

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

### **SEPA Report to the Dounreay Stakeholders' Group April 2013**

#### **Radioactive Substances Act 1993 Authorisations**

##### **Site Inspection Work**

NIL to report

##### **RSA Compliance**

SEPA has issued its final assessment of DSRL's environmental performance for 2012. The final assessment was determined using SEPA's Compliance Assessment Scheme. The results of the final assessment are: For the liquid authorisation – good, for the gaseous authorisation - excellent & for the solid authorisation - excellent. This is the first year that the Compliance Assessment Scheme has been used to assess compliance with the RSA authorisations. The CAS replaced the previous Operator Performance Assessment (OPA) scheme.

During March SEPA attended the site for a Level 4 meeting on Reactors decommissioning and to be updated by DSRL on progress on decommissioning projects.

SEPA also had discussions with DSRL on the Unirradiated Fuels Characterisation Facility (UFCF), in particular with respect to the Best Practicable Means (BPM) case.

SEPA (in conjunction with the Environment Agency) has been assessing NDA's proposed methodology for the demonstration of the broad environmental neutrality as required in Government policy for the substitution of Sellafield vitrified product for MTR or PFR raffinate for return of waste to overseas customers.

##### **RSA Authorisations**

SEPA's determination of DSRL's application is ongoing, including consideration and assessment of DSRL's justification for its proposed discharge limits. SEPA has requested further information from DSRL in support its application and continues to engage with DSRL as part of its determination process.

##### **Breeder Fuel Removal**

A briefing was given on the progress on Breeder Fuels Removal and potential implications for the management of this material within the Magnox Operating Plan.

##### **Environment Agency Visit**

DSRL agreed to host a joint visit of SEPA and Environment Agency inspectors to the site, focussing on the planned decommissioning projects and the LLWF. The purpose of the visit was to share ideas and experiences on decommissioning techniques and approaches. The Environment Agency expressed positive views about the progress on decommissioning and recognised the challenges faced by site.

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

SEPA undertook a further technical workshop with DSRL in February. This workshop looked at future operation and management of the facility and refinements to future iterations of the Environmental Safety Case.

SEPA have reviewed a first draft operational management plan for the facility and have provided feedback on the content and level of detail SEPA expects to see in such a document.

ONR will be providing SEPA with specialist support in reviewing DSRL's assessment of the early stage thermal cracking identified in the walls of Demolition LLW vault. This review will advise SEPA if it is likely, or otherwise, that the Demolition waste vault will perform as required.

SEPA understands that DSRL intend to undertake additional sealing of the cracks both on the outside and inside of the Demolition waste vault and this will ensure the RSA93 authorisation requirements in respect of permeability are met.

#### **Site End State**

SEPA participated in a meeting with DSRL, ONR, Highland Council and the NDA to discuss DSRL's progress in the development of clean-up standards for the site. A further technical workshop between SEPA, DSRL and Highland Council is scheduled for 18<sup>th</sup> April to discuss and develop understanding of the implications of the Groundwater Directive on the Dounreay site.

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

Nil to report

#### **Waste Management Licensing**

Nil to report

#### **Particles and Beach Monitoring**

Following the undertaking of trial work, DSRL has identified that modifying the beach monitoring detector system by replacing the current detector covers with carbon fibre covers would provide a slightly higher performance for detecting a beta particle similar to the Strontium-90 rich particle that was detected at Sandside beach in Feb 2012. DSRL are planning to make this modification.

#### **Planning**

Further information requested by SEPA in relation to potential flood risk in relation to Planning Application 12/04017/PIP 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" was provided to SEPA on 21 March 2013 which addressed SEPA's concerns.

#### **Vulcan**

Vulcan was inspected in March for compliance with their Letter of Agreement condition on calibration. This was found to be satisfactory.

SEPA has had a liaison meeting with DNSR to cover both current regulation of the site & possible future developments. A further meeting with DNSR & ONR is planned for June.

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