

<b>First consultation on LMG v2 - log of comments and responses</b>			
<b>Name</b>	<b>Org</b>	<b>Comment</b>	<b>Response*</b>
<b>Question 1: Do you agree that LMGv2 should provide guidance for all radioactively contaminated sites?</b>			
<b>Dr Alexander Lee</b>	WSP	Yes	See note on PSG decisions.
<b>A N Other (1)</b>	Consultant	Yes	See note on PSG decisions.
<b>Andy Dietzold</b>	Low Level Waste Repository	Yes	See note on PSG decisions.
<b>Andy Thomas</b>	Future Solutions	Yes	See note on PSG decisions.
<b>Claire Gallery-Strong</b>	BNG SL	No	Only Nuclear Licensed sites.
<b>A N Other (2)</b>	Consultant	No	It should remain with nuclear and defence sites.
<b>Dr Doug Graham</b>	UKAEA	Yes	1 We need to expose all liabilities, and not be constrained by historical categories or owners of conland - the standards being adopted need to be the same across the whole country. If not then any guidance is of limited value. 2 The guidance also needs to be given from a total programme management strategy position. Conland management should NOT be a separate activity from how to deal with sites as a package - end state, end use, risk, stakeholder views, practicability/feasibility, policy and
<b>Kim Baines</b>	RSK ENSR	Yes	See note on PSG decisions.
<b>Mark Hill</b>	DE	Yes	See note on PSG decisions.
<b>Mike Pearl</b>	UKAEA	Yes	See note on PSG decisions.
<b>Peter Booth</b>	Nexia Solutions	Yes	See note on PSG decisions.
<b>Robert Muley</b>	NUKEM Ltd	Yes	See note on PSG decisions.
<b>Steve Handsley</b>	Scott Wilson	Yes	See note on PSG decisions.
<b>Susan Crisp</b>	Cumbria County Council	Yes	See note on PSG decisions.
<b>A N Other (3)</b>	Contractor	Yes	See note on PSG decisions.
<b>Hugh Richards</b>	British Nuclear Group Magnox Electric Ltd	Yes	Despite answering Yes to Q1, I have the following comments: (1) With this defined remit, SAFEGROUNDS guidance should avoid the use of the term 'radioactively contaminated land' (which could have specific regulatory connotations) and instead use terms such as 'land (potentially) affected by radioactive contamination'. (2) The 2nd bullet point preceding Q1 suggest the remit of LMGv2 (and SAFEGROUNDS in general) is still not 100% clear. It appears that the remit is no longer based primarily on a history of nuclear/defence use, but on the potential/actual presence of radioactive contamination. Given that defence uses have given rise to other types of 'unusual' contamination - (ordnance-related including chemical weapons), it needs to be clarified that LMGv2 does not contain specialised guidance for such contamination. With the focus on radioactivity, the guidance does NOT apply to 'all non-nuclear defence sites' (including those with no suspected radioactive contamination).
<b>Alison McKay</b>	BAE Systems	Yes	See note on PSG decisions.
<b>Sean Amos</b>	AWE	Yes	See note on PSG decisions.
<b>A N Other (4)</b>	CBO	Yes	See note on PSG decisions.
<b>Jack Armitage</b>	NUKEM Limited	Yes	See note on PSG decisions.

Name	Org	Comment	Response*
Janet Young	Magnox (North)	yes	See note on PSG decisions.
Paul Dorfman	University of Warwick	yes	See note on PSG decisions.
Richard Bramhall	LLRC	Yes	See note on PSG decisions.
<b>Question 2: Do you think that LMGv2 should contain the same amount of guidance for all types of site? If not, for which types should there be most guidance and which least?</b>			
Dr Alexander Lee	WSP	Yes	See note on PSG decisions.
A N Other (1)	Consultant	Yes	See note on PSG decisions.
Andy Dietzold	Low Level Waste Repository	Yes	See note on PSG decisions.
Andy Thomas	Future Solutions	Yes	See note on PSG decisions.
Claire Gallery-Strong	BNG SL	Yes	as long as only Nuclear sites. See note on PSG decisions.
A N Other (2)	Consultant	Yes	See note on PSG decisions.
Dr Doug Graham	UKAEA	Yes	I say Yes, but the guidance provided must be proportionate to the liability. Again all the factors in the above box need to be taken into account. At the end of the day it is clear that there are certain bigger liabilities and some lesser liabilities, but geolocation becomes important. Without too much experience across the UK in releasing sites, it is probably too early in the process to start providing low level advice in some cases. See note on PSG decisions.
Kim Baines	RSK ENSR	Yes	See note on PSG decisions.
Mark Hill	DE	No	The guidance should be tailored to the site type and situation. Where possible established guidance should be cross referenced rather than duplicated. See note on PSG decisions. Other guidance will be signposted, as in LMGv1.
Mike Pearl	UKAEA	No	Guidance for nuclear licensed sites will probably need to be more than for non-licensed sites as it needs to take into account those additional requirements of the HSE NII (eg contaminated land Safety Assessment Principles, Contaminated Land Safety Cases, Site Licence Conditions, integration of contaminated land management with site decommissioning or redevelopment, and site delicensing. See note on PSG decisions. There will be more to say about nuclear-licensed sites.
Peter Booth	Nexia Solutions	No	There should be a greater emphasis on the more complex sites (nuclear licensed sites and defence sites). However this is an opportunity to ensure that other sites are covered in some manner as it could be argued that the operators of these sites and their stakeholders may in many cases not have the same amount of knowledge or experience. There is no problem covering land that might become contaminated as a result of an emergency (I interpret this to be offsite contamination) but it is important not to be emotive here and ensure that any information provided links into the emergency management arrangements affiliated to each site or to the UK arrangements, rather than providing purely judgement. Agreed. See note on PSG decisions.
Robert Muley	NUKEM Ltd	No	See note on PSG decisions.
Steve Handsley	Scott Wilson	Yes	See note on PSG decisions.
Susan Crisp	Cumbria County Council	Yes	However, this may be difficult in practice. For example, medical and research sites are usually smaller and more easily dealt with than a nuclear licensed site as large as Sellafield. See note on PSG decisions.
A N Other (3)	Contractor	Yes	See note on PSG decisions.

