



Office for Nuclear Regulation (ONR)

Site Report for Dounreay

Report for period 1 April – 30 June 2022

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

1.1. Dates of Inspection

The ONR site inspector made inspections on the following dates during the report period 1 April to 30 June 2022:

- 26 to 28 April 2022.
- 10 to 12 May 2022
- 7 to 9 June 2022

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 etc 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 the 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 Dounreay covered the following:

- Management of radioactive waste and radioactive material
- Management of criticality safety
- Examination, inspection, maintenance, and testing
- Planning, management, and governance of site decommissioning activities
- Training and the provision of duly authorised and other suitably qualified and experience persons
- Emergency preparedness.
- The provision of independent scrutiny and nuclear safety advice to the executive

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 on our website www.onr.org.uk. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

In addition, ONR conducted a systems based inspection focused on the conduct of nuclear material handling and lifting activities in support of the DFR Breeder Fuel Removal (BFR) project. On the basis of the evidence examined during this inspection, ONR is satisfied that the limits and conditions of safe operation identified within the nuclear safety case for the BFR project have been adequately implemented in support of nuclear material handling and lifting activities conducted as part of this project.

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.

2.2. Other Work

ONR safety inspectors supported the assessment of the site's annual Level 1 security demonstration exercise [REDE 22]. This is part of a broader programme of formal assessments to support a modular approach to the demonstration of DSRL's emergency response arrangements. This approach allows for the demonstration of individual and inter-related components of their arrangements against a series of accident scenarios that are more representative of the nature of the hazards on site.

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.

Matters and events of particular note during the period were:

- INF-1869: On 20 Apr 22 DSRL reported a 'pressure excursion' at the PFR Sodium Tank Farm. This has been confirmed as an INES Level 1 event. DSRL have concluded their investigation and submitted a follow-up report. ONR has undertaken its own preliminary enquiries into the incident and identified clear breaches in meeting legislative requirements. An enforcement letter [ONR-EL-22-006] has been submitted to site and a Level 3 regulatory issue [RI-10834] raised to monitor progress of DSRL's response. ONR has also placed a formal regulatory hold point on the re-commencement of operations at the PFR Tank Farm.
- INF-1931: On 26 Apr 22, during lifting operations on the Grahams Construction Site at DCP/SE, an operator failed to adhere to the requirements of the Risk Assessment Method Statement by placing his hand on the load as it was lifting. This resulted in his fingers getting trapped in the load and his subsequent

treatment at Caithness General Hospital. Grahams have already dealt with the issues related to this incident. The control of lifting operations is already being addressed by an extant enforcement letter [ONR-EL-22-001] and associated Level 3 regulatory issue [RI-10711].

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.

- The following Enforcement Letter has been issued during the period:

Table 1: Licence Instruments and Enforcement Notices Issued by ONR during this period

Date	Type	Ref. No.	Description
20/06/22	Enforcement Letter	ONR-EL-22-010	DSRL to address shortfalls identified against the requirements of the Management of Health and Safety at Work Regulations 1999 regarding health and safety arrangements in support of enhanced weathering activities conducted at the PFR Tank Farm.

In addition, ONR has placed formal regulatory hold-points on the following activities:

- Recommencement of the active commissioning of 'enhanced weathering' activities in support of residual sodium removal from Tank 2.
- Commencement of active commissioning of water vapour nitrogen (WVN) activities in support of the removal of residual alkali metal from the PFR RPV and associated plant.

5. News from ONR

For the latest news and information from the Office for Nuclear Regulation, please read and subscribe to our regular email newsletter 'ONR News' at www.onr.org.uk/onrnews

6. Contacts

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