



Office for Nuclear Regulation (ONR) Site Report for Dounreay

Report for period 1 January to 31 March 2019

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 Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

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.

TABLE OF CONTENTS

1	INSPECTIONS	3
2	ROUTINE MATTERS.....	3
3	NON-ROUTINE MATTERS.....	5
4	REGULATORY ACTIVITY	5
5	NEWS FROM ONR.....	5
6	CONTACT	6

1 INSPECTIONS

1.1 Dates of inspection

The ONR site inspectors made inspections on the following dates during the report period 1st January to 31st March 2019:

- 2^{8th} to 31st January
- 25th to 28th February
- 11th to 14th March

2 ROUTINE MATTERS

2.1 Inspections

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

- The conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- The Energy Act 2013
- The Health and Safety at Work 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 licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. 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 at Dounreay related to the following were undertaken:

Reporting of incidents on site: This inspection is one of a programme aimed at monitoring DSRL's progress against the suite of improvement activities currently ongoing in this area. There is clear evidence that DSRL has made significant progress in its understanding of the issues discussed to date and are now better placed to make improvements to the arrangements. ONR will continue to monitor progress of this improvement activity through our schedule of LC7 compliance inspections. DSRL has also strengthened the arrangements in a number of other areas; these have resulted in tangible improvements in safety performance within specific, targeted topic areas.

Overall ONR remains satisfied that DSRL's arrangements for LC7 demonstrate compliance against the legal requirements specified within the licence conditions and the regulatory expectations enshrined within ONR's guidance.

On-site Emergency Preparedness and Response Capability Map: This inspection focused on the corporate arrangements and the implementation of those arrangements that support the requirements defined against aspects of the Dounreay On-Site Emergency Preparedness and Response (EP&R) Capability Map. This topic area requires DSRL to have in place adequate arrangements to identify the range and types of emergency that might occur. ONR considers that DSRL continues to provide a comprehensive suite of arrangements that meet our expectations and demonstrated their process for reviewing those arrangements against a changing hazard profile and learning from operational experience.

Overall ONR considers that all nuclear safety requirements were met for DRL's arrangements and the implementation of those arrangements in support of the requirements of the Dounreay on-site EP&R capability map.

Safety Case Informed Inspection (SCII): This SCII was undertaken within the Dounreay Cementation Plant (DCP) Stores Area. During this inspection we:

- examined the staff's understanding of the key outcomes from the safety assessment of the storage of radioactive waste packages;
- examined how the limits and conditions identified within the safety assessment had been captured and reflected in the associated operating instructions and the maintenance of safety related plant and equipment.
- undertook a plant visit to DCP Stores, where we took the opportunity to assess the understanding operators had regarding the hazards and associated limits and conditions associated with the activities being undertaken at that time;
- examined the training undertaken by the operations staff and Shift Supervisors;
- examined how the arrangements sampled addressed the requirements regarding the leakage and escape of radioactive material and radioactive waste.

Overall ONR is satisfied that the limits and conditions and safety related plant and equipment identified within the safety assessment had been adequately captured within the associated operational and maintenance documentation reviewed; that the training records examined reflect the level of understanding expected of staff; that the arrangements provide an adequate demonstration against the requirements regarding the control of leakage and escape of radioactive material and radioactive waste

2.2 Other work

Annual Review of Safety and Security [AROSS]: The overall picture presented by DSRL in support of the AROSS was one of a good performance with some areas identified for improvement; ONR largely concurred with this summary. Hazard and risk reduction continues at a steady pace as the focus remains on material consolidation. ONR considers that there is clear professionalism and commitment from the management team to setting high standards and to reinforce these with all staff.

The subsequent plant visits to the FCA and DFR provided the opportunity to observe and discuss the work ongoing in these areas. It was clear that the operators involved in the decommissioning work in these areas are very enthusiastic and committed to high safety standards; the control and supervision and housekeeping conditions are generally good.

Overall, we considered the AROSS presented by DSRL to be consistent with ONR's current view and to provide a good basis on which to develop improvements in safety and security performance.

The formal review of progress against regulatory issues: The formal review of progress against regulatory issues raised by ONR and any regulatory actions agreed between ONR and DSRL as a result of our interventions on site: We consider that DSRL continues to make good progress against the action plans agreed to address regulatory issues raised during previous inspections on site aimed at making improvements to its arrangements. In addition, DSRL continues to implement improvements to their arrangements as appropriate in response to observations made during our site inspection activities.

