silencers or compressors) and undertaking regular maintenance of on-site machinery.

Socio-economics

Hunterston B is one of the largest employers in North Ayrshire. Hunterston B employs 400 Full time equivalent's (FTE) permanent staff with 99% classified as full-time employees. Hunterston B also employs approximately 150 permanent core contractors delivering services from a range of sectors. Hunterston B employs a total (direct, indirect and induced) of 370 FTE jobs in North Ayrshire, which represents 0.7% of all employment across the county with the rest of employment at the site largely coming from the wider Ayrshire region.

The socio-economic assessment for decommissioning will primarily focus on employment related effects, notably the change in demand and supply of employment and skills in the locality from defueling and into decommissioning. It will also consider the potential impact on the local economy as a result of this changing workforce. Work is currently on-going to quantify the decommissioning workforce profile which will inform this assessment.

Conventional Waste and Materials

During decommissioning, it is anticipated that the majority of wastes produced will be conventional in nature. This conventional waste will include items such as metals, glass, plastics and other miscellaneous wastes in line with that from the demolition of industrial buildings. To follow the principles of the waste hierarchy, wastes will be managed and segregated on-site, with the primary aim of re-using or recycling the waste prior to sending off-site to a registered landfill or other suitable facility. During the Preparations for Quiescence phase, it is anticipated that there will be approximately 82,000 tonnes of conventional waste exported off-site for re-use, recycling or disposal. The assessment will consider the types of conventional waste generated and evaluate the effects that the management of these wastes will have on the existing and committed network of waste management infrastructure in North Ayrshire and South West Scotland.

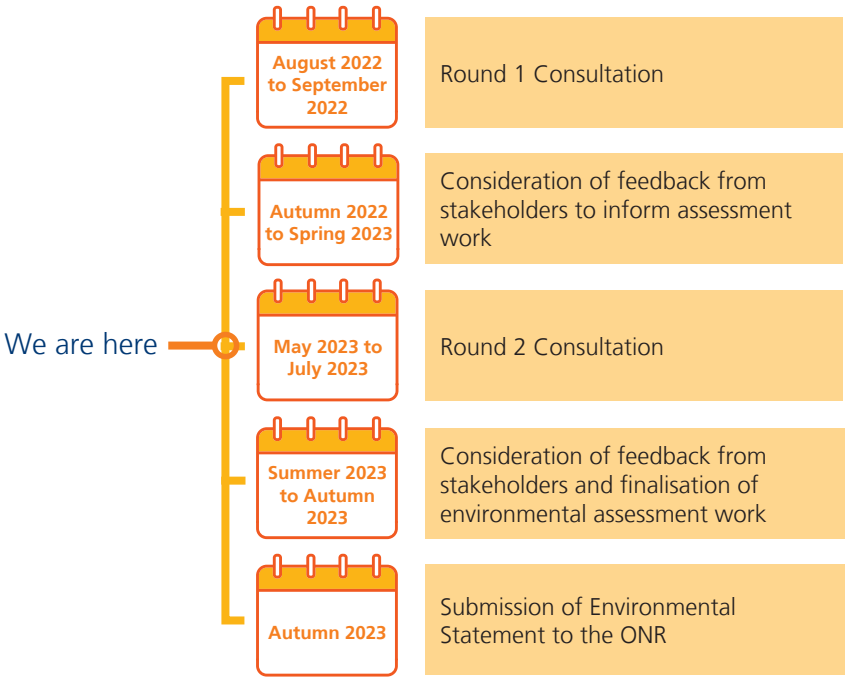
As part of the decommissioning of Hunterston B there will be the requirement to import material to site to facilitate the construction of waste management facilities and potentially infill remaining voids. These materials are likely to comprise of raw materials such as aggregates (sand, gravel, crushed stone) and other minerals, as well as manufactured construction products (steel, wood, concrete). The assessment will consider the level of burden that the decommissioning works will place on local and/or regional sources of materials.

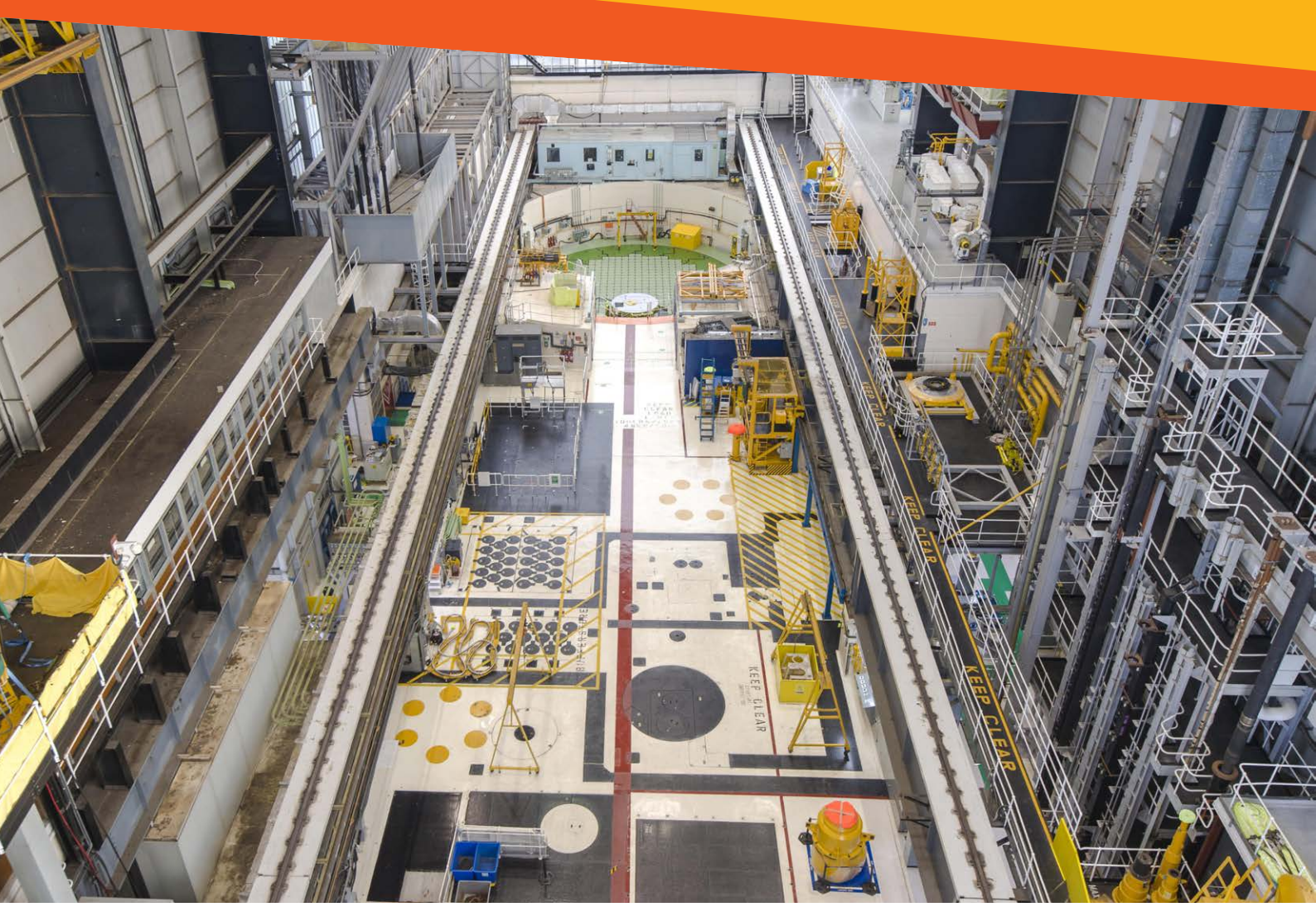
Next Steps

Our proposals require approval from the ONR, prior to commencement of the relevant decommissioning activities under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (EIADR). Under these Regulations, we are required to submit an ES to the ONR. The ONR will then make a decision on whether to give permission to commence decommissioning based upon the findings of the EIA as reported in the ES.

The ONR will make the decision on permissions following consultation with statutory and regulatory bodies, local communities, and other interested parties. Members of the public and interested parties will have the opportunity to comment on the decommissioning proposals and the supporting ES during the EIADR consenting process as well as commenting on the proposals during this consultation.

We plan to submit our ES to the ONR by the end of 2023. This will be accompanied by a Consultation Feedback Report detailing how we have consulted with stakeholders and local communities on our decommissioning proposals and how their comments have been considered.





Planning

New buildings, structures and certain engineering works that are required to enable decommissioning may also require planning permission from North Ayrshire Council. These applications may need to be accompanied by their own EIAs which will assess the impacts of the development being proposed. Members of the public and interested third parties will be able to comment on these proposals via the planning process.

Environmental permitting

The Scottish Environment Protection Agency (SEPA) is Scotland's principal environmental regulator responsible for authorising and overseeing activities that could impact the environment or human health, including enforcing compliance where necessary. Environmental permits are required from SEPA under the Environmental Authorisations (Scotland) Regulations 2018 prior to the commencement of certain activities that have the potential to cause environmental impacts.

The Hunterston B site already holds multiple permits relating to the operational period of the power station. Some of these permits may need to be varied as the site progresses through the decommissioning process, with new permits also potentially being required. The site licensee will liaise with SEPA and other regulators as required to ensure the delivery of these permits to facilitate the decommissioning works.

