



## HM NUCLEAR INSTALLATIONS INSPECTORATE

### Dounreay Site Restoration Limited

### Site Stakeholder Group Quarterly report for

**1 October to 31 December 2010**

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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 (SSG) and covers activities associated with the regulation of safety at Dounreay.

These reports are distributed quarterly and are also available on HSE's Website at <http://www.hse.gov.uk/nuclear/llic/2010/index.htm>. Site Inspectors of HM Nuclear Installations Inspectorate usually attend Dounreay SSG meetings and will respond to questions raised there by members of the Dounreay SSG. Any other person wishing to enquire about matters covered by this report may contact the HSE's Nuclear Directorate on 0151 951 3484/3290.

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## Inspections

The Nuclear Installations Inspectorate (NII) Site Inspectors and Specialist Inspectors visited Dounreay on the following dates during the quarter:-

4-8 October 2010

11-15 October 2010

15-18 November 2010

6-9 December 2010

14-15 December 2010

## Routine matters

Inspections are undertaken at site as part of the process for monitoring compliance with:

- (i) the conditions attached by HSE/NII to the nuclear site licence;
- (ii) the Health and Safety at Work etc Act (HSWA) 1974 and
- (iii) regulations made under the HSWA for example the Ionising Radiations Regulations 1999 and the Management of Health and Safety at Work Regulations 1999.

This entails monitoring licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters which may affect safety. The licensees/operators are required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation. In this period, routine inspections of the site covered:

### Operating Rules at the NaK Disposal Plant

NII carried out an inspection of the operating rules (OR) applied at the NaK Disposal Plant (NDP). There was evident good practice with regard to OR compliance, for example steps had been taken to ensure ORs are clearly written into operating instructions and that compliance with them was not optional. The means for demonstrating OR compliance was considered to be straightforward and OR compliance checks are routinely undertaken. However the inspection revealed a problem with the control of an isolation key which could have led to unsafe operations: DSRL accepted the finding and a remedial action was promptly agreed and discharged satisfactorily.

### Control of modifications

DSRL demonstrated that there are robust arrangements for controlling modifications on reactors and that they are properly implemented. NII targeted the close-out process, specifically the completion of drawings that need to be changed prior to closure of a modification. Sample checks of completed modifications confirmed that the drawings required to be changed were indeed changed prior to modification closure.

NII found that some equipment for a project within the Fuel Cycle Area may have been partly installed and inactively commissioned before the necessary regulatory permissions had been granted. This appeared to be contrary to DSRL arrangements. Prior to the NII inspection DSRL's Internal Assurance Team had already identified general site-wide concerns with the implementation of these

arrangements and had recorded a site-wide finding. NII will consider the response to this finding to check that it properly addresses the possible non-compliance identified in the FCA.

### **Response to incidents**

The implementation in PFR of DSRL arrangements for incidents on the site appears to be sound. PFR encourages the raising of incident reports; there have been relatively few significant incidents recently as compared with the number of unusual occurrences reported. NII considers that PFR's response to recent incidents was good. DSRL undertakes regular reviews of incidents to capture lessons to be learned.

### **Qualification and experience of contractor's staff**

The NII inspected the interactions between DSRL and its PFR maintenance and operations contractor, Babcock, and the way in which Babcock demonstrates that its staff are suitably qualified and experienced (SQEP). DSRL and Babcock demonstrated a strong professional relationship between client and contractor. Babcock provided a clear demonstration of the close management of the training and SQEPness of its staff.

### **Reactor decommissioning**

Further dialogue has taken place between DSRL and NII on decommissioning the fast reactors following DSRL's revised proposals made earlier this year. A technical meeting is scheduled to be held in the first quarter of 2011.

### **Safety Representatives**

NII regularly met with Safety Representatives during the quarter from organisations employed across Dounreay, including DSRL and their contractors. The impression gained was that employers do appreciate the work of Dounreay Safety Representatives and generally provide sufficient resources for their work. The site inspector emphasised that that NII valued the work of Safety Representatives.

