



Performance Report to DSG Site Restoration Sub Group  
For the period 1<sup>st</sup> October 2025 – 31<sup>st</sup> December 2025

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

Over the reporting period, the site has continued to focus on increasing the pace of delivery, addressing regulatory challenges and progressing with its asset interventions requirements.

On delivery, Dounreay progress towards its decommissioning milestones this year is highlighted by the excellence performance achieved across all targets (within one achieved at stretch during the period). In anticipation of the year end break, a further focus has been on preparing the return-to-work approach for 2026. This site safety focus will be further enhanced by the roll out of Human Performance training in the new year.

Our regulatory return-to-routine plan continues to address the two enforcement letters and one improvement notice that remain open. The COMAH enforcement letter has been reduced from level 3 to level 4 this quarter. Significant progress has been made towards exiting Enhanced Regulatory Attention.

On asset condition, significant progress is being made in completing as many as the 16 planned interventions listed against the site relevant operating target (weather permitting). Additionally, a high volume of remedial work has also been successfully undertaken following storm impact early in the reporting period.

This period has also been dominated by the preparation for the business planning of the next financial year, which is being conducted based on a 5-year rolling funding cycle (in line with the spending review 25 approach). This planning is also done based on risk-based capital allocation across NRS and as a result provide the site with a better opportunity to address both its high hazard decommissioning priorities and the requirement in asset condition improvement.

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

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

GKT09.3 Reactors: Alkali Metal Storage Improvement - Demolition of Existing DN026 Building

All other delivery targets are forecasting as 'On Target', except for GKT 09.6, 'FCA: D1206 Breaking Active Filter Containment (AFC)' and GKT 09.9, 'BoS Development of site infrastructure strategy' which are forecasting 'At Risk'. Return to green plans are in place against both targets and there is a reasonable level of confidence that they will be both recovered to at least "on target".

Good progress is being made against all operating targets, with most of those tracking at "stretch" (the remainder being at "on target", no target at risk).

## **Programme Delivery Update**

### **Reactors Programme**

Asset intervention works are progressing, although the schedules have been extended for the PFR Application of Liquid Plastic to Reactor Hall roof due to the impact of weather and specification changes, and for the PFR SGB Glazed Curtain Wall upgrade, where the scope has been increased.

Within breeder fuel removal, commissioning activities supporting operations continues. DFR breeder drilling operations (to release trapped fuel) and EC&I commissioning activities were accelerated whilst fuel element transfer from the reactor to D2160 process cell suite was paused, whilst D2160 manipulator and de-cladder equipment are repaired. Year-to-date 15 breeder fuel elements have been transferred to D2160, so the stretch target of 42 elements is still achievable if recovery to reinstate D2160 runs to plan and transport and DCP facilities are available when required.

### **Fuel Cycle Area Programme**

D1206 - GKT - Physically another positive period with significant progress witnessed through the completion of the interface piece installation and the positioning of the base plates of the containment. Development of a consistent working pattern through to completion of the commissioning phase by 31st March although remains challenging, the team retains a positive outlook on achieving this date.

D1217 - Last 6 blocks moved from D1217, essentially completing cell decommissioning  
D2001 CBF - Contract documentation nearing completion with tender period forecast to commence by the end of the calendar year. Risk modelling to produce P50 output scheduled for December.

D1204 - GKT - Development of chosen option ongoing with facility team working on response methodology and equipment required. Emergency arrangements team providing support.

The NDA/NRS scabbler innovation project being run by the D1217 project team. All equipment onsite and installed, commissioning complete.

## **Balance of Site Programme**

### **Shaft and Silo**

During this period, the Programme Business Case (PBC) was presented to and endorsed by both Balance of Site Programme Board and NRS Dounreay Portfolio Board. The PBC storyboard was presented to the NDA Group Investment Committee. The PBC was endorsed at the NRS Investment Review Panel and by the NDA's Senior Strategic Committee. The PBC will now be submitted to NDA Group Investment Committee in February 2026.