Prior to the issue of permits, environmental impacts relating to decommissioning activities will be assessed and control measures identified where required. Environmental permits provide an ongoing mechanism to ensure that activities remain safe and compliant.

Marine licenses

Some decommissioning works that take place within the marine environment will require a marine licence from Marine Scotland under the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009. Application for a marine licence may need to be accompanied by an EIA and may be subject to further consultation.

Ongoing engagement with stakeholders and communities

Submission of the ES to the ONR does not mean the end of engagement and communication with stakeholders and local communities. We will continue to engage and communicate as our decommissioning plans become a reality, including ongoing participation with the Hunterston B Site Stakeholder Group (SSG). SSGs are long-established at each of the Magnox sites and provide an opportunity for stakeholders to find out more about the work being undertaken there.

Providing Your Feedback

Your feedback is important to us and will help refine our decommissioning proposals alongside environmental assessments and ongoing work with Magnox and the NDA. This consultation is running from **9.00am on the 30th May 2023 to 11.59pm on 11th July 2023**.

You can submit your feedback through the questionnaire on our website at: www.edfenergy.com/hunterston

Alternatively, you can email your feedback to HNBDecommissioning@edf-energy.com or post it to Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

Any personal data received as part of the consultation will be stored and protected as per relevant data protection requirements as set out in the General Data Protection Regulation (GDPR). No personal details will be used or published in any materials, though feedback received will be analysed and reported on in a Consultation Feedback Report.

Public events

We are holding two public events to help people understand and comment on our updated proposals. At our events, you can view our proposals, examine documents, and speak to our team who will be on hand to answer any queries you may have. In addition, we are running a virtual exhibition for those who can't make it to our in-person events. You can access it, along with downloadable copies of documents, on our website at: www.edfenergy.com/hunterston

Event venue	Address	Date and Time
Fairlie Village Hall	Main Road, Fairlie, Largs KA29 0AD	Wednesday 7th June 2023, 3pm to 7pm
West Kilbride Village Hall	Arthur Street, West Kilbride KA23 9EN	Wednesday 21st June 2023, 3pm to 7pm

Document deposit locations

If you wish to read our documentation but are unable to attend one of our public events or access our website, we are providing reference copies of our documents for inspection at local libraries.

Deposit location	Opening Hours
Fairlie Library Main Road, Fairlie, Largs KA29 0AD	Mon: 10am-1pm, 2pm-5pm Tues: 10am-1pm, 2pm-5pm Weds: CLOSED Thurs: 10am-1pm, 2pm-5pm Fri: 10am-1pm, 2pm-5pm Sat: 10am-12pm Sun: CLOSED
Millport Library Garrison House, The Garrison, Millport KA28 0DG	Mon: 1pm-5pm Tues: 1pm-6pm Weds: CLOSED Thurs: CLOSED Fri: 10am-1pm Sat: 10am-12pm Sun: CLOSED
Largs Library 26 Allanpark Street, Largs KA30 9AG	Mon: 10am-1pm, 2pm-5pm Tues: 10am-1pm, 2pm-6pm Weds: 10am-12:30pm Thurs: 10am-1pm, 2pm-5pm Fri: 10am-1pm, 2pm-5pm Sat: 10am-12:30pm Sun: CLOSED
West Kilbride Library Halfway Street, West Kilbride KA23 9EQ	Mon: 10am-1pm, 2pm-5pm Tues: 10am-1pm, 2pm-5pm Weds: CLOSED Thurs: 10am-1pm, 2pm-5pm Fri: 10am-1pm, 2pm-5pm Sat: 10am-12pm Sun: CLOSED

These opening hours are correct at the time of print and do not include closures for Bank Holidays, please check the North Ayrshire Council website before visiting: www.north-ayrshire.gov.uk/libraries

How you can get in touch

If you would like more information about our proposals, or require alternative formats for documents (e.g. in Braille or other languages), you can contact us directly.

Call our freephone number:
0800 915 3249

Email us at:
HNBDecommissioning@edf-energy.com

scan QR code to access website

Contact details:

Call our freephone number: 0800 915 3249

Email us at: HNBDecommissioning@edf-energy.com

www.edfenergy.com/hunterston

scan QR code to access website

FAQs Document

Frequently Asked Questions

Why is Hunterston B power station being decommissioned?

Hunterston B generated low carbon energy for 46 years, outperforming expectations at the time of its construction that it would only operate for 25 years. Due to the age of the station, and to give certainty to our staff, we decided in August 2020 that Hunterston B would cease generation in January 2022 before moving into the defueling and decommissioning processes.

What is the schedule for defueling and transferring Hunterston B to the NDA?

We anticipate that defueling will be complete over the next couple of years. Once 'fuel free', the buildings and infrastructure to be decommissioned will transfer to the Nuclear Decommissioning Authority (the UK's independent regulator of the nuclear industry) and Magnox, subject to the appropriate regulatory arrangements being agreed and in place.

Defueling activities at Hunterston B are progressing well. Since defueling commenced in May 2022, we have safely removed more than 60% of the spent fuel stringers from the first reactor and onward transferred many flasks to Sellafield. All these operations have been carried out safely and with improving efficiency.

Why is EDF not carrying out the full decommissioning of Hunterston B power station?

EDF made an agreement with the UK government in June 2021 to a phased transfer of all 7 Advanced Gas-cooled Reactor (AGR) Power Stations to the Nuclear Decommissioning Authority (NDA) following the completion of defueling. This makes best use of EDF's and the NDA's expertise and provides the best and most cost-effective solution for decommissioning. Defueling is, in effect, an extension of operations and the EDF team has the expertise and experience to undertake this most efficiently.

The NDA is the nation's nuclear decommissioning body and has extensive experience in this area, being responsible for decommissioning the rest of the UK's ex-nuclear research and generation sites through its subsidiary Magnox. Transfer to NDA / Magnox provides the UK government with the best opportunity to integrate the decommissioning of all UK nuclear sites into the most cost-effective solution for the taxpayer. Magnox has decommissioning experience and expertise to undertake the decommissioning programme as Hunterston B's new Site Licence Company, following completion of defueling by EDF.

What is the timing of each stage of decommissioning?

Defueling begins when a reactor formally stops generating. It involves removing all fuel from the reactors and fuel ponds, which represents 99% of the radioactive material on site. This is expected to take approximately 4 years from the end of generation.

The first stage of our decommissioning proposals for Hunterston B power station is referred to as the Preparations for Quiescence phase. Our proposals intend to complete the first stage of decommissioning as soon as practicable. The majority of conventional buildings will be demolished and a Safestore will be constructed around the reactors and associated structure during this phase. Thereafter is the 'Quiescence' phase of around 70

years to allow for radioactive decay within the Safestore. This is followed by the 'Final Site Clearance' phase. This is expected to take approximately 10 years to undertake and includes the dismantling of the Safestore and works required to release the site for future development.

What is 'defueling'? And where does the used fuel go?

Defueling is the process of removing and carefully emptying the used fuel channels from each reactor and placing it into a storage pond within the reactor buildings to cool. The fuel channels are then removed from the pond, loaded into a flask, and transported by rail to Sellafield. They are then safely stored in a cooling pond for up to 70 years, after which they would be transferred to the UK's planned geological disposal facility.

What is 'Quiescence'?

'Quiescence' refers to the safe, passive period during which the Safestore will be left to provide time for remaining radioactive materials to safely decay prior to Final Site Clearance.

What will the Safestore look like?

The final design of the Safestore building is yet to be determined. Ongoing optioneering has suggested that there are some benefits of a reduced height Safestore structure, but this is only possible should it be practicable to remove plant from the upper part of the reactor building during the Preparations for Quiescence phase. Studies undertaken since the first consultation have found that there is not a large difference in visibility of a full height (65m) and reduced height (35m) Safestore from key receptors.

The ongoing Safestore optioneering has identified that an aluminium cladding would provide suitable stability and longevity for the Quiescence phase and minimise cladding maintenance activities during this period, but no choice on the final material to be used will be made until the detailed design stage. The works to convert the reactor building into the Safestore, including the type and appearance of any cladding, will be subject to the approval of North Ayrshire Council as the local planning authority.

How will arrangements for emergency planning change during decommissioning?

The Hunterston site will continue to be subject to regulations for radiological protection and emergency preparedness. EDF have evaluated the risk and hazards of a radiation emergency to local communities now that the station has ceased generating electricity and there has been a change in the risks associated with station operation. Ceasing generation activities reduces some hazards and eliminates others and therefore EDF has identified a reduction in the minimum technical distance for detailed emergency planning zone from 2km to 1.08km from the site centre. As a result, the Detailed Emergency Planning Zone has been reduced by North Ayrshire Council following a redetermination process. EDF will update the hazard evaluation again in advance of the Preparations for Quiescence phase. The evaluation will consider whether arrangements and processes can be simplified in line with a reduction in hazard following the removal of fuel from the site. Magnox experience will be taken into account in the review of arrangements and processes.

Again, any changes to the Detailed Emergency Planning Zone or protective actions will be determined by North Ayrshire Council. Existing emergency planning arrangements for Hunterston A will remain in place.

How will waste arising from decommissioning be managed?

