

Scottish Environment Protection Agency (SEPA)

SEPA Report to the Dounreay Stakeholders' Group April 2011

Pollution Prevention & Control (PPC)

Nothing to report for this period.

Radioactive Substances Act 1993 Authorisations

Nothing to report for this period.

Proposed new Low Level Radioactive Waste Facility

The draft paper submitted by Dounreay Site Restoration Limited (DSRL) as their revised submission to the European Commission under Article 37 of the Euratom treaty has been reviewed by SEPA as advisor to Scottish Government. The paper had required to be substantially rewritten following the unexpected changes in format and content recently (and unexpectedly) issued by the Commission. The comments provided by SEPA were generally of a fairly minor nature although some additional detail was felt to be required. A finalised document is anticipated in the near future which SEPA review prior to onward transmission to the European Commission through the Scottish and United Kingdom Governments. The Commission can take up to six months to give their Opinion, and a favourable opinion is required before SEPA carry out the proposed public consultation on any potential draft Authorisation.

The project External Advisory Group, chaired by Professor Brian Clark, met in Riccarton on Friday 21 January. They reviewed the progress made on the project since their last meeting and offered advice and comment in several areas.

A detailed workload planning meeting covering the work to be completed before the draft authorisation could be prepared was held on 27 January and the outcomes of this have been worked into the project plan.

A further technical meeting with DSRL and their consultants was held in early March and the successful bidder for the facility Design and Build contract, Graham's, was in attendance. This gave SEPA an opportunity to engage with the contractor at an early stage in the process.

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)

The Water Environment (Controlled Activities) (Scotland) Regulations 2011 have come into force. All the amendments to the 2005 regulations have been consolidated. Some of the features of the new regulations are to increase the transparency of SEPA's decision making by making advertised applications and subsequent decision documents available online. There is a new provision that would allow SEPA to issue a single consolidated licence to a Responsible Person or Operator holding more than one licence, this may allow a single site CAR licence for example. Previously, determinations of CAR applications which passed their statutory determination period were automatically deemed refused which caused SEPA (and the applicant) problems. Determinations are now only deemed refused if they pass the statutory determination period and the applicant notifies SEPA that they wish the failure to determine it to be treated as a refusal. The new regulations also permit a more flexible approach to emergency situations.

Waste Management Licensing

SEPA continues to work with DSRL in developing a site wide authorisation with both parties currently looking at options and potential constraints.

Landfill 42 – the proposed capping of the site was discussed during an inspection at the beginning of March, DSRL hope that work will begin July 2010. Their plan is for waste to be pulled back from the foreshore and rock armouring put in its place to try to prevent erosion. The site will be dome shaped with a gradual incline from base to top. The final height will be a few metres higher than it is at present. The waste already on site will be covered with an impermeable membrane and topped with 600-700mm of material, possibly sourced from the excavation of the low level waste site if authorisation for this is granted.

The Waste Management Licensing (Scotland) Regulations 2011 came into force in March.

Main changes are:

- A new definition of waste to be consistent with the Waste Framework Directive
- Means other than WAMITAB for demonstrating technical competence can be used.
- Site boundaries can be increased by modification or decreased by partial surrender
- Licenses can be partially transferred.
- Consolidated licenses can be issued.
- The Waste Hierarchy is brought into relevant objectives.
- Exempt radioactive wastes are now controlled wastes.

Particles and Beach Monitoring

Nothing to report for this period.

Dounreay Parent Body Organisation Competition

SEPA has engaged separately with both bidders as part of the dialogue process. SEPA continues to liaise with other regulators & the NDA Competition Team on the processes that will be necessary between now & final share transfer. There has also been an initial meeting of a Senior Oversight Group which is looking at the strategic aspects of the competition.

Planning

Nothing to report for this period.