



# Office for Nuclear Regulation (ONR) Site Report for Dounreay

Report for period 1 January to 31 March 2018

## Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed to members for the Dounreay Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Dounreay Stakeholder Group meetings where these reports are presented and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

## TABLE OF CONTENTS

1	INSPECTIONS .....	3
2	ROUTINE MATTERS.....	3
3	NON-ROUTINE MATTERS.....	5
4	REGULATORY ACTIVITY .....	5
5	NEWS FROM ONR.....	5
6	CONTACTS.....	6

## 1 INSPECTIONS

### 1.1 Dates of inspection

The ONR site inspector made inspections on the following dates during the report period 1 January to 31 March:

- 15 to 17 January;
- 29 to 31 January;
- 12 to 14 February;
- 26 to 28 February;
- 7 March;
- 19 to 21 March.

## 2 ROUTINE MATTERS

### 2.1 Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- The conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- The Energy Act 2013;
- The Health and Safety at Work Act 1974 (HSWA74); and
- Regulations made under HSWA74, for example the Ionising Radiations Regulations 1999 (IRR99) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The inspections entail monitoring licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of Dounreay covered the following:

- Management of operations including control and supervision. The inspection focused the governance arrangements in place to ensure the adequate control and supervision of operations and their effectiveness in identifying where management action may be required to address potential shortfalls in performance. There was clear evidence of corporate and senior management oversight of the control and supervision of operation in the areas inspected supported by a schedule of activities undertaken by the licensee's Independent Assessment team. There was also evidence of a number of improvements implemented as a direct result of these oversight activities. Overall, we considered that Dounreay Site Restoration Ltd (DSRL) had adequate arrangements in place for the control and supervision of operations in those areas inspected
- Receipt of nuclear material onto, and export of nuclear material from, the site. We inspected the licensee's arrangements for receiving nuclear matter onto site, and for accounting for nuclear matter in the breeder fuel removal project. Based on the evidence presented, we considered that the licensee has a robust process for receiving matter on site, tracking it while it is there, and ensuring that it is stored in an appropriate facility.

- Criticality controls. We carried out a systems-based inspection of criticality controls in the D1208 Liquor Store. From the evidence examined we considered that DSRL had adequately implemented the requirements of the facility safety case with respect to criticality safety systems. The Authority to Operate (ATO) holder and their staff demonstrated a good knowledge and understanding of the limits and conditions related to criticality safety as derived from the criticality safety case.

We undertook a number of inspections examining at the licensee's arrangements for decommissioning and radioactive waste management:

- We considered the implementation of the licensee's arrangements for developing and implementing its decommissioning programme. Additionally the DSRL High Activity Waste Strategy (HAWS) was reviewed, considering specifically its impact on decommissioning programme delivery. We considered that the licensee had adequate decommissioning arrangements and appropriate higher hazard plant prioritisation, with the current focus being on retrieval and treatment of Prototype Fast Reactor (PFR) reactor raffinates and enabling works for shaft and silo decommissioning. The HAWS was aligned with supporting delivery of the decommissioning programme.
- We inspected the implementation of arrangements for waste minimisation during transfer and pre-treatment of reactor fuel raffinates and their subsequent immobilisation and passivation within the cementation plant. A clear demonstration of knowledge and understanding of the requirement for and delivery of waste minimisation was exhibited by the respective ATO holders.
- We inspected the implementation of the licensee's recently revised (following an LC15 review) safety case for the wet silo, in particular as it relates to the containment of radioactive waste. Based on the evidence presented, we considered that the licensee had robust arrangements for the monitoring of the wet silo. The output from the monitoring regimes gave no reason to question the integrity of the wet silo at that time.

In general, ONR judged the arrangements made and implemented by the site in response to safety requirements to be adequate in the areas inspected. However, where improvements were considered necessary, the licensee made satisfactory commitments to address the issues, and the site inspector will monitor progress during future visits. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

Throughout the period we have continued to inspect elements of the licensee's voluntary redundancy process. The licensee has now completed the majority of the necessary management of change submissions, and has put in place a transition board to manage the wider impact of the redundancy programme.

During March, the Superintending Inspector for Decommissioning, Fuel and Waste sites visited site to conduct the annual review of safety and security. The overall picture presented by the site in support of the annual review was one of a good performance with some areas identified for improvement; we largely concurred with this summary. Hazard and risk reduction continues at a steady pace as the focus remains on material consolidation. There is clear professionalism and commitment from the management team to setting high standards and to reinforcing these with all staff.

### 3 NON-ROUTINE MATTERS

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

One incident of particular note during the period was:

- The licensee notified ONR of a personal contamination incident in its laboratory facility. The levels of contamination involved were low. We consider that the incident appears to have been well-managed, and the licensee's subsequent investigation was thorough.

### 4 REGULATORY ACTIVITY

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'Licence Instruments' (LIs), but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

No enforcement notices or Lis were issued in the period. However an enforcement letter was issued in the period. Letter DNE 7043 was issued ONR as a result of issue relating to the identification and risk assessment of computer-based systems important to safety at DSRL.

### 5 NEWS FROM ONR

In January 2018, ONR received the results of its first external stakeholder survey which was undertaken by YouGov on behalf of ONR. A broad range of stakeholders were invited to participate in an online survey, with 351 responses received. In addition to the online survey, a number of in depth interviews were also completed with stakeholders. While overall the results demonstrate ONR is seen as a high performing organisation with good levels of stakeholder confidence, there are areas where improvements can be made and we will be working with our divisions on those in the coming months. Further details about the survey results can be found in our March 2018 newsletter which is available on [ONR's website](#).

In February 2018, ONR held its first webinar following the publication of the 'Guide to enabling regulation in practice.' Chief Nuclear Inspector, Mark Foy and Deputy Chief Inspector, Mike Finnerty, were on hand to answer questions about the guide which has been designed to illustrate working examples of enabling regulation in practice. This is a new channel of communication for ONR and we'll be holding further webinars on different topics over the coming months. If you would like to join future webinars then please get in touch with the ONR Communications team via [contact@onr.gov.uk](mailto:contact@onr.gov.uk)

In March 2018, ONR held the first of two meetings this year with representatives from across the NGO community. Held in Birmingham, the meeting was attended by 15 NGO representatives from 11 different organisations. Topics discussed included: Domestic Safeguards pending the withdrawal of the UK from Euratom; Emergency Planning Arrangements; and the ONR Stakeholder Survey results. The next meeting is scheduled to take place in October 2018. We are keen to increase the number of people engaging with ONR on nuclear safety and security issues and would like to invite members of SSGs, and LCCs to join our engagement programme. For more details please get in touch via [contact@onr.gov.uk](mailto:contact@onr.gov.uk)

Insight into ONR's work as an independent regulator of the nuclear industry can be found in ONR's Regulation Matters. The online publication (<http://www.onr.org.uk/regulation-matters.htm>) reports on the key themes and developments in each of ONR's regulatory programmes and provides an update about the ongoing changes at ONR. <http://www.onr.org.uk/index.htm>. For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

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