During decommissioning, radioactive and non-radioactive waste will be produced. Waste will be managed in accordance with government policy and legislation, in a way that protects people and the environment, and in accordance with the principles of a waste hierarchy to minimise waste, re-use and recycle.

EDF have a developed understanding of the inventory of waste likely to be generated which is informing the planning and preparation for waste management. New buildings may be required for radioactive waste management, processing and packaging. NDA, Magnox and EDF are working together to develop the plans for using the existing Intermediate Level Waste (ILW) store on the Hunterston A site and to obtain the necessary regulatory approvals to enable this to happen.

ILW generated during final site clearance will be transferred to the UK's planned geological disposal facility.

What types of radioactive waste will arise from decommissioning?

The majority of the waste produced during decommissioning will be non-radioactive and non-hazardous. In respect of radioactive waste, there are two types that will be processed during the decommissioning works, Intermediate Level Waste (ILW) and Low Level Waste (LLW).

Some limited quantities of ILW have been produced during operation and defueling of Hunterston B. ILW produced during routine operations and defueling that is not contained within the debris vaults will be processed and packaged during the Preparations for Quiescence phase within our Operational Waste Processing Facility before being stored in the Hunterston A ILW store until a long-term ILW disposal facility in-line with Scottish Government Policy becomes available.

LLW produced from active area deplanting and deconstruction and waste processing in the Preparations for Quiescence phase will be processed, packaged and consigned from site from the Decommissioning Waste Processing Facility (DWPF). This facility will be provided on site through the refurbishment of existing site buildings and will be created at the beginning of the Preparations for Quiescence phase prior to being demolished at the end of this phase. Further LLW will be produced from waste processing and dismantling activities within the Safestore structure during Final Site Clearance.

What are the plans for future development of the site?

There is much decommissioning work to be planned and undertaken before the site can be de-licensed and released for future development. When the time comes, the NDA will work with local stakeholders to identify credible options for the beneficial re-use of land at Hunterston B and plan to leave the site in an appropriate end state. Any future development will require a planning application, which will be determined in accordance with the relevant national and local planning policies at that time. Currently, the Hunterston A and B stations, along with Hunterston Port, are designated as a 'Strategic Development Area' in national and local planning policy, recognising its importance as an energy hub and deep water port and the potential for employment uses including renewable energy, industrial, commercial, and research and development.

How can I provide further feedback as the proposals develop?

Feedback to this consultation will inform the development of the decommissioning proposals for Hunterston B. Our proposals require approval from the Office for Nuclear Regulation (ONR) prior to the commencement of decommissioning activities under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations.

Under these Regulations, EDF is required to submit an Environmental Statement to the ONR. Once the Environmental Statement has been submitted to the Office for Nuclear Regulation, members of the public and other interested parties will have the opportunity to make further representations.

Further consents are likely to be required through planning applications to North Ayrshire Council, Marine Licence applications to Marine Scotland and environmental permit applications to the Scottish Environmental Protection Agency as the site progresses towards and into deconstruction. These consenting processes will also provide an opportunity for you to provide comment on these parts of our proposals.

Who will make the final decision on the decommissioning proposals?

The Office for Nuclear Regulation, the UK's independent regulator of the nuclear industry, will make the decision on whether to grant consent to the decommissioning project. We will submit an Environmental Impact Assessment for Decommissioning Regulations (EIADR) application to them, including an Environmental Statement assessing the environmental impacts of the decommissioning proposals. Approvals through other consenting regimes for other parts of the project, such as waste management and the removal of marine infrastructure, will be required before the decommissioning proposals are finalised.

How will the decommissioning works affect traffic on local roads?

Where practicable, Heavy Goods Vehicle (HGV) movements will be minimised by utilising suitable material from other demolition activities on-site as infill rather than bringing material to site, and by managing voids in the long-term through the Quiescence phase of decommissioning. During the Preparations for Quiescence phase, we currently estimate that there will be less than 10 additional HGV movements a day on average for the first few years. Assuming the worst-case assumption that material needs to be imported to site to fill voids after the dismantling and decommissioning of the cooling water system and turbine hall, additional HGV movements will peak at 25 HGV movements a day for the middle period of the Preparations for Quiescence phase. This is then likely to drop to less than 10 HGV movements a day in the final years of the Preparations for Quiescence phase as the construction of the Safestore is completed and the final buildings are removed from site.

How will disturbance effects on protected species adjacent to the works be mitigated?

We will present an Environmental Management Plan (EMP), which will consist of a set of environmental mitigation, management and monitoring commitments. The Site Operator undertaking the decommissioning activities will apply the EMP during the decommissioning of Hunterston B.

Under the EMP, working practices and precautions will be put in place to manage disturbance-related effects and avoid or reduce potential impacts on species and habitat including, but not necessarily limited to:

- Best practice dust management such as dampening of work areas, sheeting of stockpiles, and vehicle washing;
- Use of directional lighting for deconstruction activities to reduce lightspill; and
- Undertaking additional surveys to identify the presence of any protected species in advance of earthworks and/or demolition, obtaining any requisite Protected Species Licenses and implementing measures to mitigate effects on these species.

How will the effects of climate change on sea level rise and increased storm severity be assessed within your application?

With Hunterston B decommissioning being a long-term project, there is potential for changes in the existing environment caused by climate change to alter the potential impacts that may be experienced. The environmental assessment will therefore consider the impact of the decommissioning proposals, to including the effects of climate change where relevant. Future climate conditions will be presented and measures to ensure the resilience of the project to the impacts of climate change will be reported.

The Hunterston B site will also be subject to maintaining a safety case during the decommissioning works on the site as a requirement of the Nuclear Site License. This will consider the potential impacts from sea level rise and storm surge on the site during decommissioning.

Feedback Form

Have your say on our plans to decommission Hunterston B nuclear power station

Consultation feedback form

EDF is consulting on its updated proposals for decommissioning Hunterston B power station, North Ayrshire.

Decommissioning will involve dismantling and demolition of the plant and buildings on the Hunterston B site.

This consultation is your opportunity to express your views at a stage when our proposals are still under development and prior to our plans being submitted to the Office for Nuclear Regulation by the end of 2023.

We want as many people as possible to share their views on our proposals as part of this consultation.

How to respond to this consultation

This questionnaire is designed to help you give us your feedback on the proposals. You can respond to the consultation by:

- completing this questionnaire online: **https://forms.office.com/e/cePifNZjcG**
- completing this questionnaire and returning it to **Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION**
- completing this questionnaire and sending it by email to **HNBDecommissioning@edf-energy.com**

The deadline for submitting a response is 23:59 on 11th July 2023.

1. How would you describe your interest in the decommissioning of Hunterston B?

Please tick all that apply

- ☐ Local resident
- ☐ Local representative
- ☐ Landowner
- ☐ Local business owner
- ☐ Local interest group (if so please name) _____
- ☐ Other _____

2. To what extent do you agree with the approach to decommissioning Hunterston B?

Please tick one

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly Disagree

---

3. Do you have any comments on how the decommissioning plans have developed and the further information provided?

4. Do you have any comments on the preliminary findings of environmental assessments?

Optional information

5. If you would like to be kept updated on this project, please provide your contact details below (name, address, phone number, e-mail address)

6. Your age

Please tick one

- ☐ 0-19
- ☐ 20-39
- ☐ 40-59
- ☐ 60-79
- ☐ 80+

7. Occupation

Please tick one

- ☐ Student
- ☐ Full-time employed
- ☐ Unemployed
- ☐ Part-time employed
- ☐ Retired

Our consultation process

8. How informative did you find our consultation events and/or our consultation materials?

Please tick one

- ☐ Very informative
- ☐ Quite informative
- ☐ Not informative
- ☐ No opinion

9. Please rate how well this consultation was advertised

Please tick one

- ☐ Very good
- ☐ Good
- ☐ Average
- ☐ Poor
- ☐ Very Poor
- ☐ Unsure

And finally...

Any comments received will be analysed by EDF and any of its appointed agents. Copies may be made available in due course to the Office for Nuclear Regulation and other relevant statutory authorities so that feedback can be considered as part of the process.

We will request that any personal details are not placed on public record and will be held securely by EDF and its agents in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent application to the ONR and, except as noted above, will not be passed to third parties.

Responses may also form the basis of a Consultation Report that will accompany the application to the Office for Nuclear Regulation. Therefore, in providing any comment, it should be borne in mind that the substance of it may also be communicated to others as part of the Consultation Report. Names and personal contact information would not be shared as part of this process.

THANK YOU

Virtual Exhibition Boards

Welcome

Click here for more information

About Hunterston B power station

Click here for more information

How we have considered your feedback

Click here for more information

How our plans have developed - Waste Management

Click here for more information

How our plans have developed - Active Effluent Discharge Line and Safestore

Click here for more information

How our plans have developed - Traffic and employment

Click here for more information

Consenting Process

Click here for more information

Respecting the Environment and our Communities

Click here for more information

Providing Your Feedback and Next Steps

Click here for more information

Thank you for visiting our exhibition

- please remember to leave your feedback

Appendix G

Round 2 Promotional Materials

Community Information Leaflet

Have your say on our updated plans to decommission Hunterston B nuclear power station

30th May 2023 to 11th July 2023

EDF is progressing with proposals to decommission the Hunterston B nuclear power station in North Ayrshire.