Advanced transition works: Shaft cover building. Cladding and structural steelwork removed, temporary shaft cover structure complete. D1225 lower fence dismantled, building radiological survey completed, newly exposed surfaces decontaminated and encapsulated.

Silo assessment: Priority actions being taken to address technical and safety queries. Follow up review held in period resulting in 3 solutions for further development. Construction study to remove loads from existing silo walls presented at an options meeting. Study report now being completed. Silo containment function being assessed as a complete system, i.e. reinforced concrete; aqualite membrane; non-structural blockwork; permeable backfill in order to fully assess the importance of the reinforced concrete walls, and inform a decision on future loading of the walls

All factory acceptance testing and integrated testing has been completed on drum handling plant and equipment.

### **DCP Store Extension 2**

Some resourcing fluctuation which is being managed to minimise delays hence an amber classification for capability and capacity.

D2703 crane installation entering final phase with contractor on site to complete control systems and undertake site acceptance testing. Recovery system requires some remedial work with components in manufacture to enable this. Installation testing continues upon other aspects of the crane.

Ventilation system installation now completed with exception of a single isolation damper, currently projected for end January 2026. EC&I installation continues to progress with NRS resource, PPD2 \* PD3 motor control centres now completed, shield door 6 drive system EC&I install continues with shield door 5 now started, some remedial civils works required on SD5.

Inactive commissioning documentation continues to progress, supporting initial testing sheets now being drafted. Additional resource in process from contractor base with a view to commencing mid to late January to augment mechanical and electrical installation teams.

### **Non-Active Drains**

Completed initial supplier engagement including identification of plant/equipment to be revised or updated. Production of procurement specifications to enable scheduled procurement of remaining process plant progressed.

### D1310 Labs Upgrades

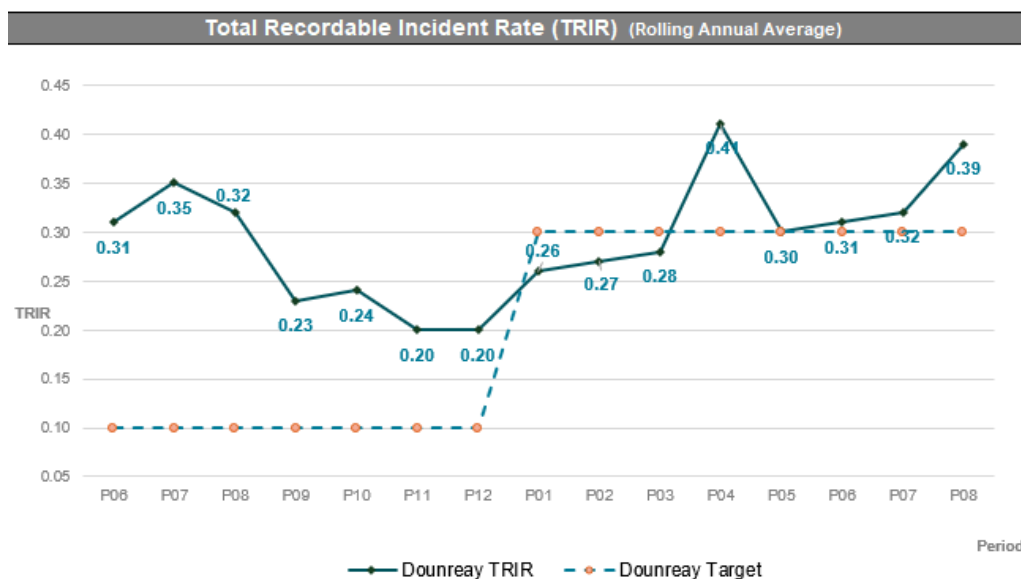
New modular wet plant room fit out commenced and foundation pads cast on site. Whole body monitor manufacture commenced. D1310 labs phase 2 design ITT returns expected 2 December.

