



DSG(2018)P011

Dounreay Stakeholder Group Site Restoration Sub Group Update Report May 2018

Site Inspection Work & RSA Compliance

At the end of January SEPA carried out its 2017 year end Compliance Assessment Scheme inspection. As reported by DSRL at the last Stakeholder Group meeting DSRL was able to provide evidence that it had made significant progress in relation to compliance issues during the later part of 2017.

During January SEPA also undertook an inspection of progress with the implementation of Standardised Reporting of its authorised discharges which found good progress to have made by DSRL and as a result SEPA has recorded DSRL as compliant with the relevant authorisation conditions.

SEPA concluded its investigation regarding the identification of a crack in a section of duct in of the PFR Fan 6 ventilation system. Although, the environmental impact was considered to be very low, SEPA's investigation identified failings in the arrangements in place for controlling modifications to equipment relied upon for compliance with the site's authorisation for the disposal and accumulation of radioactive waste. In March SEPA issued DSRL with a Final Warning Letter for failure to comply with the requirements of condition 2.2.1 of its RSA Authorisation. Condition 2.2.1 requires the site to have a management system and resources which are sufficient to achieve compliance with the limitations and conditions of the Authorisation. The Final Warning Letter outlines the failures which DSRL need to address.

In April SEPA undertook an inspection of the review and validation work undertaken by DSRL to address the Specified Improvements set in out in RSA/N/1079137/VN02 in relation to the sampling, measurement, analysis, calculation and reporting of liquid and gaseous discharges. SEPA found that good progress has been made and SEPA considers DSRL to have complied with the specified improvements. DSRL is currently undertaking work to implement the outstanding specified improvement which has a due date of 25 September 2018, which will be the subject of future inspection by SEPA.

SEPA also inspected DSRL's programme of vent system inspection and remediation work and concluded that work on this is progressing well. During that visit SEPA was updated on progress by DSRL in relation to PFR ventilation systems improvements and its review of arrangements to support disposal of solid waste generated during site works.

Low Level Radioactive Waste Facility

Investigations into the incorrectly grouted containers remain ongoing. SEPA expect to receive the output from DSRL work during May, which it will then assess and decide what actions are then appropriate.

Site End State

DSRL provided SEPA with an update in relation to progress in developing the Site Wide Environmental Safety Case and Waste Management Plan that will support delivery of site closure.

Non-Nuclear Site Regulation

SEPA undertook a compliance inspection against the requirements of Waste Management Licence WML/L/1095876 Inspection in March 2018. No compliance issues were identified during the inspection.

Planning

Further meetings and discussions have taken place between SEPA, DSRL and The Highland Council in relation to the Phase 3 planning application. SEPA continue provided input and feedback in relation to its areas of regulatory interest

<u>Vulcan</u>

During April SEPA was notified of an issue identified in the ventilation system at the Shore Test Facility. Rebalancing of the airflow took place and an investigation by MOD continues to identify the route cause. SEPA will be kept informed of the outcome of the investigation

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