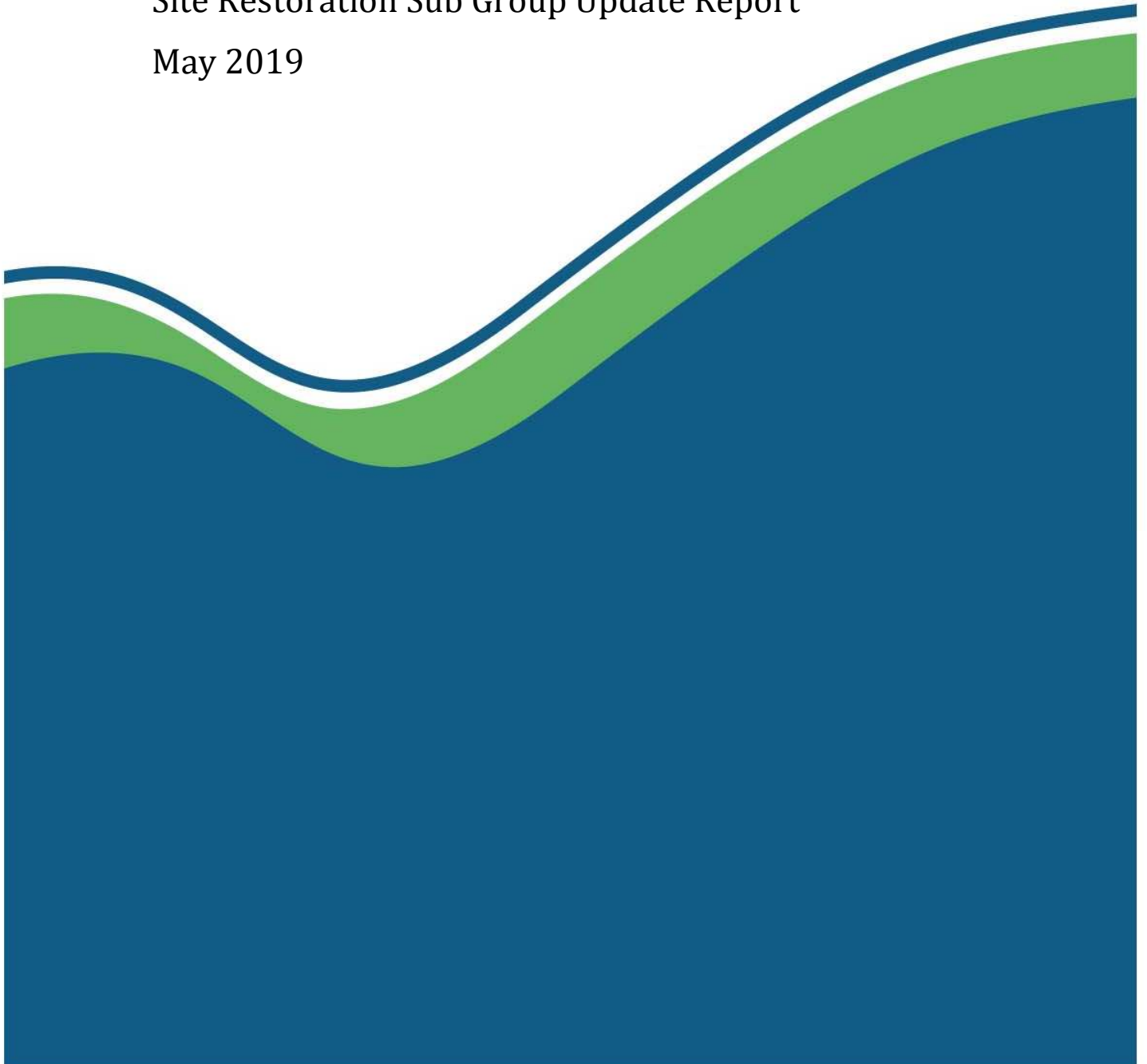




DSG(2019)P011

Dounreay Stakeholder Group
Site Restoration Sub Group Update Report
May 2019



Site Inspection Work & Compliance

SEPA have issued DSRL its consolidated permits detailing the standard and bespoke conditions, which the Dounreay site and Low Level Waste Disposal Facility are subject to under the Environmental Authorisations (Scotland) Regulations 2018 (EASR). These permits came into effect on 1st April 2019 and replaced entirely the authorisation's issued under the Radioactive Substances Act 1993, which previously had been deemed across under the EASR arrangements in September 2018.

During April SEPA undertook a compliance inspection of DSRL's Corporate Radioactive Waste Adviser arrangements. SEPA recorded DSRL as being compliant with the requirements of its EASR permit following this inspection.

