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Issue 2

Site Restoration Programme

Trawsfynydd Deposit for Recovery Permit Application

Dust Management Plan

March 2025

Trawsfynydd Deposit for Recovery Permit Application – Dust Management Plan

Author: Heather Barker

Signature:  Date: 16 June 2025

Lead Verifier: Sam Fuller

Signature:  Date: 16 June 2025

Authorise for issue: Sion Richards

Signature:  Date: 16 June 2025

Review/Revision register

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1	12 March 2025	H. Barker	
2	11 June 2025	H. Barker	NRW have requested further information at Duly Making. Additional details are included on stockpiles and procedures for dealing with multiple complaints.

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1.0 Introduction

Nuclear Restoration Services Ltd (NRS) is preparing an Environmental Permit (EP) application to authorise the Deposit of Waste for Recovery (DfR) in the improvement and extension of a laydown area for reactor dismantling at the Trawsfynydd Nuclear Power Station.

The laydown area (the site) extends to 12,260m^2. This includes a level plateau and embankments, which lie to the northern end of a Nuclear Licensed Site (NLS). The NLS consists of a former power station complex which includes two reactors and ancillary buildings that are currently undergoing decommissioning. The extent of the permit boundary for the site is outlined in green, and the NLS is outlined in blue on location plan Appendix A1.

The site is located within a 15.5-hectare (ha) site in Eryri National Park. The location is within the Meirionnydd area of Gwynedd, North Wales, LL41 4DT.

This Dust Management Plan (DMP) has been prepared in support of the EP application and in accordance with the guidance 'Control and monitor emissions for your environmental permit[1]'. The site is required to have a DMP because it is storing and depositing aggregates, soils, brick or similar materials and is within 500m of a sensitive receptor.

The waste materials being managed under the EP will be used to produce recycled aggregates, and they will not give rise to litter. The deposit for recovery activity is to extend and improve a laydown area which is already composed of granular fill, and therefore no wheeled or tracked vehicle will be in direct contact with mud during operational activities.

The implementation of the DMP shall be under the control of the site management. This plan shall be incorporated into the site procedures and shall be revised as necessary to ensure that it remains appropriate to the activities occurring on site and that any changes in conditions relating to dust management are dealt with as part of those revisions. In particular, the monitoring procedures and compliance actions will be updated as required by the procedures within the DMP.

The Deposit for Recovery permit will accept suitable waste arisings which have been treated by crushing and screening under a separate mobile plant permit. The interface between these two activities and permissioning is illustrated in Figure 1 of the Non-Technical Summary. We acknowledge that the crushing and screening could give rise to dust and fugitive emissions, and these will be managed by the mobile plant permit holder and controlled by conditions within the mobile plant permit.

1.1 Scope

The objective of this document is to specify a range of measures to manage the environmental impacts that could arise during the activities taking place on site, in respect of managing dust emissions. A series of site-specific control measures as described will therefore minimise potential risks to surrounding receptors and the environment.

The components of the DMP are set out within this document as follows:
Section 2 – Overview and potential for dust emissions

[1] Control and monitor emissions for your environmental permit - GOV.UK

Section 3 - Potential dust effects
Section 4 - Dust control measures
Section 5 - Site management & contingency measures, and
Section 6 – Contingency action plan

2.0 Overview and potential for dust emissions

2.1 Site description

The Site is located 200m to the west of the A470 Cardiff to Glan Conwy Trunk Road, approximately 3km to the north of Trawsfynydd and 1.5km to the south of Gellilydan. The NLS is situated on the banks of Llyn Trawsfynydd and approximately 100 metres to the south-west of Afon Tafarn-Helyg. To the east of the Site and beyond the A470 is Eryri National Park.

The nearest residential property is Ty Gwyn which is over 500m to the northeast of the site. The site will be accessed from the main power station entrance which runs from the A470 to the south east boundary.

The infrastructure on site would include:

- Site Offices
- Welfare Facilities
- Storage Units; and
- Car Park

The access roads onto the site and within the site have metalled surfaces, which will significantly reduce the generation and mobilisation of dust.

2.2 Site operations

The proposed improvement and extension to the laydown area is detailed in the following drawings:

- Appendix A2 Drawing TRA 3210 – LA – 42971 - 01 SA Site plan showing post-scheme completion.
- Appendix A3 Drawing TRA 3210 – LA – 42972 - 01 SA Site plan showing post scheme completion contours to create a level plateau.

The proposed size of the laydown area includes a 7,735$m^{2.}$ plateau. It is anticipated that approximately 31,492 tonnes of demolition arisings (concrete and brick) from the Reactor building Height Reduction (RBHR) project will be processed on site into 6F2[1] (or similar grade) recycled aggregate which will be recovered to form the extension and improvement to the laydown area. This will be generated on-site over the course of a 2-3 year period during the RBHR reduction project.

Each operational phase will deposit recycled aggregate in layers which will be placed and then compacted in accordance with the specifications described in the Waste Recovery Plan v4. Filling will continue until final levels have been achieved as detailed in drawing TRA3210 – LA – 42971 - 01.

Works will be carried out in a manner which protects the mature vegetation including established trees, around the base of the perimeter slope.

Working hours will be 06:45 and 18:00 Monday to Friday and in accordance with the relevant Planning Permission. There will be no working during the night, at weekends or during public or bank holidays. No operations will be conducted outside of these hours.

2.3 Site setting

The site is situated in Eryri National Park, within the Meirionnydd area of Gwynedd, North Wales and is near the A470 trunk road which forms the main route between Dolgellau to the south and Ffestiniog to the north. The small village of Gellilydan is located 1.5 km northeast of the site and Trawsfynydd village is located about 3 km to the southeast across the lake.

The site lies approx. 5 miles (8 km) southeast of Blaenau Ffestiniog, to the north of Llyn Trawsfynydd and with the Afon Tafarn-Helyg running within 100 metres of the eastern boundary. The surrounding area is mountainous, and the site has been built on the lower slopes of Craig Gyfynys (275m AOD).

The site is perched at the northern end of a wide valley now largely filled by Llyn Trawsfynydd. The landscape is generally upland in character. The land surrounding the site includes Llyn Trawsfynydd, as well as semi-natural woodlands, some of which are ancient woodland, broadleaved and coniferous plantation, watercourses, upland habitats, farmland/pasture, and scattered residential properties and farmhouses.

The nearest residential property is Ty Gwyn, which is situated approx. 500m to the north-east of the site. The only vehicular access to the site is from the A470 trunk road. This road, which links Dolgellau (22km south) to Ffestiniog (10km north), runs east of the Llyn Trawsfynydd and is approx. 400m from the site. The Environmental Setting is illustrated in Appendix A4.

The immediate surrounding land use:

Northern boundary - a mixture of woodland and upland habitats.
Eastern boundary - a wooded valley and the A470 trunk road.
Southern boundary - Llyn Trawsfynydd
Western boundary - Woodland stretching towards the mountain peak of Craig Gyfynys.

Other receptors are situated on the shores of Lyn Trawsfynydd, and this includes the Canolfan Prysor Centre (café and meeting room) which is approx. 400m to the east of the site and adjacent to the A470.

There are several public footpaths which run alongside the site and there are cycling and walking trails around the permitter of Llyn Trawsfynydd. The lake is approx. 5 miles long and is popular with anglers.

There are no details of Air Quality Management Areas within Gwynedd. Within 1km of the site there are a few other sources that have the potential to release dust emissions, and these include motor vehicles on the A470 and agricultural activities.

2.4 Potential sources of dust

The operation of a waste recovery activity at the site has the potential to generate dust from the following list of activities:

- preparation and stockpiling
- handling of materials
- on-site transportation
- off-site transportation of unsuitable wastes
- depositing inert waste to extend and improve the laydown area

3.0 Potential risk dust effects

This section presents a review of the potential risk of dust effects and can be used to inform the selection of appropriate dust control techniques, which will mitigate the release of dust emissions from the site.

3.1 Prevailing meteorological conditions

The most important climatic parameters which govern the generation and dispersal of fugitive dust are:

- wind speed - this will affect the potential for dust entrainment and the distance it may travel
- wind direction - this determines the broad transport of the emission and the sector of the compass into which the emission is dispersed
- Rainfall – this is an important climatological parameter as enough rainfall can suppress dust at the source and eliminate the pathway to the receptor. According to Arup (1995)[2] rainfall greater than 0.2mm per day is sufficient to suppress dust emissions.

