



ONR Site Report

**Magnox Limited – Dounreay**

# ONR Site Report

## Magnox Limited - Dounreay

Report for period: 1 April – 30 June 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 Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

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 April – 30 June 2023:

- 25 to 27 April 2023
- 16 to 18 May 2023
- 13 to 14 June 2023
- 27 to 29 June 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:

- Inspection of storage and management arrangements of stocks of alkali metals stored on site;
- Inspection of nuclear ventilation systems and processes;
- Inspection of Dounreay's reporting arrangements, investigation of incidents and organisational learning;
- Inspection of maintenance arrangements of equipment and training of personnel to support the site's emergency arrangements; and
- Assessment of Dounreay's annual site security demonstration exercise.

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](http://www.onr.org.uk/intervention-records) on our website [www.onr.org.uk](http://www.onr.org.uk).

In addition:

- ONR has attended Dounreay's Annual Review of Safety, Security and Safeguards (AROSSS) at which Dounreay reviewed its performance in these areas to ONR and provided future commitments.
- ONR conducted information gathering activities to consider the totality of Dounreay's chemical holdings for the purposes of compliance against the Control of Major Accident Hazards (COMAH) Regulations 2015.
- 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](mailto: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.

There were no safety events reported to ONR within 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. In addition, inspectors may take a range of enforcement actions, including issuing an enforcement notice.

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

- ONR has issued an enforcement letter to Dounreay site following an inspection of the site sodium storage arrangements on 25 to 27 April 2023. It was viewed that the storage arrangements did not meet relevant good practice as the dutyholder has failed to safely protect the drums against degradation via air and moisture ingress, large stocks of the inventory are not available for inspection due to the way in which it has been stored and, a number of the storage vessels of the material are not identified on the site maintenance system. It was viewed that Dounreay had breached Regulation 7 (1-4) of the Control of Substances Hazardous to Health (COSHH) Regulations 2002 and nuclear site licence condition 4(2) requiring the licensee to ensure that no nuclear matter is stored on the site except in accordance with adequate arrangements made by the licensee for this purpose. To further secure a commitment to return to compliance, ONR conducted a holding to account meeting with Directors of the site in June 2023.
- ONR continues to monitor Dounreay's response to an enforcement letter issued earlier this year concerning electrical safety. ONR has received responding letters and communications from site confirming the actions they have taken. ONR considers that Dounreay have taken reasonable responses and once sufficient detail of the implementation of these actions is received ONR considers it will be in a position to close out this enforcement action.



## 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](http://www.onr.org.uk/onrnews).

## 6. Contacts

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