Name	Org	Comment	Response*	
Hugh Richards	British Nuclear Group Magnox Electric Ltd	No	The focus should be on those types of site to which the guidance primarily applies. See response to Q1.	See note on PSG decisions.
Alison McKay	BAE Systems	Yes		See note on PSG decisions.
Sean Amos	AWE	No	However there is a proportionality aspect that works both ways. There are a few big sites with "lots" of resources and existing systems and then there may well be lots of small sites some of which will be orphan where those responsible for their management will need more guidance on what is required. However this guidance does need to cover the full spectrum.	See note on PSG decisions.
A N Other (4)	CBO	Yes		See note on PSG decisions.
Jack Armitage	NUKEM Limited	Yes		See note on PSG decisions.
Janet Young	Magnox (North)	yes		See note on PSG decisions.
Paul Dorfman	University of Warwick	Yes.	Please clarify the definition in footnote	See LMGv1.
Richard Bramhall	LLRC	No	However there is a proportionality aspect that works both ways. There are a few big sites with "lots" of resources and existing systems and then there may well be lots of small sites some of which will be orphan where those responsible for their management will need more guidance on what is required. However this guidance does need to cover the full spectrum.	See note on PSG decisions.
<b>Question 3: Do you agree that LMGv2 should cover all stages in the management of contaminated land?</b> <b>If not, which stages should it omit?</b>				
Dr Alexander Lee	WSP	Yes		Agreed all stages will be covered.
A N Other (1)	Consultant	Yes		Agreed all stages will be covered.
Andy Dietzold	Low Level Waste Repository	Yes		Agreed all stages will be covered.
Andy Thomas	Future Solutions	Yes		Agreed all stages will be covered.
Claire Gallery-Strong	BNG SL	No	Only on the grounds that the remit should only cover Nuclear Licensed sites in which case all stages should be included as a matter of course.	Agreed all stages will be covered.
A N Other (2)	Consultant	Yes		Agreed all stages will be covered.
Dr Doug Graham	UKAEA	Yes	No stages should be omitted.	Agreed all stages will be covered.
Kim Baines	RSK ENSR	Yes	I believe that guidance documents should provide an overall view of the issue they are addressing - therefore everything should be in one document (as much as is practical). Giving an overview of the process in a simple flow chart is a good way of seeing how different aspects fit in and where necessary supporting documents.	Agreed all stages will be covered.
Mark Hill	DE	Yes		Agreed all stages will be covered.
Mike Pearl	UKAEA	Yes	Note: Ensure that in updating the Characterisation document, it remains a good technical and pragmatic guide.	Agreed all stages will be covered and site characterisation document will be a technical and pragmatic guide.
Peter Booth	Nexia Solutions	Yes		Agreed all stages will be covered.
Robert Muley	NUKEM Ltd	Yes		Agreed all stages will be covered.
Steve Handsley	Scott Wilson	Yes		Agreed all stages will be covered.
Susan Crisp	Cumbria County Council	Yes	I think sign-posting the relevant guidance would be useful and maybe quoting some examples of what measures could be taken so as not to affect any radioactive contamination on the same site.	Agreed all stages will be covered. Examples of measures will be in options comparison guidance document.

Name	Org	Comment	Response*
A N Other (3)	Contractor	Yes	Agreed all stages will be covered.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Yes	Agreed all stages will be covered.
Alison McKay	BAE Systems	Yes	Agreed all stages will be covered.
Sean Amos	AWE	Yes	Agreed all stages will be covered.
A N Other (4)	CBO	Yes	Agreed all stages will be covered.
Colette Grundy	Environment Agency		Agreed all stages will be covered.
Jack Armitage	NUKEM Limited	Yes	Agreed all stages will be covered.
Janet Young	Magnox (North)	yes	Agreed all stages will be covered.
Paul Dorfman	Universiry of Warwick	yes	Agreed all stages will be covered.
Richard Bramhall	LLRC	yes	Agreed all stages will be covered.
<b>Question 4: How much guidance should LMGv2 give for non-radioactively contaminated land?</b>			
Dr Alexander Lee	WSP		Duplication of CLR11 which provides adequate direction and reference listings IS NOT REQUIRED.
A N Other (1)	Consultant		Minimal. Plenty of guidance already exists and to include it will run the risk of the LMG going out of date quickly.
Andy Dietzold	Low Level Waste Repository		As much as possible to ensure consistency.
Andy Thomas	Future Solutions		Signpost only
Claire Gallery-Strong	BNG SL		Signpost the non-rad guidance available elsewhere.
A N Other (2)	Consultant		Signposting all relevant guidance would be preferable as LMGv2 addresses non-radioactive contamination as well as radioactive. Although the industry is in a constant state of flux, the list would be a marker at a particular point in time.
Dr Doug Graham	UKAEA		At a level which is sufficient and proportionate for the liabilities which exist. Therefore unless you know that non-rad liabilities are small compared with rad conland liabilities, then it is premature to start leaving out guidance on the non-rad conland. Let's be fully inclusive.
Kim Baines	RSK ENSR		The focus should be on radioactively contaminated land however I do feel strongly on the need to collate the references for guidance on non-radioactively contaminated land within the LMG2 document. I'm sure it would be unusual to have a radioactively contaminated site with no non-radioactively contaminated land - therefore reference should be made as to best practice and guidance documents for the management of non-radioactivity contaminated land as well.
Mark Hill	DE		It should continue to signpost existing guidance such as CLR11 in the case of defence sites and ensure consistency of approach for radioactive and non-radioactive contaminants particularly where mixed contamination is present. In the case of non nuclear defence sites the approach to the management of land contaminated with radioactive material/contaminants will remain consistent with CLR11 as such sites are regulated principally through the planning and contaminated land regimes.