3.1.1 Local wind speed and direction

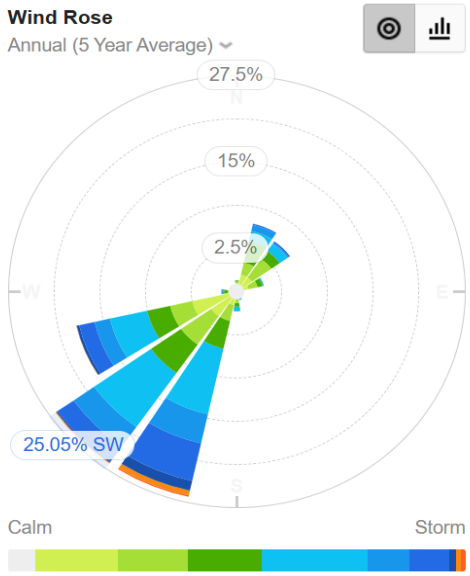

Figure 1 – Windrose from Capel Curig Weather Station (2020-2024) WillyWeather[3]

[2] Arup & Ove Arup Environmental. Environment Effects of Surface Mineral Workings. DoE, October 1995

[3] Trawsfynydd Wind Forecast, Gwynedd LL41 4 - WillyWeather

Wind speed and direction data from the meteorological observation station at Capel Curig, which is located approx. 15 miles to the north of the site is broadly representative of the local site conditions.

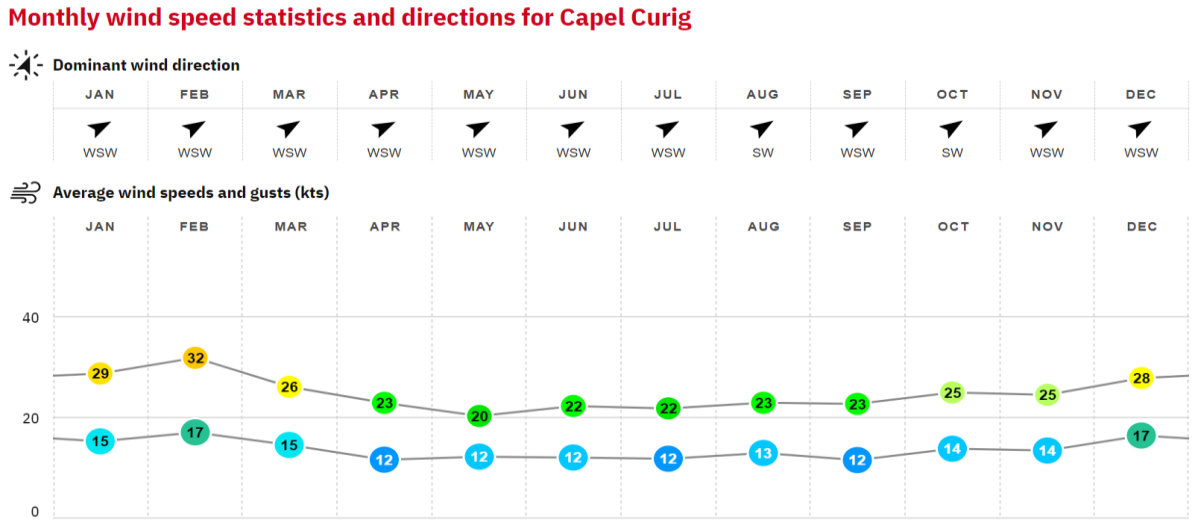

Figure 2 – Monthly wind speed and direction observations from Capel Curig (2024) WindFinder

Figure 1 indicates that the prevailing wind direction is from the south-west, followed by winds from the south-south-west and west-south-west. Winds from the north-north-east, north-east and south-south-east are relatively infrequent.

Figure 2 provides the monthly average wind speed and direction; this confirms the prevailing wind direction is west-south-west and south-west.

On this basis, receptors to the east-north-east and the north-east have the highest potential to be impacted by dust emissions from the site.

3.1.2 Local monthly and annual average rainfall data

Rainfall is typically lower in the summer months, combined with higher temperatures which results in increased periods of dryness when dust could be generated. The likelihood of dust generation and subsequent transfer of airborne dust emissions beyond the site boundary is therefore potentially higher during the summer months.

Climate period: 1991-2020

Station: Capel Curig No 3

Month	Maximum temperature (°C)	Minimum temperature (°C)	Days of air frost (days)	Sunshine (hours)	Rainfall (mm)	Days of rainfall ≥1 mm (days)	Monthly mean wind speed at 10 m (knots)
January	7.03	1.91	8.49	–	309.62	19.53	15.52
February	7.11	1.74	7.72	–	258.17	17.64	15.06
March	8.82	2.69	5.09	–	213.40	16.80	13.61
April	11.37	4.19	2.64	–	155.79	15.48	11.41
May	14.43	6.65	0.70	–	141.97	14.34	11.43
June	16.61	9.37	0.03	–	144.16	13.97	10.97
July	18.16	11.29	0.00	–	157.63	15.57	10.89
August	17.84	11.32	0.00	–	189.67	16.94	10.77
September	15.99	9.35	0.10	–	206.34	15.97	11.08
October	12.77	7.09	1.03	–	274.01	19.00	12.92
November	9.75	4.50	3.31	–	300.38	20.87	13.42
December	7.58	2.40	7.19	–	345.99	20.38	14.90
Annual	12.31	6.07	36.30	–	2697.13	206.49	12.66

Figure 3 Monthly and annual average rainfall data for Capel Curig 1992-2020 Met Office

Figure 3 shows relevant rainfall data applicable to the site. The average annual rainfall ≥ 1mm/day for the area of the Site is 206.5 days per year, comprising approximately 57% of the year. It is therefore considered that on those days the natural suppression afforded by the rain would eliminate all sources of dust across the site.

3.2 Sources of dust

The onsite activities which have the most potential to generate dust emissions are:

- handling of waste
- vehicle movements
- deposition of waste.

Table 1 outlines the potential sources of dust associated with the proposed operations.

Activity	Potential for dust generation	Description/location
Waste handling	Low	Temporary operations. Potential for short term dust emissions when the crushed and screened waste arisings are stockpiled and deposited within the laydown area. (NOTE – for all the activities listed in this table - Demolition of the reactor buildings, removal of rebar and other materials, crushing and screening of the concrete and brick and stockpiling pre and post crushing will be managed by a contractor under a mobile plant permit and appropriate waste exemptions.

		These activities are separate from the Deposit for Recovery permit application.)
On-site transportation of waste and materials	Low	Temporary operations. Dust will be created by the movement of the onsite plant, particularly during dry spells. There will be approximately 4 HGV truck movements per day.
Infilling and contouring of laydown area	Low	Temporary operations. Approximately 31,492 tonnes of waste will be deposited in the laydown area over the course of two-three years and then contoured to the appropriate landform in accordance with the Planning Application and Waste Recovery Plan. The infilling and contouring of the laydown area will take place in discrete campaigns over the course of two-three years. The laydown area will be constructed from concrete and brick which has been crushed and screened to produce 6F2.
Construction of a ramp within the temporary scaffolding storage area to access the level plateau	Low	Temporary operations. The access ramp will be constructed from concrete which has been crushed and screened to produce 6F2.
Preparation and management of stockpiles	Low	Site generated concrete and brick will be stockpiled for use on site in pre-crushed form. Pre-crushed concrete and brick are unlikely to generate dust because there will be negligible amounts of fine/un-bound particles.
Off-site transportation (this is limited to unsuitable wastes only)	Low	Off-site transport will occur along A470.

3.2.1 Designed in dust control measures

The following measures that are incorporated into the working scheme are considered to afford a degree of reduction in the potential for dust generation. These "designed in" control measures are presented below.

Table 2 Outlines the designed in dust control measures for potential dust generating activities.

Activity	Designed in Dust Control Measures
Management Procedures	The Site Manager, or their nominee, will exercise day to day control on site. They will have responsibility for ensuring compliance with the conditions attached to the permit. They will assume control either personally or by delegation to suitably trained and competent staff of: • Vehicle movements • All loading, tipping and material handling operations • Operation of dust suppression and mitigation measures • Inspection, cleaning and maintenance of plant and equipment • Visual dust monitoring • Liaison with the contractor appointed to crush and screen the waste arisings to produce 6F2 (dust generated during crushing and screening or stockpiling post crushing will be controlled by the contractor's mobile plant permit) All staff will receive necessary training and instruction in their duties relating to the control of operations and the potential sources of dust emissions. Emphasis will be given to dealing with plant malfunctions and abnormal conditions. Site staff will inform the Site Manager if visible dust emissions are observed within the laydown area. If dust emissions which are likely to cause a nuisance are detected beyond the site boundary, then the incident will be recorded in the Site Diary[4]. Immediate action will be taken to identify the cause and where necessary action will be taken to suppress any aerial emissions before they reach the site boundary. This may be achieved by damping down, covering the waste with non-dusty materials or by amending working procedures or by temporarily ceasing activities.
Complaints Procedure	Complaints will be managed in accordance with the procedure summarised in Appendix A5 and the relevant company standards which are described within the Appendix.

