



**DSG(2017)P016**

Dounreay Stakeholder Group  
Site Restoration Sub Group Update Report  
July 2017



## **Site Inspection Work & RSA Compliance**

SEPA's investigation in the incident of water ingress into the Wet Silo has been completed. SEPA's investigation covered the circumstances of DSRL's actions in response to the water ingress, DSRL's arrangements for the evaluation of the compliance implications of the event and the circumstances surrounding the maintenance of a pump at the Wet Silo facility. As a result SEPA has given DSRL a Final Warning letter covering the failure to comply with five authorisation conditions. Those conditions are detailed below;

*Condition 2.1.1 - The Authorisation Holder shall use the best practicable means to minimise the volume of and the total radioactivity in radioactive waste produced.*

*Condition 2.1.3.2 - The Authorisation Holder shall maintain in good repair the systems and equipment provided to meet the requirements.... for the disposal of radioactive waste under this Authorisation.*

*Condition 2.1.4.2 - The Authorisation Holder shall check, at an appropriate frequency, the effectiveness of systems, equipment and procedures provided...for the disposal of radioactive waste under this Authorisation.*

*Condition 2.2.1 - The Authorisation Holder shall have a management system and resources which are sufficient to achieve compliance with the limitations and conditions of this Authorisation...*

*Condition 2.5.4 - The Authorisation Holder shall inform SEPA without delay if the Authorisation Holder has reason to believe that accumulation or disposal of radioactive waste is occurring, has occurred or might occur which does not comply with the limitations and conditions of this Authorisation, and shall report the circumstances in writing to SEPA as soon as practicable thereafter.*

During March SEPA undertook an inspection of DSRL arrangements for compliance in relation to the DFR Breeder Fuel Removal project and looked at the Project Specific Waste Plans in relation to the DFR Pond Liner Removal project and the Breeder Fuel Removal project. SEPA inspected DSRL's progress on its implementation of Standardised Reporting of Discharges against the project milestone dates. In addition DSRL provided updates on progress with refining its waste inventory, progress with the Old Liquid Effluent Diffuser System action plan, the D1200 vent upgrade project, details of the current status of DSRL's site wide review of unmonitored discharges and future decommissioning plans for PFR.

DSRL has notified SEPA of several potential compliance issues that are currently under investigation. Investigations are ongoing in relation to the calculation and reporting of Tritium discharges via the PFR Fan 6 route, cracking of the PFR Fan 6 extraction ductwork and leakage from the DFR Pond extraction ductwork. SEPA's investigations remain ongoing and further details will be given at future meetings.

During w/c 10 July SEPA will be undertaking compliance inspections of arrangements for the maintenance and inspection of ventilation ductwork & of the documentation supporting the disposal of solid waste. SEPA will be progressing its on-going investigations and will be meeting with DSRL to discuss a variety of decommissioning projects.

DSRL reported elevated levels of Caesium within its non-active drainage network covering the eastern portion of the site following routine sampling in late May. Investigations by DSRL isolated the source to an area around a single building in the FCA. Investigations are ongoing to identify the source of the contamination within

that building or immediate area. Discharges to the marine environment have returned to being below Limit of Detection and works to secure a long term solution are ongoing by DSRL. SEPA's investigation into this matter remains ongoing while DSRL work towards identifying and implementing a long term solution.

In July, SEPA received an application from DSRL for a variation to the site RSA Authorisation. The variation application covers the following:

- Increases in the gaseous discharge subsidiary-limits associated with the stack height grouping of 2-10m above ground level, to accommodate anticipated increased use of temporary containments during decommissioning activities
- Addition of stacks associated with the Environmental Analysis Laboratories to the list of authorised gaseous discharge outlets
- Change of frequency for the provision to SEPA of the report of the results of the monitoring programme undertaken for the on-site Low Level Waste Pits

SEPA has commenced the determination of this application.

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

SEPA has reviewed DSRL's submissions in relation to the ullage in grouted HHISO containers and is content with DSRL proposals to top up those containers already grouted to reduce the void space. DSRL has proposed a 24 week schedule to complete works to top off existing grouted container and SEPA will formally assess progress by DSRL against that schedule and those assessments will be recorded within the Compliance Assessment Scheme. An inspection of progress against the schedule was undertaken by SEPA on 14 June, during which DSRL were able to demonstrate good progress ahead of the schedule agreed with SEPA. In addition SEPA is undertaking a review of the RSA93 authorisation for the disposal facility as a result of this non-compliance.

In March a technical meeting was held between SEPA, DSRL and its appointed consultants to review the existing site Environmental Safety Case and Performance Assessments and future disposals/ LLW strategy at Dounreay.

### **Site End State**

Nothing to report.

### **Non-Nuclear Site Regulation**

SEPA provided DSRL with feedback on its approach to Backfilling of voids on the Dounreay site with clean material and its approach to assessing levels of Chlorinated Solvent in groundwater at the site.

A small (approx. 1 tonne) unauthorised deposit of sand was found in D6500 during February 2017. This was reported to SEPA and an Investigation report issued, however the source of the material was not determined. The material was sampled and sent for testing and found to meet the criteria necessary for storage in D6500.

Waste Management Licence WML/L/1095876 Inspection carried out in March 2017. No issues identified during inspection.

### **Planning**

SEPA received and has provided feedback raising no objection to DSRL's planning application for an extension to the Dounreay Cementation Plant.

### **Vulcan**

Nothing to report.

### **General**

With effect from 1 July Dr Paul Dale has taken over as Head of SEPA's Radioactive Substances Policy and Nuclear Regulation Unit.

Stewart Ballantine

Radioactive Substances Policy and Nuclear Regulation Unit