

ONR Site Report

Magnox Limited – Dounreay

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Report for period: 1 January – 31 March 2023

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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. Date(s) of Inspection

ONR site inspectors made inspections on the following dates during the reporting period 1 January – 31 March 2023:

- 24 to 25 January 2023
- 7 to 9 February 2023
- 21 to 23 March 2023

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;
- regulations made under the Energy Act 2013, for example the Nuclear Industries Security Regulations 2003 and the Nuclear Safeguards (EU Exit) Regulations 2019;
- 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:

- Site protection and approved transport carrier security Inspection;
- Fire safety inspection focusing on nuclear safety to support the European Nuclear Safety Regulators Group (ENSREG) Topical Peer Review; and
- Electrical safety inspection of Dounreay's electrical distribution systems (including control and supervision arrangements (licence condition 26)).

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.

In addition:

- ONR has reviewed and accepted Magnox Limited's application to hold the nuclear site licence for the Dounreay site. This process was finalised by ONR issuing a nuclear site licence for the Dounreay site to Magnox limited on the 1 April 2023.

- ONR continued to remain informed on all major site activities that affect health & safety and continues to undertake proportionate assessment activities necessary to support the release of regulatory hold-points placed on a number of the projects on site.

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

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:

- Dounreay Asset Management
- Dounreay Site Safety culture
- Establishing appropriate waste route for hazardous waste materials
- Reporting and investigation of incidents and organisational learning
- Quality assurance and governance of safety documentation
- Dounreay Decommissioning Programme
- Emergency arrangements

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.

The following events have been reported to ONR relating to the Dounreay site:

- Power Dip caused by lightning strike - On 31 January 2023 the site experienced a lightning strike on or very close to the site which caused a power dip. This caused several issues on site; however, the consequences of this event were relatively short lived and had little operational impact on the site facilities. There were some inconveniences, and some additional demands were placed on security staff until the issues with the physical protection systems were resolved. Dounreay has provided their investigation report to ONR, this was viewed reasonable.
- Slip on ice event (reported under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995) – An individual exited a vehicle and slipped on ice, weather conditions were extremely cold and icy. The resultant injury prevented the person from working for more than seven days. No formal follow up action has been taken by ONR. Note – on the same day a similar incident occurred just off the licenced site. Dounreay has discussed their internal investigation into both incidents with me and I viewed their described follow up as reasonable.

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. In addition, inspectors may take a range of enforcement actions, to include issuing an enforcement notice.

The following permissioning documents, enforcement notices and enforcement letters have been issued during the period:

- Magnox Limited requested that the Office for Nuclear regulation grant it a new licence for the Dounreay Site. Previously this site was licensed to Dounreay Site Restoration Ltd (DSRL). Permission was sought to simultaneously relicence Magnox to include the Dounreay Site and revoke the DSRL site licence. The licence to Magnox was issued on the 1 April 2023. As part of its licence application for the Dounreay Site, Magnox Limited requested that the Terms of Reference (ToRs) for the Dounreay Nuclear Safety and Environmental Committee are Approved in accordance with Licence Condition 13 (2). This was agreed by ONR and the ToRs came into effect on 1 April 2023.
- ONR has issued an enforcement letter to Dounreay site following an inspection of the site electrical distribution systems on the 21 to 23 March 2023. It was viewed that Dounreay had breached Regulation 4(1), 4(2) and 5 of the Electricity at Work Regulations 1989, as well as the general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare at work of all his employees (Health and Safety at Work etc Act 1974 Section 2(1)). ONR continues to monitor Dounreay's response to this enforcement action but is content with sites initial response.
- Dounreay has submitted documents notifying ONR of its intent to conduct a Category B modification to repair a glovebox line window. The modification is required to eliminate a leak from a fluid filled window, to allow future operations to take place. ONR has agreed that no enhanced regulatory oversight will be assigned to this project.

5. News from ONR

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

6. Contacts

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