### D1313 Gamma Calibration X System

Gamma system lifting equipment and transfer flask lifting plate fabrication was completed and design substantiation completed but safety case requires rework following peer review which will push installation into Q4 of FY 25/26.

## **EHSSQ Performance**

The NRS Dounreay total recordable incident rate (excluding CNC) has risen from 0.30 to 0.39 due to A site visitor (external contractor) tripping over their own feet when walking to an allocated inspection area and injuring their face; A Dounreay Fire Brigade trainee injuring their ankle whilst attending an offsite training course. We have had two RIDDOR (reporting of injuries, diseases and dangerous occurrences regulations) reportable injuries and two lost time accident due to the incidents noted above. The below table covers the period up to the end of December 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 – continue to progress remaining Level 4 actions and collate evidence of closed actions for ONR. Working with ONR, we have agreed that there is a need to revise delivery timescales for some of the remaining Level 4 actions.

COMAH Lower Tier – Level 3 Regulatory Issue Enforcement Letter – NRS-D position statement issued to ONR in September and revised in October with updates post ONR consultation. ONR have agreed to lower the Regulatory Issue from Level 3 to Level 4 as the intent of the enforcement letter has been met. NRS-D acknowledge that full compliance has not yet been achieved, as several Level 4 actions remain in progress.

Significant Handling Operations Improvement Notice (now closed)– ONR completion intervention held 7 October with final evidence provided 24 October. ONR was content with progress with minor comments made. Formal closure notification from ONR received 30 October. ONR will monitor the effectiveness of the new arrangements as part of normal regulatory business through existing engagements with NRS-D working to move the site out of enhanced regulatory attention. Significant Handling training remains ongoing across the site.

### **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, notified to the regulators through appropriate channels.

NRS Dounreay has carried on self-monitoring and has notified SEPA of potential non-compliances in relation to the following events:

- A high-volume air sample outage at PFR was discovered during regular checks. This event was notified in December 2025
- An increase in water level in a pit in an FCA building was observed and notified in October 2025
- An increase in water levels was detected within the Silo by the monitoring system. Data review indicated ingress of water into the Silo. This event was notified in October 2025

FCA Carbon Bed Filter RN (RN/2025-001) – (on track): appropriate groundwater monitoring arrangements in place with the programme for the return to compliance already submitted to ONR and following implementation programme maturing ready for submission to ONR by 8 February 2026.