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will remove the used fuel from the reactors (called defuelling) and prepare for the decommissioning of the nuclear power station. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site.

As a result of ongoing environmental assessment work and feedback to our previous consultation last year, we have made some important updates to our decommissioning plans. We want your views as we finalise these plans before we submit them to the Office for Nuclear Regulation for approval. Once approved, decommissioning will take many decades to deliver and complete.

Decommissioning Hunterston B

The first phase of decommissioning is anticipated to start at the end of defueling with the intention that this phase is completed within approximately 12 years from the end of generation. This first phase will involve the removal of all buildings and plant from the site, with the exception of the reactor buildings and some adjoining structures which will be modified to create a Safestore structure. This Safestore is designed to maintain the reactor buildings in a safe state through the Quiescence phase of around 70 years. This allows for safe radioactive decay, prior to Final Site Clearance. Following this, the Final Site Clearance phase will involve the removal of the reactors and debris vaults housed in the Safestore structure. Whilst future uses of the site will not be achieved for many decades, our proposals are a stepped approach to dismantling and decontamination towards an end state.

Updates on environmental assessments

Since the previous consultation with stakeholders and the local community in August and September 2022, we have further developed our decommissioning plans and have begun environmental assessment work. Following submission of our scoping report last summer, ONR provided a Pre-application Opinion which confirmed the methodology and scope of our environmental assessment to be undertaken of the decommissioning proposals.

We have provided an update on our environmental assessment work as part of this consultation.

Public events

You can come along to our public events to find out more about our plans and speak to the team, who will be on hand to answer any questions.

Event venue	Address	Date and Time
Fairlie Village Hall	Main Road, Fairlie, Largs KA29 0AD	Wednesday 7th June 2023, 3pm to 7pm
West Kilbride Village Hall	Arthur Street, West Kilbride KA23 9EN	Wednesday 21st June 2023, 3pm to 7pm

Document deposit locations

If you wish to read our consultation materials but are unable to attend one of the public events or access our website, we are providing reference copies of our documents for inspection at **Fairlie Library, Millport Library, Largs Library, and West Kilbride Library**. Please check the North Ayrshire Council website for information on opening hours before visiting: www.north-ayrshire.gov.uk/libraries

scan QR code to access website

You can also find out more about our proposals, access documents, and view our virtual exhibition at: www.edfenergy.com/hunterston

Provide your feedback

You can find more information about this consultation on our website www.edfenergy.com/hunterston, and at our consultation events and document deposit locations.

Your feedback will help inform the decommissioning proposals which will be submitted to the Office for Nuclear Regulation at the end of 2023 for approval before decommissioning can proceed.

The deadline for submitting feedback is **11.59pm on 11th July 2023**.

Responding to the consultation:

Online using the questionnaire on our website www.edfenergy.com/hunterston

scan QR code to access website

Complete a paper questionnaire, available at events or on request using the contact details provided below:

Email us at HNBDecommissioning@edf-energy.com

Write to us at Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

Get in touch with the project team, or request alternate formats for documents (e.g. in Braille or other languages):

Call our Freephone number 0800 915 3249

Email us at HNBDecommissioning@edf-energy.com

Write to us at: Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

Poster

Have your say on our updated plans to decommission Hunterston B nuclear power station

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will remove the used fuel from the reactors. Working with the Nuclear Decommissioning Authority and their subsidiary Magnox, plans are being prepared for the decommissioning of the nuclear power station. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site.

As a result of ongoing environmental assessment work and feedback to our previous consultation last year, EDF can now provide further information on the decommissioning plans. We are holding a public consultation from **30th May 2023 – 11th July 2023** to obtain your views as we progress towards finalising our environmental assessment of the decommissioning proposals which we intend to submit to the Office for Nuclear Regulation for approval later this year.

Learn about our proposals and have your say at **www.edfenergy.com/hunterston** or at our public events:

Fairlie Village Hall, Main Road, Fairlie, Largs KA29 0AD
Wednesday 7th June 2023, 3pm to 7pm

West Kilbride Village Hall, Arthur Street, West Kilbride KA23 9EN
Wednesday 21st June 2023, 3pm to 7pm

If you would like more information you can contact us directly on **0800 915 3249** or email **HNBDecommissioning@edf-energy.com**

If you wish to read our documentation but are unable to come to one of our public events or access our website, we are providing reference copies of our documents for inspection at Fairlie Library, Millport Library, Largs Library, and West Kilbride Library.

Please check the North Ayrshire Council website for information on opening hours before visiting: www.north-ayrshire.gov.uk/libraries

scan QR code to access website

Letters to Stakeholders

26th May 2023

Dear Stakeholder

Re: Hunterston B Power Station Decommissioning Consultation

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will be working closely with the Nuclear Decommissioning Authority and Magnox to develop proposals for decommissioning. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site.

Under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations[1] (the EIADR), an application (an 'EIADR application') must be made to and approved by the Office for Nuclear Regulation prior to carrying out the dismantling or decommissioning work on any nuclear power station.

Prior to the submission of the EIADR application, EDF intend to undertake two rounds of consultation. The first round of consultation was held on the 8 August to 19 September 2022, seeking views to help inform the decommissioning proposals. Our second consultation aims to provide a response to key feedback raised at this first consultation and to provide an update in the development of our decommissioning proposals and accompanying environmental assessment since the autumn. This public consultation will run from **30 May to 11 July 2023**, seeking your views to help inform the decommissioning proposals.

This will be a public consultation with both in person and virtual exhibitions, details for which will be accessible on our website www.edfenergy.com/energy/power-stations/hunterston-b when the consultation opens.

As your organisation are likely to be consulted by the ONR when the EIADR application is submitted by EDF to the ONR (anticipated to be towards the end of 2023), we would very much welcome any views on the decommissioning proposals set out in the consultation.

You can either provide feedback to this pre-application consultation through the channels listed below or if you would prefer a meeting, our team is happy to provide further details on the proposals and answer any queries you may have, either in person or via videocall/Teams.

- Use the feedback form on our website www.edfenergy.com/energy/power-stations/hunterston-b

[1] The Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 as amended.

EDF Energy Nuclear Generation Ltd
EDF Energy, Barnett Way,
Barnwood, Gloucester, GL4 3RS

edfenergy.com

- Complete a paper feedback form, available at events and document deposit locations or on request using the contact details below
- Email us at HNBDecommissioning@edf-energy.com
- Write to us at Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

The pre-application consultation will close **11:59pm** on **11 July 2023**.

If you have any questions about this letter or the consultation, please contact us on 0800 915 3249 or email us at the above address.

Yours sincerely,

Clare Hennessey

EDF Nuclear Decommissioning, Consents and Statutory Engagement Manager

26th May 2023

Dear Stakeholder

Re: Hunterston B Power Station Decommissioning Consultation

Hunterston B stopped generating electricity in January 2022 after 46 years of service. Over the next few years, EDF will be working closely with the Nuclear Decommissioning Authority and Magnox to develop proposals for decommissioning. Decommissioning will involve dismantling and demolition of plant and buildings on the Hunterston B site.

After a first consultation in August and September 2022 outlining our proposed decommissioning approach, we are again undertaking public consultation to provide a response to key feedback raised at this first consultation and to provide an update in the development of our decommissioning proposals and accompanying environmental assessment. This public consultation will run from **30 May to 11 July 2023**, seeking your views to help inform the decommissioning proposals. These proposals will require the approval from the Office for Nuclear Regulation before decommissioning can proceed[1].

Public exhibitions providing information about the decommissioning proposals will be held as follows:

Fairlie Village Hall	Main Road, Fairlie, Largs KA29 0AD	Wednesday 7th June 2023, 3pm to 7pm
West Kilbride Village Hall	Arthur Street, West Kilbride KA23 9EN	Wednesday 21st June 2023, 3pm to 7pm

We are running a virtual exhibition for those who may not be able to attend one of our events that will be accessible from our website.

You can provide feedback to the consultation through the following channels:

- Online using the feedback form on our website https://www.edfenergy.com/energy/power-stations/hunterston-b
- Completing a paper feedback form, available at events and document deposit locations or on request using the contact details on this letter
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- Write to us at Freepost HUNTERSTON B DECOMMISSIONING CONSULTATION

[1] An application to the Office for Nuclear is required under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended)

Please ensure that you have provided your feedback by **11:59pm** on **11 July 2023**.

We hope that you will find the information useful. Should you have any queries related to the consultation, please contact us on 0800 915 3249 or email us at the above address.

Yours sincerely,

Clare Hennessey

EDF Nuclear Decommissioning, Consents and Statutory Engagement Manager

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[1] An application to the Office for Nuclear is required under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended)

Please ensure that you have provided your feedback by **11:59pm** on **11 July 2023**.

We hope that you will find the information useful. I am aware that my colleague has already been in contact to set-up a meeting to discuss the proposals. Should you have any queries related to the consultation prior to or post this arranged meeting, please contact us on 0800 915 3249 or email us at the above address.

Yours sincerely,

Clare Hennessey

EDF Nuclear Decommissioning, Consents and Statutory Engagement Manager

Newspaper Advertisements

£950k boost for island projects

TWO projects on Cumbrae and Arran have received over £950,000 in the latest round of funding from the Scottish Government's Islands Programme.