SEPA are currently investigating the circumstances around a contamination incident which occurred in D1203 facility during February.. This investigation remains ongoing, however no discharge limit was challenged as a result of this incident.

During the last week of April a SEPA appointed contractor will be visiting the Dounreay site to undertake reassurance monitoring of two HHISO of LLW and ten 1 tonne bags of Demolition LLW waste intended for disposal to the LLWF. This is part of a rolling programme of monitoring being undertaken across the UK through a joint contract placed by the Environment Agencies. This visit to Dounreay represents the first time the contract has been utilised in Scotland, however SEPA intends to undertake similar visits to all Scottish nuclear sites in future.

SEPA's Nuclear Power Generation and Decommissioning Sector Plan

SEPA would like to thank the DSG for it's response to the consultation and intends to launch the finalised plan on the 15th May.

The Nuclear Power Generation and Decommissioning Sector Plan (as consulted on) is still available on SEPA's website: www.sepa.org.uk under "Sector Plans".

Low Level Radioactive Waste Facility

SEPA has received from DSRL the output from its assessment of potential voidage within containers disposed of the LLWF facility. SEPA will be reviewing that document and will discuss further with DSRL following that review.

Site End State

SEPA and DSRL met in March as part of routine engagement in relation to the site End State Project. Topics discussed included the site's Waste Management Plan and Site Wide Environmental Safety Case along with achievable limits of detection for non-radiological determinants in the water environment.

Decommissioning guidance and the Environmental Authorisations (Scotland) Regulations

In July 2018 SEPA, the Environment Agency and Natural Resources Wales, jointly published “*Managing Radioactive Waste on Decommissioning Nuclear Sites: Guidance on Requirements for Release from Radioactive Substances Regulation*” (available [here](#)). Our guidance (“the GRR”), sets out the requirements against which SEPA will regulate operators’ plans for waste management and clean-up during decommissioning of nuclear sites.

SEPA has now issued EASR permits to operators of all nuclear sites in Scotland, requiring them to develop a waste management plan (WMP) and a site-wide environmental safety case (SWESC). The WMP must show that the operator will achieve the best overall balance between public, worker and environmental safety, and other economic and social factors, when deciding how to manage radioactive waste and contamination on their site. The SWESC must show that the operator will restore their site to a satisfactory state, to allow them to surrender their EASR permit. SEPA will continue to regulate any disposals of radioactive waste in accordance with EASR, and with our established standards for protection of people and the environment.

Non-Nuclear Site Regulation

SEPA carried out compliance inspections during March and April 2019 on the following authorisations;

WML/L/1095876 – Site Waste Management Licence

WML/N/0050085 – Landfill 42 Closed Landfill Licence

CAR/S/1096306 – D3100 Low Level Waste Facility Abstraction Licence

No non-compliances were identified during these inspections.

Planning

Nothing to report.

Vulcan

For information to the members following on from the discussion at the previous full DSG meeting SEPA has provided below a summary of the basis for our regulatory interaction with the Vulcan site.

Until 1 September 2018 the disposal of radioactive waste activities in Scotland was subject to the provisions of the Radioactive Substances Act 1993 (RSA93). On 1 September 2018 RSA93 was largely replaced by the Environmental Authorisations (Scotland) Regulations 2018 (EASR). MoD was largely exempt from the provisions of RSA93 and this exemption has been retained in Regulation 78(2) of EASR.

However MoD policy states that:

“where there are exemptions or derogations from either domestic or international law applicable to Defence, we introduce standards and management arrangements that

produce outcomes that are, so far as reasonable practicable, at least as good as those required by legislation” (ref 1)

To cover the environmental aspects relating to radioactive substances MoD and SEPA have agreed administrative arrangements, based on RSA93, that apply similar standards to those that would have applied had the exemption not been in place. These arrangements are detailed in the Agreement between the MoD and SEPA on Matters Relating to Radioactive Substances (ref 2). It is expected that these arrangements will be updated to reflect EASR. However, until such time as this happens and during the transitional period for EASR, SEPA will continue to use the existing RSA93 based arrangements.

The particulars of the waste disposal arrangements at a site level are covered by a Letters of Approval. The Approval for Vulcan was issued in 2009 based upon a 1999 application which was subject to public consultation by SEPA. The Approval was varied in 2016 to ensure that the annual limits on liquid and gaseous waste included any alpha emitting radionuclides that could be present in the waste.

References

1. MOD policy : Safety, Health and Environment Protection in Defence: A Policy statement by the Secretary of State for Defence
2. Agreement Between The Ministry of Defence and The Scottish Environment Protection Agency on Matters Relating to Radioactive Substances, Sept 2017

Stewart Ballantine

Radioactive Substances Unit