



Dounreay Stakeholder Group
Site Restoration Sub Group Update Report
January 2022

Covid-19

COVID-19 Full details of SEPA's response to the COVID-19 pandemic are available on our website at; [Regulatory response to COVID-19, cyber-attack and EU exit | Scottish Environment Protection Agency \(SEPA\)](#). SEPA's temporary regulatory position statement on management of radioactive substances at nuclear sites is available online at; [Management of radioactive substances at nuclear sites regulatory position | Scottish Environment Protection Agency \(SEPA\)](#)

DSRL have advised SEPA they are currently able to operate in full compliance with the limits and conditions of its EASR permits.

Cyber Attack

SEPA's website remains the best source of current information on our service status following the cyber attack. SEPA are continuing to update its service status on a weekly basis.

- [Cyber-attack | Scottish Environment Protection Agency \(SEPA\)](#)
- [Cyber-Attack: Service Status | Scottish Environment Protection Agency \(SEPA\)](#) .

Site Inspection Work & EASR Compliance

Following SEPA's completion of its assessment of DSRL's close-out of the steps required by Regulatory Notice RN01, SEPA concluded that DSRL has adequately addressed the steps. SEPA issued a Notice Withdrawing a Regulatory Notice to DSRL on 27th October.

In December SEPA granted a variation to the Dounreay site EASR permit to allow receipt of radioactive waste in the form of debris within fuel transport flasks. The variation also allows receipt of radioactive waste in the form of items found during environmental monitoring activities. It does not make any changes to the authorised gaseous and aqueous limits included within DSRL's permit. Any radioactive waste received in fuel transport flasks at Dounreay will be returned to Sellafield.

During November SEPA undertook inspection of DSRL arrangements for the analysis of environmental monitoring samples. The inspection work involved remote inspections by MS Teams and on-site inspection within the D1310 laboratories during w/c 15th November. SEPA found the laboratory personnel to be familiar with and understood the requirements of the relevant operating instructions and controlled methods. The activities which were observed were undertaken in accordance with the relevant instructions and DSRL was found to be compliant with the assessed EASR permit conditions.

SEPA visited the site w/c 15th November to inspect DSRL arrangements for interim storage and management of Low Level Waste. SEPA found DSRL arrangements to be fit for purpose and found a good understanding and implementation of site management arrangements by staff at the PFR facility. During the visit SEPA identified potential concerns with the underpinning evidence required to demonstrate compliance with EASR conditions related to optimisation of solid low level waste

management. A further visit will be undertaken in early February to look in more detail at DSRL arrangements for management and transfer of solid Low Level Waste.

Discussions are ongoing with DSRL in respect of the non-active drainage system and any improvements necessary to prevent further occurrences of liquid radioactive waste being discharged via this unauthorised route. This follows on from the incident in May 2020 when measurable levels of Cs-137 were detected in samples of groundwater taken from a sump located external to the D1208 facility in the Fuel Cycle Area that then discharged via the non-active drainage network.

Project work has been ongoing period, in particular looking at progress with the Shaft and Silo waste retrieval project and decommissioning of the DMTR facility.

On 22 November SEPA held its Environmental Annual Review with DSRL which focused on DSRL environmental compliance performance, DSRL planned environmental improvements, decommissioning plans and Higher Activity Waste plans and progress.

Transition to Magnox

SEPA are engaging with the transition team on the implications and timing for application to transfer the environmental permits currently held by DSRL to Magnox.

Low Level Radioactive Waste Facility

SEPA continue to progress matters related to the application for variation to the LLWF EASR permit. Currently we expect to begin public consultation toward the end of January.

Site engagement of compliance matters continues on a routine basis with no areas of regulatory concern having been identified since the last report.

SEPA has agreed the schedule for this calendar's year's site inspections including at least one on-site inspection.

Site End State

SEPA and DSRL have a further update meeting on matters related to Site End State scheduled for late February.

Non-Nuclear Site Regulation

Nothing to report.

Planning

Nothing to report

Vulcan

In January SEPA held its Environmental Annual Review with Vulcan.

Radioactivity in Food & the Environment

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 in publishing the results. The reports aim to provide an in-depth assessment of radioactivity in food and the environment in the UK and the public's exposure to radiation. The reports focus on key information that demonstrates both that food remains safe and that the public's exposure to ionising radiation is within legal limits. The latest edition (RIFE 26) covering 2020 has been published and electronic copies can be obtained from SEPA's website under;

[Reports | Scottish Environment Protection Agency \(SEPA\)](#)

The total dose for the critical group around Dounreay for the year was 0.009 millisieverts, and is less than 1% of the annual dose limit (1 millisievert).

Stewart Ballantine

Radioactive Substances Unit