



Dounreay Stakeholder Group
Site Restoration Sub Group Update Report
January 2023

Site Inspection Work & EASR Compliance

In December SEPA received confirmation from DSRL of the estimated tritium discharge resulting from the pressure excursion at the PFR sodium tank farm. SEPA is now finalising its conclusion to the investigation and will report the outcome to the DSG.

In November SEPA was notified by DSRL of a potential unplanned release of tritium from an unauthorised and unmonitored route. The source of the potential release is a drum containing sodium with an associated tritium inventory, being stored at the Prototype Fast Reactor (PFR) facility. DSRL have provided SEPA with a copy of its investigation report and SEPA is considering the findings as part of its ongoing investigation. Based on the information provided by DSRL we consider the risk to the public or the environment to be extremely low.

SEPA undertook a joint site visit with ONR in December to look at arrangements for the storage of waste across a number of facilities and to be updated on DSRL progress with its review of waste fingerprints and the development of the radioactive waste inventory.

In November SEPA undertook an on-site inspection of arrangements for sampling, analysis and production of records to demonstrate compliance with gaseous and aqueous radioactive waste authorised disposal limits. The inspection identified non-compliance with an EASR permit condition in relation to the implementation of an operating instruction for checking statutory gaseous discharge samplers. Although DSRL were undertaking the specified checks of the samplers, its action in relation to recorded abnormal readings was not in accordance with the operating instruction.

SEPA had a number of engagements with DSRL to be updated on decommissioning projects across the site.

Transition to Magnox

SEPA remain on track to have determined the application to transfer the site environmental permits (EASR, CAR, PPC and WML) in advance of the proposed transfer date to Magnox.

Low Level Radioactive Waste Facility

SEPA continue to engage with the LLWF team on a regular basis and are content that the facility continues to operate in a compliant manner.

Non-Nuclear Site Regulation

Vulcan

Nothing to report

Pentland Windfarm Project

SEPA continue to engage with the relevant permitting authorities (Marine Scotland and The Highland Council) on proposals to develop the Pentland windfarm off the coast of Dounreay to ensure protection of the public and the environment.

Consultation on Implementation of EASR

This consultation is aimed at seeking your views on the way we have implemented EASR for radioactive substances activities. It is separate from a consultation that the Scottish Government and SEPA are planning to carry out in early 2023, on proposals to bring the regulation of other environmental activities into EASR. The consultation briefly outlines some of the changes that were brought in by EASR, how we have implemented it.

[Consultation on the implementation of the Environmental Authorisations \(Scotland\) Regulations 2018 for radioactive substances activities - Scottish Environment Protection Agency - Citizen Space \(sepa.org.uk\)](#)

Radioactivity in Food & the Environment (RIFE)

RIFE is a collaborative report on work carried out by SEPA, the other UK environment agencies, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and the environment. The RIFE 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, including in the vicinity of Dounreay. The RIFE report incorporates the results from the analysis of a wide range of samples and key information on local habits to demonstrate both that food remains safe and that the public's exposure to ionising radiation is within legal limits.

The latest edition (RIFE 27) covering 2021 has been published and can be obtained from SEPA's website along with previous year's reports [Reports | Scottish Environment Protection Agency \(SEPA\)](#) .

RIFE 27 reports that the total dose for the representative person (most exposed) around the Dounreay site, for 2021 was 0.026 millisieverts, or less than 3% of legal annual dose limit of 1 millisievert as set out in paragraph 26, Schedule 8 of EASR18.

Stewart Ballantine

Radioactive Substances Unit