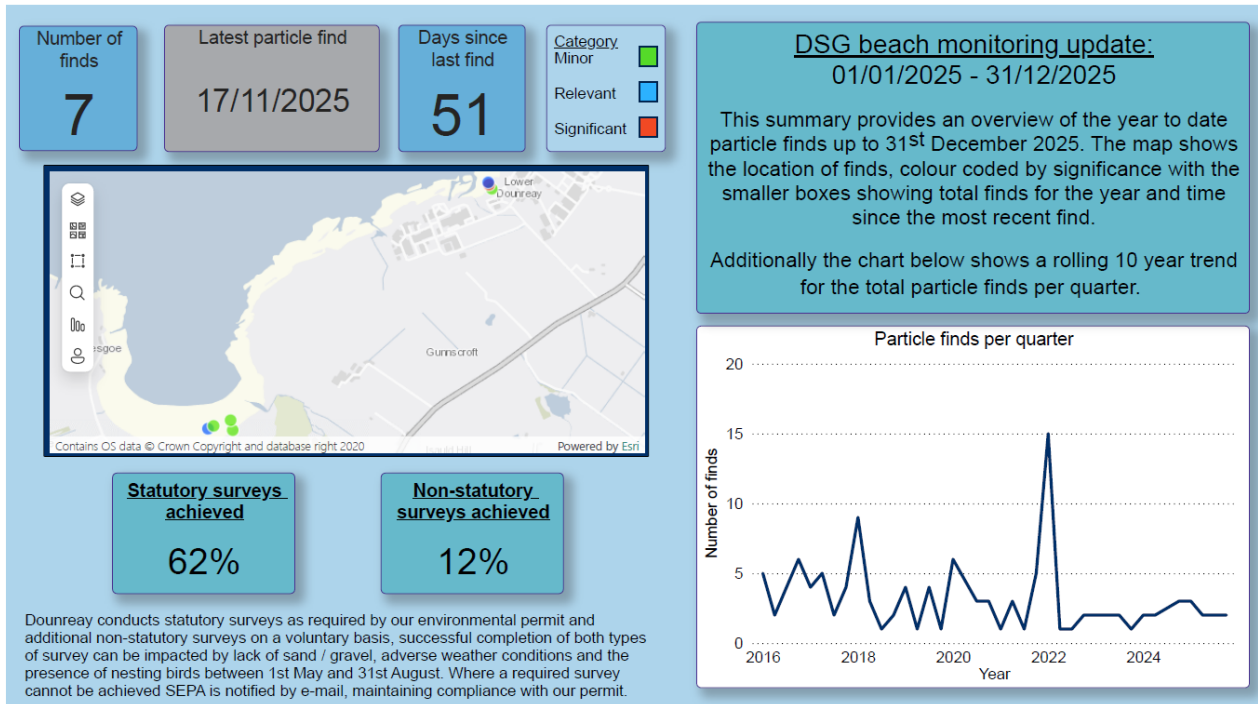
Non-Active Drain RN (RN/2025-003) – (on track): Document review of management arrangements for aqueous liquid waste disposal nearing completion, with facility physical and visual connection to non-active drains inspections programmed for January / February. Assurance activity is planned for March from which to submit review written outcomes to SEPA.

A recruitment campaign of environmental resources is ongoing. While environmental resource and SQEP vulnerability remains a concern, many functions have seen a reduction in vulnerability.

## 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>



## Other Success Stories

**Charity Golf Event:** Charity golf event has raised, £1,200 for the local Caithness Food Bank, a great day had by all participants with calls for a future event to be set up.

**Health & Wellbeing Event:** Events held throughout the day on 8 October in the canteen and adjacent meeting rooms showcasing network groups, local support and charity groups (circa twenty). Presentations and discussion groups providing opportunity for Dounreay staff and contractors to engage and learn more about personal health and wellbeing.



**NRS Dounreay sponsored the Inaugural Highlands and Islands Apprentice Awards 2025:** Kate Thomson, NRS Dounreay Commercial team apprentice won Modern Apprentice of the Year with Kate Murray being highly commended in the same category.

**Apprentice of the Year Award:** Fallon Campbell – craft electrician within the Balance of Site team won ECITB Apprentice of the Year.

UHI Awards: Neave Anderson won the Sidney Black Memorial Engineering Award, an annual prize celebrating outstanding female engineering students at the University of the Highlands and Islands.

NDA Leadership Academy: Alex Proverbio from the EHSSQ team has been selected to attend the next NDA leadership academy cohort.