More than £220,000 has been allocated for the development of a new bike park at Dyemill on the Isle of Arran.

More than £700,000 will be used to help preserve the 18th century Garrison House complex in Millport.

North Ayrshire Council leader Marie Burns said: "We're absolutely delighted to receive funding for two projects of major significance on the islands of Cumbrae and Arran.

"This will secure the future of the historic Garrison House in Millport, allowing it to be enjoyed by future generations.

"We are also thrilled to accept funding which will support the creation of an accessible, all-weather bike park at Dyemill on Arran.

"This will help make Arran High School Mountain Bike Club's vision for the park a reality and make a major contribution to encouraging residents to engage in cycling activities."

'I hope images like this will urge people to stop littering'

Photo captured of lobster living inside a traffic cone

Calum Corral
Calum.Corral@newsquest.co.uk

AN underwater photographer was gobsmacked to see a lobster had made its home in a traffic cone in the seabed near Fairlie.

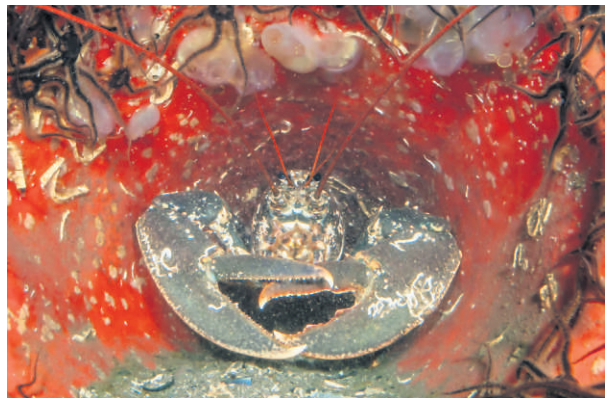
Ross McLaren, 31, was astonished to see the scene as he was diving near Fairlie Quay.

Ross, who lives in Kilwinning, regularly likes to dive at Portencross and Fairlie Quay.

He said: "The area of the seabed around Fairlie Quay is just teeming with life.

"It is incredible given it is a working marina how much you can see.

"To be honest I don't think the lobster was at risk - it has seen an opportunity and decided to take it."



Ross's photo shows the lobster looking back at the camera lens from within the traffic cone.

He said: "Having dived around many places, it is a bit of a conundrum now as to whether you pick up litter or leave it and on this occasion I thought it best to leave it as it looked like the lobster has set up its home in there.

"It is a moral and ethical issue and unless the marine creature is in danger, it is not worth changing it.

"In some of my dives, I have seen the likes of a can of Irn Bru and it has grown with bits and pieces and that is where it becomes an ethical issue."

Ross who is a chemistry teacher at Garnock Academy, said: "I was really quite surprised to see it - the visibility is sometimes not the best and it wasn't the easiest shot to get but I like to try and show, if possible, marine life interacting with external material from outwith the ocean.

"This is an absolute excellent example and hopefully will make people aware of the importance of not littering and keeping our marine environment safe.

"I used the external flash and you can see the lobster's eyes looking back at me as I was taking the photo.

"Sometimes it is the striking images such as a lobster in a traffic cone which can make the biggest impact."

Home plan on hold

THE Scottish Government's flagship energy efficiency scheme, offering free insulation to those at risk of fuel poverty, has been paused to new applications until October.

Designed to reduce fuel bills, the Warmer Homes Scotland initiative offers free installation to those in homes with poor energy ratings who are in receipt of certain benefits.

A spokesman for the Scottish Government said it will relaunch "a new and improved Warmer Homes Scotland scheme" in October that will offer "more help for households to receive a climate-friendly heating system."

He added: "Because the new scheme has different rules and offers expanded help, we need to allow a period where we complete current applications, work for which will be happening right through the summer, and gear up for the new scheme."

Father's battle with breast cancer inspires fundraiser

CHARITY FOOTBALL MATCH TO RAISE AWARENESS AND VITAL FUNDS

A WOMAN has organised a charity football match in Beith as she looks to raise awareness of breast cancer in men.

Murray Grayston
murray.grayston@newsquest.co.uk

Shannon McDermott has organised the match, which will be played at the Meadowside AstroTurf in Beith on Sunday, May 28 from 1pm. The pitch has kindly been provided for the event.

Her decision to do so has come while a member of her own family is currently battling the disease.

Shannon's father, John, was diagnosed with breast cancer in November last year and has been undergoing treatment for it ever since.

While watching her father living with the disease, Shannon decided that she wanted to do her part to increase awareness of how the life changing cancer can affect men, as well as women.

She said: "Only about 360 men are diagnosed with breast cancer a year in the UK and due to lack of awareness it is very often diagnosed in the later stages.

"My dad was diagnosed with breast cancer in November last year.

"He has since gone through eight chemotherapy sessions and an operation to remove the breast tissue and all of his lymph nodes.

"He is currently waiting to find out what other treatment he will require, this may be more chemotherapy and/or radiotherapy.

Shannon alongside her father who is currently battling breast cancer.

"After seeing him go through this, I decided to arrange a charity football match to raise money for the ward where he received his chemotherapy and to raise awareness for breast cancer in men."

All proceeds raised from the match will be donated to the oncology ward at Vale of Leven Hospital.

And as well as the football match, which will run until 5pm with a food van on site, the day of fundraising will also see all in attendance welcomed back to the Eglinton Inn in Beith.

Here, organisers will hold a raffle/tombola, selling baking from a cake stand and have a prizegiving for the players who took part.

All are welcome to attend and help raise awareness of #breastcancerinmen.

While Shannon is continuing to look for any local buisnesses who would be interested setting up a stall.

To do so, she is asking that a £20 donation is made to the charity and you can keep all profit made on the day.

For more information, you can reach out to Shannon on Facebook - facebook.com/shannon.mcdermott.92.

Social Media Advertising

EDF
Published by Lisa Sidney · 26 May ·

Last year #zerocarbon generation ended at #HunterstonB #nuclear power station in North #Ayrshire after 46 years. We know #decommissioning is an important job. That's why we're carrying out a second public #consultation on the station's decommissioning strategy. We'll be holding a 6-week consultation from 30 May – 11 July. Find out more on our web site.

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If you haven't already given us your views on the #decommissioning strategy for #HunterstonB #nuclear power station in North #Ayrshire, make sure you check out our virtual exhibition and give us your feedback! The deadline for responses is midnight on Tuesday 11 July. Check out our website to find out more.

Appendix H

Response to Feedback Received - Consultation Round 2

ID	Respondent	Issue Raised	Response from EDF
Consultation			
CN01	Local Community	Suggestion that local communities be kept updated on the project via the Community Council and SSG meetings.	The established Hunterston Site Stakeholder Group, with representation from local Community Councils, local Councillors, and North Ayrshire Council, will continue to be kept up to date on the decommissioning process.
CN02	Local Community	Suggestion that ongoing public information and consultation continues.	
CN03	Local Community	Suggestion that children and young people be engaged on the decommissioning plans due to the extended timescales involved.	Children and young people were not identified as a group to be consulted at the Round 1 Consultation. Posters for school noticeboards regarding the round 1 consultation were however circulated to schools but were not put to use and thus this was not replicated at Round Consultation 2. However, there will be future opportunities for engagement on the decommissioning proposals and the best methodology to encourage liaison with young people groups will be a consideration for the delivery of this engagement.
CN04	Local Community	Satisfied that the consultation event was informative.	We note this comment and welcome the support for our consultation events.
CN05	SEPA	Suggestion that the consultation documents are high level in relation to environmental permits and impacts of works.	Consultation documents provided at the Round 2 Consultation provided a non-technical overview of the decommissioning proposals and a summary of the preliminary findings of environmental assessments.

ID	Respondent	Issue Raised	Response from EDF
CN06	NHS Ayrshire and Arran	Concern that the consultation documents and EIA scoping report provided limited information on ensuring site resilience from climate change impacts.	Further information on the environmental impacts of the proposals, including that from climate change, are provided in the Environmental Statement.
CN07	Local Community	Request for further information on local infrastructure improvements.	At the current time, the decommissioning proposals are not anticipated to have a significant impact on any local infrastructure which is why no local infrastructure improvements are currently detailed within the HNB decommissioning proposals. The impact of the decommissioning proposals on local infrastructure and the wider environment will be kept under review as part of the ongoing management of the site through decommissioning as the decommissioning plan becomes more detailed.
CN08	Ministry of Defence	Request for further consultation as the decommissioning process progresses.	The site licensee will maintain liaison with the Ministry of Defence as the decommissioning proposals progress.
CN09	NHS Ayrshire and Arran	Suggestion that plans for waste storage and disposal be made available to review once decisions are formed.	The established Hunterston Site Stakeholder Group, which includes an invite to NHS Ayrshire and Arran with representation from local Community Councils, local Councillors, and North Ayrshire Council, will continue to be kept up to date on the decommissioning process.

