



## HM NUCLEAR INSTALLATIONS INSPECTORATE

### Dounreay Site Restoration Limited

### Quarterly report for 1 October to 31 December 2009

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#### Foreword

This report is issued as part of the Health and Safety Executive's commitment to make information about inspection and regulatory activities relating to the above site available to the public. It is for distribution to members of the Dounreay Site Stakeholder Group (DSSG) and covers activities associated with the regulation of safety at Dounreay. These reports are distributed quarterly. Site Inspectors of HM Nuclear Installations Inspectorate normally attend Dounreay SSG meetings and will be happy to respond to questions raised there or subsequently by members of the Dounreay SSG. Any other person wishing to inquire about matters covered by this report should contact the HSE, Nuclear Directorate Information Centre on 0151 951 3484/3290.

This report will be put on the HSE Website at  
<http://www.hse.gov.uk/nuclear/ilc/2009/index.htm>

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#### Inspections

NII Site Inspectors and Specialist Inspectors visited Dounreay on the following dates:-

- 12<sup>th</sup>-15<sup>th</sup> October
- 19<sup>th</sup>-22<sup>nd</sup> October
- 23<sup>rd</sup> - 27<sup>th</sup> November
- 7<sup>th</sup>-10<sup>th</sup> December

## **Routine matters**

### **Site inspection activities**

Compliance inspections were undertaken against the following Licence Conditions

- 24 Operating Instructions
- 26 Control and Supervision of Operations
- 27 Safety Mechanisms, Devices and Circuits
- 32 Accumulation of Radioactive Waste

No major issues were identified.

### **Inspections on Fuel Cycle Area**

Inspection of decommissioning activities indicated areas for improvement that were highlighted to DSRL management. In addition NII emphasised the need to maintain and update decommissioning safety cases when modifications are undertaken.

### **Annual Review of Safety**

The Dounreay Annual Review of Safety Meeting was held on 26<sup>th</sup> November where the DSRL safety performance was discussed. NII expressed the view that there continues to be good progress being made with hazard reduction activities on the site. In addition, the safety performance of DSRL had appeared to show signs of improvement but NII stressed the need to preclude complacency during future operations. NII also stated that one of the key issues for the future would be to ensure that focus on safe delivery is maintained during the forthcoming NDA competition process.

## **Non routine matters**

### **Approval of Revised Dounreay Emergency Plan**

In October, NII Approved the revised version of the Dounreay Site Emergency Plan. The main change introduced in the revised Plan was the reduction in the Detailed Emergency Planning Zone (DEPZ) from 5km to 1.15km.

### **Environmental Impact Assessment (Decommissioning) Regulations**

Compliance inspections against the DSRL Environmental Impact Assessment (Decommissioning) Regulations Arrangements were undertaken and found to adequate.

### **Approval of Licence Condition 35 Arrangements for the Management of Regulatory Decommissioning Milestones**

In November, NII Approved the DSRL arrangements for managing changes to the Dounreay regulatory decommissioning milestones.

Under these arrangements DSRL requires NII agreement before changing the 'Regulatory Milestones' set down in the Life Time Plan. Most of these Regulatory Milestones were produced during the development of the Dounreay Site Restoration Plan(DSRP).

### **Visit by HSE Fire Safety Specialists**

In October, HSE Fire Safety specialists visited Dounreay to conduct an audit of fire safety management arrangements to assess the current level of compliance with the requirements of The Fire (Scotland) Act 2005. DSRL demonstrated it has in place an effective safety team that provides a good standard of fire safety management. The HSE specialists offered guidance for some minor improvements and recognised several areas of good practice at the site.

### **Intermediate Level Waste (ILW) Flask Event**

NII was informed of an event involving higher than anticipated radiation doses received by operating staff who were preparing to move an ILW flask to a waste store on the site. NII will follow up the circumstances associated with this event in January 2010.

### **Contamination Event at DFR**

Two workers were slightly contaminated while undertaking maintenance work in DFR during July 2009. NII carried out inspections subsequently and concluded that the incident could have been prevented if work planning procedures had been rigorously followed. DSRL separately addressed the issues arising from the incident and put into place improvements to the working arrangements, which should prevent similar incidents occurring in future.

### **Radioactive Waste Management Cases**

DSRL, SEPA and NII held a joint workshop to discuss the production, content, maintenance and review of radioactive waste management cases. These cases are designed to provide a transparent demonstration of adequate radioactive waste management for higher activity waste on site.

### **Regulatory activity**

The Inspectorate has powers under the Licence to issue Consents, Approvals and Directions. In addition, the Inspectorate uses Licence Instruments to issue Specifications, Acknowledgements, and Agreements under either the conditions attached to the Licence, or arrangements made by DSRL for complying with those conditions.

During the period of this report the following Licence Instruments were issued.

LI 507 Agreement to proceed with routine operation of the Dounreay Fast Reactor NaK Disposal Plant and the Ion Exchange Plant projects  
LI 508 Approval of the Dounreay Emergency Plan  
LI 509 Approval of the Arrangements for Management of Regulatory Decommissioning Milestones  
LI 510 Agreement to proceed with the implementation and adoption of the decommissioning safety case for the Dounreay Fast Reactor

**Proposed Changes to the status of HSE's Nuclear Directorate (ND)** Work is continuing to restructure ND to establish it as a Nuclear Statutory Corporation (NSC). As described in the last quarterly report (July-September 2009), the reform of ND will result in its reestablishment as a sector-specific independent organisation but remaining under the auspices of the HSE. The purpose of this transformation is to ensure that it is best placed to deliver a new, forward thinking and world leading nuclear regulator that is fit to tackle the challenges ahead.

The necessary change to ND's status is being made via a Legislative Reform Order under the Legislative and Regulatory Reform Act 2006. If the Parliamentary timetable permits, it is anticipated that this should be made and laid before Parliament in the early part of 2010 with the new body established some time in 2010.

As part of the proposed change in status, the new organisation will adopt a new name when it becomes a formal entity and Government Ministers recently decided that this should be the Office for Nuclear Regulation. The restructuring, like the taking on of the new name, will not – however – alter or weaken the substance or standards of regulation or compromise the independence of the nuclear regulatory body, and will not affect the decisions it takes or the international obligations the government requires it to meet. Instead, it will create a body that is better positioned to support effectively the industry's planned expansion and the management of legacy works whilst most importantly continuing to enforce robustly the regulations at nuclear licensed sites.

To ensure that ND is capable of operating as a NSC, an internal programme of work has been underway to plan, develop and implement the necessary changes. This programme also incorporates ND's existing and projected work, thereby securing consistency throughout our business. ND is committed that throughout this process of transformation its stakeholders are kept fully informed of the changes and it is adopting a number of methods for engagement, including these quarterly reports, to realise this aim.