



For all our futures

Performance Report to DSG Site Restoration Sub Group
For the period July - September 2024

PROGRESS AGAINST 2024/25 PERFORMANCE TARGETS		
Category	Target	Status
Delivery	<ul style="list-style-type: none"> • PFR Ventilation Upgrade • PFR Effluent Treatment Plant (ETP) Pipework • DFR Removal of Breeder Fuel Elements • FCA Active Filter Change Containment Installed and Leak Tested • FCA Vent Improvement Project Supply Air Handling Unit in position • FCA Cut and Core South Transfer Cell walls • BoS Completion of Non Active Drains Optimisation project in year activities • BoS Drum Handling System - Completion of Assembly and Test - Crane Maintenance Shield Door • BoS Silo Waste Retrieval System- Basis of Design Established 	THRESHOLD
Delivery	<ul style="list-style-type: none"> • Consignment of CHILW Drums. • Consignment of RHILW Drums. • Consignment of HHISO containers • Diversion of LLW 	ON TARGET
Delivery	<ul style="list-style-type: none"> • Resolution of Alkali Storage Notice 	THRESHOLD
Delivery	Implementation of asset management plan	ON TARGET
Delivery	Sustainability: <ul style="list-style-type: none"> • Embedding sustainability into business as usual • Develop socio-economic impact strategy • Carbon reduction 	ON TARGET
Delivery	Commercial: social value – engaging SMEs and local supply chain	THRESHOLD
Delivery	Waste Management: <ul style="list-style-type: none"> • Implement diversion of LLW as business as usual activity 	ON TARGET

	<ul style="list-style-type: none"> Reduction in waste rejection rates ensuring waste is our quality product (right first time approach) Development and implementation of joint waste management plan 	
Delivery	Update site's aspects assessment process	ON TARGET
Delivery	Develop and implement career pathways for functions	ON TARGET
Delivery	Key asset interventions	THRESHOLD
Delivery	Roll-out of Fleetcall (loss management process)	ON TARGET
HSS&E and People Culture	Regulatory, audit and investigation action closure	AT RISK
HSS&E and People Culture	Transformation – cost avoidance	ON TARGET
HSS&E and People Culture	High performance culture programme	ON TARGET
HSS&E and People Culture	Emergency arrangements improvement plan	AT RISK
HSS&E and People Culture	'You said, we did' – closure of actions from employment engagement survey	ON TARGET
HSS&E and People Culture	Resolution of alkali metal storage notice	THRESHOLD

The site returned to decommissioning activities following the period of industrial action. Priorities for Dounreay turn to embedding the programmatic delivery model (which will enable us to deliver more effectively), address all regulatory enhanced-attention actions through our "return to routine" plans, and reduce the maintenance backlog while in parallel starting a programme of asset interventions across site (in response to past under-investment and the implications of the extended mission timeline). Additionally, a number of immediate priorities have been agreed with joint council members to aid the post-industrial action healing.

The extent of asset interventions may impact delivery of in-year targets and the near-term work plan. The longer-term prioritisation and impact will be assessed in the business plan for 2025/26. Industrial action has also impacted several targets, and the site is examining how these can be recovered.

Reactors programme

- PFR irradiated fuel cave (IFC) blowdown has commenced.
- Strip-out of the effluent treatment plant pipework is underway.
- Preparation ongoing for the asset intervention work associated with the PFR reactor hall roof and west wall repairs.

- Alkali metal storage improvement project continues as per requirements discussed with ONR, with the initial remedial work nearing completion.
- Breeder maintenance complete, enabling preparatory works for a successful Sellafield visit and review of our operating procedures.

