



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

Report for period 1 April to 30 June 2021

## 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/lrc/>).

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.

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## 1 INSPECTIONS

### 1.1 Dates of inspection

The ONR site inspectors have made visits to site on the following dates during the report period 1<sup>st</sup> April to 30<sup>th</sup> June 2021:

- 28<sup>th</sup> to 29<sup>th</sup> April 2021.
- 11<sup>th</sup> to 13<sup>th</sup> May 2021.
- 8<sup>th</sup> to 10<sup>th</sup> June 2021.
- 16<sup>th</sup> June 2021.
- 29<sup>th</sup> June 2021.

## 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 2017 (IRR17) 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.

**Safety Case Informed Inspection of the Irradiated Fuel Caves.** ONR undertook a detailed assessment of the activities associated with the Irradiated Fuel Caves (IFC) as a precursor to subsequent permissioning considerations in support of the Irradiated Fuels Disposition Programme. The inspection considers a broad range of legislative requirements covering hazard evaluation, identification and implementation of limits and conditions for safe operation, maintenance, and operator training and competency. Overall, ONR is satisfied that activities undertaken within the IFC have been adequately evaluated within the associated safety documentation and that the outcomes from that documentation have been appropriately implemented in support of operations.

**Management of Operational Records:** This inspection focused on the arrangements in place for the management and control of nuclear material inventory. ONR is satisfied that the arrangements are consistent with relevant good practice and demonstrate an adequate level of control of the site's nuclear material inventory.

**Training and the provision of Suitably Qualified and Experienced Personnel:** This inspection focused on a number of key roles identified during the recent transfer of ownership of Dounreay Site Restoration Limited (DSRL) into a wholly owned

subsidiary of the Nuclear Decommissioning Authority. There was clear evidence of a structured and rigorous approach to the training and development of personnel in key leadership roles supported by an appropriately robust assessment of competency. ONR has identified improvements required in the documentation supporting the management of nuclear baseline roles and their associated succession planning arrangements: ONR has raised two Regulatory Issues to monitor progress against these two requirements. Overall, ONR remains satisfied that DSRL has adequate arrangements in place for the training, management, and provision of suitably qualified and experienced personnel for key nuclear safety roles.

**Fire Safety [Life Safety]:** ONR undertook an inspection against the requirements of the Fire (Scotland) Act 2005 and their implementation in support of key activities on site. Specifically, the inspection focused on the arrangements in place supporting the Shaft & Silo Project, and the DMTR Decommissioning/Demolition Project. Overall, ONR remains satisfied that DSRL continues to demonstrate adequate compliance against the requirements of the Fire (Scotland) Act 2005.

**Emergency Arrangements:** ONR undertook an assessment of a facility level emergency response exercise to close out the matters raised in response to the last Level 1 Safety and Security Demonstration Exercise conducted 15 May 2019. This assessment focused on the command and control at the scene of the incident and, the management and recovery of casualties. ONR is satisfied that the exercise demonstrated the necessary improvements. ONR remains satisfied that DSRL continues to demonstrate an adequate emergency response capability.

## 2.2 Other work

**Technical assessment work:** ONR has continued to undertake assessment activities necessary to support the release of regulatory hold-points placed on a number of the projects on site. Specifically, ONR has continued to hold regular technical review meetings with the Shaft and Silo Project Team and remains confident to be in a position to release the regulatory hold-point placed on the commencement of construction activities later this year.

**Management of Regulatory Issues:** ONR is satisfied that DSRL continues to make satisfactory progress to address the formal regulatory issues raised during previous inspections. During this period DSRL has provided the evidence necessary to support the formal closure of the Regulatory Issues covering the provision of a suitable and sufficient decommissioning programme, and the implementation of revised arrangements for command and control at the scene of an incident.

