

DSG(2015)P016



Dounreay Stakeholder Group
Site Restoration Sub Group Update Report
July 2015



Site Inspection Work & RSA Compliance

As previously reported, in December 2014 SEPA issued a Notice of Variation to the RSA Authorisation, requiring DSRL to undertake a range of improvements. The majority of the specified improvements have been completed by DSRL by the due dates. This included DSRL undertaking a review of its written arrangements and procedures for the management and supervision of the planning and execution of decommissioning activities. SEPA is of the view that DSRL's review was comprehensive and as a result a number of areas for improvement were identified. In relation to the completion of the specified improvement covering the implementation of the improvements identified by DSRL's review, SEPA has advised DSRL that it considers DSRL's proposed date (December 2015) for completion of several outstanding actions relating to workplace implementation of procedural improvements to be reasonable.

In April SEPA undertook an inspection of DSRL's arrangements for the consignment of liquid waste and the outcome of this inspection was that DSRL was compliant with the relevant condition of the RSA authorisation. As a result of feedback provided by SEPA during the inspection, DSRL has reviewed and revised various aspects of the manual associated with the management, control and disposal of aqueous waste.

In April 2015 DSRL notified SEPA that it had identified an error in the monthly disposal report submitted for the disposals made in June 2014. As a result SEPA wrote to DSRL noting that several errors had occurred relating to compliance reporting with respect to DSRL's monthly disposal reports over the previous year and stated that DSRL should include the undertaking of a detailed review of the site's arrangements for the compilation and checking of the monthly disposal reports within its Environmental Improvement Plan. In May, DSRL notified SEPA that it had identified another error in the disposal reports, submitted for the disposals made during 2014.

In June SEPA undertook an inspection of DSRL's Environmental Improvement Plan, during which SEPA requested to be shown the evidence for the close out of a sample of the actions. DSRL were able to provide the necessary evidence, however a number of forward actions were left to provide further clarification on some areas and this will be subject to future inspection by SEPA.

Other Site Work

In May, the RS Unit Manager visited Dounreay and Vulcan along with site inspectors for update visits. Whilst at Dounreay, SEPA was provided with details on DSRL's progress on compiling with the specified improvements as detailed in the RSA Authorisation variation and DSRL's progress on the implementation of its Environment Improvement Plan. Whilst at Vulcan, SEPA was updated on the plans for end of reactor operations.

Low Level Radioactive Waste Facility

In April 2015, SEPA were shown a sectioned HHISO which DSRL had filled with representative inactive waste, grouted and cut into 3 sections in order to validate the effectiveness of the grouting process.

In May 2015 SEPA issued a variation to the RSA authorisation for the facility. The variation: corrected the authorised disposal inventory to ensure all necessary radionuclides are covered; corrected some administrative errors and provided clarification regarding the intent that radioactive waste from the Vulcan Nuclear Reactor Test Establishment is authorised for disposal at the facility.

It is understood that disposals have now begun to the facility and SEPA will begin inspections of DSRL's operation of the disposal facility.

Site End State

SEPA, DSRL and NDA will be meeting in August to discuss DSRL's proposed approach to the remediation of the Dounreay site and the implications of the Groundwater Daughter Directive.

Non-Nuclear Site Regulation

SEPA has received and is determining an application from DSRL to make minor modifications relating to wording and to amend the monitoring requirements for the D6500 waste storage facility to be more site specific. In addition as part of this application DSRL wish to bring the LLWF landfill area used for the storage of excavated rock within the bounds of the single Waste Management Licence covering the Dounreay site. SEPA is currently seeking further information from DSRL in order to complete its determination following meetings in May and June to discuss the application.

Planning

SEPA has been consulted on the Phase 3 planning covering the period 2018 through to Interim End State. SEPA attended a joint pre-application meeting at The Highland Council in early June and has provided written feedback to planning authority.

Vulcan

Following the departure of Roger Wilson from SEPA, the Vulcan site inspector will be Hugh Fearn.

Stewart Ballantine

Radioactive Substances Policy and Nuclear Regulation Unit