



Office for Nuclear Regulation (ONR) Site Report for Urenco UK Limited (UUK) Capenhurst

Report for Period November 2019 – 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 quarterly to members of the Urenco UK Limited Local Liaison Committee and are available on the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR usually attend the Urenco UK Limited Local Liaison Committee meetings 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.....	5
4	REGULATORY ACTIVITY	5
5	NEWS FROM ONR.....	5
6	CONTACTS.....	8

1 INSPECTIONS

1.1 Dates of inspection

The ONR Site Inspector and other ONR Inspectors conducted inspections at Capenhurst on the following dates during this period:

November	14,21,27
December	19
January	21,29,30
February	19
March	3
April	No on-site Inspections due to Covid-19
May	No on-site Inspections due to Covid-19
June	No on-site Inspections due to Covid-19

2 ROUTINE MATTERS

2.1 Inspections

Inspections are undertaken as part of the process for monitoring compliance with (but not exclusively):

- 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 1999 (IRR99), The Construction (Design and Management) Regulations 2007 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 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 normal regulatory interaction. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

In this period, routine inspections and interactions with the Urenco UK Limited (UUK) licensed site covered the following:

Thematic and System-Based Inspections

ONR carried out a number of thematic and compliance-based inspections. These inspections focussed on obsolescence, operating rules and instructions, emergency arrangements,

instructions to persons on site, training, management arrangements, maintenance and escape of radioactive material. Any observations/issues that arose from these inspections have been fully addressed by the licensee.

In this period, one routine inspection of the licensee was postponed, due to the government advice in relation to the Covid-19 pandemic.

Tails Management Facility (TMF) - Urenco Chem Plants Ltd (UCP)

The Capenhurst TMF project continues to progress towards readiness to commence active commissioning of the Tails De-conversion Plant (TDP). ONR carried out a readiness inspection at the facility and were satisfied with progress being made to close-out fault observations raised during inactive commissioning.

ONR assessment of the TMF safety case has concluded and no significant issues were identified. ONR will carry out a final readiness inspection once satisfactory progress has been made with the closure of the outstanding fault observations.

During the commissioning process, a number of incidents have occurred and ONR is satisfied with UCP's response to these. Overall, whilst generally satisfied with UCP's arrangements and their implementation, an enforcement letter has been issued in order to address some areas for improvement identified following one of the incidents. ONR is monitoring the corrective actions being undertaken by UCP.

Security

UUK has submitted its Security Assessment Principles (SyAPs) compliant Nuclear Site Security Plan and this is now undergoing assessment by ONR. All interventions during this period identified adequate arrangements and any issues or observations raised have been fully addressed by the licensee.

Safeguards

There have been seven routine safeguards inspections (joint Euratom/IAEA) at Urenco UK (UUK) facilities undertaken between October 2019 and June 2020, including a Physical Inventory Verification in March 2020. In addition, 3 Limited Frequency Unannounced Access (LFUA) Inspections were completed on UUK facilities during this period.

Euratom have also carried out a physical inventory verification (PIV) at the facilities managed by Urenco Chemplants (UCP). UUK, UCP and UNS continue to provide timely and effective closure of any Nuclear Material Accountancy, Control and Safeguards related regulatory issues.

Conventional Health and Safety - Fire

One ONR Fire inspection was conducted during this period. The inspection identified significant shortfalls in the condition and status of the Fire Alarm and Detection System (FADS) within a UUK facility. ONR issued an Enforcement Notice under Article 30 of the Regulatory Reform (Fire Safety) Order 2005. The notice requires Urenco to repair or replace the FADS so as to provide the requisite safety function.

The repair and improvement programme is progressing in line with the agreed timeframe for completion (September 2020) with suitable risk reduction measures having been implemented in the interim.

Emergency Preparedness and Response (EP&R)

During this period there has been one Emergency Preparedness Consultative Committee (EPCC) meeting, in addition to the Level 2 off-site nuclear emergency exercise planning interactions. Interventions remain ongoing between the licensee, ONR EP&R and the Local Authority, in response to the implementation of the new REPIR 19 legislation, particularly during the Covid-19 pandemic.

ONR also witnessed the on-site (Level1) emergency exercise, where UUK adequately demonstrated their emergency arrangements. All minor observations raised as a result of this intervention have been fully addressed by the licensee.

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.

During this period, UUK has responded to a number of matters ranging from external events and intelligence, through to incidents during normal operations. ONR was promptly informed of these occurrences and the follow up actions proposed or taken by the licensee. These follow up actions are being monitored and reviewed by ONR via routine interactions.

4 REGULATORY ACTIVITY

ONR inspectors 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 called 'Licence Instruments' (LIs), but can take other forms. In addition, inspectors may issue Enforcement Notices to secure improvements to safety. Within this period:

- One Fire Enforcement Order was issued to UUK.
- One Enforcement Letter was issued to UCP.
- One LI was issued to UUK with regard to High-Activity Sealed Radioactive Sources (HASS).

5 NEWS FROM ONR

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

In February ONR announced that [Sellafeld Limited had complied](#) with an Improvement Notice relating to staff training, operating procedures and procedural adherence that they were served with in May 2019.

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

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.

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 TM 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.

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.

All our latest news is available on our website www.onr.org.uk.

6 CONTACTS

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