

## Quarterly site report for Dounreay Nuclear Licensed Site

1 October to 31 December 2011

### Foreword

This report is issued as part of the Office for Nuclear Regulation's (ONR) commitment to make information about inspection and regulatory activities relating to Dounreay Nuclear Licensed Site available to the public. Reports are distributed quarterly to members of the Dounreay Site Stakeholder Group (DSSG) and are also available on the ONR website ([www.hse.gov.uk/nuclear/llc](http://www.hse.gov.uk/nuclear/llc)).

Site inspectors from ONR usually attend DSSG and will respond to any questions raised there by the members of the group. Any other person wishing to inquire about matters covered by this report should contact the ONR.

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## **Inspections**

The ONR Site Inspectors made inspections on the following dates during the quarter:

- 3 to 6 October 2011
- 19 October 2011
- 25 to 27 October 2011
- 31 October to 3 November 2011
- 9 and 10 November 2011
- 5 to 7 December 2011
- 12 to 15 December 2011

## **Routine matters**

### **Inspections at Dounreay Nuclear Licensed Site**

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

- (i) The conditions attached by HSE / ONR to the nuclear site licence;
- (ii) The Health and Safety at Work etc Act (HSWA) 1974; and
- (iii) Regulations made under 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 the following routine inspections were undertaken.

### **New incident reporting procedures**

As noted in previous reports, earlier this year ONR issued new guidance on notifying and reporting incidents and events occurring on licensed nuclear sites. DSRL and the site inspector discussed the site arrangements and are confident they meet the new ONR notification guidance. DSRL demonstrated alertness to learning opportunities from past trends and the effectiveness of improvement implementation when the guidance comes into force on 1 January 2012.

### **Radioactive Waste Management Cases (RWMCs)**

The inspector undertook a joint inspection with SEPA on the preparation of RWMCs, which address a number of licence conditions relevant to waste management. The example we examined provided a clear method of showing how a higher activity waste stream will be dealt with, from where it is stored as a liquid to storage as a passively safe solid form.

### **Operating Rules**

A sample inspection of operating rules gave confidence that DSRL's arrangements were adequate and met the spirit of ONR's new guidance on them.

## **Duly Authorised and Suitably Qualified Persons (DAPs and SQEPs)**

The inspector sampled how DSRL meet DAP and SQEP requirements under the licence. DSRL showed how staff met post holder requirements, the dates by which they needed to reconfirm suitability for the posts and plans for further staff development to meet future increases in decommissioning activity. The arrangements appeared to be adequate.

## **Leakage and Escape of Radioactive Material and Waste**

The site inspectors reviewed DSRL arrangements for adequate surveillance and condition monitoring of in-cell structures for leakage and escape of radioactive material and waste at one facility and found them adequate.

## **Safety Documentation**

ONR has been promoting right-first-time safety documentation production across all licensed sites. The initiative with respect to Dounreay found DSRL had a well defined safety case process with a clear aim to produce useable safety cases. Other strengths noted were: the involvement of Approval to Operate Holders throughout the safety case process and more focus by the Safety Working Party and Nuclear Safety Committee on scope and strategies. However, DSRL needed to maintain a sufficiently strong team of its own staff to keep the safety case process robust. ONR also suggested that the Nuclear Safety Committee should undertake a self-assessment at regular intervals and that there should be guidance and training for new members. DSRL accepted that these were good ideas.

## **Preparations for change of Parent Body Organisation (PBO)**

The inspector discussed with DSRL oversight of competency of PBO staff of the successful consortium and was satisfied there would be an adequate audit route to monitor the process. In addition ONR issued an Agreement to proceed with an organisational change to transition to a new PBO.

## **Asset and Ageing Plant Management**

ONR carried out one of a series of inspections on asset management and ageing plant management at nuclear licensed chemical plant, including Dounreay. The findings of the inspection indicated the benefit of undertaking a more detailed inspection in 2012.

