

Scottish Environment Protection Agency (SEPA)

SEPA Report to the Dounreay Stakeholders' Group December 2009

Pollution Prevention & Control (PPC)

DSRL has submitted an application to surrender the PPC permit regulating the recovery of uranium metal from uranium containing waste streams as the plant that used to carry out these operations will not operate again. The timescale for this is linked to the transfer of conditions on liquid discharges to a Controlled Activities Regulations (CAR) permit which will be incorporated into the authorisation to discharge liquid radioactive effluent.

Radioactive Substances Act 1993 Authorisations

DRSL have submitted an application for a new authorisation which is aligned with decommissioning activities. This will be subject to Public Consultation as part of the determination process.

SEPA inspection activities are focussed on DSRL's production of Environmental Support Files and the production of Project Specific Waste Plans (PSWPs) and their associated procedures & guidance. SEPA has welcomed the opportunity to provide input at the early stages of the projects for to be involved in new build waste management plants for the site.

Proposed new Low Level Radioactive Waste Facility

SEPA have reviewed the Groundwater and Surface Water Monitoring Plan and agreed that the design of the monitoring network, i.e. borehole locations and construction, is acceptable.

SEPA's review of the overall monitoring plan has progressed well and our expectations of the review of the Inventory have been communicated to DSRL. Other topics being looked at are review of the Best Practicable Means (BPM) papers, Potentially Exposed Groups (PEG) scenarios, future Performance Assessment requirements and Waste Acceptance Criteria.

A further two day technical meeting was held between SEPA and DSRL on 18/19 November in Dingwall at which the main focus was on reviewing progress since the previous successful August meeting with DSRL providing updates on Criticality Assessment, Waste Acceptance Criteria and Performance Assessment.

It is now likely that key technical submissions in support of the radioactive waste disposal authorisation application will not now be available from DSRL until October 2010. These are required to deal with issues identified by SEPA and its consultant, based on previous versions of the information. This will have a significant impact on the determination date and SEPA's plans for consultation and we will advise the SSG when the plans for this become firmer. This information will also be used as the basis for the Article 37 submission to the European Commission.

Details of the project can be found at:

http://www.sepa.org.uk/radioactive_substances/decommissioning/dounreay/proposed_llw_facilities.aspx

Controlled Activities Regulations (CAR)

Investigations into high Chemical Oxygen Demand (COD) levels in non-radioactive discharges continue. It appears from analysis of results that heavy rain is a predominant factor in cases of high COD.

DSRL continue to investigate how non-radioactive discharges can be improved in quality e.g. by fitting package sewage treatment plants.

Please also see the PPC section above.

Of more general interest are amendments that have been made to the legal charging scheme for CAR. These will deliver significant simplification to application fees and changes to subsistence charges which reflect regulatory efficiencies, where sites have more than one licensed activity.

The main changes to the scheme are:

- Significant simplification of the application charges across all regimes (a single fee for complex licences covering all regimes and simplification of the discounts for associated activities).
- Introduce a new number of point source activities factor to be used as part of the point source subsistence scheme
- Introduce a new number of activities factor to be used for calculating point source subsistence scheme charges for sewer network licences
- Introduce a new engineering subsistence
- Introduce a 10% overall reductions in subsistence charges where a site is regulated by more than one CAR regime.

For more information please see

http://www.sepa.org.uk/about_us/charging_schemes/current_legal_schemes.aspx

Waste Management Licensing

D6500 – SEPA is considering future action with respect to controlled waste storage where wastes have been stored longer than 3 yrs for reuse after DSRL submitted a list of all consignments submitted since opening the site. Several 1000 tonnes have been stored for more than 3 years.

Particles and Beach Monitoring

A meeting of the Particles Retrieval Advisory Group for Dounreay (PRAG(D)) met in Edinburgh on 18 November 2009. The DSSG chairman is now one of the observers for this group, although he was unable to attend this meeting.

Dounreay PBO Competition

SEPA has continued to liaise with NDA on the competition & will be present at both industry days (currently planned for early March 2010). It is expected that SEPA will host the Industry Day to be held in the Central Belt & will be present at the event in Caithness.

Planning

SEPA was consulted on 26 June 2009 by Marine Scotland with respect to a licence application, reference FKB/D415, from Dounreay Site Restoration Ltd. under the Food and Environment Protection Act 1985 Deposits in the Sea (As Amended) to dispose of maintenance micro dredging from Dounreay at a location below the level of Mean High Water Springs. SEPA advised in its response that it had no objections to the application as the proposed approach as detailed in the application for this operation was in accordance with the Best Practicable Environmental Option.

Radioactivity in Food & the Environment

The 2008 Radioactivity in Food & the Environment (RIFE) report has been published recently. This is a joint publication with the Environment Agency, Northern Ireland Environment Agency & the Food Standards Agency.

The maximum dose from all discharge routes in the Dounreay area is 0.078 mSv. This is dominated by consumption of venison however, it should be noted that this will be due to past as well as present discharges plus contributions from past atmospheric weapons testing and the Chernobyl accident. There was only one sample of venison taken & this represents another area of uncertainty. The dose is significantly lower than the 1 mSv dose limit for members of the public.

Electronic copies of the report (and previous publications) can be found at http://www.sepa.org.uk/radioactive_substances/publications/rife_reports.aspx although a limited number of hard copies are available on request.