

Scottish Environment Protection Agency (SEPA)

SEPA Report to the Dounreay Stakeholders' Group November 2011

Pollution Prevention & Control (PPC)

Nothing to report for this period.

Radioactive Substances Act 1993 Authorisations

Following review of the RS Authorisation in accordance with the requirements of the CAR regulations, a variation to add CAR compliant conditions and limits was issued to DSRL in October, with an effective date of 9 November 2011.

Proposed new Low Level Radioactive Waste Facility

SEPA have been developing a site-specific draft Authorisation for the disposal of the Low Level Radioactive Waste at the new facilities with a suite of Schedules of Conditions and Limitations. This has been developed to ensure that the facility will be designed, operated and closed in a manner which will comply with the performance parameters specified in the application and supporting documents. This draft Authorisation, along with a decision document supporting SEPA's decision, will be presented to the SEPA North Regulatory Review Team later this year and will form part of a four week public consultation period likely to be undertaken from mid January 2012. This consultation process is in line with the outcome of previous discussions with the Dounreay Stakeholder Group.

SEPA have been working with DSRL, and their construction contractor Grahams, on the PPC and CAR applications submitted for the site. The PPC application is currently subject to public consultation as a normal part of the determination process.

Details of the project can be found at:

http://www.sepa.org.uk/radioactive_substances/decommissioning/dounreay/proposed_llw_facilities.aspx

Site Inspection Work

SEPA is undertaking a programme of joint inspections of all civil nuclear sites in Scotland, focussing on the sampling of liquid effluent that is discharged to sea.

In August, as part of this programme, an inspection of the liquid effluent sampling, analysis and record compilation arrangements was undertaken at Dounreay. During this inspection no non-compliances were identified. The findings from the various joint inspections (in terms of examples of good practice and areas for improvement) will be compiled.

In September, an inspection of DSRL's solid waste characterisation and consignment processes and documentation was undertaken. SEPA note that improvements continue to be observed in DSRL's characterisation and consignment processes.

In October, a joint ONR/SEPA inspection was undertaken of an example of a Higher Activity Radioactive Waste Management Case. The regulators noted that DSRL continues to make good progress in the implementation of the Higher Activity Waste joint guidance and the production of Radioactive Waste Management Cases. The regulators will continue to undertake joint inspections in this area.

Site Regulation

On Friday 7 October, SEPA and ONR were advised by DSRL that they had identified a leak of radioactive liquor within the DFR NaK Disposal Plant, ion exchange plant. DSRL advised that the leak was contained within the shielded skid area, and there had been no activity detected outside the containment. SEPA subsequently attended site to assess the environmental impact, and confirmed that there was no out-of-building release of activity, and hence no release to the environment as a result of the leak. As there was no release to the environment, ONR is the primary regulator in relation to this incident. However, SEPA has an interest in operations at the plant as it is an effluent treatment plant and has an interest in any excess generation of radioactive waste. SEPA is liaising closely with ONR and a joint inspection will be undertaken.

Transfrontier Shipment

SEPA has granted an authorisation under the Transfrontier Shipment of Radioactive Waste and Spent Fuel Regulations 2008, to DSRL to return cemented radioactive waste to Belgium, its country of origin.

Controlled Activities Regulations (CAR)

The Radioactive Substances Authorisation became the CAR Authorisation for liquid radioactive discharges. The Authorisation has been reviewed in accordance with the requirements of the CAR regulations and a variation to add CAR compliant conditions and limits is in progress. The final stage consultation for the variation is currently being undertaken.

Waste Management Licensing

Landfill 42 – SEPA has issued the modification to the Waste Management License, allowing the use of recycled material in Landfill 42.

Site Wide Waste Management License – SEPA has received an application for a site-wide waste management license and is in the process of determining the application.

Particles and Beach Monitoring

Nil to report.

Dounreay Parent Body Organisation Competition

SEPA continues to liaise with other regulators, DSRL & the NDA Competition Team on the processes that will be necessary between now & final share transfer.

Planning

The Highland Council has consulted SEPA on material submitted by DSRL in relation to discharge of “pre-commencement” conditions in relation to the Dounreay Low Level Waste Facility. It has requested advice on if the information submitted is sufficient for the Council to discharge these conditions. SEPA is considering the material submitted with a view to responding to the Council within the given deadline of 21 October 2011.