



ONR Site Report

Nuclear Restoration Services Ltd – Dounreay

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Report for period: 1 April – 30 June 2024

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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 April – 30 June 2024:

- 16 to 18 April 2024
- 14 to 16 May 2024
- 25 to 27 June 2024

2. Routine Matters

2.1. Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- 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 conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- 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:

- Building and civil asset condition
- Organisational management
- Security interactions; and
- Annual Review of Safety, Security and Safeguards (AROSSS)

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at [Publication search | Office for Nuclear Regulation \(onr.org.uk.\)](https://www.onr.org.uk/publication-search) on our website www.onr.org.uk.

In addition:

- ONR has confirm that Dounreay has made sufficient progress with regard to their safe systems of work in managing the risks associated with the Reyrolle electrical switching equipment and as such the associated regulatory issue has been

closed out. ONR continues to monitor progress with regard to Dounreay's overall electrical safety strategy.

- ONR continues 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 inspectors continue 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
- Asbestos management and safety
- Establishing appropriate waste routes for hazardous waste materials
- Reporting and investigation of incidents and organisational learning
- Dounreay's decommissioning programme

The site inspectors hold periodic meetings 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:

- Dounreay have confirmed that their total holding of qualifying chemicals under the Control of Major Accident Hazards (COMAH) regulations exceeds the threshold levels stated for a Lower Tier COMAH site. Dounreay is in the process of updating its arrangements to meet its duties as a Lower Tier COMAH site but has not yet done so. The matter is being considered by the COMAH Competent Authority (comprised of ONR and SEPA) through our enforcement management model.
- Dounreay has reported to ONR that a building crane has come into contact with scaffolding setup in the building. Site has conducted a full site level investigation into this matter and ONR is reviewing whether regulatory follow up is required.

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.

Dounreay and ONR representatives conducted the Annual Review of Safety, Security and Safeguards for the Dounreay site. This session allows review of the previous year's performance and allows for commitments to be made for the year going forward.

ONR continues to monitor the safety and security position on site during the period of industrial action. ONR notes that both parties have been committed to the safety and security of site during this period.

5. News from ONR

For the latest news and information from ONR, please read and subscribe to our regular email newsletter 'ONR News' at [Latest news | Office for Nuclear Regulation \(onr.org.uk\)](#).

6. Contacts

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