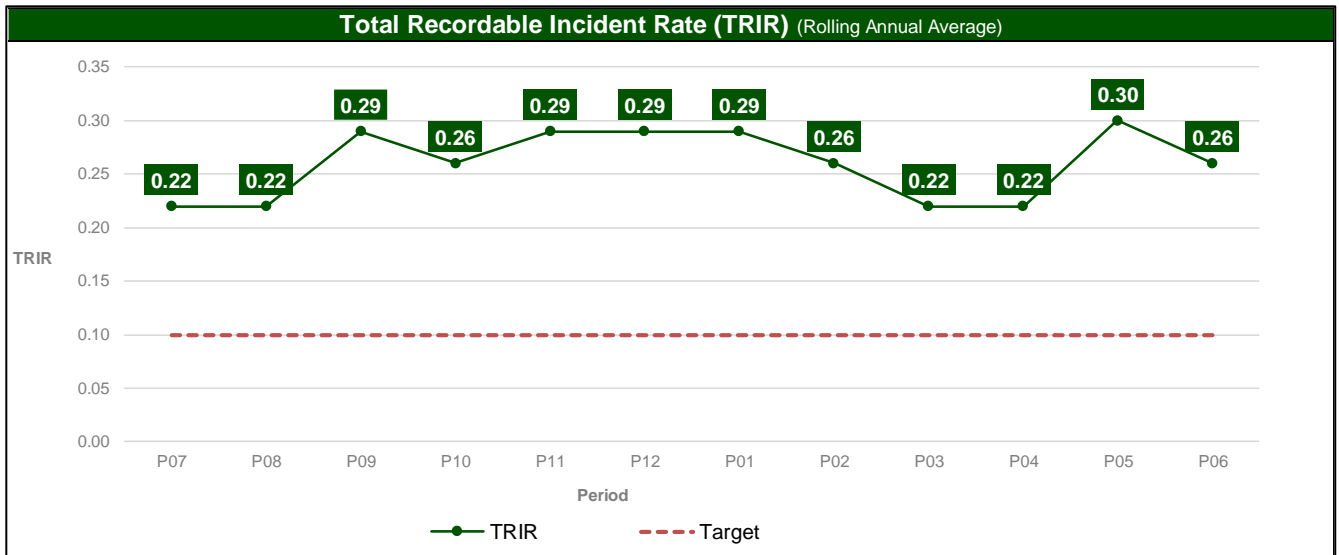
Fuel Cycle Area programme

- A return-to-green strategy for the active filter change target in the former fast reactor reprocessing plant is underway.
- Contract let for the ventilation replacement project in the former uranium recovery facility, a key step towards target delivery.
- Recovery area airline suit decommissioning activities have commenced within former uranium recovery facility.
- Transfer cell furniture removal within post-irradiation examination facility is complete. This enables the coring of the north and south transfer cell walls to commence.
- Vacuum design, inspection and test plans complete for the innovation scabblers project in PIE facility.
- Removal of water from the disused carbon bed filter complete.

Balance of Site programme

- Redundant equipment removed from the shaft top platform. The 60ft long 4" pump and pipe stringer removed from the shaft.
- The drum handling project for shaft and silo is in the manufacturing phase with inspections carried out across multiple work packages prior to integrated testing.
- A review of options to complete the DCP store extension is being carried out after NRS exercised a contractual option to terminate the contract with Graham Construction. Bridging work on electrical installation is being carried out in-house to ensure committed work on cranes can be completed in November.

EHSSQ Performance



NB. The above table covers the period up to the end of September 2024

The NRS Dounreay TRIR (excluding CNC), has increased from 0.22 (July 2024) to 0.26 (September 2024) as the result of two injuries. We continue to promote spatial awareness, dynamic risk assessment and the promotion of key learning.

- An apprentice was opening packaging with a bladed knife and cut their finger. An investigation was completed with an immediate quick alert and incident key learning were issued. Key learning: proper provision of induction and supervision of new arrivals is essential.
- A supply chain partner employee was size-reducing a piece of steelwork on the ground which rotated during cutting, impacting the side of their foot. A joint supply chain and site investigation has been completed. Key learning: proper method of work and provision of supervision balanced against experience level is required.

Zero Harm Improvement Plan

The zero harm improvement plan has been revisited with more focussed tasks to influence individual and collective behaviours, with the aim of improving harm prevention and reduction. This plan will also support an increase in key stakeholder confidence and address regulatory actions and issues. Good EHSSQ community engagement will see this plan being actively used and known at all levels.

ONR Regulatory Enforcement

NRS Dounreay is currently in Enhanced regulatory attention for safety with one Improvement Notice and three Enforcement Letters. Our Control of High Hazard Non-Nuclear Activities Enforcement Letter dated 16 June 2022 has now been closed.