## 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.

ONR was notified that the site lost electrical supply in the early hours of the 7 June 2021. Back-up systems to the site worked as intended. The site was closed to all but essential personnel until such time that external power supplies had been restored. ONR is satisfied that nuclear, radiological, and industrial safety was not compromised during the outage and that there was no loss or degradation of essential safety systems. DSRL are in discussion with Scottish & Southern Energy regarding the

failure of the off-site transformer and will be provided with the outcome of its investigation in due course. ONR is satisfied that no further regulatory action is required in response to this event.

#### 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’. In addition, inspectors may take a range of enforcement actions, including the issuing of an Enforcement Notice.

No Licence Instruments, Enforcement Notices or formal letters were issued during this period.

#### 5 NEWS FROM ONR

Below are summaries of key activities over the last three months. Further detail is available on our [website](#).

##### **Covid-19 (Coronavirus) (ONR position)**

We are continuing to obtain assurance that nuclear site licensees and other dutyholders are adequately resourced to continue to safely and securely carry out their activities. We remain satisfied with industry’s response at this time and there has been no significant change to dutyholders’ safety and security resilience.

All licensed sites are required to determine minimum staffing levels necessary to ensure safe and secure operations and contingency arrangements in the event that these levels are not met. This condition is specifically designed to ensure that industry can adequately manage and control activities that could impact on nuclear safety and security under all foreseeable circumstances, including pandemics.

Although ONR staff continue to work primarily at home, (carrying out as much of our work as possible via videoconference, phone and email), we are carefully and progressively increasing our site footprint. We continue to assess our on-site presence in line with government guidelines and our business needs, ensuring we have a balanced portfolio of on-site inspections and interventions, that are important to support effective regulation across our purposes.

Our latest position can be found on our [website](#).

##### **Enforcement Action**

In April, we announced that EDF [complied](#) with a Direction we served on 14 December 2020, under the Pressure Systems Safety Regulations (2000). This followed an inspection, at which found a number of pressure system components at Heysham 1 Power Station were overdue their scheduled examination.

In May, we agreed to [extend an improvement notice](#) served on EDF in September 2020, recognising the progress made so far. The notice was served after some of the equipment used to measure reactor power at Heysham 2 was incorrectly configured. We judged that Heysham 2 is able to operate safely, and that additional time to

demonstrate the required improvements will not pose a risk to safety. EDF must now comply with the improvement notice by 31 July 2021.

In June, we announced that Rolls-Royce Submarines Ltd (RRSL) had [complied](#) with an improvement notice served on 29 May 2020. The notice was served after RRSL operators brought 21 units of fissile material into the facility – which exceeding the limit defined within the safety case and set out in the Criticality Control Certificate for the facility.

## Stakeholder Engagement

In April, we published an [article](#) introducing our newest board member, Jean Llewellyn, who joined us in October 2021, as security lead. Jean brings with her a wealth of experience, including serving as a non-executive director on the board of the World Institute for Nuclear Security since 2018 – which has given her a good understanding of the global security challenges facing the nuclear industry.

In May, we issued our e-bulletin '[ONR News](#)' to subscribers. This issue included farewell reflections from our outgoing chief executive, a leadership update, further information on our COVID -19 response, and the results of our latest stakeholder survey. You can sign up for our e-bulletin [here](#)

On 1 June, we [announced](#) the full implementation of our new leadership structure. Mark Foy is now our combined Chief Executive and Chief Nuclear Inspector. He is supported by Sarah High as Deputy Chief Executive, and Donald Urquhart as Executive Director of Operations.

In June, we published our new [Corporate Plan for 2021/22](#), which sets out our key priorities to protect the public by securing safe nuclear operations.

In June, our State System of Accounting for and Control of Nuclear Material (SSAC) project - which saw ONR become the UK's national nuclear safeguards regulator from 31 December 2020, was [shortlisted for a national award](#) in the Project Management Institute's UK National Project Awards in the 'Project of the Year (Public Sector)' category.

Nuclear safeguards are measures to verify that countries comply with international obligations not to use nuclear materials from civil nuclear programmes for non-peaceful purposes.

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