# **Scottish Environment Protection Agency (SEPA)**

# SEPA DSRL Report to the Dounreay Stakeholders' Group January 2012

## Radioactive Substances Act 1993 Authorisations

#### **Site Inspection Work**

NIL

#### **RSA Compliance**

SEPA has now concluded its investigation into the circumstances surrounding the incident when a consignment of solid waste left the site without going through DSRL's due process. A final review of DSRL's implementation of the recommendations resulting from its own investigation was undertaken in December, at which time SEPA noted that the incident did not result in any radioactive waste leaving the site, the investigation undertaken by DSRL was of a high standard and the resulting recommendations were implemented appropriately. As a result SEPA sent a warning letter to DSRL on this matter and do not envisage taking further enforcement action regarding this incident.

During the first week of December SEPA visited the site to look at Environmental documentation prepared in support of Reactor decommissioning and future disposal of the redundant WRACS supercompactor. In addition a joint inspection of the accumulation and storage arrangements of LLW was undertaken with ONR. No issues of concern to SEPA were identified during this visit, however it is recognised much of the relevant documentation is still in development

#### **RSA Authorisations**

The discretionary and public consultation on DSRL's application for a decommissioning authorisation is now closed. SEPA received 14 responses which are now being considered as part of the application determination process.

#### **Proposed New Low Level Radioactive Waste Facility**

The RSA93 draft authorisation and supporting documentation has been through SEPA's internal due process and final consultation with the Scottish Government completed. The authorisation is intended to be granted to DSRL on 14<sup>th</sup> January 2013.

SEPA met with DSRL on December 11<sup>th</sup> when it was brought to SEPA's attention that a greater degree of thermal cracking had occurred in the concrete walls of the Demolition Waste vault during the curing process than had been envisaged. The design intent was for 0.06mm predicted mean thermal cracking, however cracking in the mean range 0.12mm – 0.16mm has been detected (Note: industry standard is <0.2mm).

DSRL are considering a range of remedial options, which will be supported by a BPM case. SEPA's authorisation prescribes maximum permeability rates which the base, sides and final cap of the vaults must meet. DSRL are confident that the authorisation permeability requirements will be met.

No issue with thermal cracking of the LLW vault has been identified.

#### **Site End State**

During November SEPA undertook a half day meeting with DSRL to discuss at a high level to proposed Environmental Safety Strategy and how DSRL would interact with SEPA through the End State Project. SEPA also attended a meeting between DSRL and the Local Authority to discuss communication between the regulatory bodies.

## **Controlled Activities Regulations (CAR)**

Nil to report

## **Waste Management Licensing**

Nil to report

# **Particles and Beach Monitoring**

Nil to report

## <u>Planning</u>

SEPA has been consulted by The Highland Council on the planning application 12/04017/PIP accompanied by Environmental Statement for "The development of shaft and silo retrieval facilities, change of use from an existing waste facility to a store for conditioned ILW and the demolition of redundant buildings". Having considered the submitted material carefully, SEPA has responded to the planning authority requesting further information in relation to flood risk, requesting a planning condition in relation to an environmental management plan, and providing advice on what will be regulated by SEPA. DSRL has subsequently confirmed that they are to undertake revised flood risk work in light of SEPA comments

# **Vulcan**

NIL

Stewart Ballantine Radioactive Substances Policy and Nuclear Regulation Unit