



## Performance Report to DSG Site Restoration Sub Group

For the period 1<sup>st</sup> July 2025 – 30<sup>th</sup> September 2025

### **NRS Dounreay Delivery Business Key Points**

Our regulatory return-to-routine plan continues to address the two Enforcement Letters and one Improvement Notice that remain open. Significant progress has been made towards exiting Enhanced Regulatory Attention. A Safety Priority Action Plan has been developed, with five workstreams focussed on returning NRS Dounreay to Routine Attention. Work streams include Safety Leadership, Organisational capability, Safety Culture, Asset Management and Safety Performance.

### **Operational, Enabling & Programme Delivery Target Status**

During the reporting period, the following Group Key Targets (GKT) were completed at 'Stretch';

- GKT09.2 - Reactors Irradiated Fuel Cave – Removal of Sodium from 12 Buckets Contained in Primary Storage Tanks
- GKT09.3 FCA D1203 Vent Improvement Project HEPA Filter Bank and Extract Fans in position
- GKT09.6 FCA D1217 Removal of South Wall Cut Blocks

All other targets are forecasting as 'On Target', except for GKT 09.4, 'FCA: D1206 Breaking Active Filter Containment (AFC)' and GKT 09.7, 'BoS Development of site infrastructure strategy' which are forecasting 'At Risk'.

GKT 09.4 is 'At Risk' due to high radiation levels being uncovered as equipment was removed from the Core Cave, preventing any work in the area until additional shielding can be added. A recovery plan is in place and there has been a huge effort from the plant team to minimise this impact.

GKT 09.7 is 'At Risk' due to resource availability which has been impacted by emergent issues on the remaining active steam line. A stabilisation optioneering workshop has been held, however, further workshops are required. This GKT will remain 'At Risk' until the programme has been underpinned.

### **Programme Delivery Update**

#### **Reactors Programme**

All infrastructure improvement activities, those being upgrades to the effluent treatment plant, PFR reactor hall roof and PFR 'glazed wall' replacement, are progressing as planned.

Within breeder fuel removal, commissioning activities supporting operations continues. Twelve elements (12/42) have been delivered to D2160 Process Cells. De-fuelling will now recommence during October (12 Elements) once some issues in the associated downstream plant have been resolved.

Treatment of the 'sodium buckets' within the PFR irradiated fuel cave (IFC) which held PFR fuel has been completed 'At Stretch' with all twelve buckets cleaned of Sodium and returned to the Primary Storage Tank.

### **Fuel Cycle Area Programme**

D1217 achieved the first FCA GKT of the year. Removal of the South Outer Wall blocks was completed successfully 2 days ahead of the target date.

The NDA/NRS Scabbler innovation project being run by the D1217 Project Team is continuing to make good progress. Final testing to be completed in October, with delivery of equipment to the Dounreay site towards the end of October.

The D1203 Vent Improvement Project Plant Room works are now complete, allowing fans and filters to be installed as part of the FCA GKT. All excavated wastes have now been processed through DN060.

Within D1206, removal of the waste adapter assembly is now complete and the contract for the Active Filter Change Robot Modifications has now been awarded. These are key steps in achieving both physical and design elements of the GKT.

Contingency works associated with D1204 Pond substantiation have moved at pace. A knowledge sharing visit to Sellafield and an optioneering workshop were undertaken during the reporting period.

### **Balance of Site Programme**

#### **Shaft & Silo**

During this period, progress has been made on service diversion works and preparatory works ahead of the civils contractor returning to site to commence dismantling activities for Advanced Transition Works.

A first stage high hazard risk reduction assessment for the silo is now complete. Resource is now being mobilised to specify scopes to address findings.

#### **DCP Store Extension 2**

The NRS installation team has now been fully deployed following 'no bid' from the supply chain for EC&I installations and there is now a higher than planned NRS self-performance for completion of the installation phase. The Commissioning team is now established and continuing with development of the Commissioning suite of documents.

During the reporting period, concrete plinths and supporting 3D surveys and manufacturing design of the ventilation systems were completed. Manufacturing of ventilation systems is now underway, along with erection of the required scaffold systems.

#### Non-Active Drains

The BES contract for the procurement and installation of mechanical and electrical process plant and systems for the Non Active Drains Optimisation Project is now fully mobilised with design support established with WSP Ltd. Installation design and procurement specification is being produced for acquisition of process during Q3 & Q4.

#### D1432 Boiler House

Installation of the sump pump is ongoing. Additional Earth mats require to be laid following resistance testing. Inspection and Test Plan and Commissioning Strategy for Kerosene is in production.