ID	Respondent	Issue Raised	Response from EDF
Decommissioning approach			
DA01	Local Community	Suggestion that dismantling take place later.	Work continues to develop the right decommissioning plan for Hunterston B. The deferred dismantling approach is currently considered to be the preferred approach to decommissioning HNB due to: • Lower dose rates – the deferral of Higher Activity Waste, allows time for radioactive decay, reducing dose rates in line with regulatory principles; • Lower Higher Activity Waste volumes, resulting in reduced processing, packaging and reduced need for interim waste storage facilities in the absence of a long term management solution in-line with Scottish policy; and • Lower overall decommissioning cost associated with disposal of lower volumes of Higher Activity Waste.
DA02	Local Community	Suggestion that the decommissioning approach take account of lessons learnt from Hunterston A.	Magnox Ltd and EDF have set-up collaborative synergy groups to enable learning from Magnox Ltd to be taken into account as EDF develop their decommissioning proposals for both the HNB site and other AGRs that will transfer at later dates.
DA03	Ministry of Defence	Suggestion for the consideration of deployment and heights of cranes and structures impacting or	Whilst the max crane height required during decommissioning would be subject to identification by detailed design, it is not currently anticipated that this

ID	Respondent	Issue Raised	Response from EDF
		entering the Clyde / Faslane microwave link.	would be significant compared to other high infrastructure planned in the wider Hunterston area.
DA04	NHS Ayrshire and Arran	Request for information on the removal of sewage treatment works relating to the site.	The Sewage Treatment Plant at Hunterston B only serves the foul water requirements of the HNB Site.
DA05	SEPA	Support for the preferential use of soft engineering techniques.	We note this comment and welcome the support for our preferential use of soft engineering techniques.
Environment			
EN01	Local Community	Concern about the environmental effects of decommissioning on the local area.	An Environmental Statement (ES) has been written in support of the application made by EDF Energy Nuclear Generation Limited to the Office for Nuclear Regulation (ONR) to achieve consent to carry out the dismantling or decommissioning of the Hunterston B Nuclear Power Station. An Environmental Impact Assessment (EIA) has been undertaken, culminating in the provision of an ES which presents the findings of the EIA and describes the likely significant effects, including cumulative effects associated with the Proposed Works.
EN02	SEPA	Suggestion for further information on the process for annual updates to the Environmental Monitoring Plan.	It is our assumption for EIADR that the current sit monitoring programme will continue. Results from this monitoring will continue to be reviewed as the decommissioning proposals develop to scrutinise whether further monitoring is required.

ID	Respondent	Issue Raised	Response from EDF
EN03	SEPA	Suggestion that the EIA should consider soil and groundwater as both standalone receptors and pathways to other receptors.	The baseline information in **Environmental Statement Chapter 12: Soils, Geology and Hydrogeology** details the ground conditions at the Works Area including soils, geology, hydrogeology and the land contamination status of the Works Area and its surrounding area. This information has been used to identify receptors considered in the assessment later in that chapter. Effects of the Proposed Works on the Southannan Sands SSSI are considered in **Environmental Statement Chapter 9: Marine Biodiversity.** Offsite surface water and property and are also considered as potential land contamination receptors in this chapter.
EN04	SEPA	Suggestion that the soils, geology and hydrogeology assessment should consider potential interdependencies with other topics.	
EN05	SEPA	Suggestion that the groundwater assessment should consider the influence of climate change on the hydrogeological regime.	Consideration of changes to the existing hydrogeological regime due to climate change effects including extreme rainfall events, drought and sea level rise and potential for resulting changes to land contamination risks is an embedded measure in **Chapter 12: Soils, Geology and Hydrogeology**.
EN06	SEPA	Suggestion that suitability for use criteria for the re-use of waste materials on-site consider potential risks to soil and groundwater.	This is included in the Environmental Statement as an embedded measure of **Chapter 12: Soils, Geology and Hydrogeology**.
EN07	NHS Ayrshire and Arran	Suggestion that the EIA considers aligning definitions with the Civil Contingencies Act and references the Preparing Scotland guidance.	The Civil Contingencies Act 2004 defines only the term ‘emergency’, and it does not define the concepts of major accident or disaster. There are risk assessment criteria provided for use by Category 1 Responders in Annex 4D

ID	Respondent	Issue Raised	Response from EDF
			of the UK Wide Emergency Preparedness guidance. It is noted that Major Accident and Disasters are broadly but not completely aligned to Level 3, 4 & 5 emergencies in the health and environment categories. The Preparing Scotland guidance provides a number of example consequence categories but does not provide a basis for risk assessment of major accidents and disasters to determine the level of risk that would represent a significant effect.
EN08	NHS Ayrshire and Arran	Suggestion that reference to the Detailed Emergency Planning Zone be corrected.	At the time of the Scoping Report the Detailed Emergency Planning Zone was correct. This has since been redetermined by North Ayrshire Council, and **Chapter 18: Major Accidents and Disasters** has been updated accordingly.
EN09	NHS Ayrshire and Arran	Support for inclusion of decommissioning hazards in the EIA scope.	We note this comment and welcome the support for our inclusion of hazards in the EIA scope. These hazards are assessed in the **Environmental Statement Chapter 18: Major Accidents and Disasters.**
EN10	NHS Ayrshire and Arran	Suggestion for consideration of radiological incidents during road transport movements in EIA.	Radiological accidents in transport were scoped out of the assessment on the basis of the continued application of a comprehensive regulatory regime covering the transportation of radioactive materials. A risk assessment covering the transportation of materials must be produced by the Site Licensee and approved by ONR under different legislation. The Carriage of Dangerous Goods Regulation requires a

ID	Respondent	Issue Raised	Response from EDF
			specific emergency plan to be defined for radiation emergencies. This justification was accepted by the ONR, who did not challenge this justification in their Pre-Application Opinion. Therefore, this regulatory process has not been duplicated for the EIA.
EN11	NHS Ayrshire and Arran	Suggestion that previous periods of heavy rain be reviewed to ascertain previous flooding or runoff issues	**Chapter 11: Surface Water and Flood Risk** of the **Environmental Statement** considers the potential effect of surface water run-off from adjacent areas and alterations of existing surface water pathways, and changes in surface water flood risk on site and to surrounding areas. As part of the baseline the HNB Safety Case was reviewed along with the NAC Strategic Flood Risk Assessment to gather data on historic flood incidents on the operational site. No previous runoff incidents were highlighted by any of these reports. The HNB Safety Case documents, Japanese Earthquake Response (JER) studies and SEPA flood maps all contain information on predictions of pluvial flooding which has been used within the baseline and future baseline sections. Information on the Proposed Works, and a range of embedded environmental measures including surface water management measures, to help minimise potential effects posed towards on-site and off-site staff and infrastructure.

ID	Respondent	Issue Raised	Response from EDF
EN12	NHS Ayrshire and Arran	Concern that there are no plans for additional on-site air quality monitoring during demolition.	The Site lies within a rural environment and therefore the air quality at the Site is assumed to be better than that reported within the baseline section of **Chapter 6: Air Quality** of the Environmental Statement. Receptors in close proximity to the Site have the potential to be impacted from dust emissions associated with the Proposed Works. An assessment of the impact of these dust emissions has now been completed and is reported within **Environmental Statement Chapter 6: Air Quality.** The effects from road traffic emissions associated with the Proposed Works have been considered within **Environmental Statement Chapter 6: Air Quality**. Traffic movements predicted as a result of the Proposed Works are not considered to be high, with the increased movements not being sufficient to warrant detailed assessment of road traffic emissions in line with the screening criteria within **Environmental Statement Chapter 6: Air Quality.**
EN13	NHS Ayrshire and Arran	Suggestion that flood risk from sea be reviewed in light of the deep water sea port and infilling of tunnels.	**Chapter 11: Surface Water and Flood Risk of the Environmental Statement (ES)** presents an assessment of potential changes in tidal flood risk towards the Site and surrounding areas as a result of changes in wave energy, and resultant effects on tidal erosion, sediment deposition and flood defences. This has taken into account existing modelling studies for coastal flood risk, which have considered the influence of coastal bathymetry, still sea level rise, storm surge
EN14	NHS Ayrshire and Arran	Suggestion that rises in sea levels or increased frequency or severity of extreme weather events that may impact radioactive storage	

ID	Respondent	Issue Raised	Response from EDF
		during the Quiescent phase be modelled.	activity and wave overtopping as part of the current and future baseline sections **ES Chapter 11: Surface Water and Flood Risk)**. In addition to this the assessment (**ES Chapter 11: Surface Water and Flood Risk**) has considered the Proposed Works including the capping of the intake and outfall, sealing of the tunnels and removal of the jetty.
EN15	NHS Ayrshire and Arran	Suggestion that the EIA include greater details on adaptation measures for potentially significant risks to climate resilience.	The current and future baseline (in **Section 1.5 of ES Chapter 11: Surface Water and Flood Risk**) was updated with a review of existing flood studies and the findings of the HNB Safety Case which concluded that the Site will be resilient during extreme events. The ES chapter also proposes embedded environmental measures which will help minimise any potential effects towards flood risk receptors. Measures can be found in **Section 10.5.62 of the ES Chapter** and include surface water management, future coastal protection and flood risk adaptation and emergency response planning.
EN16	NHS Ayrshire and Arran	Suggestion that local and national policies and guidance relating to environmental hazards be reviewed over the course of decommissioning.	As a condition of the Nuclear Site Licence, the site licensee is required to maintain its Safety Case for the site. This requirement for a Safety Case will drive ongoing review of hazards over the course of decommissioning.
EN17	NHS Ayrshire and Arran	Concern that uncertainties remain around potential impacts and	We note your concern. We have prepared an Environmental Impact Assessment in accordance with the Environmental Impact Assessment for

