

Scottish Environment Protection Agency (SEPA)

SEPA DSRL Report to the Dounreay Stakeholders' Group July 2012

Pollution Prevention & Control (PPC)

Nil to report

Radioactive Substances Act 1993 Authorisations

Site Regulation

In May SEPA attended the site to update DSRL on SEPA's policy for revocation of authorisations granted under RSA 93, to discuss DSRL's site decommissioning and clean-up plans and to outline SEPA's regulatory expectations.

Site Inspection Work

During February SEPA undertook an on-site inspection of key aspects of DSRL's management system for achieving compliance with the limitations and conditions of the site's RSA 93 authorisations. The inspection concluded that the arrangements included appropriate involvement of environmental personnel within the key processes and several examples of good practice were noted.

During May SEPA undertook an on-site inspection of DSRL's processes for consigning Out of Scope waste and the implementation of recent changes to RSA regarding the revised exemption order. In general it was found the changes and move to Out-of-Scope were well implemented and the revised arrangements appeared to be working well.

SEPA has scrutinised DSRL's proposals for a revised management structure, including PBO secondees. This was done in close liaison with ONR. The proposals were found to comply with management conditions in DSRL's authorisations.

RSA Compliance

Following notification from DSRL of the identification of unauthorised disposals of radioactively contaminated effluent, SEPA has been investigating the circumstances surrounding these disposals. The disposals relate to effluent discharges from the environmental laboratories into the inactive drainage system and involve very low levels of radioactivity in the discharges. DSRL has provided SEPA with information relating to the estimated historical discharges from the environmental laboratories and SEPA anticipate that its investigation will be concluded shortly.

Following notification from DSRL that a consignment of solid waste had been removed from the site without it going through DSRL's due process for waste leaving site, SEPA has commenced an investigation into the circumstances. SEPA is satisfied that the waste removed from the site was proved to be clean waste. SEPA's investigation will include review of DSRL's arrangements for control of the disposal of waste from the site.

RSA Authorisations

It is anticipated that the discretionary and public consultation on DSRL's application for a decommissioning authorisation will be undertaken this summer.

SEPA is in the process of determining an application from DSRL for a variation to the gaseous waste authorisation. The application requested a reallocation of a portion of the site's existing Krypton-85 limit from the Fuel Cycle Area stacks to the Prototype Fast Reactor stack, resulting in an overall reduction of the site's authorised Krypton-85 discharge limit.

Proposed new Low Level Radioactive Waste Facility

The draft authorisation has now gone to public consultation which closes on the 29th of August 2012. The consultation can be found at:

http://www.sepa.org.uk/about_us/consultations/dounreay.aspx

Transfrontier Shipment

Nil to report

Controlled Activities Regulations (CAR)

Nil to report

Waste Management Licensing

Nil to report

Particles and Beach Monitoring

On 14 February, SEPA was informed of the detection and recovery of a particle which had a different composition compared to those detected previously at Sandside. The initial results indicate that the particle is dominated by the radionuclide Strontium-90. Previously detected and recovered particles had equal quantities of the radionuclides Caesium-137 and Strontium-90. The initial results indicate the particle has a Strontium-90 activity of around 1-2 Mega Becquerels, with a few kilo Becquerels of Caesium-137. SEPA has advised the operator that it is content for destructive testing of the particle to be undertaken. SEPA will provide the information on this find to the Particles Retrieval Advisory Group for its consideration.

Planning

Nil to report.