



**nuclear
information
service**

2013 PROGRESS REVIEW

OPENING THE GATES: RAISING
THE STANDARD OF COMMUNITY
LIAISON AT THE ATOMIC
WEAPONS ESTABLISHMENT

INTRODUCTION

In 2012 Nuclear Information Service (NIS) published 'Opening the Gates: Raising the standard of community liaison at the Atomic Weapons Establishment' - a detailed research study analysing the effectiveness of the Local Liaison Committee (LLC) at the Atomic Weapons Establishment (AWE).



The study concluded that although members of the LLC take their duties seriously and work hard, it is not reasonable to expect them to take on a mass communication role about issues at AWE sites. The committee was established in 1993 and has not significantly changed its approach since then. As a result it now falls well short of standards which are adopted elsewhere in the nuclear sector for engaging with the public and local communities. Our report (available online at www.tinyurl.com/awereport) made a series of suggestions on how improvements might be made to increase the openness and transparency of the Committee's work.

One year after 'Opening the Gates' was published, Nuclear Information Service has undertaken a review of progress to see how far AWE, the LLC, and other key stakeholders have moved forward in terms of increasing the openness, accuracy, and effectiveness of their public communications. This progress report outlines our conclusions, representing a subjective qualitative assessment of the state of play at the end of 2013. We have highlighted important issues, opportunities, or setbacks which have arisen for each stakeholder during the year and given a simple assessment of their current level of openness and transparency based on a 'traffic light' system where green represents good performance, amber signifies that there is work to be done, and red represents poor performance. We have also indicated whether performance has improved, remained steady, or deteriorated over the year. Nuclear Information Service intends to publish similar progress reports next year and over the years ahead to map progress in improving community liaison standards at AWE.

2013 KEY ISSUES

- AWE has engaged in informal dialogue with some non-government organisations and has been willing to discuss some of its work through specialist forums such as the Project for Nuclear Issues. However, AWE continues to refuse to deal directly with non-government organisations and independent local groups on a formal basis.
- AWE has announced that it intends to set up a Stakeholder Engagement steering group on decommissioning of the Pangbourne Pipeline (although there is as yet no intention to allow independent local groups to be represented on the steering group).
- AWE has set up a joint steering group to review the role and purpose of the LLC.
- Despite our recommendation in 'Opening the Gates', AWE has not yet given a public commitment to adopting best practice in community engagement and adopting standards which are accepted elsewhere in the nuclear industry - standards which themselves are in many respects unsatisfactory.
- The company continues to put a public relations spin on news relating to AWE rather than give objective facts.

Example: A company press release on the annual Chief Inspectors Report published by the Office for Nuclear Regulation did not mention that AWE was one of a small number of sites which had been placed under an enhanced inspection regime by the regulator because of the hazard level and safety standards at its sites.

Example: The company did not proactively inform local residents or the media when structural corrosion was discovered in a nuclear processing facility - even though the Office for Nuclear Regulation has stated that this had "exposed people to risk" and has issued an enforcement notice over the matter.

CONCLUSIONS

During the year AWE has taken some small steps towards increasing openness and transparency and improving communication, such as undertaking a review the role of the LLC. These steps are welcome. However, there needs to be a fundamental shift of attitude within the company on the rights of people outside its gates to have access to accurate information, and an acceptance - as is the case elsewhere in the nuclear industry - that dialogue with the public and a broad range of stakeholders should be a routine part of its operations and a practice which can benefit the company.

2013 has been a poor year for AWE, with its safety performance under the spotlight as a result of a number of cases of enforcement action taken against the company by government regulators. Media coverage of these incidents has emphasised the secrecy and distrust with which AWE is seen to operate, and a more open and honest approach to communication would have helped in addressing the reputational issues which have resulted from this.

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AWE LOCAL LIAISON COMMITTEE

2013 KEY ISSUES

- The LLC has taken a lead in setting up a working group to review its role and purpose, and deserves significant credit for this. However, the reform process has yet to bear fruit and will need to go beyond the very modest steps currently proposed if it is to match the standards of accountability that are in place for equivalent committees at other nuclear licensed sites and address the issues that were raised in 'Opening the Gates'.