ID	Respondent	Issue Raised	Response from EDF
		mitigations around a number of areas.	Decommissioning Regulations 1999 (EIADR). The EIA assesses the likely significant effects of the Proposed Works on the environment and identifies the measures to mitigate these effects where required.
EN18	NatureScot	Suggestion that the 2022 baseline natural capital assessment for the Hunterston Strategic Development Area (SDA) be considered in the EIA.	The baseline environment within the Environmental Statement has been informed by desk study and species specific surveys across the last 4 years.
EN19	NatureScot	Suggestion that the Hunterston PARC approach to Landscape Specification Document be followed.	Noted. The Interim State Landscape Plan will be subject to further development prior to implementation at the end of the Preparations for Quiescence phase.
EN20	NatureScot	A battery storage scheme within the Hunterston SDA provides opportunities for a wider range of biodiversity on a landscape scale across ownership boundaries.	Non-operational areas of the Site continue to be managed for biodiversity conservation in accordance with the HNB ILMP and the site's certification under the Wildlife Trusts' Biodiversity Benchmark. Biodiversity monitoring is undertaken annually to assess progress against management plan objectives and is reported in Land Management Annual Reviews (LMARs). After transfer, the HNB site will be absorbed under the Magnox Sustainability Policy and Strategy. The policy includes an objective of 'nurturing biodiversity within and around our sites'. This will include creating biodiversity plans to optimise biodiversity at the site including reviewing the opportunity for local synergies in biodiversity management.

ID	Respondent	Issue Raised	Response from EDF
			The biodiversity net gain (BNG) metric, approved by Defra for calculating biodiversity net gain in England and Wales, is to be applied to calculate the anticipated loss of biodiversity units to the Proposed Works. The UK habitats classification survey have already been undertaken which will then act as the baseline for which habitat creation requirements can be calculated. BNG plans will also seek synergies with biodiversity conservation plans and strategies associated with neighbouring development areas and local plans.
EN21	NatureScot	Suggestion for discussions with the Hunterston Circle initiative on opportunities within the framework of the EIA process.	Noted. This has not been undertaken within the EIADR but can be initiated as part of further development of the HNB Decommissioning Proposals and development of the HNB Biodiversity Plan by Magnox Ltd.
EN22	NatureScot	Suggestion that the Carbon Neutral Islands project presents nature-based opportunities for biodiversity restoration to provide a legacy for decommissioning.	Noted.
EN23	NatureScot	Suggestion for the integration of the Proposed Works with the North Ayrshire Nature Network to enhance biodiversity and natural capital.	Noted. See response to EN20.
EN24	NatureScot	Suggestion that there are opportunities for on-site	See response to EN20.

ID	Respondent	Issue Raised	Response from EDF
		biodiversity enhancement and the identification of land to be prioritised for management for biodiversity.	
EN25	NatureScot	Agreement with the ONR that an accurate definition of the baseline status of the site needs to be agreed and defined to help the EIA process and land use assessments.	Noted. A UK habitats classification survey has already been undertaken for the HNB Site which will then act as the baseline for which habitat creation requirements can be calculated.
General			
GE01	Local Community	General support for the decommissioning plans.	We note this comment and welcome the support for our decommissioning plans.
GE02	Local Community	Suggestion that an additional nuclear power station be developed during the decommissioning timeframe.	Noted. This is not in-line with current Scottish Government policy.
GE03	Local Community	Suggestion for tours at the power station to make use of the visitor centre.	We note your request, however the visitor centre is now closed.
GE04	Local Community	Concern about whether local authorities are providing the EDF decommissioning team with required information.	We have engaged with North Ayrshire Council during the EIA process to obtain information useful to informing the establishment of the baseline environment.

ID	Respondent	Issue Raised	Response from EDF
Health and Safety			
HS01	Local Community	Suggestion that living near the power station has not been a risk factor and can help establish the safety of nuclear power.	Noted.
HS02	Local Community	Suggestion that public health information related to radiation dose be shared.	Doses to members of the public in the UK are tightly controlled and regulated to within safe levels. The total dose from all pathways and sources of radiation was 0.0006 mSv in 2021, 0.6% of the dose limit. Discharges during decommissioning, following the removal of 99% of radioactive material from the Hunterston B site, are likely to be lower. Further information can be found in the Radioactivity in food and the environment (RIFE) reports which can be found here: https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports
HS03	Local Community	Concern about the existing Offsite Emergency Plan and suggestion that EDF work with North Ayrshire Council to improve.	EDF have considered a wide range of accident scenarios and evaluated the risk and hazards to local communities. Recommendations have been made to North Ayrshire Council on arrangements for emergency planning. North Ayrshire Council have judged that as the risk rating for the site remains very low, that only a small number of households will continue to receive information.

ID	Respondent	Issue Raised	Response from EDF
HS04	NHS Ayrshire and Arran	Suggestion that hazards may emerge or persist from decommissioning that may have significant implications for health and wellbeing.	To discharge to the environment, the site is required to have an environmental permit regulated by the Scottish Environmental Protection Agency (SEPA) under the Environmental Authorisations (Scotland) Regulations 2018. This permit, which has been in place during the operational period and will also be required for decommissioning require the site to demonstrate that Best Practicable Means (BPM) in order to minimise the volume and radioactivity of radioactive waste discharges to the environment have been utilised. This permitting regime therefore ensures that effects from radioactive discharges and disposals to the environment are tolerable and acceptable. The impacts on human health from other sources such as noise, air quality and changes in employment are included within the scope of the Environmental Statement.
HS05	NHS Ayrshire and Arran	Suggestion that planning for decommissioning should address public communications for major incidents.	Noted.
HS06	NHS Ayrshire and Arran	Request for information on how resident communications around controlled explosions for pontoons and marine structures removal will be managed.	No controlled explosions will be required during the decommissioning process.

ID	Respondent	Issue Raised	Response from EDF
HS07	NHS Ayrshire and Arran	Concern about contaminants from decommissioning entering the food chain via nearby agricultural land.	Doses to members of the public in the UK are tightly controlled and regulated to within safe levels. The total dose from all pathways and sources of radiation was 0.0006 mSv in 2021, 0.6% of the dose limit. Discharges during decommissioning, following the removal of 99% of radioactive material from the Hunterston B site, are likely to be lower. Further information can be found in the Radioactivity in food and the environment (RIFE) reports which can be found here: https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports The development of these reports will continue into the decommissioning process for the site.
HS08	NHS Ayrshire and Arran	Suggestion that all forms of safety and risk management measures be prioritised on-site, including for non-radiological hazards.	Safety is our most important principle and will be a key factor in all optioneering for how the decommissioning proposals develop.
HS09	NHS Ayrshire and Arran	Suggestion for active community engagement at each decommissioning stage to mitigate impacts on community mental health and wellbeing.	EDF has engaged regularly with local communities about the decommissioning process, before and since, end of generation at Hunterston B. We have done this through the Site Stakeholder Group (SSG) and via two rounds of public consultation. We will continue to engage as defueling progresses and as plans to transfer the site to Magnox Ltd develop.

ID	Respondent	Issue Raised	Response from EDF
			Magnox Ltd will regularly update the SSG on the decommissioning plans and progress. We will engage more widely with communities around the site on any proposed changes to our decommissioning strategy and at key points in the decommissioning timeline.
Safestore			
SS01	Local Community	Concern about the height of the proposed Safestore.	The EIADR assumes the Safestore structure will remain the highest building on-site at 66.5m until Final Site Clearance and that it would be a grayscale/blue similar to the colour of the existing facades. The impact of the Safestore on visual receptors is outlined in **Chapter 14: Landscape and Visual Assessment** of the **Environmental Statement.**
SS02	NHS Ayrshire and Arran	Support for the consideration of the reduced height Safestore option.	We note this comment.
Socioeconomics			
SE01	Local Community	Concern about the long-term employment prospects in the local area as a result of decommissioning.	The impact of decommissioning on local employment is assessed in **Chapter 17: Socio Economics** of the **Environmental Statement**.
SE02	NHS Ayrshire and Arran	Concern about the impact of closure of major employers on health and wellbeing.	The impact of decommissioning on local employment and subsequent impact of this on health and well-being

ID	Respondent	Issue Raised	Response from EDF
			is assessed in **Chapter 17: Socio Economics** of the **Environmental Statement**.
SE03	NHS Ayrshire and Arran	Suggestion that workforce changes be gradual, planned and communicated in advance.	Whilst decommissioning proposals may change, it is currently our assumption that workforce changes will be gradual through the Preparations for Quiescence phase. Further information about our assumptions for employment at the site during the decommissioning works is provided in **Chapter 2: Project Description of the Environmental Statement.**
SE04	NHS Ayrshire and Arran	Suggestion that decommissioning use knowledge and experience of existing staff as far as possible.	EDF and Magnox Ltd are working together closely to understand the staffing requirements for deconstruction following the end of defueling with the aim to retain staff where practicable. We are aiming to have a high-level people plan established by the end of the year to share with our people. EDF will be working hard with the appropriate unions to understand what employee aspirations are for the future – whether that is remaining at the site, moving elsewhere or leaving the business. EDF and Magnox Ltd will be working together to ensure that the right people with the right skills are transferred into Magnox Ltd. It is essential that it is established what skills, knowledge and experience are needed for deconstruction and that all relevant people are transferred. This will be achieved through consultation with EDF employees and Trade Union partners.