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Mike Pearl	UKAEA	The guidance on non-radioactive contamination should take into account the "special" circumstance of its occurrence. Topics to be covered should include the potential for non-radioactive contaminants to influence the behaviour of radioactive contaminants, and also issues associated with having to deal with non-radioactive contaminants on a nuclear licensed site. In addition a means of assessing the relative significance of the two types of contamination should be addressed, ie guidance on how to assess, compare and prioritise potential harm from sites in which chemically contaminated soils are in some areas, and radioactive contaminated soil in others.	Largely agreed. Prioritisation will be dealt with (see flow diagrams) but no attempt will be made to provide a general comparison of the risks of radioactive and non-radioactive contaminants.
Peter Booth	Nexia Solutions	I don't think we should stray too far from the remit of SAFEGROUNDS and therefore signposting to guidance for non-radioactively contaminated land should be sufficient.	Agreed.
Robert Muley	NUKEM Ltd	Any guidance that helps to clarify how radioactively contaminated land management is impacted by non-radioactive contamination should be included.	Agreed.
Steve Handsley	Scott Wilson	LMGv2 should only give the main sources of information on non-radioactive contamination.	Agreed.
A N Other (3)	Contractor	Should signpost to the main documents which then cascade down to lower documents.	Agreed.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Keep to a minimum and sign-post key sources of information such as EA/Defra. CLR11 must be referenced.	Agreed.
Alison McKay	BAE Systems	I think basic sources of information should be sufficient bearing in mind the likely readership of the guidance ie already practitioners in conventional contaminated land assessment.	Agreed.
Sean Amos	AWE	Not a great deal as there are other documents that cover that. The guidance should cover how the presence or potential for the presence of RA interacts with the non ra land management	Agreed.
A N Other (4)	CBO	Radioative and non-radioactive contaminated land should be treated with the same rigour	See note on PSG decisions. Non-radioactive guidance will only be signposted because there is so much available elsewhere.
Jack Armitage	NUKEM Limited	Sign posts to other documents would be acceptable with a brief summary of the documents.	See note on PSG decisions and responses above.
Janet Young	Magnox (North)	From a practical perspective (ie the need to keep it up-to-date) I suggest that LMGv2 should only give basic guidance on non-radioactive contamination. Management of Land Contamination is now an established professional discipline, and it would be reasonable to assume sufficient knowledgeable practitioners (or make reference to SiLC).	See note on PSG decisions and responses above.
Paul Dorfman	University of Warwick	Give regard to potential problems associated with negative synergy between contaminants (eg rad and chem.)	Agreed.
Richard Bramhall	LLRC	Not a great deal as there are other documents that cover that. The guidance should cover how the presence or potential for the presence of RA interacts with the non ra land management.	Agreed.
<b>Question 5: What should LMGv2 say about any differences of approach to the management of radioactively and non-radioactively contaminated land?</b>			

Name	Org	Comment	Response*
<b>Dr Alexander Lee</b>	WSP	A tabular summary or similar should be used to clearly summarise the differences to approach, levels of acceptable risk and key differences in exposure assumptions of CLEA vs ICRP, NRPB36	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Andy Dietzold</b>	Low Level Waste Repository	Very little. The only real differences are 1) The public perception of risk and 2) The final disposal option for radioactive contaminated land. The act of clearing the site remains the same and should have the same considerations.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Andy Thomas</b>	Future Solutions	Compare and contrast	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Claire Gallery-Strong</b>	BNG SL	Differing regulatory context and general risk perception.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>A N Other (2)</b>	Consultant	Should there be a difference of approach?	See note on PSG decisions. Agreed to summarise existing differences in approach.
<b>Dr Doug Graham</b>	UKAEA	It should say sufficient to explain what the differences are and how they are dealt with by the regulators.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Kim Baines</b>	RSK ENSR	It would be very useful to outline any differences and similarities in the two approaches - this will help to better understand the context, drivers and needs of the approaches.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Mike Pearl</b>	UKAEA	The emphasis should be on ensuring that the guidance is consistent with regulation. Thus if a risk based approach is the recommended approach of the EA and SEPA, then the guidance needs to ensure that it is consistent with , or at least does not contradict, EA/SEPA documentation such as	See note on PSG decisions. Agreed to summarise differences in approach and be consistent with regulatory approach for non-rad in particular.
<b>Peter Booth</b>	Nexia Solutions	There are some differences but clearly many similarities. A high level statement should be able to adequately describe these differences.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Robert Muley</b>	NUKEM Ltd	Only that which is relevant to radioactive aspects of land management. An exhaustive critique of non-radioactive land management is not required.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Steve Handsley</b>	Scott Wilson	Where there is a different approach to radio-actively contaminated land (in comparison with non radio-active)LMGv2 should identify why a different approach is needed/required (ie because of regulatory requirements etc) and explain any consequences of the different approach.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Susan Crisp</b>	Cumbria County Council	They should both be approached with the waste hierarchy and proximity principle foremost.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>A N Other (3)</b>	Contractor	Outline main differences and point to main non-radioactively contaminated land documents.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Hugh Richards</b>	British Nuclear Group Magnox Electric Ltd	Keep it simple and 'high level'. Main theme should be regulatory differences (including RSA93 and NIA65).	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Alison McKay</b>	BAE Systems	I think it is important to highlight any differences in approach in this respect, both in technical issues and policy issues where applicable.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Sean Amos</b>	AWE	It should cover the different principles that need to apply and how the options open to RA are very much less than for non RA. There are aspects of risk perception that also could be included.	See note on PSG decisions. Agreed to summarise differences in approach. Options will be dealt with in options comparison document.