[4] The site diary may also be another suitable electronic incident recording system e.g. QPulse or similar

Transporting waste and materials	Internal transportation of wastes will be restricted to clearly delineated areas, or on roads with metalled surfaces. Wastes will be handled at low levels where possible, to reduce drop height. The access ramp and surface of the laydown area will be maintained in good condition by regular grading, good drainage and use of recycled aggregate which has achieved 6F2 specification. A water bowser will be available to suppress dust emissions, together with a spray line for use on the internal roads, as necessary. Water will be obtained from the supply source point adjacent to RB2 building, or rainwater collected into storage containers. All site vehicles will be maintained in accordance with the manufacturer's manual. The site will benefit from good housekeeping which will include regular sweeping of site roads, if dust becomes visible on or adjacent to the road surfaces. Site haulage will be restricted to low speed limits to minimise the mobilisation of dust particles. All drivers, including visitors, will be made aware of the site's commitment to minimising dust. The Site Manager or their nominee will be responsible for checking the situation regarding dust on a regular basis throughout working hours, and for ensuring that mitigation measures are provided as necessary. HGVs transporting dusty materials beyond the NSL boundary will be sheeted.
Waste handling	Only inert waste will be used for the improvement and extension of the laydown area. When necessary, working areas will be misted with water from a bowser. In unusually dry or windy conditions, site activities will be suspended if it appears likely that the dust suppression won't prevent dust being carried towards sensitive receptors, particularly those towards the north-east of the site e.g. Ty Gwyn.

3.3 IAQM assessment of dust impacts

In support of this EP application, a dust impact assessment has been undertaken in accordance with the IAQM guidance[5] 'Guidance on the Assessment of Mineral Dust Impacts for Planning'.

The IAQM mineral guidance presents a simple distance-based screening process to identify those mineral sites where the dust impacts are unlikely to be significant and require further assessment. Wherever a more detailed assessment is required, a basic assessment framework is presented which employs the Source – Pathway –Receptor approach to evaluate the risk of dust impacts and effects.

The DMP requires consideration of sensitive receptors. All potential receptors within 1km are listed in Table 3.

Table 3 dust sensitive receptors within 1 km of the site

Ref No	Receptor	Grid ref X	Grid ref Y	Distance from site boundary (m)	IAQM distance description	Direction from site boundary
1	Eryri National Park			0	Close	All directions
2	Public footpath	268799	338478	100	Intermediate	North West
3	Public footpath/Cycle Trail	269467	338186	100	Intermediate	South
4	Canolfan Prysor Centre (café and meeting room)	269848	338312	400	Distant	East
5	Ty Gwyn Farm	269084	338914	500	N/A	North East
6	Creigiau duon (listed building and farmhouse)	269278	339151	800	N/A	North
7	Utica (Welsh Congregational Chapel)	269514	339008	800	N/A	North East
8	Coed Y Rhygen (SSSI, SAC and NNR)	268139	336915	1,000	N/A	South West
9	Tomen y Mur (scheduled ancient monument)	270500	338600	1,000	N/A	East

[5] Guidance on the Assessment of Mineral Dust Impacts for Planning, May 2016 (v1.1), Institute of Air Quality Management (IAQM) http://www.iaqm.co.uk/text/guidance/mineralsguidance_2016.pdf

The IAQM guidance goes on to state that “where there are no receptors near to a mineral site there will be no significant effect”. This is because at mineral operations, “the change in both airborne concentrations and the rate of deposition with distance, suggests that dust impacts will occur mainly within 400m of the operation, even at the dustiest of sites”. Thus, dust will only have a negligible impact on receptors beyond 400m.

Based on the IAQM screening criteria, an assessment of both deposited dust and PM10 has been undertaken on dust sensitive receptors located within 400m of the on-site activities. These are shaded in green in Table 3.

The background concentrations of PM10 at the site and the surrounding locale were obtained from UK AIR Information Resource (UK AIR)[6] . The PM10 ambient background annual average for the site in 2023 was 14µg/m3 or less.

In accordance with the IAQM guidance, ‘If the long-term background PM10 concentration is less than 17µg/m^3 there is little risk that the Process Contribution would lead to an exceedance of the annual-mean objective’. No further consideration of PM10 emissions was not required since the effects are ‘Not Significant’.

Further assessment of deposited dust was undertaken in accordance with the methodology contained within the IAQM minerals guidance. The Magnitude of Dust Effects were calculated for each relevant receptor within 400m, using the following methodology:

1. Identification of Residual Source Emission Category
2. Quantification of Frequency of Dusty Winds
3. Categorisation of Receptor Distance
4. Calculation of Pathway effectiveness (using 2 and 3)
5. Estimation of Dust Impact Risk (using 1 and 4)
6. Identification of Receptor Sensitivity
7. Calculation of Magnitude of Dust Effects (using 5 and 6)

3.3.1 Residual Source Emissions

The first step towards determining the impact of the dust from Site operations on the local receptors is the determination of the residual source emissions applicable to the site. The operations were broken down into six activities, as detailed in Section 3.2.

3.3.2 Frequency of Dust Winds

Table A3-2 of Appendix 3 to the IAQM guidance, which is replicated in Table 4 below, provides the following thresholds for determining the frequency of dust winds between an activity and a receptor:

[6] DEFRA UK Air Information Resource (UK-AIR) website, available at https://uk-air.defra.gov.uk/data/laqm-background-map

Table 4 Criteria to determine the frequency of dust winds

Frequency Category	Criteria
Infrequent	Frequency of winds (>5 m/s[7]) from the direction of the dust source on dry days are less than 5%
Moderately Frequent	Frequency of winds (>5 m/s) from the direction of the dust source on dry days are between 5% and 12%
Frequent	Frequency of winds (>5 m/s) from the direction of the dust source on dry days are between 12% and 20%
Very Frequent	Frequency of winds (>5 m/s) from the direction of the dust source on dry days are greater than 20%

For each receptor, the Wind Rose in Figure 1 was used to observe the average windspeed and distance in each direction. This data was then compared to the thresholds given in Table 4 of this document to determine the probable frequency of dust winds between the site and receptor in question.

All receptors as listed in Table 4 have been identified as receiving infrequent dust winds, with the exceptions of those to the North East and East of the site. These include receptors reference numbers 1, 5, 7 and 9.

3.3.3 Receptor Distance

Table A3-3 of Appendix 3 to the IAQM guidance, which is replicated in Table 5 below, provides the following thresholds for determining receptor distance or a receptor's proximity to an activity which could give rise to dust emissions:

Table 5 Criteria to determine receptor distance category

Receptor Distance Category	Criteria
Close	Receptors < 100m from the source
Intermediate	Receptors between 100m and 200m from the source
Distant	Receptors between 200m and 400m from the source

Using the IAQM guidance, distances were assigned to the four receptors within 400m of the Site, as detailed in Table 3 (these are shaded green).

One receptor, Eryri is identified as 'close' to the source since the site is located within the National Park boundary.

3.3.4 Pathway Effectiveness

The frequencies of dust winds from section 3.3.2 and the receptor distances from Table 3 were then used to calculate the pathway effectiveness, in conjunction with the framework given in Table A3-4 of the guidance.

[7] 5 m/s is equivalent to 11.2 mph or 9.7 knots

Table A3-4. Pathway Effectiveness

		Frequency of potentially dusty winds			
		Infrequent	Moderately frequent	Frequent	Very frequent
Receptor Distance Category	Close	Ineffective	Moderately Effective	Highly Effective	Highly Effective
	Intermediate	Ineffective	Moderately Effective	Moderately Effective	Highly Effective
	Distant	Ineffective	Ineffective	Moderately Effective	Moderately Effective

All receptors as listed in Table 3 have been determined as having ineffective pathway except for Eryri National Park which could be described as having a moderately effective pathway.

3.3.5 Risk of Dust Impact

The risk of dust impact between each activity and each receptor was then calculated using the residual source emissions and the pathway effectiveness. The pathway effectiveness and residual source emissions scores were input into the framework given in Table A3-5 of Appendix 3 to the IAQM guidance.

Table A3-5. Estimation of Dust Impact Risk

		Residual Source Emissions		
		Small	Medium	Large
Pathway Effectiveness	Highly effective pathway	Low Risk	Medium Risk	High Risk
	Moderately effective pathway	Negligible Risk	Low Risk	Medium Risk
	Ineffective pathway	Negligible Risk	Negligible Risk	Low Risk

The results of this step are presented in Table 6 below. The screening step identified that all six residual source emissions to be carried out on site have a small potential to generate dust. This is because of the nature and scale of the activity and the types of wastes being recovered.
Therefore, even with the moderately effective pathway identified for Eryri National Park, the overall risk of dust impact is negligible.