### **Leadership and Management for Safety**

DSRL have an excellent health and safety record based standard industry measures. However, the NII reminded DSRL that having low personal injury rates does not always provide a true picture of process safety performance and the health of the safety culture (a key finding of the BP Texas City Final Investigation Report). During the quarter, the NII linked licence condition inspections with leadership and management for safety indicators. This highlighted areas of weakness, including in the appointment of Duly Authorised Persons and their interactions with Suitably Qualified and Experienced Persons. DSRL responded positively to these findings and are actively seeking ways to make improvements. NII will continue to look for indicators of DSRL's effective leadership, management and oversight of nuclear safety and radiation protection.

### **Regulatory milestones**

DSRL and NII continued discussions on regulatory milestones with agreement being reached that the milestones should where possible reflect reductions in nuclear hazard on the site. The steps along the way to reaching the reductions are contained within DSRL's lifetime plan.

### **Visit by French Regulator**

Four inspectors from the French Nuclear Safety Authority (ASN), accompanied by two NII inspectors, visited PFR and DFR and discussed mutual experience with fast reactor decommissioning. This was a particularly effective exchange visit. It was

clear that ASN, DSRL and NII have much to gain from promoting interactions between the respective French and British licensees and regulators.

### **Non-Routine matters**

Licensees are required to have arrangements to respond to non-routine matters and events. NII inspectors judge the adequacy of the licensee's/operators response including actions taken to implement any necessary improvements. Matters of particular note considered during the current period include the following.

DSRL is actively looking at ways to improve emergency arrangements on the site and made significant progress towards implementing improvements.

DSRL demonstrated that adequate emergency arrangements are documented for the reactors. Key posts are identified, staff competent in these roles are appointed and their skills developed during regular facility exercises. NII witnessed a DFR table-top emergency exercise, which was successful and which served to illustrate the good work that is being done across the site to improve emergency arrangements.

The NII completed its investigation into intermediate level waste flask event that took place during November 2009 against the HSE's Enforcement Management Model. The investigation concluded that the actual harm caused by the calculated doses received was relatively small and the potential doses that could have been received if the sources had been moved as planned would also have been low. In addition DSRL moved quickly to remedy the situation and implement changes to ensure the event or similar events were not repeated elsewhere on the site. The NII will carry out related inspections to confirm that appropriate changes have been implemented.

### **Regulatory activity**

Under Health and Safety legislation NII Site Inspectors, and other HSE Inspectors, may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions HSE/NII issues regulatory documents, which either permission an activity or requires some form of action to be taken; these are collectively termed Licence Instruments (LI). In addition inspectors may issue enforcement notices to secure improvements to safety.

No Licence Instruments were issued to the licensee during the quarter.

## **TRANSFORMING HSE NUCLEAR DIRECTORATE**

HSE's Nuclear Directorate (ND) continues work on a programme of change entitled 'Transformation' which is intended to help ND realise its aims to become recognised as a world-class regulator. Over the coming months, ND's focus will include improving the way it engages with all of its stakeholders, including communities around nuclear licensed sites, to explain the work that it does and the regulatory decisions it makes.

ND will keep stakeholders fully informed of changes and any decisions that are made through channels including:

- The HSE Nuclear eBulletin (visit [www.hse.gov.uk/nuclear/ebulletin](http://www.hse.gov.uk/nuclear/ebulletin) to subscribe);
- Site stakeholder group and local liaison committee reports;
- ND's newly re-launched website ([www.hse.gov.uk/nuclear](http://www.hse.gov.uk/nuclear)).

If you have any comments, questions or suggestions regarding ND's Transformation programme, please get in touch by emailing [NDenquiries@hse.gsi.gov.uk](mailto:NDenquiries@hse.gsi.gov.uk).