Scottish Environment Protection Agency (SEPA)

SEPA Report to the Dounreay Stakeholders' Group June 2010

Pollution Prevention & Control (PPC)

DSRL applied to SEPA to surrender the PPC permit, PPC/A/1008889, for the uranium recovery line at D1203 in September 2009. In order to assist the process of determining the PPC permit surrender officers from SEPA's North Process Engineering Unit inspected the D1203 recovery line and associated activities (D1213 main stack, D3000 LLLETP and D3001 sludge treatment plant) on 7 May 2010. Following this inspection, the surrender process is proceding. DSRL had previously agreed an extension of time to allow SEPA to determine the permit surrender, until 30 June 2010. SEPA will now complete its written determination of the application for surrender, for peer review

Radioactive Substances Act 1993 Authorisations

DRSL have submitted a valid application for re-authorisation. A consultation package is being prepared.

SEPA has previously expressed concerns about the condition and integrity of the Wet Silo, used to store Intermediate Level Waste. SEPA Radioactive Substances officers have been working in conjunction with SEPA Environmental Science (ES) Hydrogeology staff to assess the leak detection monitoring systems. SEPA has made recommendations for improvements to the leak detection systems and contingency arrangements in the event of silo leakage, which were implemented by DSRL. Work to analyse the data from the improved monitoring programme is currently being undertaken by ES Hydrogeology.

SEPA is working together with the HSE's Nuclear Directorate (who regulate the accumulation of radioactive waste on nuclear licensed sites) in relation to the Wet Silo.

During 2010 the Nuclear Decommissioning Authority imposed funding constraints which are likely to result in delays to new projects, including the plans for the retrieval and processing of waste from the Wet Silo. SEPA is of the opinion that the emptying of the waste from the wet silo is a high priority and should be undertaken as soon as is practicable to do so. DSRL are currently considering alternative options for dealing with the Wet Silo waste. SEPA and the Nuclear Directorate will be reviewing DSRL's revised plans and timescales for dealing with the wet silo waste.

Proposed new Low Level Radioactive Waste Facility

A further two day technical meeting was held with DSRL in Dingwall on 25/26 May 2010 at which much continued good progress was made. Among topics discussed was how construction would be demonstrated to comply with the requirements of the Guidance on Requirements for Authorisation (GRA). Considerable time was spent on the parameters to be used in compiling the assessment biosphere for the Run 3 Performance Assessment in the next few weeks. Other items discussed included optimisation of various aspects of the facility, hydraulic conductivity of the walls, rock excavation methods and possible conditions which may be attached to any potential Authorisation.

The coming months are likely to be very busy with a lot of work being finalised in preparation for the next iteration of the Environmental Safety Case scheduled for October 2010.

In late April 2010 SEPA project staff held a meeting with the Buldoo Residents Group to keep them updated on progress to date.

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 has asked DSRL for an update on proposals regarding improvements to the 6 CAR outfalls which were mentioned in SEPA's March report.

Waste Management Licensing

SEPA is 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. SEPA has recently written to DSRL requesting an update of the present inventory to further inform the regulatory process.

Particles and Beach Monitoring

Nothing to report for this period.

Dounreay PBO Competition

SEPA attended Industry Day 2 in Glasgow & chaired the Regulators' session. SEPA is liaising with NDA and the other regulators for the next phase of the competition process which will follow the down selection by NDA following their evaluation of the responses to the Pre-Qualification Questionnaire.

Planning

Nothing to report for this period.