

Scottish Environment Protection Agency (SEPA)

SEPA Report to the Dounreay Stakeholders' Group March 2010

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 varied into the authorisation to discharge liquid radioactive effluent.

Radioactive Substances Act 1993 Authorisations

DSRL have submitted an application for a new authorisation which is aligned with decommissioning activities. This was found to be not properly made & has been returned to the site. SEPA will engage with DSRL on this issue & await a re-application.

Proposed new Low Level Radioactive Waste Facility

For the past twelve months DSRL have been carrying out extensive quarterly monitoring of Groundwater and surface water in order to provide a baseline characterisation of the site prior to any work commencing. A meeting was held in early February between DSRL and SEPA hydrogeologists to discuss the progress of this work and review the way in which findings would be presented in the future. The report structure and interpretative work required were agreed. The full year report for SEPA to review is expected around late March and will cover water flows, chemical analysis and radionuclide analysis – all of which will be looked at over time, depth and location.

DSRL have submitted an update to their Inventory report and Waste Acceptance Criteria paper and SEPA are currently reviewing this work. A technical meeting between DSRL and SEPA was held on the 17th and 18th of February in Edinburgh where these issues, and others affecting the next run of the Performance Assessment for the facility, will be discussed.

In early December 2009 SEPA project staff held a meeting with the Buldoo Residents Group. This meeting provided an opportunity to update the group with what had been happening on the project since the Planning Application had been approved in April 2009.

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)

SEPA have completed its consideration of the analytical results of one-off samples taken in September 2009 from the six non-radiological discharge outfalls licensed by the Water Environment (Controlled Activities) Regulations 2005. This sampling exercise was undertaken following the observation that the regular weekly samples taken from the outfalls showed occasional high levels of COD (Chemical Oxygen Demand) which on examination by DSRL could not easily be accounted for.

SEPA was pleased to note that the one-off sample results revealed no significant levels of pollutants that might threaten the quality of coastal waters, however DSRL will be asked to continue to investigate any future COD 'spikes' in the weekly samples as they have been doing for the last year. The most plausible explanation offered thus far by DSRL for these anomalies is that sewage and trade effluent tends to become deposited in the drainage systems such that heavy rain falling after a dry spell is washing these accumulations out in exaggerated concentrations, and any samples taken during such a 'first flush' are thus elevated in nutrients.

SEPA recently received the latest revision of the non-radioactive drains Management Plan, and are pleased to note that DSRL are planning several actions to remedy some of the drain problems and improve discharge quality, including a trial of installing package sewage treatment plants at the main centres of population on the Dounreay site; diverting clean surface water away from the drainage system to reduce Milliscreen loading; de-silting and repair of the drains where necessary, and undertaking of regular gulley cleaning.

Waste Management Licensing

SEPA are currently considering what if any action to take regarding the unlicensed keeping of excavation and similar wastes by DSRL in Dounreay's D6500 waste storage site. A large quantity of wastes has been stored for longer than 3 years which is not allowed under the Waste Management Licensing regime.

Particles and Beach Monitoring

SEPA attended a meeting of the Particles Recovery Advisory Group in Edinburgh on the 17th of February.

Dounreay PBO Competition

SEPA has continued to liaise with NDA on the competition & was present at Industry Day 1 in Wick and will be present at Industry Day 2 in Glasgow when SEPA's Chief Executive Officer will introduce the Regulators' presentations.

Planning

An informal meeting was held between the Highland Council, DSRL and SEPA On 14 Dec 2009 to discuss initial considerations regarding the scope of a future Environmental Impact Assessment that will support a major planning application at Dounreay, referred to as Phase 2 (2013 – 2020) Planning Application. SEPA encourages pre-planning application discussions of this nature.