

**DSG(2018)P032**

Dounreay Stakeholder Group

Site Restoration Sub Group Update Report

October 2018

## **Site Inspection Work & Compliance**

On 1<sup>st</sup> September The Environment Authorisations (Scotland) Regulations 2018 (EASR) came into force. This replaces the Radioactive Substances Act 1993, associated Exemption Order and High-Active Sealed Sources Regulations 2005.

During October SEPA undertook a compliance inspection of DSRL's Environmental Monitoring Programme, which found all necessary arrangements in place to demonstrate compliance. SEPA also undertook a compliance inspection of the steps taken by DSRL to address specified improvement 8g relating to the sampling, analysis, calculation and evaluation of gaseous and liquid discharges as set out in the variation to DSRL's authorisation issued by SEPA in September 2017. Improvement 8g required DSRL to implement any changes to its systems, equipment, procedures, arrangements, resources and training identified during steps 8a to 8f of the programme of work. SEPA found DSRL to be compliant with this requirement.

While onsite in October DSRL updated SEPA on progress with improvements to the PFR ventilation system and on steps taken to address the site wide implications of the failures in DSRL management system that led to SEPA issuing a final warning letter in March 2018. SEPA left an action at that meeting for DSRL to provide greater detail on how site wide implications have been addressed.

DSRL provided SEPA's hydrogeologist with an overview of the groundwater flow model developed to support its ongoing review of what represents BPM for the managements of the onsite LLW Waste Pits through to waste retrieval. The model has been used to run multiple scenarios that will help inform that BPM review, and will assist with further assessment works related to waste retrieval and future monitoring.

SEPA is currently investigating the circumstances surrounding the identification of an issue relating to the management of aging High Efficiency Particulate Air (HEPA) filters and met with DSRL on this. SEPA left a number of actions at that meeting regarding the status of HEPA filters which are classed as Environmental Protection Equipment.

## **Low Level Radioactive Waste Facility**

A compliance inspection was undertaken of DSRL's arrangements for the keeping and retention of records as specified in RSA/A/1031285 that relate to the Environmental Safety Case, facility construction and waste disposal among others. Arrangements were found to be robust and in compliance with the authorisation requirements.

SEPA was updated on progress with the waste verification project ongoing at present. Good progress had been made and a further update to SEPA provisionally scheduled for early December, but which time DSRL should have completed the verification work and any forward actions falling out from that work identified.

## **Site End State**

Discussion are ongoing between SEPA and DSRL to establish timelines and an appropriate structure for the Site Wide Environmental Safety Case and Waste Management Plan.

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

The suspended solids limits on the discharge from Outfall 2 was exceeded at 800mg/l. Re-sampling concluded it was not an ongoing event. Investigation report completed and discussions held about progress with improvements to the Non Active Drainage System.

### **Planning**

Nothing to report.

### **Vulcan**

Nothing to report

Stewart Ballantine

Radioactive Substances Policy and Nuclear Regulation Unit