3.3.6 Receptor Sensitivity

IAQM guidance (Box 5) identified that Eryri National Park is within 400m of the site and it has been assessed as a medium sensitivity receptor.

Box 5. Sensitivities of Receptors to Ecological Effects

A Habitat Regulation Assessment of the site maybe required as part of the planning process, if the site lies close to an internationally designated site[a].

Professional judgement is required to identify where on the spectrum between high and low sensitivity a receptor lies, taking into account the likely effect and the value of the ecological asset. A habitat may be highly valuable but not sensitive, alternatively it may be less valuable but more sensitive to dust deposition. For the sensitivity of ecosystems to dust deposition the IAQM recommends that an ecologist is consulted to determine the potential effects on plant communities.

High sensitivity receptor
- locations with an international designation and the designated features may be affected by dust soiling
- locations where there is a community of a particularly dust sensitive species such as vascular species included in the Red Data List For Great Britain.
- an indicative example is a Special Area of Conservation (SAC) designated for acid heathlands adjacent to a minerals development releasing alkaline dusts.

Medium sensitivity receptor
- locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown;
- nationally designated site and the designated features may be affected by dust deposition; or indicative examples include Sites of Special Scientific Interest (SSSIs) or a local wildlife sites with very specific sensitivities

Low sensitivity receptor
- locations with a local designation where the features may be affected by dust deposition.
- an indicative example is a local Nature Reserve with dust sensitive features.

[a] Special Conservation Areas (SAC) and Special Protection Areas (SPA) designated under the Habitats Directive (92/43/EEC) and RAMSAR sites
[b] Cheffing C. M. & Farrell L. (Editors) (2005), The Vascular Plant. Red Data List for Great Britain, Joint Nature Conservation Committee

IAQM guidance (Box 3) identified that the public footpaths, cycle trail and the Canolfan Prysor Centre are within 400m of the site and have been assessed and low sensitivity receptors.

Box 3. Sensitivities of People to Dust Soiling Effects

For the sensitivity of people and their property to soiling, the IAQM recommends that the air quality practitioner uses professional judgement to identify where on the spectrum between high and low sensitivity a receptor lies, taking into account the following general principles:

High sensitivity receptor
- users can reasonably expect[a] enjoyment of a high level of amenity; or
- the appearance, aesthetics or value of their property would be diminished by soiling; and the people or property would reasonably be expected[a] to be present continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land.
- indicative examples include dwellings, medium and long term car parks[b] and car showrooms.

Medium sensitivity receptor
- users would expect [a] to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; or
- the appearance, aesthetics or value of their property could be diminished by soiling; or
- the people or property wouldn't reasonably be expected [a] to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land.
- Indicative examples include parks, and places of work.

Low sensitivity receptor
- the enjoyment of amenity would not reasonably be expected[a]; or
- there is property that would not reasonably be expecteda to be diminished in appearance, aesthetics or value by soiling; or
- there is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land.
- Indicative examples include playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks[b] and roads.

[a] People's expectations will vary depending on the existing dust deposition in the area.
[b] Car parks can have a range of sensitivities depending on the duration and frequency that people would be expected to park their cars there, and the level of amenity they could reasonably expect whilst doing so. Car parks associated with work place or residential parking might have a high level of sensitivity compared to car parks used less frequency and for shorter durations, such as those associated with shopping or errands. Cases should be examined on their own merits.

3.3.7 Magnitude of Dust Effects

The final step is combining the receptor sensitivity with the dust impact risk from the activities for each receptor. After this, it was possible to determine the magnitude of dust effect that the site could reasonably be expected to have on each receptor, as given below in Table 6:

Table 6 Assessment of the magnitude of dust effects for each receptors within 400m of the site boundary

Ref No	Receptor	Receptor Sensitivity	Dust impact risk	Distance from site boundary (m)	Magnitude of dust effects	Direction from site boundary
1	Eryri National Park	Medium	Low	0	Negligible	All directions
2	Public footpath	Low	Low	100	Negligible	North West
3	Public footpath/Cycle Trail	Low	Low	100	Negligible	South
4	Canolfan Prysor Centre (café and meeting room)	Low	Low	400	Negligible	East

In conclusion, the risk of dust impact at any of the four receptors within 400m of the site boundary is expected to have negligible effect.

4.0 Control of dust emissions

4.1 Overview

NRS recognises the potential for the site to generate dust emissions and is committed to preparing, operating and completing the site in accordance with industry best practice. The implementation of industry best practice measures to control and mitigate the generation and transportation of dust can ensure that dust Is adequately controlled.

The dust control measures contained within this DMP have been defined based on the findings of the IAQM dust impact assessment and the following regulatory guidance:

- IAQM Guidance on the Assessment of Dust from Demolition and Construction sites (Version 2.2) Jan 2024
- IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning (2016);
- Mineral Industry Research Organisation (MIRO) Good practice guide: control and measurement of nuisance dust and PM10 from the extractive industries (AEA, 2011);
- Process Guidance Note 3/16 (12) Statutory guidance for mobile crushing and screening (Defra, 2012); and
- Control and monitor emissions for your environmental permit, Gov.UK (Defra updated 2022).

The key methods for controlling dust emissions are through good site design, management practices and subsequent good housekeeping, i.e. avoidance of dust generation.

4.2 Dust control measures

Dust control measures that will be employed at the Site as part of routine planning and operations are detailed in Tables 7, 8 and 9 below.

Table 7 General Site Control Measures

Activity	Control Measures
Design and location of dust generating activities	Dust-generating activities will, where possible, be located where maximum protection can be obtained from topography, buildings or other sheltering features. The stockpiles and exposed areas will be set back as far as reasonably possible from the site boundary and upwind of the operational area will be sheltered by several large buildings. Downwind of the site mature vegetation will be maintained between the area of deposit and stockpiling and the site boundary.
Equipment and vehicles	The site has been designed to minimise transportation distances between where the waste will be generated, processed, stockpiled and deposited. All roads have a metalled surface and parking is paved. Therefore, the likelihood of any vehicle encountering mud and then tracking this onto the internal roads or public highway is very small.
Planting	Existing woodland/hedgerows along site boundaries will be retained where possible. This existing vegetation will act to reduce wind speed and entrainment of dust. This planting is sufficient that a boundary fence for dust management is not deemed necessary.
Communication	Good communication will be maintained to prevent anxieties between the operator and the surrounding communities. Regular, accessible liaison arrangements will be implemented to provide information as freely as possible
Training	Training on dust mitigation will be provided to site personnel.
Monitoring	Refer to Section 4.3
Management	All dust and air quality complaints will be recorded. The cause will be identified, and appropriate measures taken. See Section 5.0

Table 8 Activity Specific Preventative Dust Control Measures

Activity	Management Actions and Preventative Dust Control Technique	Trigger for Implementation
Temporary stockpiles	• Drop heights will be minimised. • Vehicles will not be overloaded. • A maximum of three temporary waste stockpiles will be created within the permitted area for the storage of 6F2 prior to construction of the laydown	Control measures will be implemented when the site is operational

	area. Waste arisings will be generated through at least two campaigns and the maximum volume of 6F2 to be stored at any one time will be 7,500 m^3 e.g. if three stockpiles are created then each will contain < 2,500 m^3 • Temporary stockpiles will be stored up to a maximum of 12 months and will be used in strict rotation e.g. first in and first out. • The maximum height of the temporary stockpiles will be 4m and stockpiles will not be constructed within 3m of the perimeter slope • Existing trees/hedgerows will be retained around the permit boundary. • Waste arisings being stockpiled will be screened and excess fines removed prior to stockpiling. Therefore, wind whipping and dust mobilisation from piles is considered low risk.	
Waste handling	• During prolonged periods of wind and dryness visual dust monitoring will be increased. If dust is being generated in significant quantities, such that it may travel beyond the site boundary, then handling will be reduced so as far as reasonably practicable. • Dust control measures (e.g. dampening down) will also be implemented if needed.	Control measures will be implemented during all periods when the site is operational
On-site transportation	• All vehicles will adhere to the maximum site speed limit of 10mph. • Controlled use of fixed haul routes. • Abrupt changes in direction will be avoided. • Where necessary, vehicles entering and leaving the NLS will be covered to prevent escape of materials during transport • Haul roads will benefit from regular maintenance. Necessary repairs to the surface will be instigated as soon as reasonably practicable.	Control measures will be implemented during all periods when the site is operational