#### D1310 Labs Upgrade

Mechanical and electrical installation is now complete, testing of systems is underway.

### **Commercial**

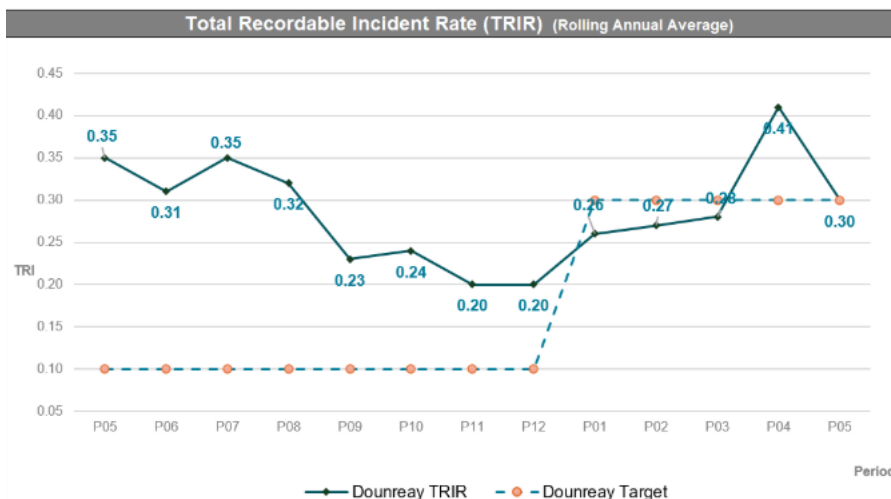
Work to progress the transfer of the decommissioning operatives from GDES, Morson and Nuvia is ongoing. Dialogue will continue between NRS and the three companies throughout the process. With the agreement from GDES, Morson and Nuvia, sessions will be set-up between representatives from NRS, the three companies, and the transferees to discuss the TUPE process and the key steps between now and the transfer date. The sessions will allow the transferees to raise questions and any issues with NRS. Work is also underway with the NRS HR teams to prepare for the onboarding of the c80 staff.

### **EHSSQ Performance**

The NRS Dounreay total recordable incident rate (excluding CNC) has risen from 0.28 to 0.30 due to an employee sustaining a finger injury whilst loading a trailer and an employee injuring their ankle whilst walking on an uneven road.

We have had one RIDDOR (reporting of injuries, diseases and dangerous occurrences regulations) reportable injuries and one lost time accident due to the incidents noted above.

The below table covers the period up to the end of September 2025.



### ONR Regulatory Enforcement

NRS Dounreay Regulatory Return to Routine Plan remains on target with significant focus on COMAH/DSEAR regulatory issues.

Control of the risk presented by Dangerous Substances and Explosive Atmospheres Regulations Enforcement Letter – Near term focus is on completing DSEAR risk assessments with the longer-term focus on developing SQEP staff and action closure.

COMAH Lower Tier – Level 3 Regulatory Issue Enforcement Letter – loss of action closure momentum due to summer leave and facility resource prioritisation, current focus is on the CDOIF delivery, training and action closure to enable the closure of the enforcement letter by 30 September 2025.

Significant Handling Operations Improvement Notice – Delivery date extended by ONR to 24/10/25 due to the nature and scale of the gap found during first phase of recovery and fact that it will take longer to address. Four key aspects being addressed: (1) all significant handling activities with elevated risks are appropriately identified (COMPLETE), (2) a suitable & sufficient assessment of the risk is made (90% COMPLETE), (3) commensurate control measures are identified including adequate arrangements (30% COMPLETE - BEHIND PLAN by 2 weeks) and (4) Implement the arrangements (by 24/10/25). Revised delivery plan and acceptance criteria agreed with ONR. Additional sprint week planned to get back on track.

### SEPA Regulatory Actions

The NRS Dounreay environmental total recordable incident rate has remained at 0.00 during the reporting period. All permits/authorisations remain in “good status” except for the site radioactive substance EASR permit which continues to be “at risk”. This is a consequence of recorded non-conformance with arrangements.

NRS Dounreay has carried on self-monitoring and has notified SEPA of one potential non-compliance in relation to inaccurate records

- for gaseous H3 discharge from the D1310 stacks. Non-compliance against A4.1 You must make, as soon as practicable, true, accurate and legible records that ensure and demonstrate compliance with the requirements of your authorisation.

NRS Dounreay received regulatory notice RN/2025-001 in P4 in relation to contravention of environmental permit EAS/P/1173600/CP01 conditions in relation to the leakage of radioactively contaminated water from the D2001 Carbon Bed Filter (CBF) within the FCA. Actions are in progress.