Alkali Metal Storage Improvement Notice: Storage strategy, detailed project plan and building risk assessments shared with ONR and review of storage guidance completed in June 2024. Disposal strategy and Implementation project actions progressing.

Building Weathertight Integrity and Heating Enforcement Letter: Agreed infrastructure review plan in place with facility-by-facility assessments prioritised and underway with urgent repairs completed or planned. New issues reported immediately to ONR. PFR glass wall and roof repair contract awarded with physical work to commence in October. 3-year maintenance schedule and dashboard created to assist closure of purlin maintenance, maintenance regime and maintenance arrangements. These regulatory actions should be closed on or before schedule.

DSEAR Enforcement Letter: Working Group established, plan developed and being enacted, overseen by new Chemical Steering Board. Project lead in place with two new roles being recruited with facility assessments being completed. Issue closure reliant on external recruitment. Good project traction now being made.

COMAH Enforcement Letter: Working Group in place, recovery plan developed and being enacted. External SME resource contract established, and public information submission submitted. Active discussion with ONR is ongoing around mandated and desired timelines. Current focus is on the production of a Major Accident Prevention Policy (MAPP), COMAH SQEP capability, and to implement MAPP via safety management systems. In discussion with ONR, we expect to see revised final implementation extended by 3-6 months based on supply chain capability and extent of work to complete.

Regulatory Return to Routine Plan: NRS Dounreay has developed a regulatory return to routine plan that ensures appropriate action is taken to address extant regulatory issues and seeks to demonstrate proactive ownership of the compliance challenges that the site faces across conventional safety, infrastructure / assets and organisational change.

Environment

As part of a national programme, NRS Dounreay was subject to an ONR led Climate Change intervention in late September with the aim of scoping the maturity and inclusion of climate change impacts in projects. This intervention went well with the full report due shortly.

SEPA Regulatory Actions

All permits/authorisations remain in “Good Status” except for the site EASR permit for Radioactive Substance which continues to be “at Risk”; this is a consequence of recorded non-conformance with arrangements noting that no discharge limits have been breached.

PFR Surge Tank Pit elevated tritium: SEPA has recorded that NRS Dounreay has returned to compliance with condition A.6.3, but non-compliant with B.2.1. SEPA intend to follow-up NRS’s progress in addressing the investigation actions as part of our routine regulatory engagement. This will include discussion of the steps being undertaken by NRS to minimise the water entering the Surge Tank Pit.

Radioactive Waste Adviser Corporate Arrangements: SEPA has recorded that NRS Dounreay has returned to compliance with condition B.10.1 after a follow-up session to the inspection held in August 2024. This action is now closed.

Site Level Investigations

NRS Dounreay initiated several site level investigations in the reporting period. These included:

FCA Steam Pipe Weld Defect: On 23 May 2024, an annual visual inspection of the FCA steam main was carried out, where a small leak was identified North of D1208. In seeking to repair the leak, the pipe lagging was attempted to be removed but identified to be made of asbestos. A stop work was called, and a licenced specialist called to remove the lagging. The weld was inspected and found to contain a crack, and a site level investigation initiated to identify the scale of the issue across the steam pipe system.

FCA Carbon Bed Filter: On 26 June 2024, a UNOR was raised and SEPA and ONR were notified as to a potential loss of containment from the below-ground carbon bed filter (part of a disused ventilation system). A site-investigation was convened, and it was confirmed by the Fuel Cycle Area programme manager that addressing the liquor reduction was to be treated as the priority project.