Name	Org	Comment	Response*	
<b>A N Other (4)</b>	CBO		see above	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Janet Young</b>	Magnox (North)		For Radiological contamination, the difference in approach needed between a Licenced and Non-Licenced site needs to be clear. Clarity should be provided in who the lead regulator is (to ensure practitioners and land holders / management contractors have clarity). Any differences in management should be framed in the context of the definition of 'contaminated land' and the source-pathway-receptor linkages. ie for non-radioactive contamination you need to break the linkage (statute) and anything beyond is 'good practice'. I'm not sure that there is such clarity for radioactive contaminated land where there may be need for safety cases depending on whether the site is licenced or not. Where similarities in approach are identified, these need to be stressed (to prevent re-invention of the wheel!)	Differences between site types will be dealt with as in LMGv1, including differences in regulatory regimes. Note that there is not one regime for non-licensed sites but several (see regulatory framework paper).
<b>Paul Dorfman</b>	University of Warwick		See Q4 answer	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Richard Bramhall</b>	LLRC		It should cover the different principles that need to apply and how the options open to RA are very much less than for non RA. There are aspects of risk perception that also could be included.	See note on PSG decisions. Agreed to summarise differences in approach.
<b>Question 6: Do you agree with these proposals for the function of LMGv2?</b>				
<b>Dr Alexander Lee</b>	WSP	No	In delivering a more practical document a degree of balance is required towards "how to" for example summarising RCLEA vs NRPB 36 and when to use. Emphasis must be made towards the consultant in making the appropriate decision but a little how to would not go amiss while avoiding being prescriptive	See note on PSG decisions.
<b>A N Other (1)</b>	Consultant	Yes		See note on PSG decisions.
<b>Andy Dietzold</b>	Low Level Waste	Yes		See note on PSG decisions.
<b>Andy Thomas</b>	Future Solutions	Yes		See note on PSG decisions.
<b>Claire Gallery-Strong</b>	BNG SL	Yes	Note: This assumes Nuclear Licensed sites will be the main focus.	See note on PSG decisions.
<b>A N Other (2)</b>	Consultant	Yes		See note on PSG decisions.
<b>Dr Doug Graham</b>	UKAEA	Yes	I have one residual concern. There does need to be a strategic approach for whole sites, and it would be useful if there was guidance on how to manage whole site and a case-by-case assessments. If the 'dose' from different components on the site (from the different cases) have impacts on specific individuals, then decisions cannot be made solely on a case-by-case basis. There needs to be a programme whole site view - an integrated assessment/safety case. On a complex multi-liability site, one cannot and should not make decisions on the basis of one impact alone.	Agreed. See note on PSG decisions.
<b>Kim Baines</b>	RSK ENSR	Yes	First two points are very important.	See note on PSG decisions.
<b>Mark Hill</b>	DE	Yes		See note on PSG decisions.
<b>Mike Pearl</b>	UKAEA	Yes		See note on PSG decisions.

Name	Org	Comment	Response*
Peter Booth	Nexia Solutions	Yes I have ticked yes, but would like to provide a further thought. We need to make sure that a version "aimed primarily at technical people" which will be complemented by the Citizens' Guide also covers the many people whose expertise falls in between the two. Many problem holders do not have strong technical people who understand all the issues involved with the management of contaminated land, how best to make the important decisions and how to manage their subcontractors. Clearly they will not want to visit the Citizens' Guide either. Therefore LMGv2 needs to fulfil their needs as well as the "technical community".	Agreed. See note on PSG decisions.
Robert Muley	NUKEM Ltd	Yes	See note on PSG decisions.
Steve Handsley	Scott Wilson	Yes	See note on PSG decisions.
Susan Crisp	Cumbria County Council	Yes Though care must be taken not to produce too much literature/versions that will negate its accessibility.	See note on PSG decisions.
A N Other (3)	Contractor	Yes	See note on PSG decisions.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Yes	See note on PSG decisions.
Alison McKay	BAE Systems	Yes	See note on PSG decisions.
Sean Amos	AWE	Yes	See note on PSG decisions.
A N Other (4)	CBO	Yes	See note on PSG decisions.
Colette Grundy	Environment Agency		See note on PSG decisions.
Jack Armitage	NUKEM Limited	Yes	See note on PSG decisions.
Janet Young	Magnox (North)	yes	See note on PSG decisions.
Paul Dorfman	University of Warwick	Absolutely not 'be more complementary to statutory and regulatory guides. We have clearly decided that, at the end of the day, these do not obtain.	See note on PSG decisions. Statutory and regulatory guidance must be followed - there is no choice about this.
Richard Bramhall	LLRC	Agree	See note on PSG decisions.
<b>Question 7: Are there any other purposes that LMGv2 should fulfil?</b>			
Dr Alexander Lee	WSP	No	Noted.
Andy Dietzold	Low Level Waste Repository	It may, as an offshoot, challenge some of the more 'intense' Regulatory guidance.	This is best done elsewhere in SAFEGROUNDS, rather than in LMGv2.
Andy Thomas	Future Solutions	No	Noted.
Claire Gallery-Strong	BNG SL	No. Note: This assumes Nuclear Licensed sites will be the main focus.	Noted.
Dr Doug Graham	UKAEA	Sorry to bang the same drum, but conland management on a complex whole site needs to be one part of a more complex programme management involving:- end state, end use, risk, stakeholder views, practicability/feasibility, policy, and geographical location. It would be useful getting this lot into perspective, setting the context, rather than charging straight into conland management alone. That way will lead to the risk that conland management decisions stemming from conland remediation project managers will lead to inappropriate end states/end points/objectives. Conland management is only one part of the bigger picture.	Agreed. Whole site, strategic context will be addressed.

Name	Org	Comment	Response*
Mark Hill	DE	No, but I would still like to see greater use made of flow diagrams/decision trees to streamline the guidance and signpost the key sections/annexes, decision points and other guidance.	Agreed to try to do.
Mike Pearl	UKAEA	LMG2 shouldn't be prescriptive, but it should be possible for users of the guidance and reviewers of output to be able to identify how SAFEGROUNDS guidance has been implemented in their approach to managing contaminated land. LMG2 is guidance. Full adherence to all aspects of LMG2 should not be expected by all stakeholders.	Agreed.
Peter Booth	Nexia Solutions	As proposed it needs to link into the flow diagrams so that it can quickly take the reader through the process, or allow the reader to acquire more detail if deemed necessary.	Agreed.
Susan Crisp	Cumbria County Council	Possibly, but none I can think of now.	Noted.
A N Other (3)	Contractor	No	Noted.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	No	Noted.
Sean Amos	AWE	Not that I can think off at the moment, additionally too many purposes can dilute the message and then the intended objective may not be met.	Noted.
A N Other (4)	CBO	see below	
Janet Young	Magnox (North)	Probably not one to state explicitly, but it would be good for LMGv2 to help educate the regulators and achieve better consensus between the EA and NI!!!!	Noted!
Paul Dorfman	University of Warwick	For scientific and technical clarity, it is important here to be clear about the differing risk estimates that obtain.	Will be done in Risk Assessment document, and referenced in LMGv2.
Richard Bramhall	LLRC	Not that I can think of at the moment, additionally too many purposes can dilute the message and then the intended objective may not be met.	Noted.
<b>Question 8: Do you have any comments on the flow diagrams?</b>			
Dr Alexander Lee	WSP	No, format and logic is clear	Noted
Andy Dietzold	Low Level Waste Repository	No	Noted.
Andy Thomas	Future Solutions	No	Noted.
Claire Gallery-Strong	BNG SL	Yes - All flow diagrams Comment 1 Land management guidance should apply to all nuclear licensed sites, not with the caveat re 'if no radioactive contamination then SAFEGROUNDS does not apply'. Comment 2 Record keeping should be double headed arrows. Comment 3 Management strategy needs to include words regarding remediation, these words do not appear anywhere throughout guidance . Comment 4, should mirror risk based approach of CLR 11 and include setting of objectives at beginning. Focus needs to remain on nuclear licensed sites.	Comment 1: not understood. All nuclear-licensed sites have radioactively contaminated land. Comment 2: agreed, see note on PSG decisions. Comment 3: see LMGv1 for reasons for not using 'remediation', but this may be changed for LMGv2. Comment 4: there will be no mirroring of CLR11; starting point is LMGv1.
A N Other (2)	Consultant	Take care not to repeat CLR11 flow charts.	Agreed.
Dr Doug Graham	UKAEA	I FULLY AGREE WITH THIS APPROACH. However, the whole site strategy should drive the area-by-area approach. The tail should not wag	Noted.