- There is evidence that some members of the LLC are willing to question AWE's version of events and challenge the company about its performance.

Example: At the June 2013 meeting of the LLC members had a number of questions about safety issues following news that AWE had pleaded guilty and been fined for a breach of health and safety law in the aftermath of a fire in August 2010.

- Some members of the LLC, however, have little to say at LLC meetings and are willing to accept information from AWE uncritically.

Example: At the March 2013 meeting of the LLC the only response from members to news that the Office for Nuclear Regulation had taken enforcement action against AWE following the discovery of structural corrosion in a nuclear processing facility was to criticise alarmist media coverage, rather than make enquiries about the event.

- Feedback from individual LLC members to their own local councils and constituents generally remains weak.

Example: Little, if any, information on Exercise Aldex 13 - a major three-yearly test of off-site emergency arrangements - appears to have been passed back by LLC members to their local councils or the public, and no reports from LLC observers at the exercise have yet been published.

CONCLUSIONS

The AWE LLC has taken a number of positive steps forward during the year, such as undertaking a self-review of its role and purpose, and these are to be welcomed. The impression remains, however, that the majority of LLC members are timid in questioning AWE and have been co-opted into a comfortable, cosy relationship with the company. LLC members could do much more to show their independence in questioning AWE on behalf of the local communities they represent and challenging the company when it is necessary to do so. Future reforms to the working of the LLC will need to go deeper than currently proposed by the steering group examining the role and purpose of the committee if they are to be of value in improving the LLC's effectiveness and accountability.



2013 KEY ISSUES

- The Ministry of Defence (MoD) does not yet have any departmental policy on stakeholder engagement arrangements for its nuclear programmes. 'Opening the Gates' recommended that Ministers should adopt a policy that states that stakeholder engagement standards for MoD nuclear programmes will be at least as good as those in the civil nuclear industry.
- Ministers turned down an invitation from Reading West MP Alok Sharma for a meeting to discuss issues highlighted in the 'Opening the Gates' report and how stakeholder engagement standards at AWE could be improved. MoD has to date shown no interest in addressing the issues identified in 'Opening the Gates'.
- The department's media comments on nuclear matters are restricted to the bare minimum and the department is too ready to claim that security risks prevent discussion of legitimate issues of public concern

Example: Following media revelations of a radioactive leak in the reactor cooling circuit of the nuclear powered submarine HMS Tireless, the Ministry of Defence issued a one-sentence statement commenting on the incident. A series of Parliamentary Questions about the incident asked by MPs Paul Flynn and Angus Robertson received evasive answers from MoD.

- In one area where MoD has been taking positive steps to engage with stakeholders on nuclear issues - the Submarine Dismantling Project - the project Advisory Group has been disbanded, removing an important channel for consultation.

CONCLUSIONS

The Ministry of Defence is the single most important agency which could do the most to improve standards of stakeholder engagement at AWE and elsewhere in the military nuclear programme. A senior level commitment that MoD will match standards of stakeholder engagement elsewhere in the nuclear industry would cost little and be a big step forward to show that the department is willing to pay heed to the views of the public and its stakeholders. However, rather than improving, the Ministry's performance in this area is, if anything, deteriorating.

Whilst MoD is in a position to drive standards upwards, the converse is also true: there is unlikely to be any meaningful improvement in standards of accountability within the military nuclear programme until those at the top of the MoD insist on such an improvement. The conclusion that we draw is that the MoD has no desire to improve the openness and transparency of its nuclear programmes. This secrecy has nothing to do with the demands of security and everything to do with avoiding scrutiny of performance.

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**↓ RED: ↓
DETERIORATING**

2013 KEY ISSUES

- The Office for Nuclear Regulation (ONR) has discussed the issues raised in 'Opening the Gates' with AWE and asked the company to respond to them.

- ONR has taken a lead in attempting to increase accountability within the UK nuclear sector. There is commitment to openness and transparency at the most senior levels within ONR and the topic is seen as a management priority for the organisation.

- ONR has established steps for engaging in dialogue with a range of its stakeholders, including industry, non-government organisations, and communities affected by the nuclear industry.

