



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

Report for period 1 April to 30 June 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.

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## 1 INSPECTIONS

### 1.1 Dates of inspection

The ONR site inspectors have made no visits to site during the report period 1<sup>st</sup> April to 30<sup>th</sup> June 2020. This is in accordance with ONR policy regarding visits to sites during the Covid-19 pandemic.

## 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.

**DSRL Response to Covid-19:** The site inspection team has been in regular contact with DSRL personnel regarding the site response to Covid-19. This has included discussions held by the executive and senior leadership team to develop the arrangements for placing the site into a quiescent state and the maintenance of essential safety systems and services during this period. ONR has been in receipt of daily briefs from DSRL providing updates on activities, manning levels and the status of critical services and supplies. Where appropriate, ONR has requested and reviewed documentation supporting the development, governance and monitoring of these arrangements. Based on these interactions, ONR is satisfied that DSRL has managed the transition to, and maintenance of, a quiescent state in a suitably and sufficient safe and secure manner.

**DSRL Approach to Re-Mobilisation and Re-Commencement of Operational Activities:** The site inspection team has been in regular contact with DSRL regarding the development and implementation of the site's arrangements for the return of staff to site and the recommencement of operational activities. ONR has had ongoing visibility of DSRL's strategy and proposals for the remobilisation of staff and recommencement of operations as they have developed during this period and remains satisfied that DSRL has taken full cognisance of the guidance provided by UK and Scottish Government and the learning from other site across the NDA estate in their considerations. ONR has also taken full cognisance of the activities undertaken by the DSRL Independent Challenge and Oversight Team. The critical assessment provided by this team has been instrumental in informing the decisions made by the executive and senior leadership team regarding DSRL's transition between phases and for driving improvements in the revised arrangements across site.

ONR is now in the process of reviewing the arrangements in place to control the return of staff to site and for the recommencement of those activities identified to commence as part of DSRL's transition into Phase 2 [recommencement of decommissioning and construction activities]. The implementation of these arrangements will be subject to a number of

inspection activities to be conducted by ONR inspectors during planned visits to site in July, August and September.

## 2.2 Other work

**Technical assessment work:** ONR has continued to undertake its assessment necessary to support the release of regulatory hold-points placed on a number of the projects on site. The assessments supporting the hold-points placed within the ADU Floc Modification Project and the PFR Residual Alkali Metal Removal Project are now complete and the regulatory hold-points will be released in due course following a formal readiness review to be conducted by the site inspection team.

ONR is also continuing with its review of the justification supporting the Advance Transition Works (ATW) component of the Shaft and Silo Project. ONR expects to be in a position to release the regulatory hold-point placed on the commencement of ATW construction activities within Quarter 4 of this year.

## 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 matters to report during this 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, including the issuing of an Enforcement Notice.

ONR has issued two Licence Instruments to DSRL this period:

- LI 525: issued under LC13(3) to approve DSRL's revised arrangements for the DSRL Nuclear Safety and Environment Committee (DNSEC);
- LI 526: issued under LC13(12) to approve DSRL's revised arrangements by which the DNSEC considers 'urgent proposals'.

DSRL has also submitted its revised emergency arrangements in response to the revised requirements under REPP19. ONR will be issuing a Licence Instrument to approve these amended arrangements as soon as the Highland Council has had the opportunity to implement their revised off-site arrangements under REPP19: This is currently on hold whilst Highland Council focus on matters related to the Covid-19 pandemic.

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)

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

ONR is continuing to protect society by securing safe nuclear operations during the Covid-19 (coronavirus) pandemic. Our staff continue to work from home, in line with government advice, with a limited number of our inspectors, as key workers, travelling to site as necessary to conduct urgent and essential regulatory inspections. ONR's latest position [can be found on our website](#).

### Enforcement Action

ONR served an Improvement Notice on EDF Energy Nuclear Generation Ltd (EDF Energy) for contravention of the Pressure Systems Safety Regulations (2000) at Heysham 1 Power Station. The notice was served after shortfalls were discovered in the examination and inspection of the Reactor 1 pressure vessel at the Lancashire plant. EDF Energy must comply with the Improvement Notice and complete the eleven overdue examinations by 18 December, 2020.

ONR has granted an extension to an Enforcement Notice served on Urenco UK Ltd, recognising the good progress made so far. The notice was issued in late December 2019, following a fire safety inspection at the Capenhurst Works in Cheshire, which revealed shortfalls in the fire alarm and detection systems at one of the site's facilities. Urenco UK Ltd must comply with the requirements of the extended notice by 30 September, 2020.

### Regulatory Updates

ONR received an application for a nuclear site licence from NNB Generation Company (SZC) Limited, to construct and operate two EPR TM reactors, at its proposed development in Sizewell, Suffolk. We will now assess the application, partly informed by our previous assessment of the EPR at Hinkley Point C – including using the relevant lessons from that assessment, while focusing on aspects specifically relevant to Sizewell C.

Whilst we are satisfied that the application is sufficiently complete to proceed to assessment stage, there is still a lot of work to do – and we do not expect to reach a decision, until at least the end of 2021.

## 6 CONTACT

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