Name	Org	Comment	Response*
Kim Baines	RSK ENSR	A bit too much information - are they just trying to show which stages link to which or are they also trying to provide additional information for a decision process? I think an overall simple flowchart should just be simple e.g. CLR11 Model Procedures overall flowchart.	Guidance will be built around the flow charts, so there needs to be a reasonable amount of detail.
Mark Hill	DE	Have provided comments previously.	Noted.
Mike Pearl	UKAEA	No	Noted.
Peter Booth	Nexia Solutions	No further comments than those during the formulation of the flow diagrams.	Noted.
Robert Muley	NUKEM Ltd	It might be helpful to include waste management activities in the flowcharts, e.g. obtaining letters of acceptance in principle, submitting RSA applications to accumulate and dispose of waste. These are sometimes overlooked when planning and can introduce lengthy delays.	Will be dealt with in the text, as in LMGv1.
Steve Handsley	Scott Wilson	Should generic flow diagram have only box headings and no bullet points, so that it is outline only, and the reader then refers to the simple or complex site flow diagrams for the detail.	Generic diagram will also be used for Citizens' Guidance, so needs a bit more than headings.
Susan Crisp	Cumbria County Council	No, they seemed to make sense, though the 'complex sites' diagram was quite wordy and not that easy to follow over 3 pages.	Noted.
A N Other (3)	Contractor	Generic box 1 - reference SAFEGROUNDS land management guidance for the uninitiated. Generic box 3 - reference supporting document on site characterisation. Complex box 1 - reference SAFEGROUNDS land management guidance for the uninitiated. Simple box 1 - reference SAFEGROUNDS land management guidance for the uninitiated. Otherwise OK - seems logical	References to LMG not required because flow diagrams will be within LMGv2. Site characterisation and other supporting documents are referenced in notes to generic diagram.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Each step in each diagram should have a unique reference number - e.g. G1, G2, etc for Generic, C1, C2, etc for Complex Sites, S1, S2, etc for Simple Sites	Not necessary because they will be used in different parts of LMGv2, not referenced in the same section.
Alison McKay	BAE Systems	Sorry, I have not been able to look at the detail in the flow diagrams but would comment as follows:  I agree with the principal of the use of flow daigrams, providing that they are adequately backed up by supporting text. It would be helpful if they mirrored the existing Model Procedures CLR11 as a starting point with notes to say which stages have been elaborated on in terms of the particular nature and complexities associated with radioactively contaminated sites.	CLR11 has been considered when developing the diagrams.
Sean Amos	AWE	No	Noted.
A N Other (4)	CBO	No comments	Noted.
Janet Young	Magnox (North)	In the initial characterisation box (all flow charts) why does site walk over include specifically a site gamma survey (if applicable). Surely it would be more relevant to suggest non-intrusive analysis generically ('cos there are many different techniques, inc. gamma survey, which are equally valuable here, depending upon the site history and likely contaminants).	Gamma survey is included because it is so common for radioactive contamination, which is the focus of LMGv2.
Richard Bramhall	LLRC	no	Noted.
<b>Question 9: Do you prefer structure A or structure B or would you suggest another structure entirely?</b>			

Name	Org	Comment	Response*
Dr Alexander Lee	WSP	A	Agreed B, see note on PSG decisions.
A N Other (1)	Consultant	A	Agreed B, see note on PSG decisions.
Andy Dietzold	Low Level Waste Repository	A	Agreed B, see note on PSG decisions.
Andy Thomas	Future Solutions	A	Agreed B, see note on PSG decisions.
Claire Gallery-Strong	BNG SL	B	Structure B has more emphasis on nuclear licensed sites which is where we would prefer to focus.
A N Other (2)	Consultant	B	Agreed B, see note on PSG decisions.
Dr Doug Graham	UKAEA	B	If you do not know where your site fits into the types in 'A', then which guidance do you go for?
Kim Baines	RSK ENSR	B	Agreed B, see note on PSG decisions.
Mark Hill	DE	B	B is more akin to CLR11 which works very well.
Mike Pearl	UKAEA	B	With B ensure ease of use through tables, checklists and flow-diagrams that are tailored to the specific types of site.
Peter Booth	Nexia Solutions	A	Agreed B, see note on PSG decisions.
Robert Muley	NUKEM Ltd	B	Agreed B, see note on PSG decisions.
Steve Handsley	Scott Wilson	B	Agreed B, see note on PSG decisions.
Susan Crisp	Cumbria County Council	B	Agreed B, see note on PSG decisions.
A N Other (3)	Contractor	A	Agreed B, see note on PSG decisions.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	B	Agreed B, see note on PSG decisions.
Alison McKay	BAE Systems	B	Agreed B, see note on PSG decisions.
Sean Amos	AWE	A	I can see value in both, however from a personal standpoint I prefer A
A N Other (4)	CBO	B	Agreed B, see note on PSG decisions.
Colette Grundy	Environment Agency		Agreed B, see note on PSG decisions.
Jack Armitage	NUKEM Limited	A	Agreed B, see note on PSG decisions.
Janet Young	Magnox (North)	B	Agreed B, see note on PSG decisions.
Paul Dorfman	University of Warwick		unsure
Richard Bramhall	LLRC	A	I can see value in both, however from a personal standpoint I prefer A
<b>Question 10: If you prefer A or B, do you have any modifications to suggest to your preferred structure?</b>			
Dr Alexander Lee	WSP		No
Andy Thomas	Future Solutions		No
Claire Gallery-Strong	BNG SL		If nuclear licensed sites only, would prefer structure B. If non nuclear sites included, then structure A.
A N Other (2)	Consultant		Best to keep the text as succinct as possible, referring to figure, tables, flowcharts and appendices as appropriate.
Dr Doug Graham	UKAEA		1 Perhaps use of appendices to capture the details. 2 Probably there will be a need to better define the types of sites expected/existing.
Mark Hill	DE		I would like to see it mimic CLR11 more closely including the use of colour coding for the key management stages.
Mike Pearl	UKAEA		B - ensure ease of use through tables, checklists and flow-diagrams that are tailored to the specific types of site.
Peter Booth	Nexia Solutions		No