The formal review of the DSRL's internal regulation activities: ONR continues to have good confidence in DSRL's internal regulation capability and consider that the risks identified to senior management from their activities align with ONR's observations.

Meeting with the Site Safety Representatives: The site inspectors also held a periodic meeting 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. There were no such matters or events of significance to report during the period.

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; these are usually collectively termed 'Licence Instruments' (LIs), but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

No LIs, Enforcement Notices or letters were issued during this period.

5 NEWS FROM ONR

5.1 Enforcement Action

A summary of enforcement action is provided below. Further details are available on [our website](#).

- Improvement notice issued to Sellafield Ltd on 4 January 2019 – requires improvements to be made in its principal contractor arrangements for construction, design and management.
- On 1 February, following ONR's prosecution, EDF Energy Nuclear Generation Ltd and Doosan Babcock Ltd £200,000 and £150,000 respectively following an incident where a worker fell from height at Hinkley Point B power station in 2017.
- Two improvement notices issued to two transport logistics companies on 4 February following breaches in regulations for the safe transport of radioactive materials.
- Two improvement notices issued to EDF Energy on 20 February following an incident on 19 November 2018 at Heysham 1, which resulted in injury to three EDF Employees.
- On 2 April, Sellafield Ltd were fined £380,000 following ONR's prosecution for safety breaches relating to equipment used for the processing of plutonium.

5.2 Regulatory updates

Following the introduction of new integrated [Environmental Authorisations Regulations in Scotland](#), the [MOU between ONR and the Scottish Environmental Protection Agency](#) has been updated. The MOU ensures effective cooperation and collaboration in the regulation of nuclear safety, security, radioactive materials transport, nuclear safeguards and environmental protection on nuclear licensed sites and at other sites where both ONR and SEPA have regulatory functions.

In February, [a new nuclear site licence was granted to Tradebe Inutec](#) for its site at Winfrith in Dorset. A new site licence was required following Tradebe Inutec's acquisition of buildings and land at the Winfrith site from the Nuclear Decommissioning Authority (NDA) in February 2019.

In March we published a report detailing safety "events" that took place in the UK between 2015-2017. The report details the 56 safety significant events that took place between April

2015 and December 2017 – describing each event, the duty-holder’s response, and the actions taken by the ONR. The full report is available on our [website](#).

5.3 Stakeholder Engagement

In February, our Chief Nuclear Inspector, Mark Foy and Technical Director, Anthony Hart hosted a webinar which focused on the first Topical Peer Review of 'Ageing management of nuclear power plants and research reactors.' Further details about the webinar are available on our [website](#).

We published our [2018 Stakeholder Survey report](#), in February following the survey in October/November last year. Stakeholders from across the sector were invited to take part in the survey with 329 responses received, providing valuable insight into how we are viewed by our stakeholders. The full report is available on our [website](#).

On 28 March, we held our NGO Forum in Manchester and were delighted to welcome 15 NGO representatives from 12 organisations. We'll be making the minutes, agenda, presentations and pre-event briefing papers available on our website over the coming weeks.

5.4 Corporate news

In February we announced the appointment of Mark McAllister as the new Chair of ONR. Mark will join ONR from 1 April, succeeding Nick Baldwin CBE.

We were delighted that our Chief Executive was recognised as Transformational Leader at the Northern Power Women Awards 2019, an event that celebrates the women and men working towards accelerating gender diversity across the Northern Powerhouse. Adrienne won the award in recognition of her work in leading ONR through significant change while, in parallel, driving gender balance.

ONR has been recognised for its commitment to equality, diversity and inclusion by gaining accreditation to the National Equality Standards (NES).

6 CONTACT

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
website: www.onr.org.uk
email: ONREnquiries@onr.gov.uk

This document is issued by the Office for Nuclear Regulation (ONR). For further information about ONR, or to report inconsistencies or inaccuracies in this publication please visit <http://www.onr.org.uk/feedback.htm>.

© Office for Nuclear Regulation, 2019

If you wish to reuse this information visit www.onr.org.uk/copyright for details.

Published 2019

For published documents, the electronic copy on the ONR website remains the most current publicly available version and copying or printing renders this document uncontrolled.