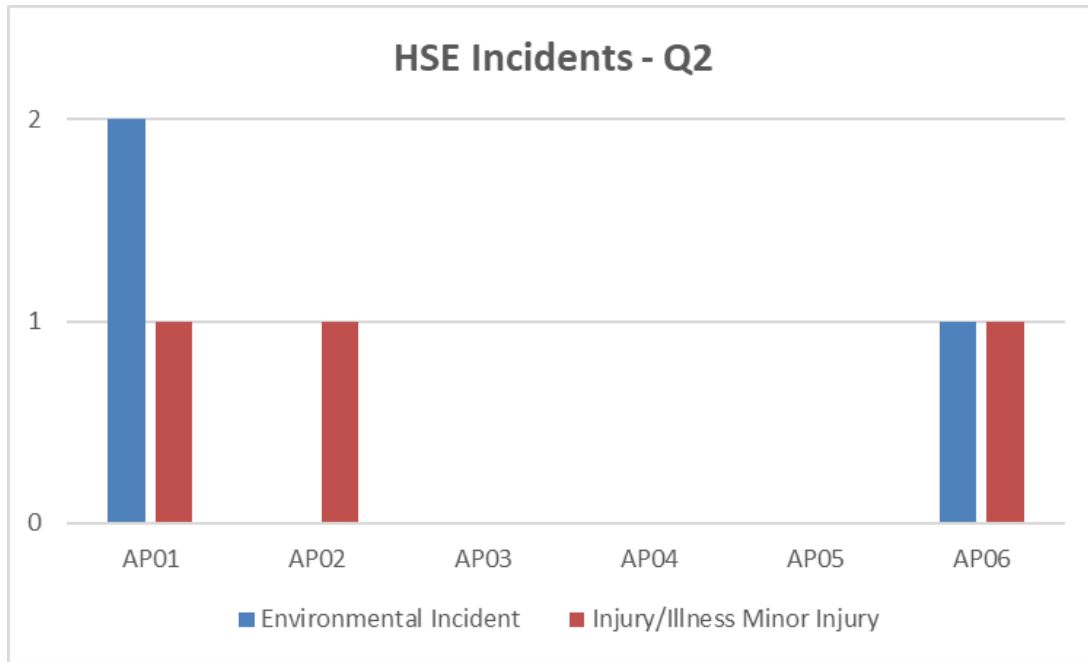


VULCAN NRTE Report to the DSG – July 2024



Health and Safety

There have been no Lost Time Accidents/reportable events since my last report to the Sub-Group, however we have had one minor injury (person aggravated an old knee injury). Please note that the graph is taken from a Rolls-Royce management system and AP stands for Accounting Period; with AP01 effectively aligning with January, AP02 aligning with February so forth.

Environment

The sole environmental event since my last report involved a minor leak (approx. 2l) of hydraulic oil from wastewater pump lorry. The spill was contained using spill kits and DFERS attended site and used absorbent material to clean up.

As previously briefed to the DSG we have experienced problems with the reliability of flowmeter recording the sewage plant discharge. The further administrative actions imposed, as mitigation, remain in place, though no further failure has occurred. We are currently in the process of replacing this flowmeter with an alternative from a different manufacturer, the mitigations will remain until this is completed. We remain engaged with SEPA regarding these events and related events previously reported to them (and to the DSG).

With the summer now upon us, the Site boilers have been shutdown, during this shutdown period the modifications to increase the redundancy within the discharge system will be installed. These were identified as appropriate mitigation from the investigation into the event where boiler effluent out of specification pH was discharged.

Radioactive Waste Disposal

There have been no challenges to the Approval of Arrangements (AoA) limits during this period.

At the end of May 2024, the annual rolling discharge (expressed as a percentage against the maximum detailed in the SEPA letter of agreement) was:

	Type	Percentage
Gaseous	Noble Gases	0%
	Other radionuclides not specifically listed, taken together.	13.4%
Liquid	Cobalt 60	0.05%
	All other radionuclides not specifically listed, taken together.	0.05%
	Tritium	0.04%
Solid	No waste sent off site	N/A

The two non-conformances raised at the SEPA inspection have now been closed, we still await formal acceptance from SEPA. Our reporting now aligns with our AoA requirements.

Following the letter sent to SEPA in March with further information on errors found in our data presentation, we continue to progress the actions to resolve them. We will provide a further update to SEPA once all actions have been completed. I must emphasise that the problems relate to data presentation and the actual discharges have always been and remain well within limits.

Site Programme

Focus has continued on the commissioning and revalidation of the equipment that is required for the next phase of operations that are scheduled to commence later this year. With the commissioning nearing completion we have started the training associated with the equipment and processes for this phase of operations.

The remainder of the Site programme progresses to schedule.

Events

Since the last meeting no events have occurred that required reporting to DNSR or ONR in accordance with their **mandatory** reporting criteria.

Emergency Arrangements

On the 5 June 2024 the annual security exercise was held. This was a challenging scenario to be managed by the Site Security Force, with the inclement weather adding additional challenge.

The postponed LONESTAR annual nuclear emergency response demonstration was successfully completed on the 19 June 2024.

Regulatory Inspections / Audits

As stated in the April update, the ONR electrical safety inspection in March raised two Regulatory Issues (RI) relating to exposed battery terminals and electrical switching with older equipment. Following receipt of the formal report, the site has been noted as exemplary by ONR for actively progressing activities to completion and obtaining verbal agreement for closure of both issues.

We have received the formal report from DNSR's March inspection of the site's AC36 - Organisational Capability arrangements. We are working towards closing the 2 recommendations and 3 observations raised.

Regarding the two SEPA non-conformances mentioned in the Radioactive Waste Disposal section, we are waiting for a formal response.

Vulcan Decommissioning Programme

The Joint Project Team continues to progress the workstreams to enable the transfer to the NDA at a suitable point. The focus remains on developing the submissions required for the applications for the Nuclear Site License and SEPA permits.

With the clear direction for the decommissioning of the site, a revised plan for demonstrating compliance to AC35 - Decommissioning, whilst still a MOD Site is being developed. Whilst not yet approved, one element of this strategy is to remove as much redundant equipment as possible. This is being progressed with one load of metal for recycling identified and in the final stages of being removed from Site.

Other

Liam Hamilton has now replaced Andy Maxwell as the Rolls-Royce Vulcan General Manager. Andy was very vocal in his support of Vulcan and the opportunities that Caithness has to offer, and I am sure you will join me in wishing him all the best for

the future. I am sure Liam will bring similar enthusiasm and develop a fondness for Caithness like Andy did.

The MOD team at Vulcan provided support to the RNLI Summer Fayre and the Armed Forces day event organised by Thurso branch of Legion Scotland.

I Walker
Commander Royal Navy
Naval Superintendent Vulcan