## 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              | Variance to on Target | Forecast Last Period | Forecast Last Period  | RAG Previous Period       | Trend              |          |
| Proposed Overall Measure of GKT3<br>Threshold 5 out of 9 elements achieved<br>On Target 5 out of 9 elements achieved<br>Stretch 6 out of 9 elements achieved |            |  |             |                           |  |                           |                       |                      |   |                           |                    |          |
| GKT3   | s01        | BoS Shaft Headworks – Accepted core sample report  | Naomi Mawby | 30/06/25                  | Complete<br>26/06/2025                             | All sub elements achieved | Stretch - On Track    | -4                   | Complete<br>26/06/2025  | All sub elements achieved | Stretch - On Track | On Track |
|  | s02        | BoS Arrangements in place for inactive commissioning of DCP store extension 2  | Naomi Mawby | 28/02/26                  | On Target - On Track<br>28/02/2026                 |                           |                       | 0                    | On Target - On Track<br>28/02/2026  |                           |                    |          |
|  | b01        | Reactors Alkali Metal Storage Improvement – Demolition of Existing DN026 Building                                      | Craig Brown | 14/11/25                  | Complete<br>14/11/2025                             |                           |                       | 0                    | Complete<br>14/11/2025  |                           |                    |          |
|  | b02        | Reactors Irradiated Fuel Cave – Removal of Sodium from 12 Buckets Contained in Primary Storage Tanks                   | Craig Brown | 30/09/25                  | Complete<br>15/08/2025                             |                           |                       | -46                  | Complete<br>15/08/2025  |                           |                    |          |
|  | b03        | HEPA Filter Bank and Extract Fans in position  | Becky Ruddy | 26/09/25                  | Complete<br>22/09/2025                             |                           |                       | -4                   | Complete<br>22/09/2025  |                           |                    |          |
|  | b04        | FCA D1206 Breaking active filter containment   | Becky Ruddy | 31/03/26                  | 3 days behind - Recovery plan in place<br>03/04/26 |                           |                       | 3                    | 13 days behind (7 standard working days) - Recovery plan in place<br>13/04/26 |                           |                    |          |
|  | 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<br>31/03/2026                 |                           |                       | 0                    | On Target - On Track<br>31/03/2026  |                           |                    |          |
|  | b06        | FCA D1217 Removal of South Wall Cut Blocks   | Becky Ruddy | 17/07/25                  | Complete<br>15/07/2025                             |                           |                       | -2                   | Complete<br>15/07/2025  |                           |                    |          |
|  | b07        | BoS Development of site infrastructure strategy  | Naomi Mawby | 31/03/26                  | At Risk<br>31/03/2026                              |                           |                       | 0                    | At Risk<br>31/03/2026   |                           |                    |          |

| Group Key Targets |            |  |             |         |     |  |                           |              |  |                      |                      |                     |
|-------------------|------------|--|-------------|---------|-----|--|---------------------------|--------------|--|----------------------|----------------------|---------------------|
| ID                | Key Target |  | Owner       | Planned |     | Forecast                                   |                           |              |  |                      |                      |                     |
|                   |            |  |             |         |     | Current Year End Forecast                  | Current Year End Forecast | RAG Year End | Variance to on Target                      | Forecast Last Period | Forecast Last Period | RAG Previous Period |
| GKT6              | 1          | Metric 1: Consignment of CHILW Drums into unconditioned CHILW store                                  | Mick Moore  | 2       | 3   | Stretch - 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  | 6       | 14  | Stretch - 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  | 7       | 19  | Stretch - On Track                         |                           |              | Stretch - 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  | 73      | 108 | On Target - On Track                       |                           |              | On Target - On Track                       |                      |                      |                     |
|                   |            |  |             |         |     | 63% of target metric = 108 tonnes of LLW.  |                           |              | 63% of target metric = 108 tonnes of LLW.  |                      |                      |                     |
|                   | 5          | Metric 5: Average controlled waste recycling rate (%) over the 12 months                             | Mick Moore  | 89%     | 89% | Stretch - On Track                         |                           |              | On Target - On Track                       |                      |                      |                     |
|                   |            |  |             |         |     | 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  | 89%     | 89% | Stretch - On Track                         |                           |              | Stretch - On Track                         |                      |                      |                     |
|                   |            |  |             |         |     | Average Waste acceptance rate >85%         |                           |              | Average Waste acceptance rate >85%         |                      |                      |                     |
|                   | 7          | Reactors: DFR Removal of Breeder Fuel Elements   | Craig Brown | 27      | 42  | Stretch - On Track                         |                           |              | Stretch - On Track                         |                      |                      |                     |
|                   |            |  |             |         |     | 42 elements removed                        |                           |              | 42 elements removed                        |                      |                      |                     |