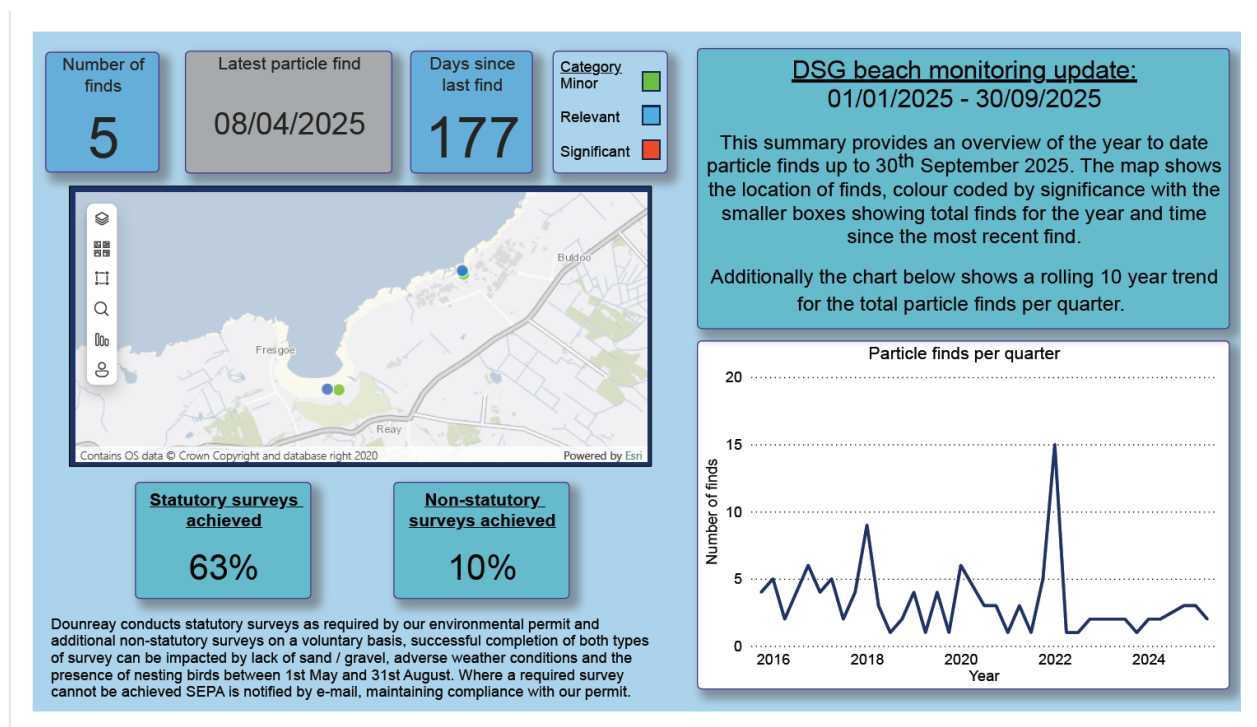
We also received a draft regulatory notice in P5 in relation to the disposal of radioactive aqueous liquid waste from the D1401 sump to the marine environment via our non-active drains.

Environmental resource and SQEP vulnerability remains a concern. Additional resource has been sanctioned by the NRS Dounreay Portfolio Board which is now with NRS Corporate for approval.

### 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>



### Success Stories

**Long Running Scheme Award from IET** - Dounreay has received a Long Running Scheme Award from The Institution of Engineering and Technology (IET). The award was presented to Dounreay for being part of the IET's accredited company scheme for 10 years. Being part of the IET's accredited company scheme means that we can provide quality-assured pathways for our own engineers to achieve professional registration building on the development programmes we already have in place at Dounreay.

**Festival of Politics** – several colleagues visited the Scottish Parliament in Edinburgh to sit on a panel for the Festival of Politics. The festival happens every summer when the parliament opens its doors to the public and hosts events that showcases the work it does along with relevant people and topics. We were invited to take part and explore the impact that Dounreay has had on the community