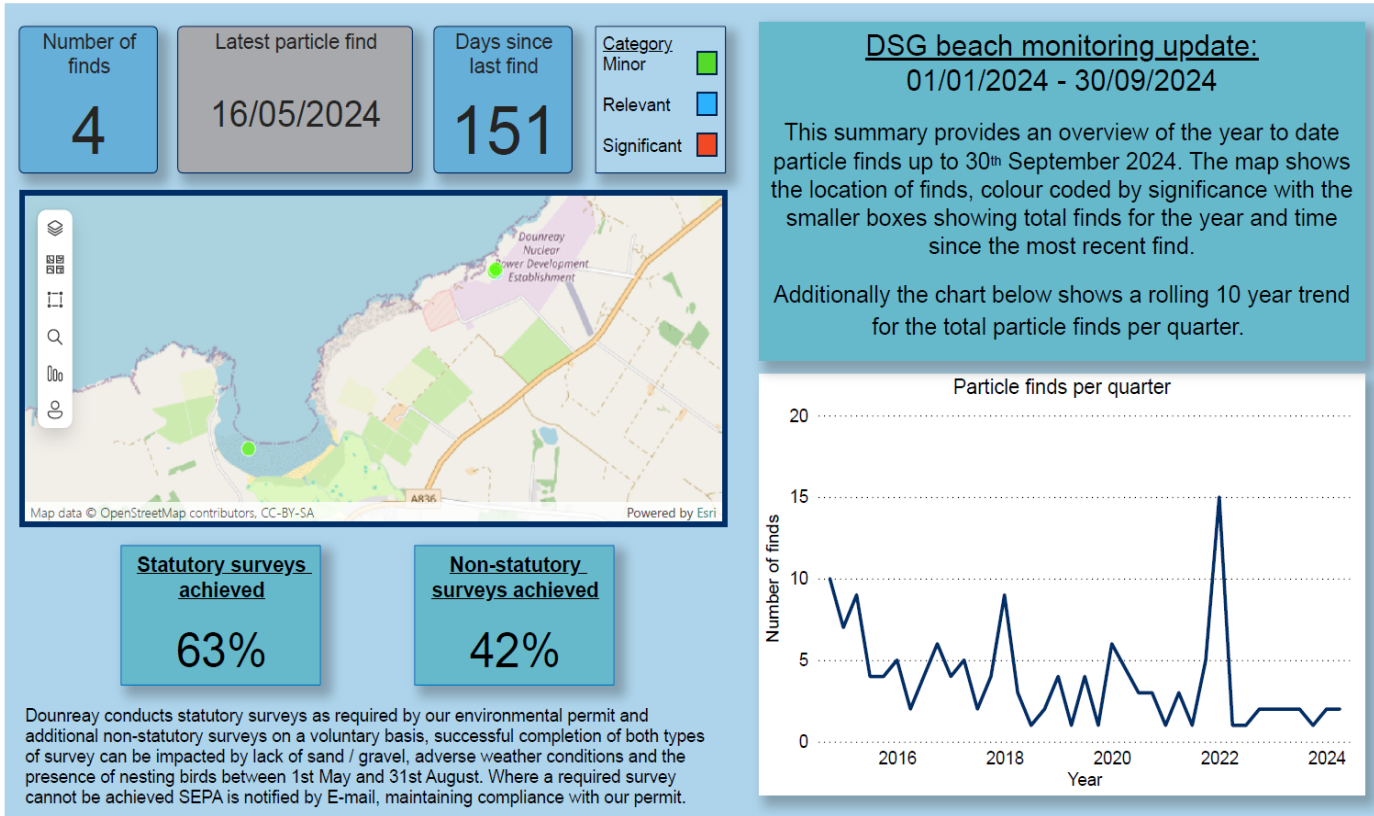
The liquor level was found to be reducing at approximately 2.25 litres per day. The liquor has now been removed, with new monitoring arrangements installed as part of an accelerated decommissioning strategy. Enhanced sampling has not reported any elevated activity that could be attributed to the carbon bed filter.

Loss of Network Telecommunications: The site experienced an issue with part of the telephone network, affecting communications with the Dounreay Fire, Ambulance and Rescue Service and CNC. The cause has been identified and actions taken to minimise the impact of a re-occurrence.

ONSHORE MONITORING OF RADIOACTIVE PARTICLES

All information and updates can be found on the Dounreay environmental monitoring website at:

<https://www.gov.uk/government/publications/onshore-monitoring-of-radioactive-particles>



CORPORATE AND PEOPLE

- Recruitment to the position of NRS Dounreay managing director took place, with an announcement expected in the next reporting period
- We received 86 nominations across various categories linked to our values for the annual Dounreay Decommissioning Excellence Awards. The winners will be announced at an awards ceremony in November
- Nine apprentices received their indentures at the annual apprentice prize-giving ceremony held in Thurso in September. Thirteen new apprentices started their first year of training in August
- Liam Gordon, a chemical engineer working on the shaft and silo project, won the Young Engineer of the Year award at the annual awards of the Aberdeen branch of the Institute of Chemical Engineers