

Scottish Environment Protection Agency (SEPA)
SEPA Report to the Dounreay Stakeholders' Group
June 2009

Pollution Prevention & Control (PPC)

SEPA has now seen a draft application to surrender the PPC permit regulating the recovery of uranium metal from uranium containing waste streams and DSRL is expected to submit the formal application very shortly.

Radioactive Substances Act 1993 Authorisations

SEPA attended the NII Level 4 meeting (held with DSRL and Nuvia) on the D3900 project. The D3900 is the facility planned to immobilise the stocks of liquid ILW and to store the conditioned waste in 500 litre drums.

SEPA and the NII continue to monitor the progress of the outstanding actions, following the leak of active liquor in the Ion Exchange plant (IXP), part of the Dounreay Fast Reactor (DFR) NaK Disposal Plant (NDP). These actions will have to be completed by DSRL before the facility transfers from active commissioning to full operations. SEPA and NII will undertake another joint inspection of NDP and IXP before the facility transfers to full operations.

SEPA continues to monitor the progress of the improvement conditions which were written into the authorisations which were transferred from UKAEA to DSRL.

SEPA issued a Warning Letter to DSRL concerning tritium discharges to atmosphere from the Sodium Inventory Destruction Plant (SID). DSRL has voluntarily shut down this plant until it has carried out and implemented a Best Practicable Means review. The use of Best Practicable Means is a condition of DSRL's certificates of authorisation for the disposal of radioactive wastes.

Proposed new Low Level Radioactive Waste Facility

A revised Environmental Safety Case (ESC) which forms DSRL's application for authorisation was submitted to SEPA in April. The format of this submission aligns with the revised Guidance for Requirements for Authorisation which were published by the UK Environment Agencies in January 2009. The ESC sections on Waste Acceptance Criteria need further development before SEPA can determine the application. SEPA has held meetings with DSRL at both working and senior levels with the aim of ensuring that information is supplied in such a manner to enable the project to proceed to programme.

SEPA continues to work on other parts of the application and a detailed report on the Performance Assessment is due to be submitted by SEPA's contractor by mid-June.

The precise form and timing of consultation is still being developed by SEPA.

DSRL has also submitted an Article 37 submission to SEPA and SEPA has responded in detail. DSRL are expected to submit a revised version by mid June so that SEPA can review this before passing it forward to Scottish Government for onward transmission to the EC. SEPA must have an Opinion from the EC's experts before they can determine the application.

Details of the project can be found at:

[http://www.sepa.org.uk/radioactive_substances/decommissioning/dounreay/proposed llw facilities.aspx](http://www.sepa.org.uk/radioactive_substances/decommissioning/dounreay/proposed_llw_facilities.aspx)

Controlled Activities Regulations (CAR)

SEPA met with DSRL on 9 March 2009 for further discussions about the non-active drainage systems at Dounreay. Of particular concern to SEPA are the occasional high levels of pollutants such as COD (Chemical Oxygen Demand) in the weekly routine outfall sampling exercise. These high levels are unlikely to be caused by sewage alone, and DSRL agreed to formally investigate each of these 'spikes' in an effort to determine their cause, with a view to eliminating any undesirable and possibly unlicensed discharges into the drainage systems. The first such report submitted to SEPA, covering March and April 2009, listed 7 'spikes' that were investigated by DSRL, and the results are currently being discussed with SEPA.

The Part A PPC Permit mentioned above includes conditions for the discharge of liquids via the Low Active Drain and Low Level Liquid Effluent Treatment (LLETP) and by the date of revocation such conditions must be incorporated into a Controlled Activities Regulations (CAR) licence which will continue to regulate this discharge. A meeting will be held shortly between DSRL and SEPA to help establish how this should be effected. SEPA are afforded a 4-month determination period for this licence from date of application.

Particles and Beach Monitoring

SEPA has sent a letter sent to various local landowners in the Dounreay area to advise them of SEPA's plans to carry out a radioactive contaminated land assessment. The landowners contacted own beach areas which we expect to cover within the scope of the assessment. These assessments will be carried as part of SEPA's duties under the Radioactive Contaminated Land (Scotland) Regulations 2007.

SEPA has contracted CEFAS to undertake a habits survey at Dunnet beach this summer. The outcome of the survey will help inform any need for future monitoring of the beach for fuel fragments.

Preliminary discussions have been held between SEPA, NII, The Highland Council, NHS Highland & DSRL about the need for and the feasibility of closing the Dounreay Foreshore as recommended by DPAG.

A successor group to DPAG has been set up to advise on particle recovery – this is the Particle Recovery Advisory Group (Dounreay) (PRAG(D) PRAG(D) which will be chaired by Professor Keith Boddy and members will include Professor Tim Atkins and Professor Marian Scott. Dr Paul Dale of SEPA will be the Technical Secretary. SEPA will be writing to the chairs of DSG & the DSG ESG to advise them of and to invite them to nominate a representative to attend the group.

Dounreay PBO Competition

SEPA has met with NDA for an initial meeting on regulatory involvement the competition process and has subsequently had a joint meeting with NDA and NII. SEPA has emphasised to both NDA & DSRL that it expects "business as usual" at the Dounreay site during the competition process.

Planning

SEPA has received and responded to Planning Consultations on a new stack system for the Prototype Fast Reactor (PFR) and the D3900 project mentioned above.