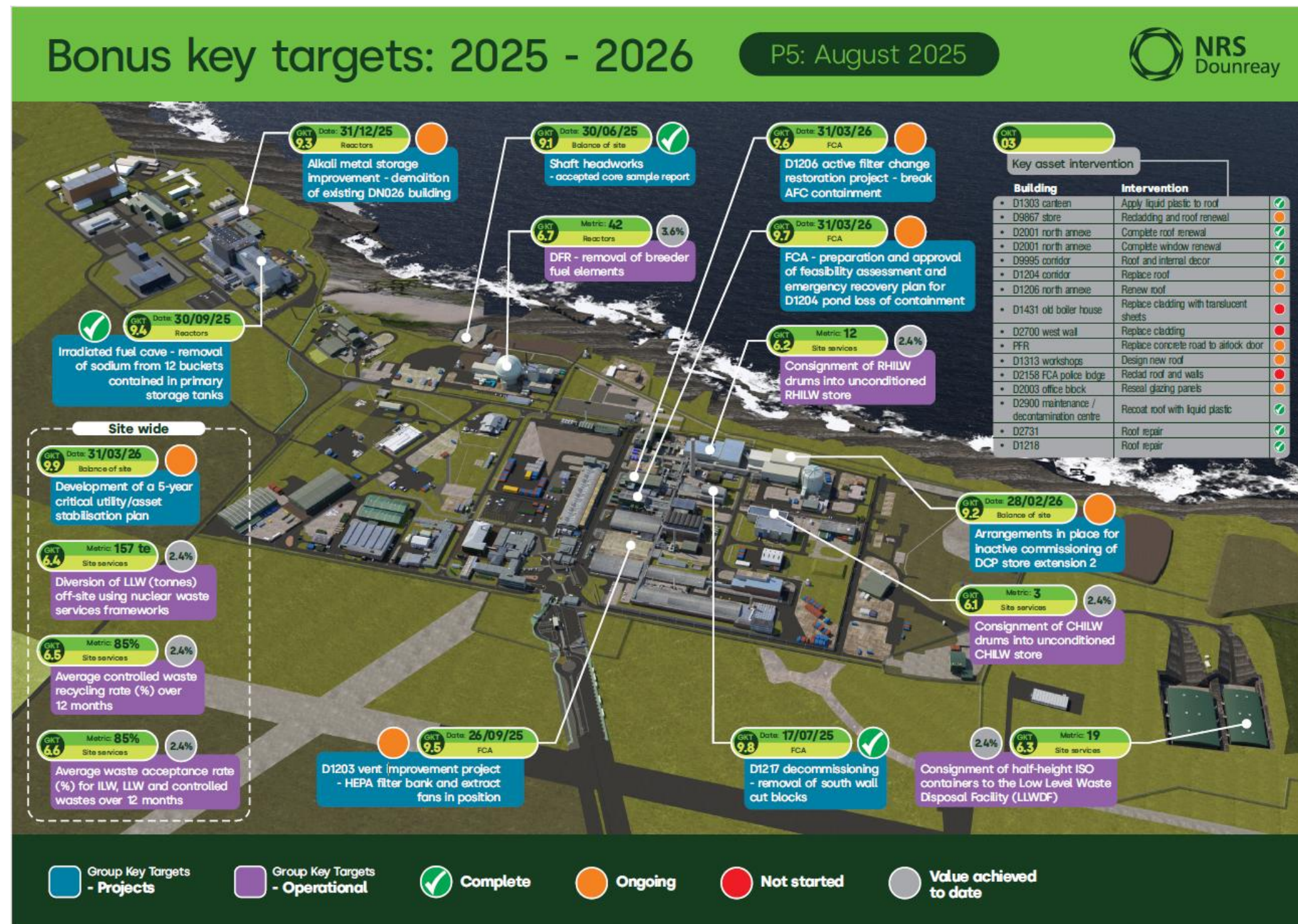
over the last 70 years. Discussion was wide ranging, from lessons learned about waste, to skills and knowledge cross-over into other sectors and how Caithness changed in the 1950's.

Dounreay Employees' Charity Fund – The Dounreay Employees' Charity Fund (DECF) has donated £1,000 to Team Tender, a group dedicated to raising funds in memory of the late Donald McWilliam. Donald, together with his friends, raised thousands of pounds for local charities over the years. Donald was also a committee member of DECF during his time on site.

STEM Ambassadors – Several primary schools across Caithness participated in the Greenpower Goblin event held in Aberdeenshire. The initiative, aimed at children aged 9 to 11, provides electric Goblin car kits that enable participants to build and race their own vehicles. Engineers from NRS Dounreay led the project within each school, sharing their expertise and guiding the pupils through the build process. Additional support was provided by apprentices from both NRS Dounreay and Rolls-Royce. Although Caithness teams did not secure any wins this year, all pupils gained valuable experience and thoroughly enjoyed the educational opportunity.



