



**DSG(2019)P031**

Dounreay Stakeholder Group  
Site Restoration Sub Group Update Report  
October 2019



## **Radioactive Substances Unit Restructure**

The final post in the restructuring of SEPA's Radioactive Substances unit has now been recruited, with Mark Toner appointed as manager of the science function.

## **Site Inspection Work & Compliance**

SEPA has concluded its investigation into the circumstances leading to contamination of the D1203 facility on the Dounreay site. The cause of the contamination incident was a valve operational failure during the testing of a ventilation system, which resulted in disturbance of radioactively contaminated dust within the ventilation system and subsequent discharge into the facility and through a gaseous discharge stack to atmosphere. The increased discharge of radioactivity to the environment resulting from this incident was calculated to be less than 1% of the relevant authorised gaseous discharge limit, there was no breach of discharge limits. Although the environmental impact of the discharge is considered to be very low, SEPA's investigation into the incident concluded that DSRL contravened multiple conditions of its EASR radioactive substances authorisation.

In order to secure current and future compliance, we have issued a Regulatory Notice to DSRL that outlines the steps DSRL is required to take to address the identified contraventions between now and October 2020.

During September SEPA undertook a compliance inspection of DSRL's implementation of standards and codes of practice, which form part of the sites management system. That inspection identified a number of failings across the site, therefore SEPA have recorded DSRL as non-compliant with four standard conditions for radioactive substances apply (A.2.1, A.3.1, A.4.1 and A.6.3.c). A copy of the standard conditions is available at;

<https://www.sepa.org.uk/regulations/how-we-regulate/environmental-authorisations-scotland-regulations-2018/>.

SEPA are now considering the wider compliance implications of these failings.

## **Low Level Radioactive Waste Facility**

SEPA undertook a regular scheduled inspection of the site on the 27<sup>th</sup> August 2019 and found the site to be compliant with the conditions of the permit that were the subject of the inspection. The next scheduled inspection will take place on the 19<sup>th</sup> November 2019.

SEPA also had a routine technical meeting with DSRL about the ongoing work to update the Environmental Safety Case in anticipation of a submission to vary the sites permit. A significant part of the meeting provided background information to the new SEPA site inspector, Richard McLeod.

### **Site End State**

SEPA met with DSRL in August to be updated on work streams and progress being by DSRL Interim End State Delivery team. Discussion included areas related to the updated closure report of Zone 1B (former bee meadow area), development of the Groundwater model for the site and optimisation of limits of detection for substances in Groundwater.

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

In August DSRL reported that Hazardous waste in the form of transformers containing oil were transported from site without the correct Special Waste consignment note paperwork. SEPA are still awaiting DSRL's formal investigation report.

SEPA met with DSRL in September to discuss the need to progress with improvements to the Non-Active Drainage system. It was agreed that DSRL would provide further details by the end of November 2019.

### **Planning**

Nothing to report.

### **Vulcan**

Nothing to report.

Stewart Ballantine

Radioactive Substances Unit