

Office for Nuclear Regulation (ONR)

Site Report for Dounreay

Report for period 1 July – 30 September 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/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 inspector made inspections on the following dates during the report period 1 July to 30 September 2022:

- 12 to 14 July 2022.
- 15 to 17 August 2022
- 6 to 8 September 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:

- Control, supervision and conduct of operations;
- Construction (Design and Management) Regulations;
- Fire Safety (Scotland) Regulations;
- Ionising Radiations Regulations; and
- Emergency preparedness and response.

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 observed the annual Level 1 Site Safety Demonstration Exercise, Delta 58, conducted on 7 Sep 22. ONR considered the scenario to be appropriately challenging as well as providing an opportunity for ONR to observe DSRL's planning for the subsequent recovery from the incident. ONR concluded that this was an adequate demonstration of DSRL's emergency arrangements and clearly demonstrated the improvements site has implemented in the areas of command and control and, casualty management and recovery.

ONR's Head of Decommissioning, Fuel and Waste Sub-Division attended the site's annual review of safety conducted on 13 Jul 22. This provided the opportunity to review the site's safety performance over the previous year and to agree the focus for the coming year. ONR was satisfied that DSRL's assessment of safety performance aligned with that of ONR's and acknowledged the activities DSRL had implemented, or were proposing, to address those areas identified from their review.

ONR's Chief Nuclear Inspector (CNI) and ONR Chair visited the Dounreay site on 16 Aug 22 as part of an ongoing schedule of site visits. The visit provided the opportunity for the CNI and Chair to observe the scope of decommissioning activities in progress on site and to meet representatives from across the workforce. The CNI concluded that it had been a successful visit and had provided a valuable opportunity to discuss the development of DSRL's latest Lifetime Plan, its Fit for the Future programme, workforce resilience, conventional health and safety performance and the site's cultural change initiative.

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

The site inspector continues to conduct formal quarterly reviews of site's progress in delivering a number of agreed improvement activities. Topics include:

- Safety culture
- Reporting and investigation of incidents and organisational learning
- Emergency arrangements
- Quality assurance and governance of safety documentation
- DSRL Decommissioning Programme
- Review of proposed changes to the target end state of decommissioning at the 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.

No matters or events of particular note were reported 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 new Enforcement Notices, Letters or Licence Instruments were issued this period.

ONR has now closed out Enforcement Letter, ONR-EL-21-044, requiring DSRL to address shortfalls identified against the requirements of the Construction (Design & Management) Regulations.

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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