



Performance Report to DSG Site Restoration Sub Group
For the period April - June 2024

NRS Dounreay Delivery Business Key Points

The reporting period was dominated by a deterioration in industrial relations and ballots for industrial action over the 2023/24 pay claim by members of the three unions at the site – Unite, Prospect and GMB. Members of Prospect voted to accept an improved offer but it was rejected by members of Unite and GMB. A series of strike days and rolling action short of a strike in support of their claim severely disrupted normal activity at the site.

Compliance and maintenance activities essential to safety, security and environmental protection continued under an agreement with the trade unions. Approximately 95% of our decommissioning and hazard-reduction programme was affected by industrial action, however.

Following further negotiations in June, a new offer was tabled. This involves changes to working patterns, principally a shorter lunch-break and closure of the site every third Friday. All 3 unions balloted their members.

NB POST-REPORTING PERIOD UPDATE

On 4/5 July, all 3 unions informed NRS Dounreay their members had accepted the offer and industrial action was over. A safe and managed restart of project work commenced on 8 July.

Targets

- During FY24 NRS Dounreay is tracking against two group key targets (GKT), nine other key targets (OKT) and three beacon targets.
- GKT1.4 - the D1206 active filter change - has been missed as a result of industrial action.
- OKT9 delivery of key asset interventions across Dounreay site has slipped to “threshold” due to industrial action. The remaining OKTs are forecasting “on target” at the end of the financial year.

HEALTH, SAFETY, ENVIRONMENT AND SECURITY

EHSSQ Performance

NRS Dounreay continues to have challenges with our EHSSQ performance given the nature and prevalence of all our all-hazards approach.

The NRS Dounreay TRIR (excluding CNC), has improved in the last quarter from 0.29 (January 2024) to 0.22 (June 2024). Whilst the data indicates performance is improving, we remain cautious given the level of potential workforce distraction linked to organisational change and the industrial action.

NRS Dounreay had one significant near miss to report:

DFR Butters Crane Event – Near Miss

On 28 March 2024 a scaffold was erected in the Dounreay Fast Reactor (DFR) hall to allow replacement of light tubes and fittings.

On 3 April 2024, during the weekly checks on the DFR Butters crane, the crane made contact with the scaffold. The scaffold was immediately removed from service and scaff-tag removed. The crane was removed from service and barriers to prevent access to the area were put in place.

A site investigation was convened, subsequent action review meeting conducted, and key learnings implemented locally within reactors and distributed across the Dounreay, NRS and NDA.

Status of ONR Regulatory Action:

During NRS Dounreay's annual review of safety, security and safeguards (26 June 2024), ONR informed us that Dounreay has been placed in enhanced regulatory attention for safety. This follows a number of formal interventions in aspects of our work. There will be three areas of ONR focus;

- Asset condition
- Organisational change
- Management of the totality of health and safety legislation

ONR informed us this will be noted in the Chief Inspector's annual report and they will not be undertaking a team inspection. Security and safeguards is considered to be in good health and will remain at routine.

ONR Regulatory Issue	Received	Target Date	Status
Implementation of <i>CDM Improvement Plan</i>	09/08/2022	18/03/2024	Closed on 18/03/2024 (content to move regulatory issue to BAU)
<i>Control of High Hazard Non-Nuclear Activities</i> (ONR-EL-22-010)	16/06/2022	30/08/2024	Agreed plan in place. Task continues with the potential of being above lower tier for nitric acid, linked to Chemical & Process Safety improvements. A Chemical Steering Board has been established.
Control of the risk presented by <i>Dangerous Substances and Explosive Atmospheres Regulations (DSEAR)</i> (ONR-EL-23-047)	12/03/2024	18-month timeframe	Plan being developed. Part of the Chemical Steering Board Work scope. Two new roles being recruited and facility assessments are being completed.
<i>Building Weathertight Integrity and Heating</i> (ONR-EL-23-045)	11/01/2024	31/10/2024	Agreed plan in place. Task underway – facility by facility assessments have been prioritised with urgent repairs planned and any new issues reported immediately to ONR
<i>Storage arrangement of alkali metal</i> within PFR's turbine hall, steam generator hall and generator transformer house (ONR-IN-23-03)	25/05/2023	18-month timeframe	Agreed plan in place. The strategy for storage of alkali metal has been updated and a project plan has been created and shared with ONR. This is now underway.

