

Quarterly site report for Dounreay Nuclear Licensed Site

1 July to 30 September 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:

02 to 05 July 2012

16 to 19 July 2012

21 to 23 August 2012

27 to 31 August 2012

17 to 21 September 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.

Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations (EIADR)¹

The purpose of the visit was to engage with key DSRL staff involved in implementing and ensuring compliance with the requirements of EIADR and to provide appropriate regulatory advice and guidance. It was clear that the decommissioning project is progressing well, and DSRL have appropriate and fit for purpose EIADR management procedures and arrangements in place. The visit provided a useful and timely interaction with DSRL, including senior managers and staff involved in the decommissioning project. ONR provided clear regulatory guidance and direction to DSRL on a number of issues.

¹ The Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations, 1999 (as amended; "EIADR") requires that the environmental impact of work to decommission nuclear power stations and other nuclear reactors is appropriately managed and minimised. Decommissioning projects starting since EIADR came into force in 1999 require consent from HSE / ONR before they can commence. Decommissioning projects which began before EIADR came into force, such as at Dounreay, do not require consent, but still need to comply with some of the requirements of EIADR.

Examination, maintenance, inspection and testing

ONR sampled the management of plant maintenance in a facility within the site laboratories. Licensee arrangements for the control of maintenance were judged to be adequate following a review of documentation and a comparison of DSRL arrangements against ONR guidance.

Management of operations

Site arrangements

ONR undertook an inspection of the site arrangements for control and supervision of operations. The inspection concluded that project directors recognise the importance of ensuring that no operations are carried out which may affect safety, except under the control and supervision of suitably qualified and experienced persons appointed for that purpose. DSRL has strategies in place to provide assurance that high standards are maintained.

Management of operations across Dounreay facilities

ONR inspectors considered DSRL's approach to control and supervision of operations at the liquid effluent treatment plant and in facilities in the Fuel Cycle Area. DSRL demonstrated a standard of control and supervision of operations that was considered adequate and there was generally a good standard of house-keeping within these facilities. On two separate occasions plant operators and supervisors demonstrated a good level of competence and good understanding of how their tasks fitted into the overall management of the facilities. ONR raised no concerns with regard to the management of the facilities, although some minor issues were noted which DSRL readily acknowledged and actioned. Overall the inspection outcome gave confidence in the ability of the plant management to maintain the safe operation of the plant.

Plant construction and/or commissioning

Earlier this year ONR undertook an inspection of a new facility at Dounreay to evaluate its readiness to commence active commissioning of breeder material repackaging prior to its transportation to Sellafield. We concluded that, although further work is required to ensure readiness for active commissioning, there were no outstanding regulatory concerns which might delay the wider programme of breeder repackaging and transport to Sellafield. ONR concluded its assessment in July. The facility continues its phase of active commissioning, and authorisation to transport the material is awaited.

Incidents on the site

ONR reviewed the management of incidents and resulting actions over the past year. The discussions supported the view that the licensee has an adequate process in place and future interventions can consider its implementation. DSRL will consider further how to refresh learning from past events to inform future decommissioning activities.

Discussions on event reporting and learning from experience were carried out on a facility within the Fuel Cycle Area. ONR found that events were trended and appropriately investigated, and an example of the way that the resulting learning was applied was noted. ONR has further examined the output from DSRL investigations into two minor personal contamination incidents across the reactor estate. Discussions on both examples have promoted confidence in DSRL's response to events and subsequent learning.

Organisational Changes

DSRL briefed ONR site inspectors on proposed organisational changes to the Fuels Directorate. ONR raised no objections to the proposals which have since been implemented.

Periodic safety review

An inspection of DSRL site-wide approach to managing periodic reviews of safety cases was undertaken. This demonstrated that DSRL is implementing adequate arrangements to ensure that facility safety cases are appropriately reviewed and updated.

ONR continued discussions on the preparation of the periodic review of the safety case for the active liquor storage, treatment and evaporation facility. Adequacy of DSRL arrangements was confirmed by a review of DSRL procedures and processes against the requirements of relevant nuclear site licence conditions, and through discussions with the plant manager. Examination of two supporting safety case documents provided further evidence of compliance. The process being used by DSRL appeared logical and robust, and ONR was satisfied that DSRL was following its own internal arrangements.

Safety Representatives

ONR inspectors met with safety representatives during the quarter from organisations employed across Dounreay, including DSRL and their contractors. Safety representatives accepted an invitation from ONR to participate in a planned compliance inspection. 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. There were no matters of note to report.

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 LI was issued to DSRL during the quarter: an agreement to proceed with the active commissioning and operational phases of the out-of-reactor breeder material repacking project. Nuclear site licence Sc17, Licence Instrument 515, under Licence Condition 21 (Commissioning).

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 (<http://www.hse.gov.uk/nuclear/onr-quarterly-report.htm>). The online publication reports on key themes and developments in each of the regulatory programmes of work and provides an update on ongoing changes at ONR as it progresses toward becoming an independent statutory corporation.

Regular news and updates are available on the ONR website (<http://www.hse.gov.uk/nuclear/index.htm>), together with information about our people, sites that we regulate and the work that we do, as well as key guidance and resources.