## **Installation of new fences**

ONR discussed with DSRL the safety implications that may arise from the installation of new fences on the site, including implications for emergency arrangements.

## **Safety Representatives**

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

In general the arrangements made and implemented by the site in response to safety requirements were deemed to be adequate in the areas inspected. However, where improvements were considered necessary, satisfactory commitments to address the issues were made by the licensee, and the Site Inspectors will monitor progress during future visits. Where necessary, formal regulatory enforcement action will be taken to

ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

## **Non-routine matters**

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

DSRL is undertaking a number of initiatives to ensure the needs of safety and security are coordinated when responding to non-routine matters and events. ONR safety and security inspectors are working with DSRL on this important issue, which will result in a joint exercise of the emergency arrangements next year.

Modifications were made by DSRL to the emergency arrangements that took account of changes to the hazards remaining on the site and the building of new security fences.

## **Regulatory activity**

Under health and safety legislation, ONR site inspectors, and other HSE inspectors, may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'licence instruments' (LIs), but can take other forms. In addition, inspectors may issue enforcement notices to secure improvements to safety.

One Licence Instrument was issued to DSRL during the quarter, an Agreement (nuclear site licence Sc17, licence instrument number 513) under licence condition 36 to proceed with a category A organisational change to transition to a new parent body organisation.

Reports detailing regulatory decisions can be found on the ONR website ([www.hse.gov.uk/nuclear/pars](http://www.hse.gov.uk/nuclear/pars)).

## **News from ONR**

### **Final Fukushima report**

The final report, 11 October, revealed no fundamental safety weaknesses in the UK's nuclear industry but concluded that by learning lessons it can be made even safer. The report, the Government's response and a podcast featuring Mike Weightman is available on the ONR website. A report will be published next year on progress in implementing the lessons for the UK.

### **Radioactive Materials Transport Team (RMTT) join ONR**

The team joined ONR from the Department of Transport on 24 October. The team is responsible for regulating the transport of radioactive material by road and rail in Great Britain, as well as advising on transport by sea and air within the United Kingdom. Their remit covers the transport of material to and from licensed nuclear sites and non-nuclear sectors such as hospitals and education establishments.

### **Non Governmental Organisations Forum**

ONR's second NGO forum was held in London (17 November). Topics covered included openness and transparency, generic design assessment and the final Fukushima report. The forum was well attended with constructive discussion sessions. Minutes will be published on ONR's website and a third forum will be held in April 2012.



### **International Physical Protection Advisory Service (IPPAS) mission**

A team of international nuclear security experts led by the International Atomic Energy Agency (IAEA) visited the UK in October to assess civil nuclear security arrangements. They concluded the state of civil nuclear security in the UK to be sufficiently robust and identified many examples of good practice within the civil nuclear security regime and a number of valuable recommendations and suggestions.

### **Senior representatives' conference**

The annual event brought together nuclear industry leaders on 14 November. Discussions focused on: openness and transparency in the post-Fukushima era; promoting a safety culture across all parts of the nuclear industry supply chain; and responding to challenges post-Fukushima.

### **ONR public consultation – update**

The 12 week public consultation to clarify ONR's interpretation of bulk quantities relating to radioactive matter closed on 12 December. ONR is now analysing responses to the consultation and will make a policy announcement once a suitable definition is agreed.

### **Stress tests**

ONR received the progress reports from licensees for UK **non nuclear power plants** by the required date of 15 October. Final reports are due by 31 December with a report due for publication in Spring 2012.

ONR received the final stress tests reports from licensees of UK nuclear power plants by the required date of 31 October. ONR will independently review these reports and provide a UK national report for the European Council by the end of December.

### **Generic Design Assessment**

On 14 December generic designs for EDF and Areva's UK EPR and Westinghouse's AP1000 reactors were granted interim acceptance by ONR and the Environment Agency. However, neither reactor can be built in the UK until a number of issues are resolved.

ONR published its second **quarterly report** on 8 November.