	• Adequate water supply will be provided for effective dust mitigation. • Vehicles will be evenly loaded to avoid spillages	
Off-site transport	• Where necessary, vehicles leaving the NLS will be covered to prevent escape of material during transport • An adequate area of metalled road surface will be maintained between the site activities and NLS boundary onto the public highway to prevent the transfer of soil or debris onto the public highway.	Control measures will be implemented during all periods when the site is operational
Infilling and contouring of waste	• Good standards of all plant and equipment will be maintained; and • Drop heights will be minimised when depositing inert material • If visible plumes of dust emissions are identified crossing the site boundary, operations will cease until dust can be satisfactorily managed.	Control measures will be implemented during all periods when the site is operational Routine daily monitoring will enable dynamic assessments and prompt action
Construction of access ramp	• Recycled aggregates will be stored in piles to minimise their overall height as far as is reasonably practicable. • Visual monitoring will be carried out to provide early warning of the piles becoming excessively dry such that visible dust plumes could be generated. Where necessary the piles will be dampened down. • The access ramp will benefit from regular maintenance. If necessary, repairs to the surface will be instigated as soon as reasonably practicable	Control measures will be implemented during all periods when the site is operational

Table 9 Activity Specific Remedial Dust Control Measures

Activity	Management Actions and Preventative Dust Control Technique	Trigger for Implementation
Excavation and stockpiles	• Water suppression including hoses and use of a water bowser to dampen operational area. Water-based suppression system will have coverage of all areas of the site used	Visible dust plumes carried towards / across site boundary.

	for traffic and waste activities and sufficient water supply.	
Waste handling	• Dampening of material by water bowser as and when required.	Visible dust plumes carried towards / across site boundary.
On-site transportation	• Sweeping of site using a road brush • Dampening of roads when necessary	Visible dust plumes carried towards / across site boundary. Track surface no longer clearly visible
Off-site transport	• Use of water and road sweeper to remove visible dust and debris from internal roads as and when necessary.	Visible dust plumes carried towards / across site boundary. Track surface no longer clearly visible
Infilling and contouring of waste	• Dampening of material as and when necessary • Minimising the amount of dust and fine particles within the recycled aggregate product by following WRAP aggregates from inert waste protocol to manufacture 6F2 graded material	Visible dust plumes carried towards / across site boundary.
Construction of access ramp	• Dampening of material as and when necessary • The area will be graded in such a way as to minimise the amount of dust and fine particles present on the surface.	Visible dust plumes carried towards / across site boundary.

The remedial dust control measures outlined above would be undertaken until the dust emissions were contained within the site boundary and significantly reduced. The decision would be at the discretion of the Site Manager or their nominee.

4.2.1 Housekeeping

Road sweeping will be carried out as and when necessary, or when there is the potential for dust mobilisation.

Other aspects of the housekeeping schedule for the site include:

- Due to the relatively small scale of the activity, it is unlikely that lorries would need to park while waiting to deposit load
- Anti-idling policy for vehicles and machinery on site
- The internal roads and metalled and will be maintained in a good state of repair to prevent soil and debris from accumulating

- In order to prevent dust and emissions during dry and windy weather, any outgoing lorries containing wastes that might generate dust, will be sheeted before crossing the NLS boundary.

4.3 Monitoring

4.3.1 Meteorological Conditions

Weather forecasts will be monitored daily during operations. This is done to actively predict and plan for weather conditions such as prolonged dry, hot spells or significantly strong winds. Such conditions may give rise to elevated levels of dust, which may require additional dust control measures, including the temporary suspension or relocation of certain activities.

4.3.2 Visual Dust Monitoring

The Site will undertake regular visual monitoring to ensure that dust control techniques are being carried out effectively. The objective of the visual monitoring is to anticipate whether dust is being transported beyond the site boundary in quantities sufficient to cause a nuisance to off-site receptor locations.

Visual monitoring of dust will be undertaken at strategic locations to be agreed with NRS stakeholders. Responsibilities can either be delegated to various site operatives to carry out visual observations of their working areas during normal operations or be delegated to a single operative to perform daily visual checks of key areas.

The areas that require consideration for inclusion within the visual observations are as follows:

- Inert infilling, contour shaping, compaction and grading of the surface
- Cleanliness of internal roadways
- Areas of temporary stockpiling

Monitoring locations will consider prevailing wind direction, and the sensitive receptors identified in Section 3.3. The results of all visual observations, and any remedial actions will be recorded. Any personnel who undertake visual dust monitoring will have received appropriate training, guidance and instruction on how to carry out the task in line with the requirements of this DMP.

NRS will carry out an annual review of the DMP, and any complaints which have been recorded along with the results of dust monitoring on the site. This will be in accordance with S-495 event recording procedure.

Table 10 Visible Dust Monitoring

Parameter	Limit	Frequency	Locations
Visible Dust Emissions	Visible Dust Emissions Crossing the Site Boundary	Daily (during extended periods of	Operational Areas Dust monitoring points will be in the general direction of sensitive receptors including Ty Gwyn and Lyn Trawsfynydd.

		dry weather)	

Results of visual observations will be recorded in accordance with S-495. The following details shall be noted:

- Weather conditions (rainfall, wind speed, wind direction)
- Current site activities
- Identification of any visible dust emissions travelling beyond the site boundary
- Details of any remedial action undertaken as a result

The frequency of visual monitoring will be increased to twice daily observations in the following scenarios:

- Regular observations detect significant dust plumes crossing the site boundary towards off-site receptors
- In response to a complaint being received by the site or NRW.

4.4 Site management and contingency measures

This section details the responsibilities of the Site Management towards actions within the DMP. The responsibilities are illustrated in Figure 4

Figure 4 Dust Management Plan Responsibilities

There will be a trained site manager on site during working hours who is responsible for overall site environmental management, including dust management and visual observations. The site manager will be responsible for ensuring effective dust control is achieved by good operational practises, including:

- identifying and monitoring the intensity of activities with a high potential for dust generation
- monitoring weather conditions during periods of such activity
- planning and preparing for the implementation of contingency measures
- responding to potential and actual dust monitoring issues, and
- ceasing operations if significant off-site impacts cannot be avoided

Responsibilities will be allocated to specific personnel to ensure dust generation is avoided or effectively controlled, as presented in Table 11.

Table 11 Responsibilities for aspects of dust management

Actions	Responsibility
Monitoring weather forecasts and current wind directions on Site	Site Manager
Routine visual observation monitoring	Site Manager
Coordination of application of water dust suppression	Site Manager
Completion of dust event forms	Site Manager
Activation of contingency action plans	Site Manager
Liaison with public and regulator	Site Manager
Coordinating reviews and updates of DMP	Site Manager

4.5 Training

All personnel on site will understand their responsibility to ensure the dust is minimised and controlled. Each employee shall be made aware of the importance of effective dust control and the most effective measures available to minimise such emissions from the various activities. Such training shall be provided as part of the induction process for all new employees.

Specific training will be provided to:

- operatives in use of the water suppression techniques, and
- all site personnel on the importance of reporting potential/ actual dust emissions or the malfunctioning of dust control to the appropriate person

4.6 Incident reporting

Incidents of high dust levels will be reported to the Site Manager or nominee and recorded in accordance with S-495. Any incidents that have created significant dust issues off site shall be reported to NRW as appropriate.

4.7 Dust complaints procedures

Dust complaints will be managed in accordance with the procedure described in Appendix A5 and following the relevant company standards which are described in the Appendix.

Investigations will include, but not be limited to the following:

- Visit by a member of site management to the location of the complaint, to verify the issue (If complaint is made after the event this may not be possible)
- A review of site activities in operation at the time of the incident
- A review of the dust monitoring results for the period of the incident (if applicable)

- For recurring events, the frequency of visual dust monitoring should be increased to a twice daily basis
- A review of control measures and dust suppression in place at the time of the incident (i.e. application of water, drop heights during transfer etc)
- A review of the meteorological conditions at the time of the incident, and
- Report findings

4.8 Liaison with the local community and regulator

The Site Manager (or nominated representative) shall engage with the EHSSQ team, regarding liaison with the regulator and local community in relation to dust emissions off-site.

NRS has an effective stakeholder liaison group for the Trawsfynydd site, which will be used to ensure timely communication with the local community about these waste activities and providing assurance around effective dust management.

If appropriate key issues will be communicated between both sides, including but not limited to the following:

- Presentation of the monitoring scheme and the latest dust monitoring results
- Update on the working scheme of the Site and when/where future operations will be
- Summary of the dust controls on site and any planned improvements
- Contact details for the site should any issues arise between the meetings
- Summary of any complaints received, the findings of any investigation(s) and actions taken

4.9 Record keeping

NRS will keep records of all dust monitoring, dust contingency actions, investigations and complaints on Site for a minimum period of 2 years; these shall be made available to the regulator on request.