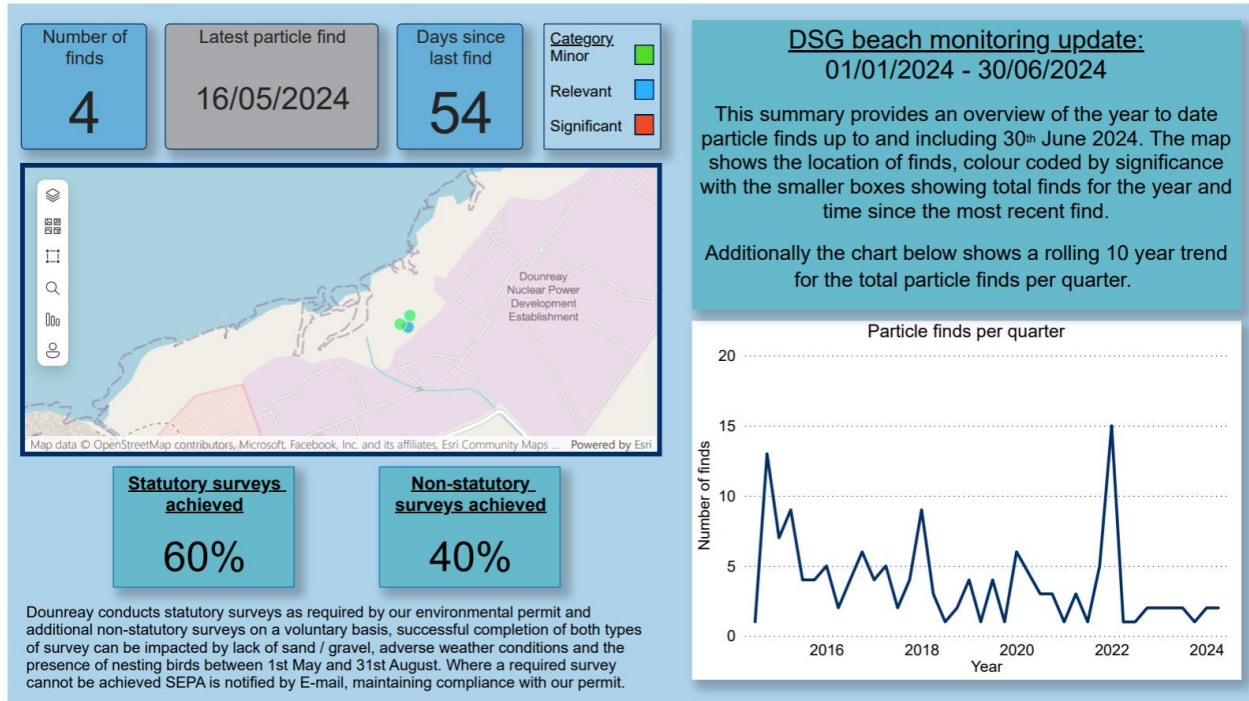
Status of SEPA Regulatory Action:

SEPA Regulatory Issue	Received	Target Date	Status
NRS Dounreay has <i>non-compliances open against EASR18 Conditions A.3.1 and B.4.4 for alkali metal storage</i> at the Prototype Fast Reactor (PFR).	25/05/2023	18-month timeframe	<ul style="list-style-type: none"> Installation of short-term measures for protection of ISO containers in the Turbine Hall (top-hat arrangements). Update to Code of Practice 2011 covering alkali metal storage and handling – good progress being made that will enable PFR to be back in compliance with A.3.1. Longer-term, the rebuild of DN026 for KNK drum storage will be done such that individual drum inspection can be routinely carried out. This should bring us in compliance with B.4.4.
<i>Final Warning Letter in relation to measurable low levels of Cs137 in groundwater</i> pumped from a sump and discharged to the Non Active Drains.	19/08/2020	Open Discussion with SEPA	This is an ongoing issue where contaminated groundwater enters the drains as infiltration water and at times of low flow, it can be detected by analysis. We are progressing data collection to allow a complete application to vary the EASR Permit to allow radioactivity to be discharged via the sewer outfalls rather than just via the authorised liquid discharge route as at present.
NRS Dounreay has <i>non-compliances open against EASR18 Conditions 8.1 and 8.2 for the Low Level Waste Pits</i> where we cannot prevent the migration of radionuclides and hazardous substances into the groundwater environment.	19/08/2020	1/09/2035	We cannot make any managerial changes that would allow us to return to compliant. Instead, a large engineering project such as leave in situ or a waste retrieval option would need to be undertaken. It is estimated that it would take 10 – 15 years to implement and complete the project.
<i>Final Warning letter regarding the PFR sodium tank farm excursion</i> which stated that EASR Conditions A.3.1, A.6.1, A.6.2, G.1.2 and G.1.5 had been contravened	24/01/2023	25/06/2024	SEPA issued a letter on 25/06/2024 stating that NRS Dounreay is now compliant with those Conditions listed.

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>



CORPORATE

Mark Rouse, who returned to Dounreay as managing director in 2020, left in May to take up a leadership role with the UK Government’s nuclear skills task force. John Grierson, chief nuclear officer at NRS, took over as interim managing director pending the recruitment of a permanent successor later this year.

Dounreay signed a corporate partnership agreement with the Institute of Engineering and Technology (IET).

PEOPLE

Three teams of Dounreay graduates took part in a national project management challenge and managed to make the final

Congratulations to the following who were short-listed in the NDA group awards 2024:

- Adam Shone for safety and security excellence in the safety, wellbeing and security category
- The Dounreay and Sellafield collaboration project teams for the most collaborative in the stand-out individuals and teams category
- The purchase goods and services carbon baseline project team at Dounreay for environmental improvement in the sustainability and environment category