



ONR Site Report

Nuclear Restoration Services – Dounreay

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Report for period: 1 October – 31 December 2023

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Approved by:, DFW Delivery Lead

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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/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. Date(s) of Inspection

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

- 17 to 19 October 2023
- 7 to 9 November 2023
- 21 to 22 November 2023
- 5 to 7 December 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 legal compliance. 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:

- Arrangements for managing radiological waste
- Safeguards compliance
- Testing and exercising the security response
- Periodic review of safety (LC15) arrangements
- Alkali metal storage arrangements
- Safety walkdowns of a number of facilities

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 continues to interact with representatives of Dounreay and Nuclear Restoration Services to understand and assess Dounreay's proposed upcoming organisational change initiatives to confirm that the organisation will be able to remain compliant with relevant legislation.
- ONR continued to remain informed on all major site activities that affect health and 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's asset management arrangements
- Alkali metal storage and disposal arrangements
- Dounreay's arrangements for managing chemical inventories on site
- Electrical safety
- Establishing appropriate waste routes for hazardous waste materials
- Reporting and investigation of incidents and organisational learning
- Dounreay's decommissioning programme

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.

Within this period Dounreay has reported the following safety events to ONR:

- An asbestos "dangerous occurrence" (schedule 2 of reporting of injuries, diseases and dangerous occurrences regulations (RIDDOR)) occurred relating to a breach of Dounreay's asbestos control arrangements. Despite failures in the arrangements, it was viewed that an exposure to asbestos was unlikely due to the workers' recognition of the hazard and the termination of the associated task. The event was followed up by ONR inspectors in December 2023. It was judged that Dounreay's response to this event was appropriate.
- A twisted ankle which occurred whilst exiting a works vehicle on uneven ground resulting in the worker needing to take a period off work. ONR has acknowledged and recorded this occurrence for identification of trends but has not formally followed up at this time as the nature of the event does not warrant formal regulatory follow up.
- An occurrence of a work related illness. ONR has acknowledged and recorded this occurrence for identification of trends but has not formally followed up at this time as the nature of the event does not warrant formal regulatory follow up.

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.

ONR conducted an inspection of Dounreay's alkali metal storage arrangements within the Prototype Fast Reactor (PFR) turbine hall, steam generator hall and generator transformer house. This inspection followed on from a previous inspection in April 2023 which judged these arrangements inadequate and resulted in an enforcement letter being issued to site and a holding to account meeting with Dounreay senior management. The inspection identified that there has been limited improvements and further action is now being considered by ONR.

During walkdowns of a number of Dounreay facilities concerns were raised around asset management and safe working conditions. Rain water was observed to be ingressing into a number of buildings on site which has the potential to affect electrical safety, mobilise radiological contamination and generally degrade building condition. Further, it was identified that a number of building heating systems were not available during the inspection, one had been unavailable for a prolonged period. This resulted in challenging working conditions as well as having the potential to further degrade building conditions. These matters are not viewed as presenting immediate concerns around nuclear safety. Further action is now being considered by ONR.

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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