



**DSG(2019)P004**

Dounreay Stakeholder Group  
Site Restoration Sub Group Update Report  
January 2019



**Site Inspection Work & Compliance**

SEPA has concluded its investigating the circumstances surrounding an issue relating to the management of aging High Efficiency Particulate Air (HEPA) filters.

In May 2018 it was identified that HEPA filters present within a ventilation system on the Dounreay site had exceeded the maximum age specified within the relevant Dounreay Site Restoration Limited (DSRL) standard. The HEPA filters are provided in gaseous discharge systems for the purpose of minimising radioactive waste discharged to the environment and are relied upon for compliance with the site's authorisation for the disposal and accumulation of radioactive waste. SEPA investigated the circumstances surrounding the arrangements which DSRL have in place for maintaining the HEPA filters in good repair. SEPA's investigation concluded that DSRL failed to implement the filter age management requirements included within its standard and identified shortcomings in the management system arrangements in place.

Although there was no environmental impact as a result of this, DSRL's failure to implement the filter age management arrangements increased the likelihood of failure of the HEPA filters which could have resulted in increased discharges of radioactive particulate to the environment. As a result we have issued a Final Warning Letter to DSRL that outlines the failures which DSRL need to address.

Whilst on site during November DSRL updated SEPA on progress regarding several projects including: PFR ventilation upgrade; installation of new DMTR gaseous discharge stack; shaft groundwater borehole upgrade work and the shaft and silo waste retrieval project. SEPA will be onsite the week commencing 21 January undertaking its year end compliance assessment which will inform DSRL's final status for 2018 in SEPA's compliance assessment scheme. In addition during that week SEPA will receive updates on a number of decommissioning projects and progress with DSRL's ventilation improvement programme. In October SEPA published the Compliance Assessment Scheme scores for 2017. The compliance bands for the Dounreay RSA, CAR and WML authorisations are listed below.

<b><u>Regime</u></b>	<b><u>Authorisation Number (s)</u></b>	<b><u>Site Name</u></b>	<b><u>Compliance Band</u></b>
RSA	RSA/N/1079137	Dounreay	Broadly Compliant
RSA	RSA/A/1031285	New LLW Disposal Facilities at Dounreay	Excellent
CAR	CAR/S/1096306, CAR/S/1108400	New LLW Disposal Facilities at Dounreay	Excellent
CAR	CAR/L/1012697	Dounreay	Excellent
WML	WML/L/1095876	Dounreay	Good
WML	WML/N/0050085	Landfill 42, Dounreay	Excellent

## **Radioactivity in Food & the Environment (RIFE)**

SEPA works together with the Environment Agency, Natural Resources Wales, Northern Ireland Environment Agency, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and the environment, and publishes the results within the RIFE report. The report looks at the levels and concentrations of radioactivity measured in the environment during 2017 and discharges from all the nuclear licensed sites in Scotland. It assesses the dose a member of the public could receive, based on a number of factors such as environmental concentrations, diet and activity and shows that the doses were within legal limits.

The latest edition (RIFE 23) covering 2017 has been published and electronic copies can be obtained from SEPA's website: [www.sepa.org.uk](http://www.sepa.org.uk) under "*Environment/Radioactive Substances/Environmental monitoring and assessment/Reports*".

The total dose for the representative person around Dounreay for the year was 0.010 millisieverts which is 1% of the annual dose limit (1 millisievert). The total dose for 2017 was lower than the total dose in 2016, this decrease was mostly due to the exclusion of caesium-137 concentration in game (venison) in 2017 (collected in 2016), the activity most likely from historical releases.

## **Scottish Pollutant Release Inventory (SPRI)**

The Scottish Pollutant Release Inventory (SPRI) is a publicly accessible electronic database of releases of pollutants to all environmental media and transfers of non-radioactive waste.

The data for 2017 has been published and is available on SEPA's website: [www.sepa.org.uk](http://www.sepa.org.uk) under "*Environment/Environmental data/SPRI*".

## **SEPA's Nuclear Sector Plan**

SEPA has published the draft Nuclear Sector Plan, which has been developed with significant input from the nuclear sites. The document is out for public consultation which closes on 15 February 2019. SEPA plans to hold a workshop to discuss the draft sector plan on 24 January 2019 and the Dounreay site and stakeholder group have been invited.

The Nuclear Power Generation and Decommissioning Sector Plan is available on SEPA's website: [www.sepa.org.uk](http://www.sepa.org.uk) under "*Sector Plans*".

## **Low Level Radioactive Waste Facility**

SEPA has been updated by DSRL on progress with the waste verification project. SEPA is content that good progress has been made by DSRL and will be continuing to monitor the progress of this project and its findings through 2019.

**Site End State**

SEPA and DSRL met in December to discuss DSRL's revised proposals for establishing Environmental Reference Condi