

# **Dounreay Site Stakeholder Group**

## **Site Restoration Sub-Group**



**SEPA organisational update:**

As the group may be aware, SEPA is currently restructuring to become an organisation that offers more resilience, is future-ready, and is able to deliver with greater impact for Scotland's environment. Dr Paul Dale, former Radioactive Substances Unit Manager, has been appointed to the role of Chief Regulator and he took on this role on 1st December. As Chief Regulator, Dr Dale will be working closely with SEPA's regulatory teams including radioactive substances.

Interim management arrangements are currently in place for the Radioactive Substances Unit Manager role as follows;

16<sup>th</sup> December till 19<sup>th</sup> January - Mark Toner

20<sup>th</sup> January till 23<sup>rd</sup> February - Isabelle Watson

24<sup>th</sup> February till 31<sup>st</sup> March - Stewart Ballantine

**Site Inspection Work & EASR Compliance**

During the reporting period SEPA has engaged regularly with Dounreay at a programme level or directly with project teams on matters relating to ongoing projects including Waste Management, FCA decommissioning, Reactor decommissioning and Balance of Site projects including Shaft & Silo Waste Retrieval Project.

As previously reported, NRS had notified SEPA of the potential discharge of very low levels of radioactivity from a sump to the environment via the non-active drain system. The non-active drain system outfall is not an authorised disposal route for aqueous radioactive waste. Dounreay subsequently advised the discharge from the sump had been routed to the Low Active Drain shortly thereafter. SEPA's investigation of the circumstances concluded that NRS had contravened conditions of its EASR radioactive substances authorisation. In October, SEPA issued a Regulatory Notice to NRS that specifies the steps it is required to take. The steps relate to the management arrangements in place for the disposal of aqueous liquid waste. NRS is currently undertaking work to address the requirements of the notice.

SEPA undertook compliance inspections at the Dounreay site in late September and November. During the September visit SEPA looked at NRS Dounreay arrangements for compliance with Conditions 5.1 to 5.5. NRS Dounreay were unable to provide adequate evidence to demonstrate compliance with conditions 5.4 and 5.5. A follow up inspection was carried out in November following which NRS Dounreay were recorded as non-compliant with condition 5.1 which relates to ensuring non-radioactive

discharges do not have an adverse impact on, or cause pollution of, the water environment. NRS Dounreay was also recorded as non-compliant with condition 5.3 which requires that prior to any non-radioactive aqueous waste being added to the disposal system it is appropriately characterised.

SEPA's November visit also covered arrangements for compliance with A.2.1 to have and maintain a management system adequate to ensure compliance with the site authorisation. NRS Dounreay were found to be compliant with this requirement.

### **Variation Application**

SEPA issued NRS Dounreay a variation to their EASR radioactive substances permit in January 2026 which included changes to the list of authorised gaseous outlets which are detailed in Table 2 of the extant permit. The changes made are as follows;

- Removal of authorised gaseous outlets which are no longer required to be permitted
- Amendment of some of the authorised gaseous outlet heights
- Amendment of some of the authorised gaseous outlet names
- Re-ordering of the authorised gaseous outlets by height
- Removal of the Cemented Material Test Raffinate waste route to Belgium, Australia or German, which is no longer required
- Amendment to wording of conditions associated with transfer of radioactive waste outside of the UK

### **Low Level Radioactive Waste Facility**

SEPA continue to engage with the LLWF team on a regular basis and are content that the facility continues to operate in a compliant manner.

### **Non-Nuclear Site Regulation**

Nothing to note.

**Vulcan**

Nothing to note.

Stewart Ballantine

Radioactive Substances Unit

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