## Appendix A - Operational, Enabling &amp; Programme Delivery Target Status



Group Key Targets											
ID	Key Target	Owner	Planned	Forecast							
				Current Year End Forecast	Current Year End Forecast	RAG Year End	Forecast Last Period	Forecast Last Period	RAG Previous Period	Trend	
Proposed Overall Measure of GKT9 Threshold 5 out of 9 elements achieved On Target 5 out of 9 elements achieved Stretch 6 out of 9 elements achieved											
GKT9	a01	BoS Shaft Headworks – Accepted core sample report	Naomi Mawby	30/06/25	Complete  26/06/2025	All sub elements achieved	Stretch - On Track	Complete  26/06/2025	All sub elements achieved	On Target - On Track	▲
	a02	BoS Arrangements in place for inactive commissioning of DCP store extension 2	Naomi Mawby	28/02/26	On Target - On Track  28/02/2026			On Target - On Track  28/02/2026			
	b01	Reactors Alkali Metal Storage Improvement - Demolition of Existing DN026 Building	Craig Brown	31/12/25	On Target - On Track  31/12/2025			On Target - On Track  31/12/2025			
	b02	Reactors Irradiated Fuel Cave – Removal of Sodium from 12 Buckets Contained in Primary Storage Tanks	Craig Brown	30/09/25	Complete  15/08/2025			Complete  15/08/2025			
	b03	FCA D1203 Vent Improvement Project HEPA Filter Bank and Extract Fans in position	Becky Ruddy	26/09/25	On Target - On Track  28/08/2025			On Target - On Track  26/09/2025			
	b04	FCA D1206 Breaking active filter containment	Becky Ruddy	31/03/26	9 days behind - Recovery plan in place  09/04/26			On Target - On Track  27/03/2026			
	b05	FCA: Preparation and Approval of Feasibility Assessment and Emergency Recovery Plan for D1204 Pond Loss of Containment	Becky Ruddy	31/03/26	On Target - On Track  31/03/2026			On Target - On Track  31/03/2026			
	b06	FCA D1217 Removal of South Wall Cut Blocks	Becky Ruddy	17/07/25	Complete  15/07/2025			Complete  15/07/2025			
	b07	BoS Development of site infrastructure strategy	Naomi Mawby	31/03/26	At Risk  31/03/2026			At Risk  31/03/2026			



				Stretch	On Target						
GKT6	1	Metric 1: Consignment of CHILW Drums into unconditioned CHILW store	Mick Moore	100% of target metric = 3 CHILW drum	66% of target metric = 2 CHILW drum	On Target - On Track	On Target - On Track	On Target - On Track	On Target - On Track	On Target - On Track	
					66% of target metric = 2 CHILW drum			66% of target metric = 2 CHILW drum			
	2	Metric 2: Consignment of RHILW Drums into unconditioned RHILW store	Mick Moore	100% of target metric = 12 RHILW drums	83% of target metric = 10 RHILW drums	On Target - On Track		On Target - On Track			
					83% of target metric = 10 RHILW drums			83% of target metric = 10 RHILW drums			
	3	Metric 3: Consignment of Half Height ISO Containers to the Low-Level Waste Disposal Facility (LLWDF)	Mick Moore	47% of target metric = 19 HHISO containers	47% of target metric = 12 HHISO containers	On Target - On Track		On Target - On Track			
					47% of target metric = 12 HHISO containers			47% of target metric = 12 HHISO containers			
	4	Metric 4: Diversion of LLW (tonnes) off-site using Nuclear Waste Services (NWS) Frameworks	Mick Moore	100% of target metric = 157 tonnes of LLW.	69% of target metric = 108 tonnes of LLW.	On Target - On Track		On Target - On Track		On Target - On Track	
					69% of target metric = 108 tonnes of LLW.			69% of target metric = 108 tonnes of LLW.			
	5	Metric 5: Average controlled waste recycling rate (%) over the 12 months	Mick Moore	Controlled waste recycling rate >85%	Controlled waste recycling rate >80%	On Target - On Track		On Target - On Track		Controlled waste recycling rate >80%	
					Controlled waste recycling rate >80%			Controlled waste recycling rate >80%			
	6	Metric 6: Average Waste acceptance rate (%) for ILW, LLW and Controlled Wastes over the 12 months	Mick Moore	Average Waste acceptance rate >85%	Average Waste acceptance rate >80%	On Target - On Track		On Target - On Track		Average Waste acceptance rate >80%	
					Average Waste acceptance rate >80%			Average Waste acceptance rate >80%			
	7	Reactors: DFR Removal of Breeder Fuel Elements	Craig Brown	42 elements removed	30 elements removed	Stretch - On Track		On Target - On Track			
					42 elements removed			30 elements removed			