

DSG(2021)P028

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

Report for period 1 July to 30 September 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/llc/>).

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

## Dates of inspection

The ONR site inspectors have made visits to site on the following dates during the report period 1 July to 30 September 2021:

- 13 to 16 July 2021.
- 14 to 16 September 2021.

## 2. Routine Matters 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.

In this period, routine inspections of site covered the following:

- LC7 [Incidents on the site]
- LC11 [Emergency arrangements]
- LC23 [Operating rules]
- LC24 [Operating instructions]
- LC27 [Safety mechanisms, devices, and circuits]
- LC36 [Organisational capability]
- Lifting Operations and Lifting Equipment Regulations 1998
- Construction (Design and Management) Regulations 2015
- Ionising Radiations Regulations 2017
- Control of Asbestos Regulations 2012
- Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009

During the reporting period, ONR judged the arrangements made and implemented by the site in response to safety requirements to be satisfactory in the areas inspected. Where improvements have been identified, the licensee has made a commitment to

address those issues, and ONR inspectors will closely monitor progress during future site inspections. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales. Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at [www.onr.org.uk/intervention-records](http://www.onr.org.uk/intervention-records) on our website [www.onr.org.uk](http://www.onr.org.uk). Should you have any queries regarding our inspection activities, please email [contact@onr.gov.uk](mailto:contact@onr.gov.uk).

In addition, ONR assessed the following emergency exercises conducted at site:

- A table-top exercise conducted on 15 July demonstrating Dounreay Site Restoration Ltd's (DSRL) arrangements and response to an off-site transport emergency. This provided an opportunity to assess DSRL's arrangements against the requirements of LC11 and CDG 2009. The exercise involved representation from each of the external stakeholder groups and highlighted a number of valuable learning opportunities. Overall, ONR is satisfied that DSRL has adequate arrangements to respond to an off-site transport emergency.
- The site's annual safety demonstration emergency exercise [Delta 56] conducted on 15 September. Overall, we considered that the exercise provided an adequate demonstration of the site's emergency arrangements and their capability to deal with an emergency on site. In accordance with ONR's arrangements, a letter will be forwarded to site in due course with our formal assessment and feedback on those areas where the site performed well and those areas identified for improvement.

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 recently completed a formal review to release the regulatory hold-point placed on the commencement of construction activities supporting the Shaft and Silo Project.

## Other work

During the period of this report, ONR attended DSRL's annual review of safety, security, and safeguards. DSRL provided a succinct summary of their performance over the past year and provided a forum to discuss their future programme, in particular, those activities they considered posed the more significant challenge and regulatory risk. We are satisfied that the performance reported by DSRL aligned with that of the ONR site inspectors and welcomed the opportunity to discuss the principles by which ONR implements an enabling regulation approach to permissioning.

The site inspector undertook a periodic review to ensure that DSRL continues to make satisfactory progress to address the formal regulatory issues raised during previous inspections.

The site inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety, and welfare at work.

## 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.

No matters of regulatory interest were notified to ONR during this period.

## 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' (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

- No LIs, Enforcement Notices or Enforcement letters were issued during this period.

Reports detailing regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

## 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 duty-holders are adequately resourced to continue to safely and securely carry out their activities. We remain satisfied with industry's response at this time; there has been no significant change to duty-holders' safety and security resilience.

We have measures in place to try and prevent asymptomatic ONR staff unwittingly conveying the virus onto a regulated site. We require all staff to take a circular 1 health (C1H) antigen test in advance of them visiting a site. In addition to the C1H test, we also require them to take a lateral flow test on the morning of their planned site visit. We are keeping our COVID-19 testing guidance under regular review, in-line with the changing national context and any further developments in industry approaches to testing arrangements.

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

### **Enforcement Action**

In July, we served an improvement notice on Devonport Royal Dockyard Ltd (DRDL) for shortfalls in its health and safety arrangements. The notice was served after DRDL failed to demonstrate consistent and effective arrangements to control and monitor the risks associated with working at height at its Devonport site. DRDL must comply with the requirements of the improvement notice by 31 March 2022.

In August, we announced that Morgan Sindall Infrastructure Ltd had complied with an improvement notice served in January 2021 after workers came close to striking a live high voltage electric cable during excavation work at the Sellafield site. Since this incident occurred, Morgan Sindall has put in place measures to prevent similar occurrences, and we are satisfied that they have complied with the requirements of the improvement notice.

### **Stakeholder Engagement**

In July, our project to become the UK's domestic safeguards regulator was named the public sector's [Project of the Year at the National Project Awards](#).

In September we invited stakeholders to submit comments on our updated reference papers for Coastal Flood Hazards and Meteorological Hazards for Nuclear Sites. Although supplementary to our normal governance process, we are doing this due to stakeholder interest in these topics and our commitment to being an open and transparent regulator.

The reference papers provide additional detail on the analysis of the external hazards for nuclear sites and have been produced by our [Expert Panel on Natural Hazards](#), a group of academic and industry technical specialists working under contract to provide us with independent expert advice. You can find out more about how to get involved and comment on these papers on our [website](#).

For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

## 6 Contacts

Office for Nuclear Regulation  
Redgrave Court  
Merton Road  
Bootle  
Merseyside  
L20 7HS

website: [www.onr.org.uk](http://www.onr.org.uk)  
email: [Contact@onr.gov.uk](mailto:Contact@onr.gov.uk)

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