Name	Org	Comment	Response*	
Susan Crisp	Cumbria County Council		Not at this stage; I think an actual draft document would give a better idea.	Noted.
A N Other (3)	Contractor		If document is electronic then duplication does not matter too much and the non-applicable material can be ignored by the reader. If the document is a hard copy it could be published in 5 parts so that only part 1 and then any one of parts 2 to 5 as necessary need to be obtained.	Noted.
Hugh Richards	British Nuclear Group Magnox Electric Ltd		No	Noted.
Sean Amos	AWE		No	Noted.
A N Other (4)	CBO		no	Noted.
Richard Bramhall	LLRC		No	Noted.
<b>Question 11: Would you like any changes to the wording of the existing key principles?</b>				
Dr Alexander Lee	WSP		The preferred land management option should also consider the term sustainability be included under Principle 3	The sustainability principle and how it applies will be covered in the options comparison document, which expands on Principle 3.
A N Other (1)	Consultant	No		
Andy Dietzold	Low Level Waste Repository	No		
Andy Thomas	Future Solutions	No		
Claire Gallery-Strong	BNG SL	Yes	Would like to see concepts of risk based approach and remediation explicit in the principles rather than implicit.	Rejected for LMGv1 and would not be agreed by most stakeholders.
A N Other (2)	Consultant	No		
Dr Doug Graham	UKAEA	No	No, because we should now be gathering experience in the use of the principles. Changing them can only follow such a debate or the changes will be unfounded.	Noted.
Kim Baines	RSK ENSR	No	No	Noted.
Mark Hill	DE	No		

Name	Org	Comment	Response*
Mike Pearl	UKAEA	<p>Yes</p> <p>Principle 1 This will need amending to take into account "land outside the above types of site that becomes contaminated as a result of a nuclear or radiological accident or emergency."</p> <p>Principle 2 (a) This needs only to say: "Site owners/operators should develop and use stakeholder involvement strategies in the management of contaminated land." The second part of the KP is unnecessary, and as written, implies that stakeholders make decisions. In practice stakeholders are consulted as part of the decision making process by the problem holder. Their views may well have a significant influence on the outcome of this process. However, the final decision rests with the problem holder, who has to take responsibility for that decision (Stakeholders are not legally accountable for the decision). With a slight amendment, the second part of KP2 could be added to the description/amplification text ie "In general, a broad range of stakeholders should be involved in the decision-making process." (b) The concept of proportionality should be added to KP2. As it stands KP2 gives no indication of this and implies stakeholders will be involved in all decisions. This is obviously uneconomic and impractical, and will lead to stakeholder fatigue etc. Although the concept of proportionality is clarified in the description of the original LMG document, it is lost in all other documentation relating to the Key Principles – most notably in the 4-page summary (which in practice, is probably all many stakeholders will read).</p>	See note on PSG decisions. No changes to Key Principles to be made at this time but there will be further discussions about Principle 2.
Peter Booth	Nexia Solutions	No	Noted.
Robert Muley	NUKEM Ltd	No	Noted.
Steve Handsley	Scott Wilson	Yes	The first principle should refer to all radioactively contaminated site (not just nuclear licensed and defence sites)
Susan Crisp	Cumbria County Council	No	Noted.
A N Other (3)	Contractor	No	Noted.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Yes	The wording of all principles should be amended to align with the revised remit of LMG (and by implication SAFEGROUNDS in general) - i.e. 'land affected by radioactive contamination', rather than 'contaminated land on nuclear and defence sites' (since the latter includes non-radioactive contamination). The actual 'principles' within the Key Principles should not

Name	Org	Comment	Response*
Alison McKay	BAE Systems	Yes Principal 4 - Immediate action  I think there needs to be a distinction here between the following: -accident/incident related contamination which would fall into this category for immediate action to control and monitor and -historical contamination where the action would take place where a risk had been identified as existing or likely. This is particularly important if the guidance is to be widened to any site which may have radioactive contamination eg a closed landfill where radium dials may have been disposed of in the past. Perhaps consider deletion of this principle or limiting it to accidents and incidents.	Do not agree. It is fundamental that some action should be taken once pre-existing contamination is discovered, for example see the HSE safety assessment principles for nuclear sites. The immediate actions required after an accident are quite different and are covered in emergency response guidance that is outside the scope of SAFEGROUNDS.
Sean Amos	AWE	No	Noted.
A N Other (4)	CBO	no	Noted.
Jack Armitage	NUKEM Limited	no	Noted.
Janet Young	Magnox (North)	yes Record holding: records should not just be made, but should also be used. This is particularly relevant during on site excavation during both demolition and construction of ILW facilities and the like (this would help & link with Principle 1). There may also be a need to review the preferred management option (once it is identified) to reflect changes in environment, legislation, technology etc. The periodicity of such reviews should NOT be too frequent.	These points will be made in the text and are already included in the flow diagram for complex sites. See LMGv1 for existing guidance on reviews of preferred options.
Paul Dorfman	University of Warwick	No	These were obtained at great effort by a very large group of legitimately representative people. Noted.
Richard Bramhall	LLRC	no	Noted.
<b>Question 12: Should any of the principles be omitted from LMGv2?</b>			
Dr Alexander Lee	WSP	No	Noted.
A N Other (1)	Consultant	No	Noted.
Andy Dietzold	Low Level Waste Repository	No	Noted.
Andy Thomas	Future Solutions	No	Noted.
Claire Gallery-Strong	BNG SL	No	Noted.
A N Other (2)	Consultant	No	Noted.
Dr Doug Graham	UKAEA	No	It would be a brave person to suggest any of the 5 principles were not worth it. Noted.
Kim Baines	RSK ENSR	No	Noted.
Mark Hill	DE	No	Noted.
Mike Pearl	UKAEA	No	Noted.
Peter Booth	Nexia Solutions	No	Noted.
Robert Muley	NUKEM Ltd	No	Noted.
Steve Handsley	Scott Wilson	No	Noted.
Susan Crisp	Cumbria County Council	No	Noted.
A N Other (3)	Contractor	No	Noted.