4.10 DMP update and review

This DMP is an active, controlled document which forms part of the site management documentation. It shall be reviewed on an annual basis, as a minimum by senior site management. Given that the document is a point of reference for daily operations, it shall be updated as required should any of the following situations occur:

- significant changes are made to the plant or operational practices
- the regulator specifically requests for the DMP to be updated, or
- following investigations into dust control, additional measures are adopted that are not contained within the document

On review of Site operations and the effectiveness of the DMP, senior management are required to make any changes deemed appropriate to ensure dust emissions are kept to a minimum.

5.0 Contingency Action Plan

A contingency action plan has been defined to react to situations whereby visual monitoring of dust indicates that a potential dust source is not being mitigated effectively, appropriate control measures are not in place or that an adverse impact has / may occur.

This includes incidents or accidents which would result in the loss of control of potential dust sources and have the potential to cause an unacceptable impact on the environment. The contingency action plan therefore includes both pro-active and re-active actions to events.

Contingency measures have been identified for the following scenarios and are presented in Table 12 below.

- observed change in wind direction towards nearby receptors during activities close to site boundary
- visual monitoring records visible dust plumes across the site boundary in the direction / proximity to the off-site receptors
- malfunction of road sweeper rendering it in-effective
- receipt of a particularly dusty load (inert material for infilling)
- complaints received from members of the public or neighbouring businesses, verified by visual monitoring on site
- malfunction of water collection system or bowser, resulting in inadequate water for dust suppression
- prolonged periods of hot weather, resulting in very dry ground and limited supply of water

Event	**Change in in wind direction towards off-site receptors**
Contingency Actions	The weather forecasts will be monitored and the frequency of visual monitoring for dust, will increase to twice daily. This will incorporate walkovers along the Site boundary. Additional dust suppression will be implemented on high-risk activities using water sprays, reduction in drop heights or cessation of material handling / transfer. In the event dust is observed to be crossing the boundary when additional dust suppression in place, then any dust-generating activities will be relocated or ceased until more effective mitigation is in place. The Site Manager will be informed of actions taken and this will be recorded in accordance with S-190 and S-495.
Event	**Visual monitoring records dust plumes across site boundary in direction of off-site receptors**
Contingency Actions	The weather forecasts will be monitored, and the wind direction will be determined. The frequency of visual monitoring will increase to a minimum of twice daily. This will incorporate walkovers along the site boundary. Water supplies will be available. The likely dust source will be determined, and additional dust suppression will be implemented e.g. Increased frequency of water suppression on internal roads and commence water suppression on material using manual techniques on site.

	If additional dust suppression not effective, dust-generating activities will be relocated or ceased until dust can be satisfactorily controlled. The site manager will be informed of actions taken and this will be recorded in accordance with S-190 and S-495.
Event	**Malfunction of water suppression techniques, rendering them ineffective**
Contingency Actions	Essential Spares for any dust suppression equipment will be maintained on site Repairs will be undertaken using on-site spares if possible, or a technician will be called to repair at earliest opportunity. Manual methods will be undertaken to clean down vehicles. The frequency of visual monitoring will increase to twice daily, which will incorporate a walkover of the all the boundaries. Manual water techniques will be available on site and at the location of the dust source. The site manager will be informed of actions taken and this will be recorded in accordance with S-190 and S-495.
Event	**Receipt of a particularly dusty load (inert material for depositing)**
Contingency Actions	Loads will be investigated to ascertain whether they can be received without causing dust emissions to leave the site boundary. If necessary, the following actions may be undertaken: • use of additional mitigation, e.g. dampening down during unloading Ultimately, if waste cannot be received without dust emissions causing an unacceptable impact, then receipt of load (s) will cease, and the contractor will be informed, with a view to reviewing operational procedures to attempt to minimise dust generation during crushing and screening. The site manager will be informed of actions taken in accordance with S-190 and S-495
Event	**Complaints received from members of the public or neighbouring businesses, verified by visual monitoring on site**
Contingency Actions	Managing complaints will be carried out in accordance with the procedure described in Appendix A5 and following the relevant suite of company standards as listed within the Appendix. The frequency of visual monitoring will increase to twice daily and will focus on boundary locations in proximity to the location of any complainants. If required, NRW will be notified to discuss further monitoring requirements. Complaint escalation procedures as described within Appendix A5 will be followed (if necessary). The DMP will be reviewed and if necessary updated to prevent reoccurrence.
Event	**Prolonged periods of hot weather, resulting in very dry ground and limited supply of water**

Contingency Actions	Water suppression techniques to be prioritised for operational activities occurring closest to the off-site receptors. Ensure rainwater collection techniques, if used, are fully functioning. All site roads are metalled. Road sweeping to be undertaken if large accumulations are visible on internal roads, in operational areas and access road. However, be mindful this may resuspend the dust therefore not to be undertaken in windy conditions. If water supply on site has significantly reduced, consider importing water onto site. Increase daily monitoring to twice daily and if dust is being released in significant quantities likely to cause impact, then cease dust-generating activities. The site manager will be informed of actions taken and this will be recorded in accordance with S-495 and S-190.