- A wide range of key documents has been published on the ONR website.

- ONR has involved non-government organisations and others who have criticised its past performance in trying to raise standards.

- ONR is sometimes reluctant to take action which could influence change in areas where its statutory powers are not clear.

Example: ONR has not yet taken visible steps to improve the standards of stakeholder engagement by nuclear site licensees or introduce a code of practice for the conduct of LLC meetings (or the equivalent).

- There is a conflict between ONR's view that they should reassure the public about the safety of the nuclear industry and in providing objective information.

- ONR can sometimes send mixed messages to different stakeholders

Example: Briefings on the Chief Inspector's annual report to non-government organisations and the AWE LLC emphasised different issues and gave differing impressions about ONR's regulatory strategy for AWE.

CONCLUSIONS

ONR is genuinely trying to raise its own standards of openness and transparency and has worked hard to build relationships and establish trust with some of its critics among non-government organisations. Good progress has been made on this front over the last year or so.

ONR will now need to focus on coaxing others in the nuclear sector - particularly nuclear site operators - to raise their game. This will be a tougher job, requiring the regulator to use influence above and beyond its statutory powers and with some risk of upsetting established relationships with industry and government. It will be important for ONR to show persistence and fortitude in this task, and be willing to remind others in the sector of the significant problems which a lack of openness and transparency in the Japanese nuclear industry caused during and after the Fukushima nuclear crisis. However, such an effort, allowing ONR to demonstrate its regulatory authority and independence, will go a long way to dispelling the unfortunate perception in some quarters that ONR is 'in the pocket' of the nuclear industry - a notion which ONR must publicly and unequivocally demonstrate is incorrect.

**PERFORMANCE
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▲ **AMBER:** ▲
IMPROVING

OUR ROLE DURING 2013

Nuclear Information Service offered to assist AWE and its stakeholders in addressing the issues we raised in 'Opening the Gates' and during the year we have taken the following action:

- We have discussed our findings informally with AWE and formally with ONR. Our offer to provide assistance in making the changes necessary to increase the accountability and effectiveness of the LLC still stands.
- We have provided information and support to some LLC members who are interested in our work and will continue to do so.
- We have launched a new website which reports on issues relating to the AWE and allows readers of our articles to give feedback. The new website also explains more about NIS and our work.

CONCLUSION: PROGRESS IN 2013

Over the last year, awareness has grown that AWE's arrangements for dialogue with surrounding communities are unsatisfactory, and that reforming the LLC could help to address this problem. However, relatively little action has been taken to date to address the issues that NIS has raised through the 'Opening the Gates' study. The bottom line remains that residents living in the areas surrounding AWE have the right to expect the company to meet the same standards of dialogue adopted at other nuclear licensed sites. AWE is not yet meeting those standards.

One of the points we made about AWE in the 'Opening the Gates' report was that:

"If the company seeks to adopt the highest standards in everything it does except the way it handles its relationships with local communities then it is sending out an unmistakable signal - local people and their views do not matter to us".

AWE has yet to demonstrate that it does respect the views of local people and is willing to listen their views.

SUMMARY

Last year Nuclear Information Service published 'Opening the Gates' - the results of a detailed study into the effectiveness of the Local Liaison Committee at the Atomic Weapons Establishment. This annual review gives a summary of progress made since 'Opening the Gates' was published in increasing the openness of communications by the Atomic Weapons Establishment and the effectiveness of the Local Liaison Committee's work.

Some useful first steps have been made by the Atomic Weapons Establishment in undertaking a review of the role and purpose of the Local Liaison Committee, though the review will need to go beyond making moderate recommendations if it is to successfully address the issues we raised in 'Opening the Gates'. Within the Atomic Weapons Establishment there needs to be a shift in attitudes towards accepting that greater dialogue with outsiders is in the company's interests. One of the main barriers preventing change is the Ministry of Defence, which, unlike the civil nuclear industry, currently shows no desire to improve the openness and transparency of its nuclear programmes.

*nuclearinfo.org
office@nuclearinfo.org*

0118 327 7489

Nuclear Information Service
Ibex House
85 Southampton Street
Reading
RG1 2QU

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