



# Office for Nuclear Regulation (ONR) Site Report for Dounreay

Report for period 1 January to 31 March 2020

## 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.....	4
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 1<sup>st</sup> January to 31<sup>st</sup> March 2020:

- 28<sup>th</sup> to 30<sup>th</sup> January 2020
- 10<sup>th</sup> to 12<sup>th</sup> March 2020

## 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:

**Organisational Capability:** This inspection focused on DSRL's management of organisational change arrangements, their governance of these arrangements, the maintenance of the nuclear baseline and, succession planning. Based on the evidence examined it is clear that DSRL has developed comprehensive governance arrangements which they are in the process of implementing. ONR will follow up on the progress of this implementation during subsequent visits to site. Overall ONR is satisfied that DSRL has adequate arrangements in place for the management of organisational change and the maintenance of organisational capability.

**Recording and Learning from Incidents on Site:** This inspection provided the opportunity to follow up on progress against the improvement areas reported on previous inspections in this area. It is clear that DSRL continues to improve their understanding of the issues discussed to date and have implemented a number of arrangements that have successfully addressed a number of specific topic areas. DSRL is now looking to further their understanding of the underlying cultural factors associated with incident and event reporting and learning from experience and will be presenting the outcome of their considerations to ONR during a subsequent inspection. Overall ONR is satisfied that DSRL has adequate arrangements for the reporting and investigation of incidents on site.

**Control and Supervision of Operations:** This inspection included plant walk-downs as part of the Annual Review of Safety and Security (ARoSS) and drew upon the plant visits undertaken as part of the schedule of ONR inspections during 2019/20. It is clear that the operators involved in decommissioning activities in high hazard areas are enthusiastic and committed to high safety standards; the control and supervision of operations and general

housekeeping within the facilities visited were of a good standard. It is also evident that the management teams in those areas demonstrate a clear professionalism and commitment to engage with their teams, setting high standards which are continually reinforced through regular engagements with their staff. Overall, ONR is satisfied that DSRL continues to demonstrate adequate control and supervision of its activities.

## 2.2 Other work

The site inspectors also undertook a number of other inspection activities not linked directly to compliance against legislation.

**Annual Review of Safety and Security (ARoSS):** The ARoSS presented by DSRL provided an open and balanced reflection of the site's safety and security performance during 2019/20 whilst acknowledging the difficulties it has had to contend with during this period. The site was commended by ONR for the safe and secure delivery of the material consolidation programme whilst maintaining progress on a number of other key hazard reduction activities across the site. DSRL also acknowledged their aim to improve safety and security performance in a number of areas with a focus on improved culture, control and supervision of high hazard construction and industrial safety activities and, improved resilience of their organisational capability. DSRL focus for 2020/21 is to continue with the hazard reduction and decommissioning activities to deliver the agreed interim end state position.

**Permissioning activities:** ONR has completed its technical assessment of the safety justification related to the modifications necessary to address the radioactive liquids remaining from previous fuel processing activities on site and will be in a position to release the formal regulatory hold-point placed on that project in due course. Technical assessments continue to support the release of the formal regulatory hold points associated with the activities to remove the residues of liquid metal coolant within the Dounreay and Prototype Fast Reactors.

ONR has also commenced technical discussions with the DSRL Shaft and Silo project team, placing a formal regulatory hold-point prior to commencement of construction.

**The formal review of progress against regulatory issues:** ONR continues to undertake formal reviews of progress against regulatory issues raised by ONR and any regulatory actions agreed between ONR and DSRL as a result of our inspections on the site: DSRL continues to make good progress against the action plans agreed to address regulatory issues raised during previous inspections on site.

**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. ONR has also reviewed the activities undertaken by DSRL's own internal regulation team to release the recent permissioning hold point within the PFR decommissioning project.

**Meeting with the Site Safety Representatives:** The site inspectors held a 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.

- COVID-19: ONR has been kept routinely updated on the site's response to the current Coronavirus pandemic and its activities to comply with UK Government directives. ONR is fully supportive of the measures taken by site and remains satisfied that the residual

quiescent state the site is now in has been achieved with due consideration for maintaining nuclear, radiological and industrial safety and security.

