

Email 10 December 2011

Dear

Thank you for your reply.

We are now attaching the corrective response discussed, and which we would ask ONR to publish on its website alongside Mr Spackman's review of the J-value.

The response details the numerous omissions, flaws and inconsistencies contained in Mr Spackman's review of the J-value. We consider these should be of legitimate concern to ONR and others.

We should be grateful if you could let us know by 16 January 2012 whether you intend to publish this response. If not we shall seek open publication elsewhere.

Please respond to me as corresponding author.

Yours sincerely

Philip Thomas

pp. P. J. Thomas and R. D. Jones.

On 15 July 2011 15:39, <ONRenquiries@hse.gsi.gov.uk> wrote:

Dear Professor Thomas,

Thank you for your e-mail enquiry as to whether HSE's Office of Nuclear Regulation (ONR) would consider publishing a report you and Mr Jones have produced. Your e-mail states that this is a corrective report that reflects your opinion that the report of Michael Spackman of NERA Consulting placed on HSE's ONR website is "a one-sided piece of work that suffers from serious omissions and contains inconsistencies and major flaws".

ONR is rather surprised by the strength of your opinion. Mr Spackman's report was commissioned by HSE's ONR (formally ND) to provide an Independent Review of work it had undertaken in response to a request from MOD for it to provide an opinion on a proposal it was considering for the application of J Values. The ONR report was subject to full internal scrutiny before MOD was given the opportunity to comment on both the ONR report and the supporting Independent Review produced by Mr Spackman. Finalisation of both the HSE ONR report and Mr Spackman's

report took this feedback into account. Additionally the technical content of Mr Spackman's report was accepted by HSE economists as suitable for use and a Government Interdepartmental Group for Valuing Life and Health separately heard an overview of the J Value Techniques and reached opinions consistent with those expressed in Michael Spackman's report.

HSE's ONR website includes reports relevant to the outcomes of its work that are subjected to appropriate challenge before publication (see above). The purpose of the website is not to provide a forum for an academic peer review debate. However if you wish to submit a copy of your "corrective response" to HSE's ONR it is prepared to consider whether the opinions you express undermine the fundamental elements of its advice to MOD and the outcome of the Government Interdepartmental Group for Valuing Life and Health.

Yours sincerely

enquiry:

The J-value framework (J for Judgement) is an integrated methodology that generates objective advice on how much should be spent to avert human harm and environmental loss. The HSE's website carries a literature review, apparently commissioned by HSE's Nuclear Division, of the J-value by Michael Spackman of NERA Economic Consulting:

<http://www.hse.gov.uk/nuclear/j-value-report.htm>

While Michael Spackman's review provides a welcome stimulus to discussion on the J-value, it is a one-sided piece of work that suffers from serious omissions and contains inconsistencies and major flaws. This must be of grave concern in a piece of work commissioned and published by the Health and Safety Executive. Accordingly Mr Roger Jones and I have prepared a corrective response, which you will wish to publish alongside Spackman's review.

Please let me know the appropriate electronic format for publication, and I will send it to you.

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Name:

Professor Philip Thomas,