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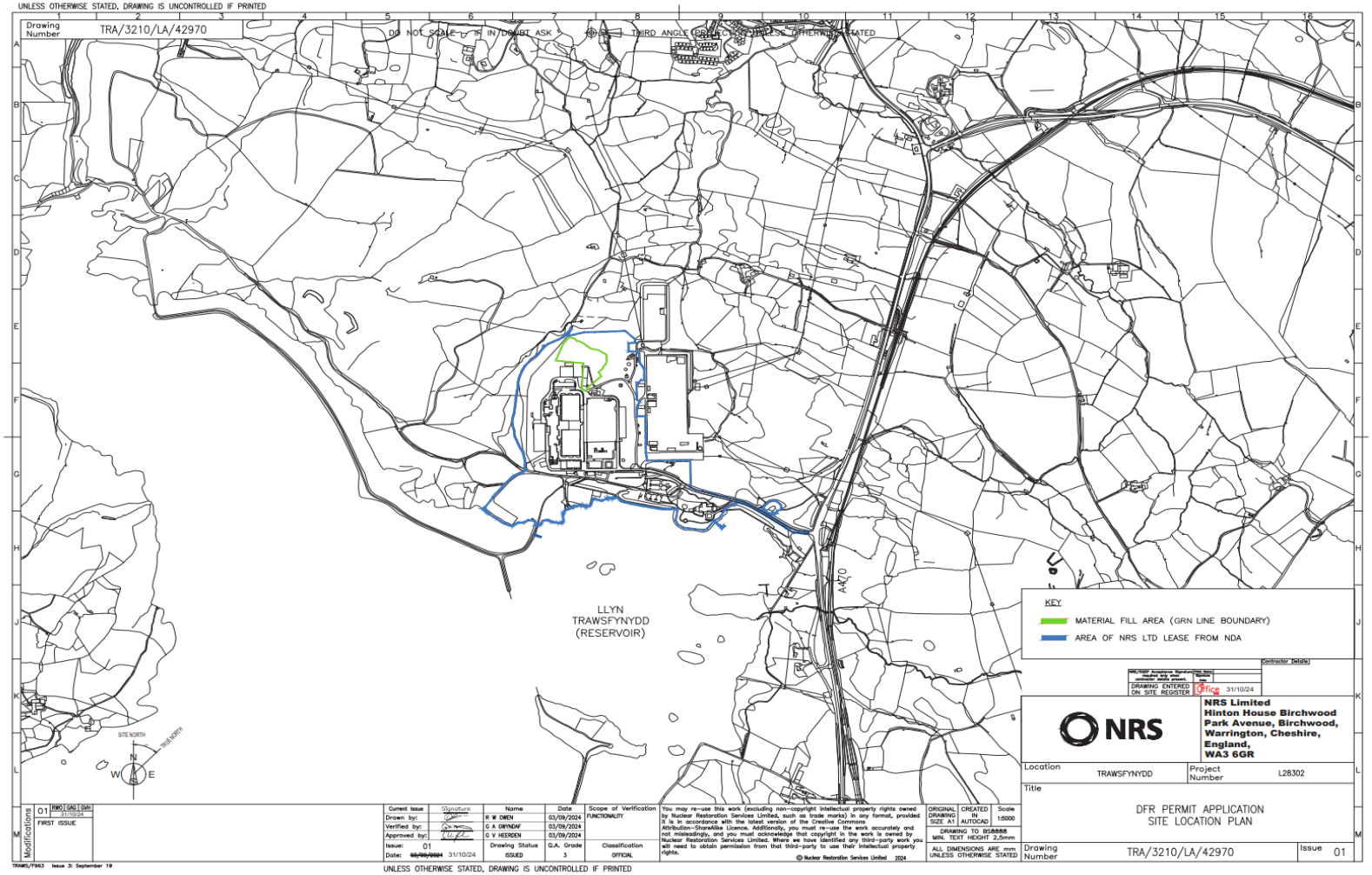
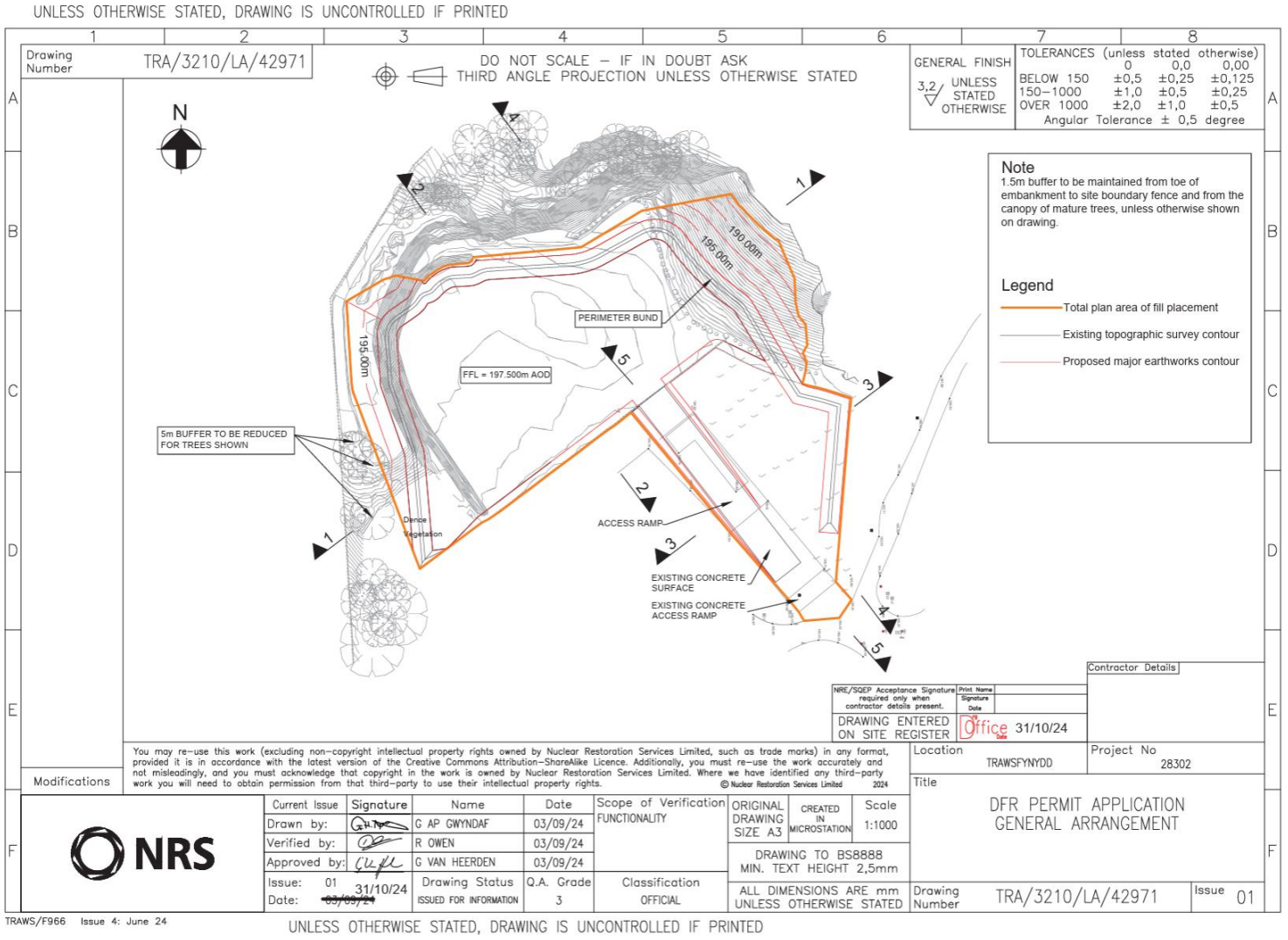
Appendices

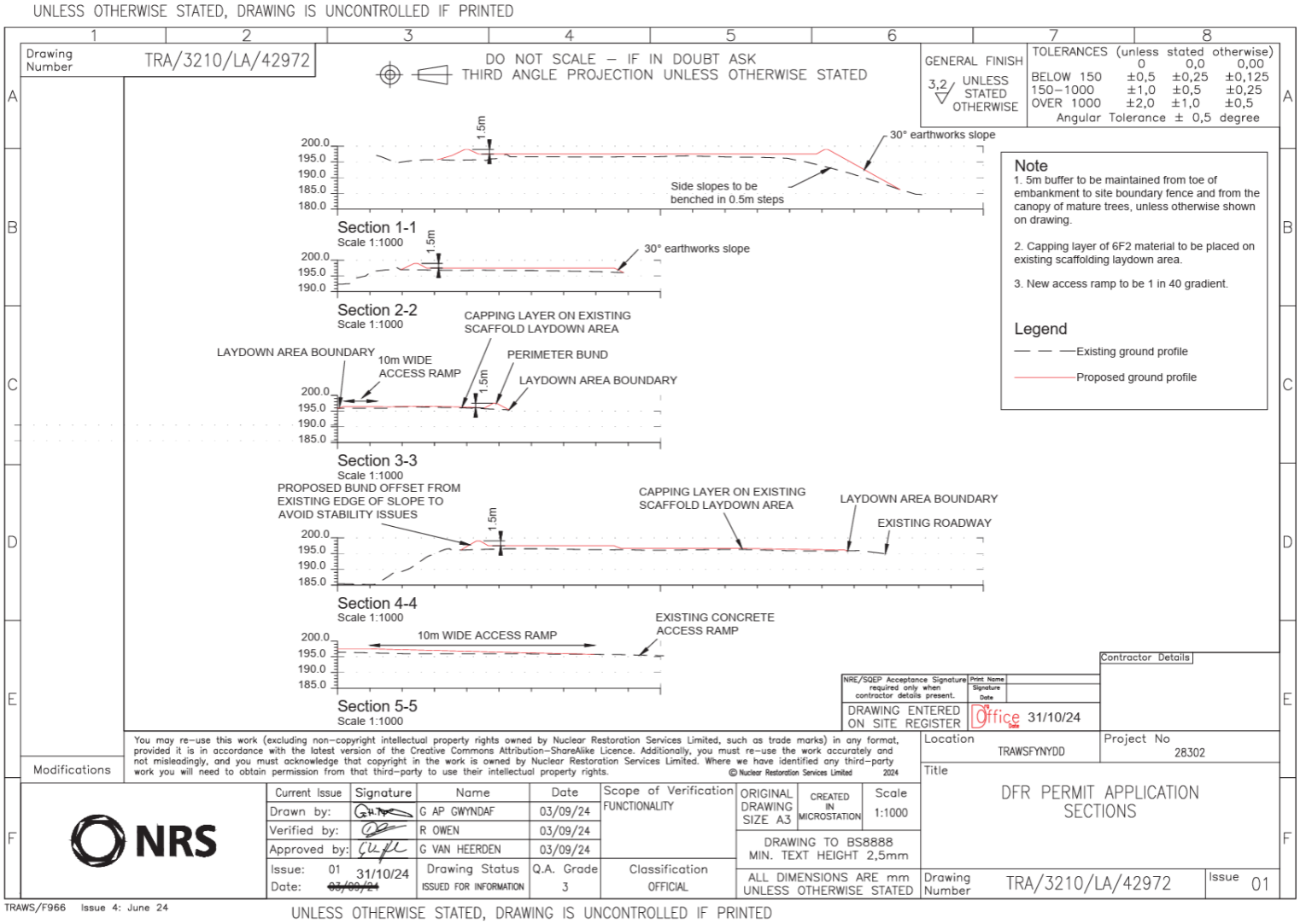
Appendix A1 – Location of Trawsfynydd power station (permit boundary in green)