- Leakage of Radioactive Material: ONR were informed of leakage of an oil/solvent mix containing uranium radionuclides from an approved IAEA transport container. The initial report cited quantities that met the ministerial reporting criteria. A subsequent investigation has concluded that the actual quantity released falls below formal notification limits. ONR will be following up on the site's investigation into this incident during its next scheduled visit to site.
- Crane operations: ONR was informed of an incident where an operator became snagged in the lifting tag line. The site stopped all associated lifting work immediately and undertook a detailed investigation. The site also took the opportunity for a peer review of lifting operations to be conducted by a team from Devonport Dockyard. Both the investigation and the peer review identified a number of improvements to be implemented prior to resumption of crane operations on site. The results of the investigation and the improvement actions have been assessed by industrial safety and crane operations specialists within ONR. ONR has also examined evidence to gain assurance that the revised arrangements have been implemented and has reviewed the basis for lifting the 'stop work'. ONR is content that lifting operations can resume and will maintain regulatory oversight in this area including via specific interventions on site.

#### 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 Enforcement Notices or Formal Letters were issued during this period.

#### 5 NEWS FROM ONR

##### Corporate news

All our latest news is available on our website [www.onr.org.uk](http://www.onr.org.uk)

Below are summaries of key activities over the last three months. Further detail is available on [our website](#).

##### Covid-19 (Coronavirus) (ONR position)

- ONR is continuing to protect society by securing safe nuclear operations during the Coronavirus pandemic. ONR staff continue to work from home, in line with government advice. We have considered our priorities, have deferred non-critical activities, and are carrying out as much of our work as possible via videoconference, phone and email. Our regulatory focus includes assurance, where appropriate, from site licensees that they are applying the public health measures introduced to reduce the spread of coronavirus. A limited number of our inspectors can, as key workers, continue to travel to site as necessary to conduct urgent and essential regulatory inspections. Nuclear sites have been reducing non-essential activities so as to protect staff, infrastructure, and the public. As always, we are regulating those activities to ensure they are carried out safely and securely. ONR's latest position [can be found on our website](#).

## Enforcement Action

- ONR served an [Enforcement Notice](#) on Urenco UK Ltd following a fire safety inspection at its Capenhurst Works in Cheshire during December 2019. The notice was issued in response to shortfalls identified in the fire alarm and detection systems at one of the site's facilities.
- In February ONR announced that [Sellafield Limited had complied](#) with an [Improvement Notice](#) relating to staff training, operating procedures and procedural adherence that they were served with in May 2019.

## Regulatory Updates

- In January ONR published an update to its [Safety Assessment Principles](#), to incorporate some relatively minor revisions including typographical corrections and updates to reflect changes to the UK's nuclear regulatory framework since 2014.
- In February ONR completed Step 3 of the Generic Design Assessment (GDA) of the UK HPR1000 design, and took the decision to progress to Step 4 of the GDA. During Step 3, ONR increased its regulatory scrutiny and undertook a more detailed assessment of the design, focusing on the methods and approaches used by the GDA Requesting Party to underpin their safety and security claims.
- In March we published the Quarterly [Statement of Civil Incidents](#) for the period 1 October to 31 December 2019. During this reporting period there were two civil incidents at nuclear licensed sites within Great Britain that met the Ministerial Reporting Criteria as defined within the Nuclear Installations (Dangerous Occurrences) Regulations 1965 and ONR guidance in relation to notifying and reporting incidents and events.

## Stakeholder Engagement

- On 15 January ONR launched a four-week public consultation on its draft 2025 Strategy. Once agreed, the strategy will set our direction and priorities for the next five years. To support the public consultation we held a webinar for NGOs and other stakeholders in which our Chief Executive, Adrienne Kelbie, and Technical Director, Anthony Hart, gave an overview of the strategy and welcomed questions and comments. The strategy is due to be published in May 2020.
- In January, ONR achieved Level 3 Disability Confident (Leader) status, recognising our desire to put people first and create an environment in which everyone can thrive. The government-backed scheme encourages employers to think differently about disability and take action to improve how they recruit, retain and develop disabled people.
- In February, we announced the appointment of two new members to the ONR Board. Dr Janet Wilson took up the appointment on 1 April 2020 and Tracey Matthews will take up her appointment on 1 June 2020 – both appointments are for five year terms.
- In February more than 70 stakeholders involved in the transport of radioactive material attended a conference organised by ONR's Transport Competent Authority (TCA) team. The event provided a good opportunity for the TCA team to share their expectations on compliance with regulations governing the transport of radioactive material.

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