ID	Respondent	Issue Raised	Response from EDF
SE05	NHS Ayrshire and Arran	Suggestion for engagement and two-way communication with the workforce and wider community.	EDF and Magnox Ltd will continue to engage with local communities and stakeholders via the Site Stakeholder Group through the decommissioning process of the HNB site.
SE06	NHS Ayrshire and Arran	Suggestion that decommissioning align with local investment and development to provide alternate routes for staff and the local community.	EDF, NDA and Magnox Ltd will align with local and regional economic strategies and support the Ayrshire Growth Deal vision for the transformation of Hunterston. This includes supporting the education, retraining and skills development of local communities. The NDA and Magnox Ltd operate socio-economic programmes at each of their sites. As part of this programme, Magnox Ltd operates a good neighbour scheme where individual projects up to £2,000 can be supported. In addition, there are the Magnox Ltd and NDA socio-economic schemes for more transformational projects which can see significant multi-year funding made available. A local example was the financial assistance provided to North Ayrshire college for the construction of a new centre to support students in learning construction trades. This was an NDA supported scheme administered by Magnox Ltd. These arrangements will continue and cover Hunterston B when the site transfers to NDA ownership.
SE07	NHS Ayrshire and Arran	Suggestion that local and regional stakeholders and institutions be	See response to SE06.

ID	Respondent	Issue Raised	Response from EDF
		involved to address socioeconomic impacts.	
SE08	NHS Ayrshire and Arran	Suggestion that community engagement can help maintain and strengthen community identity and mitigate concerns about jobs	Noted. See response to SE05.
SE09	NHS Ayrshire and Arran	Suggestion that workforce planning discussions include local authority officers and local employability and development groups.	See response to SE06.
SE10	NHS Ayrshire and Arran	Request for confirmation on the likelihood of significant external workforce to be brought in for the Proposed Works.	At this stage, the location of all workforce is not possible to confirm. Our current assumptions for workforce inform the assessment in the EIADR Environmental Statement which can be found in the **Environmental Statement Chapter 2 Project Description.**
SE11	NHS Ayrshire and Arran	Concern about EDF withdrawal from community initiatives and organisations.	EDF, NDA and Magnox Ltd will align with local and regional economic strategies and support the Ayrshire Growth Deal vision for the transformation of Hunterston. This includes supporting the education, retraining and skills development of local communities. The NDA and Magnox Ltd operate socio-economic programmes at each of their sites. As part of this programme, Magnox Ltd operates a good neighbour scheme where individual projects up to £2,000 can be supported. In addition, there are the Magnox Ltd and

ID	Respondent	Issue Raised	Response from EDF
			NDA socio-economic schemes for more transformational projects which can see significant multi-year funding made available. A local example was the financial assistance provided to North Ayrshire college for the construction of a new centre to support students in learning construction trades. This was an NDA supported scheme administered by Magnox Ltd. These arrangements will continue and cover Hunterston B when the site transfers to NDA ownership.
Traffic and Transport			
TR01	Local Community	Concern about the cumulative traffic impact of waste removal and local housing developments on local roads.	**Chapter 16: Traffic and Transport** of the **Environmental Statement** presents an assessment based on the worst-case scenario. Transport Scotland confirmed they were content that no further assessment was required, if thresholds are not exceeded.
TR02	NHS Ayrshire and Arran	Suggestion that HGV movements be planned to minimise overall traffic levels and community impacts.	**Chapter 16: Traffic and Transport** of the **Environmental Statement** presents an assessment based on the worst-case scenario. Transport Scotland confirmed they were content that no further assessment was required, if thresholds are not exceeded.
TR03	NHS Ayrshire and Arran	Suggestion that transport planning take advantage of technological	**Chapter 16: Traffic and Transport** of the **Environmental Statement** presents an assessment based on the worst-case scenario and based on current

ID	Respondent	Issue Raised	Response from EDF
		developments to reduce emissions and noise.	process. As the plan develops over time, EDF and Magnox Ltd will take advantage of suitable technological advances where practicable. Transport Scotland confirmed they were content that no further assessment was required, if thresholds are not exceeded.
TR04	NHS Ayrshire and Arran	Suggestion that a sustainable travel plan be established to mitigate impacts from staff commuting.	The workforce during decommissioning is likely to be similar to or less than the site during operation and thus no impacts are associated with staff commuting compared to the baseline environment.
TR05	Transport Scotland	Confirmation that no further assessment is required if thresholds stipulated in the Scoping Report are not exceeded.	We note this comment.
TR06	Transport Scotland	Agreement with the scoping out of the A78(T), A71 and A77(T) from the assessment.	We note this comment.
TR07	Transport Scotland	Suggestion that more updated traffic count data be used, including from Transport Scotland's count site on the A78(T).	All ATC DfT data used in assessment is based on the latest data available via the DfT Website and Transport Scotland Drakewell C2 Traffic (2022 – 2023). Survey ATC data is from 2021 when recorded.
TR08	Transport Scotland	Request that low growth factors from the National Road Traffic Forecast be used to factor base	The assessment has been updated to use the NRTF low growth to factor base traffic to the peak design year for traffic calculations.

ID	Respondent	Issue Raised	Response from EDF
		traffic to the peak design year for traffic calculations.	
TR09	Transport Scotland	Request that the assessment quantify the scale of movements, suitability of access to the A78(T), percentage increase in traffic, account of accident history, and measures to minimise construction movements.	The ES assessment includes quantified assessment of traffic impacts, accidents and movements during decommissioning process. The proposed CTMP will be provided to minimise impacts during decommissioning, once the contractor has been appointed.
TR10	Transport Scotland	Suggestion that routing studies and swept path analysis is required for Abnormal Indivisible Loads.	There will be a small number of Abnormal Indivisible Loads required during the Preparation for Quiescence Phase which are not considered to be significant. EDF/Magnox Ltd will therefore look to undertake Abnormal Loads Assessment and swept path analysis at a later stage, should this be required.
TR11	Transport Scotland	Transport Scotland will need to be satisfied that proposed loads sizes can negotiate the selected route and transport will not adversely affect structures within the route path.	We note this comment.
TR12	Transport Scotland	Suggestion that a full Abnormal Loads Assessment be provided identifying pinch points on the trunk road network.	There will be a small number of AILs required during the Preparation for Quiescence Phase which are not considered to be significant. EDF/Magnox Ltd will therefore look to undertake Abnormal Loads Assessment

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			and swept path analysis at a later stage, should this be required.
TR13	Transport Scotland	Suggestion that a swept path analysis be undertaken, and detail provided of required changes to street furniture or structures along the route.	There will be a small number of AILs required during the Preparation for Quiescence Phase which are not considered to be significant. EDF/Magnox Ltd will therefore look to undertake Abnormal Loads Assessment and swept path analysis at a later stage, should this be required.
TR14	Transport Scotland	Any proposed changes to the trunk road network must be discussed and approved by the Area Manager.	We note this comment.
Waste Management			
WM01	Local Community	Concern about the removal of waste from deplanting by road rather than by rail.	See response to TR01.
WM02	Local Community	Concern that local roads are unsuitable for the removal of waste from deplanting by road.	See response to TR01 and TR13.
WM03	SEPA	Suggestion that the Environmental Authorisations (Scotland) Regulations 2018 currently only apply to radioactive substances activities.	Noted.

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WM04	SEPA	Waste generated on-site should be appropriately reused and disposal be to a suitable licensed facility.	Waste management is a key component of the Proposed Works, with deplanting and demolitions leading to both radioactive and conventional waste streams that will require disposal. Anticipated conventional wastes arising from the Proposed Works may include metals, glass, plastics and other miscellaneous wastes similar to any other demolition of industrial type buildings. Due to the age of the buildings and plant at the Site, the demolitions will generate some hazardous wastes such as asbestos and lagging that will require special management during removal to protect both our workers and the environment. The use of the Waste Hierarchy is a central component of the decommissioning proposals and has informed key strategic decisions regarding the decommissioning strategy for HNB. All wastes will be handled in line with relevant waste legislation. Where practicable, wastes will be segregated and processed in-line with the waste hierarchy to maximise re-use and recycling. Further information can be found in **Environmental Statement Chapter 2: Project Description.**
WM05	SEPA	Waste material should be quantified and assessed prior to final use or disposal.	Waste management planning and reuse of material will be completed in accordance with Scottish Environment Protection Agency guidance, the HNB Waste Management Plan (WMP) and a site-wide environmental safety case (SWESC). The WMP will set out how

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			stockpiles will be managed and segregated to avoid cross-contamination and will include the anticipated programme for storage of materials. Where it is identified that materials cannot be re-used on the Site, these will be suitably contained to prevent uncontrolled releases to the environment, and an off-site disposal option at a suitably licensed facility by a licensed waste carrier will be identified and collection arranged at the earliest opportunity.
WM06	NHS Ayrshire and Arran	Support for the recycling of on-site material and reduction in volume of waste to be transported off-site.	We note this comment and welcome the support for our approach to the recycling of on-site material and reduction of waste to be transported off-site.

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