Name	Org	Comment	Response*
Hugh Richards	British Nuclear Group Magnox Electric Ltd	No	Noted.
Alison McKay	BAE Systems	No	However Q10 comment
Sean Amos	AWE	No	Noted.
A N Other (4)	CBO	no	Noted.
Colette Grundy	Environment Agency	no	Noted.
Janet Young	Magnox (North)	no	Noted.
Paul Dorfman	University of Warwick	no	Noted.
Richard Bramhall	LLRC	no	Noted.
<b>Question 13: Are there any principles that should be added?</b>			
Dr Alexander Lee	WSP	No	Noted.
A N Other (1)	Consultant	No	Noted.
Andy Dietzold	Low Level Waste Repository	No	Noted.
Andy Thomas	Future Solutions	No	Noted.
Claire Gallery-Strong	BNG SL	No	Noted.
A N Other (2)	Consultant	No	Noted.
Dr Doug Graham	UKAEA	Yes	Well, perhaps it is part of P3, but that any decision making is made on the basis of the most appropriate site strategy. Conland is only one part of the equation. Either add something to P3 or create a new high level principle seeking to place conland as part of the high level vision of the site.
Kim Baines	RSK ENSR	No	Noted.
Mark Hill	DE	No	Noted.
Mike Pearl	UKAEA	No	Noted.
Peter Booth	Nexia Solutions	No	Noted.
Robert Muley	NUKEM Ltd	No	Noted.
Steve Handsley	Scott Wilson	Yes	Should there be a principle that says that during the management process, if conditions change (ie unexpected radioactive contamination is found) then the management option should be reviewed to ensure that it is still valid.
Susan Crisp	Cumbria County Council	No	Noted.
A N Other (3)	Contractor	No	Noted.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	No	Noted.
Alison McKay	BAE Systems	No	Noted.
Sean Amos	AWE	NO	Noted.
A N Other (4)	CBO	yes	I almost certainly mean "no" here, but I don't want to absolutely prevent any major new breakthroughs or techniques.
Jack Armitage	NUKEM Limited	No	Noted.
Janet Young	Magnox (North)	yes	Like all land holders, the NDA are driving sites to quantify liabilities. Perhaps quantifying the extent of any contaminated land issue should be a principle (even though it could be seen as a key component of the characterisation, it can sometimes be overlooked as sites focus on finding out about their known contamination, without reassuring themselves that they have identified all potential sources of contamination that are present).
			Will be covered in the text and in the site characterisation guidance. Already in the flow charts.

Name	Org	Comment	Response*
Paul Dorfman	University of Warwick	unsure	Noted.
Richard Bramhall	LLRC	no	Noted.
<b>Question 14: Should LMGv2 advocate the adoption of safety, security, environmental protection and stakeholder engagement cultures at all types of site on which there is radioactively contaminated land, and the continual strengthening of these cultures at sites where work will continue for many years?</b>			
Dr Alexander Lee	WSP	No	Stakeholder consultation must be proportionate to the scale of the site and problem. To implement such consultation on non nuclear sites such as a historic manufacturing site with legacy luminising dials would often be inappropriate and costly. We do not engage in stakeholder consultaion for every Part IIA site why should radiologically contaminated land be any different
A N Other (1)	Consultant	Yes	Proportionality will be covered in the text of LMGv2. It was agreed years ago that radioactive contamination is different and stakeholder consultation is essential in most instances. See also new Part 2A Statutory Guidance for radioactive contaminated land.
Andy Dietzold	Low Level Waste Repository	Yes	Agreed, see note on PSG decisions.
Andy Thomas	Future Solutions	Yes	Agreed, see note on PSG decisions.
Claire Gallery-Strong	BNG SL	No	Not necessary to include these words as these fundamental principles are already embedded in the culture of nuclear licensed sites.
A N Other (2)	Consultant	Yes	See note on PSG decisions. There will be a short section on the cultures.
Dr Doug Graham	UKAEA	Yes	Agreed, see note on PSG decisions.
Kim Baines	RSK ENSR	Yes	As you say, experience says that decision-making on rad issues cannot be made easily behind closed-doors.
Mark Hill	DE	Yes	Difficult question, I would say mostly yes but on small sites stakeholder engagement may slow the process down where there are obvious mitigating measures to manage the risks. NORM sites may also present a problem where questions could be asked as to how to quantify whether an impact is also present of site which has not been recognised until the site works? Safety, security and environment protection should be advocated at all sites.
Mike Pearl	UKAEA		Agreed, see note on PSG decisions.
Peter Booth	Nexia Solutions	Yes	With the introduction of the Freedom of Information Act etc it is essential that stakeholder engagement and openness are encouraged.
Robert Muley	NUKEM Ltd	Yes	See note on PSG decisions. There will be a short section on the unnecessary question which is beyond the scope of SAFEGROUNDS.
Steve Handsley	Scott Wilson	Yes	Agreed, see note on PSG decisions.
Susan Crisp	Cumbria County Council	Yes	Agreed, see note on PSG decisions.
A N Other (3)	Contractor	No	Should we firstly acknowledge that contaminated land is a legacy of the past? (i.e. if a safety and environmental protection culture had always existed the land would not be contaminated). Adoption of the right culture for the future is reflected in 'principle no 1'
Hugh Richards	British Nuclear Group Magnox Electric Ltd	Yes	See note on PSG decisions. There will be a short section on the cultures.
Alison McKay	BAE Systems	Yes	But this should be only a brief 'high level' advocacy statement, since these 'cultural' issues apply across all aspects of site operation/management, and are not specific to land contamination.
Sean Amos	AWE	Yes	Agreed, see note on PSG decisions.
A N Other (4)	CBO	yes	Agreed, see note on PSG decisions.
Colette Grundy	Environment Agency		Agreed, see note on PSG decisions.

