

Office for Nuclear Regulation

An agency of HSE

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Quarterly site report for Dounreay Nuclear Licensed Site

1 January to 31 March 2012

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/llic).

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:

- 16 to 19 January 2012
- 23 to 26 January 2012
- 30 January to 2 February 2012
- 6 to 9 February 2012
- 5 to 8 March 2012
- 19 to 21 March 2012
- 30 and 31 March 2012

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.

Examination, inspection, maintenance and testing

The inspectors undertook a follow-up inspection on concerns previously raised on the way Dounreay Site Restoration Ltd (DSRL) brought equipment back into service after maintenance. ONR inspections showed that there was room for improvement in the process by which plant items after maintenance were confirmed as fit for normal service.

Modification to existing plant

An inspection of a modification to existing plant to aid decommissioning indicated the modification was appropriate and would assist the decommissioning process.

Incidents on site

The inspectors sampled how DSRL conducted investigations throughout the period. They found that improvements could be made in the way learning from incidents was applied across the site and in assessing the root causes to minimise the possibility of similar incidents occurring in future.

Control and supervision of operations

The inspector undertook out of hours inspections to confirm that no operations were being carried out which may affect safety except under the control and supervision of suitably

qualified and experienced persons appointed for the purpose by the licensee. The supervisors met during the inspection were found to be fully acquainted with the safe operation of their plant and the correct actions to take if plant started to operate in an unexpected manner.

Nuclear safety committee

The inspector discussed with the Director of Assurance aspects of the arrangements for the committee to meet the licence condition. This included independence from nuclear safety assessment, appropriate skills for a decommissioning licensed site and the ability to deal with urgent safety proposals. The committee met the standards suggested by ONR guidance. ONR also previously 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 had implemented these suggestions.

Control of contractors

The inspector discussed with DSRL arrangements for procurement of services, being an intelligent customer, acceptance of contractor procured items and a graded approach to receipt inspection and records management. DSRL noted areas that could be improved.

Preparations for change of Parent Body Organisation (PBO)

The inspector continued to discuss with DSRL oversight of competency of PBO staff of the successful consortium Babcock Dounreay Partnership (BDP). In addition ONR and Scottish Environment Protection Agency met with BDP in the presence of the Nuclear Decommissioning Authority and discussed BDP decommissioning proposals. ONR stressed that before undertaking changes to current DSRL decommissioning plans, BDP would need to undertake optioneering studies to show the proposed approaches were appropriate for Dounreay and prepare a safety case demonstrating the approach was safe, reduced risks so far as was reasonably practicable and met environmental requirements.

Management systems

From the evidence reviewed during the inspection, the overall quality arrangements were adequate. Although areas were identified where improvements could be made, the overall controls for materials and operational activities were adequate.

Installation of new turnstile for site entry

ONR discussed with DSRL the safety implications that may arise from the installation of new turnstile for site entry by foot, including implications for emergency arrangements. DSRL made an adequate safety case for using the turnstiles.

Safety Representatives

ONR inspectors regularly met with Safety Representatives during the quarter from organisations employed across Dounreay, including DSRL and their contractors. 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 later this year.

During the quarter, DSRL took part in the EC Stress Test Process and ONR's Chief Inspector's report on the lessons learnt from Fukushima. On-going proactive dialogue with ONR was welcomed.

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 acknowledgement (nuclear site licence Sc17, licence instrument number 513) under licence condition 14 of the DSRL site-wide safety case.

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

News from ONR

Insight into more of ONR's work as an independent regulator of the nuclear industry can be found in ONR's Quarterly News, which is produced every three months. The online publication (<http://www.hse.gov.uk/nuclear/onr-quarterly-report.htm>) reports on the key themes and developments in each of ONR's regulatory programmes and provides an update about the ongoing changes at ONR, as it progresses toward becoming an independent statutory corporation.

For the latest news and updates from ONR visit the website <http://www.hse.gov.uk/nuclear/index.htm> and sign up for our ebulletin (<http://www.hse.gov.uk/nuclear/ebulletin/index.htm>)