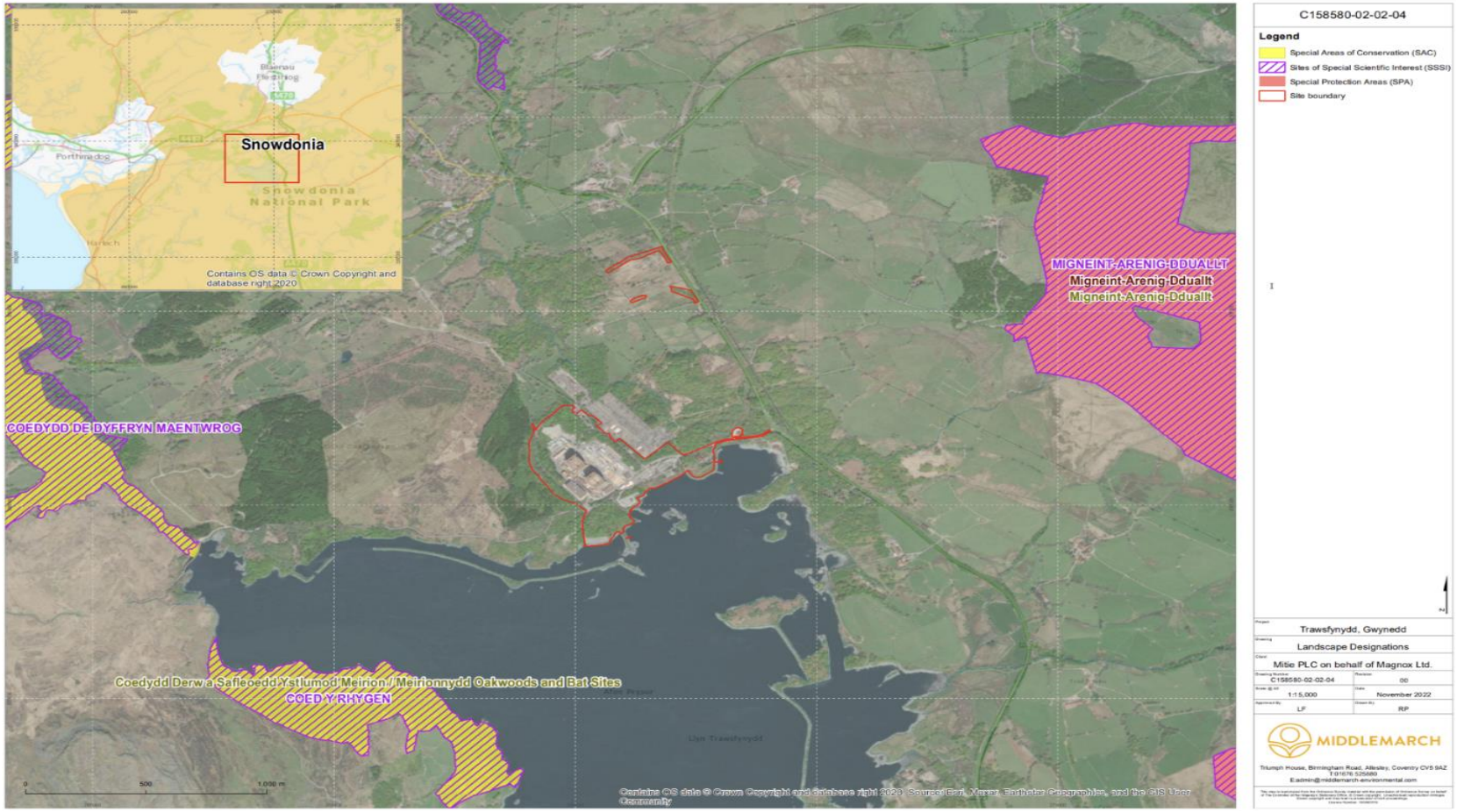
Appendix A2 – Post scheme completion



Appendix A3 - Cross-sections across of the site showing existing and new levels



Appendix A4 – Environmental Setting



Note – the Site boundary outlined in red shows the Nuclear Licensed Site

Appendix A5 – Managing complaints

All complaints in relation to the DfR activity will be managed in accordance with NRS written procedures.

In summary:

- Typically a verbal complaint from the public will be received by the NRS Switch Board and an electronic/email complaint will be received via the Communications team. Where a complaint is received via phone outside of normal working hours, this shall be routed to the Duty Controller in accordance with contingency arrangements (see below). See Company standard S-335
- All complaints are recorded on the Q-Pulse system, in the Site Diary and where appropriate on F-020 (following Company standard S-335).
- The complaint will be passed to the Environmental, Health and Safety, Standards and Quality (EHSSQ) team (or appropriate persons) for validation, categorisation and investigation. See Company standard S-495
- Once the complaint has been validated, we will categorise it's significance and carry out an investigation. See Company standards S-190 and S-039
- We will attempt to identify the cause of the complaint and minimise the impact of the activity causing the problem. See Company standards S-190 and S-039
- If it is substantiated and a significant environmental impact occurred, then it will be reported without delay to NRW (in accordance with the permit requirements).
- The root cause of the problem will be investigation, and practical steps will be introduced to ensure the problem is not repeated, this may include changing a piece of equipment or reviewing an existing procedure. See Company standards S-190 and S-039
- A record of the investigation, characterisation and steps taken to resolve the issue will be recorded in Q Pulse and we will notify the complainant of our actions (unless the complaint was made anonymously). See Company standard S-335
- We will review and amend the environmental management system to reflect any changes and we will inform NRW of our investigation, outputs and any changes to the EMS. See company standards S-190 and S-039
- For significant events, or where an incident escalates (multiple complaints, significance changes), Contingency arrangements will be activated in accordance with TRAWS-CONT-HBK Trawsfynydd Contingency Handbook and S-074

A summary of the relevant NRS Company standards and site contingency handbook.

Company Standard S-495 Categorisation and Notification of Events.

In summary, this document specifies the arrangements for the categorisation and notification of events to both internal and external stakeholders.

It supports compliance arrangements and relevant legal notification requirements including environmental protection, nuclear, radiological, security, safeguards, safety, dangerous goods transport and data protection.

We use this procedure to consistently categorise the severity of an incident, including one where there are multiple complaints, and to inform who is notified and when they are notified.

Company Standard S-039 Establishment, conduct of accident, event and near miss investigations

In summary, this document provides guidance to sites on how to determine what investigations should be carried out into accidents, events and near misses, and how to carry out effective investigations.

We use this procedure to consistently carry out effective investigations leading to learning points, corrective and preventive actions, particularly those from minor events, in order to minimise the risk of recurrence and more serious events/complaints.

Company Standard S-190 Event reporting and investigation and operational experience feedback

In summary, the objectives of this document are to ensure that:

- Events are identified, reported and recorded, to enable the causes to be established, corrective actions and preventive actions implemented, and learning opportunities shared to prevent recurrences.
- Relevant learning points are shared with other nuclear sites/programmes to benefit the industry in general.
- Relevant practical experiences at other sites/programmes are considered and acted upon to improve the safety, security, reliability and performance of the site.

This Standard covers the following activities:

- Identification, notification, reporting and recording of on-site events, near misses and good practices in accordance with nuclear site licence, NISR 2003, company and industrial legislation requirements
- Screening of on-site events and near misses for significance to the site/programmes and other nuclear sites
- Investigation and analysis of on-site events and near misses, including root cause and human factors analysis where appropriate, and formulation of actions to prevent recurrence
- Assessment of the applicability to the site of reported events, near misses and good practices at other Sites/Programmes, and formulation of preventive actions and improvements
- Setting and tracking of agreed actions to completion
- Communication of learning opportunities and improvements via Event Briefs
- Incorporation of experience into training programmes where appropriate
- Tracking Timeliness and Overseeing Quality of Investigations

We use this procedure to consistently identify, notify, report and record incidents and complaints on site. To investigate causes and to track and agree actions including the review and update of any relevant procedures and documents (including the EMS).

Company Standard S-335 Communications and Socio Economics

This document outlines the procedures and minimum standards for internal and external communications activities across the Company.

It is intended to facilitate effective and consistent engagement with the Company's stakeholders (excluding the regulatory stakeholders), and to ensure that the reputation of business and the NDA is properly maintained among those groups. In this context socio-economic activity is part of the Company's engagement process.

We use this procedure and Form F-020 to capture a summary of the complaint (where the initial call has come via the Communications Team). It describes the timeliness of our response and how we reply to the complainant(s). An issues log is maintained for live complaints, these are monitored by the Head of Strategic Communications.

TRAWS-CONT-HBK Trawsfynydd Contingency Handbook.

In summary this document specifies how the site shall implement S-074, Contingency & Emergency Arrangements to comply with Site License Condition 11 (LC11), Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR19) and the Ionising Radiations Regulations (IRR17).

We use this procedure as an aide memoire for all site staff when responding to foreseeable accidents, emergencies or complaints (including out of hours arrangements).

Company Standard S-074 Contingency and emergency arrangements

In summary this document describes the arrangements which ensure that:

- there are suitable and sufficient response arrangements for all work
- individuals understand their responsibilities with regards to the contingency / emergency arrangements (as appropriate)
- adequate numbers of trained staff are available to respond to contingencies, emergencies, accidents, incidents and events
- the methodology of providing contingency plans for specific tasks is understood
- information is provided so that arrangements can be adequately tested.

We use this as an overview to guide our contingency and emergency arrangements for dealing with accidents, incidents and complaints