



**DSG(2019)P024**

Dounreay Stakeholder Group  
Site Restoration Sub Group Update Report  
July 2019



## **Radioactive Substances Unit Restructure**

SEPA's Radioactive Substances unit has been restructured to provide more efficient and effective management within the team. The function remains a single unit under the overall management of Dr Paul Dale; however, four additional management posts have been created with responsibility for distinct areas within the unit's remit. Three of those posts have now been recruited;

Decommissioning sites – Stewart Ballantine

Operational sites – Isabelle Watson

Policy – Andrew Whittall

A further post covering the science function will be advertised shortly, in the interim, that area of the unit's work remains directly under the management of Dr Dale.

## **Site Inspection Work & Compliance**

During April NNL, on behalf of SEPA, undertook reassurance monitoring of two HHISO containers of Low Level Waste and ten 1 tonne bags of Demolition LLW waste intended for disposal to the LLWF. The purpose of this was to confirm (or otherwise) that DSRL's characterisation of the waste was appropriate and met the requirements set out in the LLWF Waste Acceptance Criteria. The output from this work showed good correlation between the characterisation undertaken by DSRL and the findings of NNL, in line with SEPA's expectations.

SEPA's investigation into the circumstances around the D1203 contamination incident in February remains ongoing. SEPA received DSRL's investigation report in late June and are considering the findings. As part of the investigation on 4<sup>th</sup> June SEPA issued DSRL with a Notice Requiring Information related to valves and associated control equipment which form part of the systems used for disposal of gaseous radioactive waste, and are relied upon to ensure compliance with the site's EASR permit. The information required covered details of the equipment in place across the site and any associated corrective maintenance works identified and undertaken spanning the last four years. DSRL's response to that notice is required by SEPA prior to the end of July.

SEPA is considering the compliance implications of the presence of small amounts of fuel debris and other small waste items within several fuel flasks received by DSRL.

During a site visit in June SEPA were updated on progress with the Shaft and Silo waste retrieval project and fuels disposition projects. SEPA undertook preparatory work for a future compliance inspection against the management system requirements as set out in EAS/P/1173600. During that visit SEPA also undertook a compliance inspection against the site specific requirements in the EASR permit covering the onsite Low Level Waste Disposal Pits. DSRL have been recorded as non-compliant with the requirement to prevent entry to groundwater of radionuclides and hazardous substances contained in the radioactive waste deposited in the Pits. This follows on from extensive work looking at the groundwater monitoring data gathered from round the Pits by SEPA hydrogeologist and separately by DSRL, which both concluded that during periods of low groundwater levels total containments within the Pits was not being achieved.

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

Following the restructuring of the RS Unit the lead inspector role for the Dounreay Low Level Waste Facility has been re-assigned to Richard McLeod, based in SEPA's Edinburgh office. Richard brings considerable experience to the role and was one of the authors of the 'Guidance on Requirements for Authorisation – Near-surface Disposal Facilities on Land for Solid Radioactive Wastes (GRA)'. The GRA is the document the application by DSRL for the authorisation for the facility was assessed against, as will any future applications by DSRL to vary the permit so Richard is well qualified to take on this role.

### **Site End State**

SEPA and DSRL will be meeting in late August to review DSRL progress in relation to Site End State.

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

Nothing to report.

### **Planning**

Nothing to report.

### **Vulcan**

SEPA undertook a compliance inspection in late May, during which the site was found to be in compliance with the arrangements as set out in the sites Letter of Approval.

Stewart Ballantine

Radioactive Substances Unit