Name	Org	Comment	Response*	
Jack Armitage	NUKEM Limited	Yes	lesser emphasis on smaller, simpler sites	Agreed, see note on PSG decisions.
Janet Young	Magnox (North)	no	Whilst this is a good idea, this strays beyond what I see the purpose of LMGv2 is, and potentially 'steps onto the toes' of established responsibilities. 'Safety culture' is v. difficult to define in a meaningful way. Better to set a more tangible objective such as each site should clearly define where (within which post) responsibility for oversight and management of contaminated land lies. and integration of Contaminated Land information into other work tasks (such as excavation) should be encouraged.	See note on PSG decisions. There will be a short section on the cultures. For nuclear-licensed sites reference will be made to SAPs material on management systems and safety culture.
Paul Dorfman	University of Warwick	yes		Agreed, see note on PSG decisions.
Richard Bramhall	LLRC	yes		Agreed, see note on PSG decisions.
<b>Question 15: Should LMGv2 attach equal importance to safety, security, environmental protection and stakeholder engagement cultures?</b>				
Dr Alexander Lee	WSP	No	Safety and security should always take priority	Will give equal importance, see note on PSG decisions.
A N Other (1)	Consultant	Yes		Agreed.
Andy Dietzold	Low Level Waste Repository	Yes		Agreed.
Andy Thomas	Future Solutions	Yes		Agreed.
Claire Gallery-Strong	BNG SL	No	Not relevant see notes to Q14.	Noted.
A N Other (2)	Consultant	Yes		Agreed.
Dr Doug Graham	UKAEA	Yes	Yes, until we have more experience in their application. Also ask a security person if security is more important and he will say it is. Same for a con land project manager/. There needs to be an overview in all areas.	Agreed.
Kim Baines	RSK ENSR	Yes	Mostly yes but same concern as in Question 14.	Noted.
Mark Hill	DE	Yes	The key principles and LMGv2 should provide a flexible management framework that can be tailored to the site situation allowing for site specific judgement on the relative importance of safety, security etc.	Noted.
Mike Pearl	UKAEA	No	Safety, security and environmental protection are equally important and are regulated and therefore require strict compliance. As is often shown by the poor response to many of industry consultations, stakeholder consultation beyond that of with the regulators is less important.	Will give equal importance, see note on PSG decisions.
Peter Booth	Nexia Solutions	No	I think for this particular document and its intended remit the environmental protection culture should be the most important, without detracting from safety and security which are naturally high on a site's agenda. Stakeholder engagement culture should be encouraged.	Will give equal importance, see note on PSG decisions.
Robert Muley	NUKEM Ltd	Yes		Agreed.
Steve Handsley	Scott Wilson	Yes		Agreed.
Susan Crisp	Cumbria County Council	No		Noted.
A N Other (3)	Contractor	Yes		Agreed.
Hugh Richards	British Nuclear Group Magnox Electric Ltd	No	'Equal importance' seems to me to be a meaningless concept in this context.	Noted.
Alison McKay	BAE Systems	Yes		Agreed.
Sean Amos	AWE	Yes		Agreed.
A N Other (4)	CBO	yes		Agreed.
Jack Armitage	NUKEM Limited	Yes		Agreed.

Name	Org	Comment		Response*
Janet Young	Magnox (North)	no	Sites already have established processes for these topics. Whilst they should always be equal, there are many situations where there may be a mismatch, and I fear this falls into the 'too hard to describe and impossible to change' pile.	Will give equal importance, see note on PSG decisions.
Paul Dorfman	University of Warwick	yes	These are interlinked – interdependent.	Noted.
Richard Bramhall	LLRC	yes		Agreed.
<b>Question 16: Are there any other cultures that should be mentioned for some or all types of site?</b>				
Dr Alexander Lee	WSP	No		Noted.
A N Other (1)	Consultant	No		Noted.
Andy Dietzold	Low Level Waste Repository	No		Noted.
Andy Thomas	Future Solutions	Yes	Value for money where public funding is involved	Will cover in the text.
Claire Gallery-Strong	BNG SL	Yes	Some more emphasis on the "doing of work".	Will cover in the text.
A N Other (2)	Consultant			
Dr Doug Graham	UKAEA	Yes	Something which encompasses the big picture - a whole site strategy culture, where individual areas do not dominate.	Will cover in the text.
Kim Baines	RSK ENSR			
Mark Hill	DE	No		Noted.
Mike Pearl	UKAEA	No		Noted.
Peter Booth	Nexia Solutions	Yes	Records retention (unless this is taken for granted under the other headings).	Covered by the Key Principle on record keeping and accompanying text.
Robert Muley	NUKEM Ltd	No		Noted.
Steve Handsley	Scott Wilson	No		Noted.
Susan Crisp	Cumbria County Council	No		Noted.
A N Other (3)	Contractor	No		Noted.
Hugh Richards	British Nuclear Group MAGNOX Electric Ltd	No		Noted.
Alison McKay	BAE Systems	No		Noted.
Sean Amos	AWE	No		Noted.
A N Other (4)	CBO	yes	see below	Noted.
Jack Armitage	NUKEM Limited	No		Noted
Janet Young	Magnox (North)	no		Noted
Richard Bramhall	LLRC	no		Noted.
<b>Other comments: Please enter any other comments on any aspect of the revision of the SAFEGROUNDS guidance here.</b>				
Dr Doug Graham	UKAEA		Lets ensure that the case studies are correct/up to date before they are published.	Agreed.
A N Other (4)	CBO		To "yes see below" I probably mean no, but I do not want to prevent new initiatives	Noted

Name	Org	Comment	Response*
Colette Grundy	Environment Agency	<p>I am not intending to comment in detail at this stage on the Comparison of Land Management Options document and LMG V2. Couple of comments for now:</p> <p>For the comparison of Land Management Options, it is important to be transparent and provide justification for the choice of option(s). Also , Section 2.3 para 1, I don't think the types of land are well defined, particularly for the second and third examples- what is the distinction?</p> <p>Environment Agency welcomes the extension of the Land Management Guidance(LMG) for radioactively contaminated land on nuclear and defence sites to deal with radioactive contamination on other types of site.</p>	See note on PSG decisions.
*Note on PSG decisions' is the note of 11 April 2007 entitled 'Revision of SAFEGROUNDS Guidance, First Consultation on LMGv2, Summary of Responses and PSG Decisions'.			