



Office for Nuclear Regulation (ONR) Biannual Site Report for Low Level Waste Repository (LLWR) Limited

Report for period 1 October 2019 – 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 West Cumbria Sites Stakeholder Group (WCSSG) and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

The ONR Site Inspector usually attends one WCSSG LLWR Working Group meeting each year 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

The ONR Site Inspector and other ONR Inspectors made inspections on the following dates during the period 1 October 2019 to 31 March 2020:

November	12 & 13
January	14 & 15
March	16

2 ROUTINE MATTERS

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);
- the Energy Act 2013;
- the Health and Safety at Work Act 1974 (HSWA74);
- regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99); and
- the Regulatory Reform (Fire Safety) Order 2005.

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 November, ONR carried out planned inspections of the licensee's arrangements for the production, assessment and periodic review of safety cases, and the licensee's quality management arrangements.

In January, ONR carried out planned inspections of the licensee's arrangements for transport of radioactive materials, including staff training, competency and the control and supervision of transport operations.

In March, ONR carried out a planned inspection of compliance with the fire, life safety requirements of the Regulatory Reform (Fire Safety) Order 2005.

In general, ONR judged the arrangements made and implemented by the site in response to safety requirements to be adequate in the areas inspected. However, where improvements were considered necessary, the licensee made satisfactory commitments to address the issues, and the site inspector will monitor progress during future visits. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

3 NON-ROUTINE MATTERS

Licensees are required to have arrangements to respond to non-routine matters and events on the site. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements. The licensee records and assess a range of minor incidents which are discussed with ONR during bi-monthly teleconferences. There were no significant matters or events to report during the period.

In response to the Covid-19 pandemic the site has implemented arrangements to put the facility into a non-operational safe state. All non-essential personnel have been sent home and radioactive waste handling operations have been halted. Minimum staffing levels are being maintained at the site mainly for security, maintenance, surveillance and environmental monitoring duties. To date absenteeism has not compromised the site's extant emergency arrangements, with capacity to call personnel to site in the very unlikely event that they are needed.

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 have been issued during the period.

As a result of implementation of the Basic Safety Standards Directive (Council Directive 2013/59/Euratom of 5 December 2013), in December 2019 ONR issued a new Specification under LC25(4) to reflect changes in the relevant legislation for reporting on holdings of High Activity Sealed Sources upon the site. This new Specification superseded a previous Specification.

Reports detailing regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

5 NEWS FROM ONR

For the latest news and updates from ONR visit the website and sign up for our [ebulletin](#).

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.

Enforcement Action

EDF Energy has complied [with two ONR Improvement Notices](#) relating to the way it maintains auxiliary steam systems and instructs staff operating these systems. The Notices were issued in January 2019 following a serious incident at Heysham 1 power station in November 2018, when a valve failed on a steam system resulting in injury to three EDF employees. Further details are available on our [website](#).

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 October, our Chief Nuclear Inspector (CNI) Mark Foy published his view on the performance of Great Britain's nuclear industry during 2018/19. In the first [report](#) of its kind, the review provides an independent, authoritative view of safety, security and safeguards performance across the nuclear industry over the last year. The report is accessible via our website homepage www.onr.org.uk

Throughout October we hosted an [Integrated Regulatory Review Service Mission](#) that saw a team of 18 independent experts from across the globe scrutinising the regulation of nuclear and radiological safety across 15 different regulatory bodies. The final report is expected in February/March 2020.

Along with the Environment Agency and Natural Resources Wales (NRW) we have published [new Generic Design Assessment \(GDA\) guidance](#) for Requesting Parties. It reflects the changes seen in the nuclear industry in the decade since GDA was introduced, in particular the Nuclear Sector Deal and the potential for Small Modular Reactor (SMR) designs to enter GDA in the future. The new guidance also incorporates lessons learnt from previous GDAs.

Together with the Environment Agency, we have also published a [joint annual report](#) on our scrutiny of Radioactive Waste Management's (RWM) work to develop geological disposal. This report summarises our work relating to the geological disposal of radioactive waste.

We have formally concluded the [licence revocation for the Cardiff Nuclear Licensed Site](#) in Wales, thereby de-licensing the site. This follows many years of nuclear site decommissioning and work to clean up the site and is the first time ONR has de-licensed a site completely, although several sites have been de-licensed by ONR's predecessor organisation, the Nuclear Installations Inspectorate.

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

In November, we hosted our second NGO Forum of the year and were delighted to welcome 18 NGO attendees from 14 different organisations. Agenda items included our work at Sellafield, ageing management of reactors and our relationship with the Defence Nuclear Safety Regulator. Presentations and minutes from all our [NGO Forum meetings](#) are made available on our website. If you represent an NGO group and would like to get involved with our NGO Forum, please get in touch with our Communications team (contact@onr.gov.uk) for further details.

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.

6 CONTACTS

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