



Office for Nuclear Regulation (ONR) Site Report for AWE Aldermaston and Burghfield

Report for period 1 June 2020 to 30 September 2020

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the Aldermaston and Burghfield sites available to the public. Reports are distributed to members for the Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR usually attend Aldermaston and Burghfield 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. The AWE Local Liaison Committee meeting has now moved to a four month frequency. This ONR report (period 1st June – 30th September) covers a four month period in order to reflect the frequency of AWE LLC meetings.

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1 INSPECTIONS

1.1 Dates of inspection

ONR inspectors carried out inspections on the following dates during the period:

- August 10th – 19th (remote)
- August 12th
- August 20th
- August 27th
- September 29th

2 ROUTINE MATTERS

2.1 Inspections at Aldermaston and Burghfield

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 1999 (IRR99) 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 36 conditions attached to the nuclear site licence in order to ensure legal compliance. Inspectors seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections at Aldermaston and Burghfield covered the following Licence Conditions (LC):

- LC7 Incidents on the site
- LC10 Training
- LC12 Duly authorised and other suitably qualified and experienced persons
- LC22 Modification or experiment on existing plant
- LC28 Examination, inspection, maintenance and testing

Also inspected:

- Conventional Health and Safety Inspection covering the Health and Safety at Work Act.

ONR judged the arrangements made and implemented by AWE in response to safety requirements to be adequate in the majority of areas inspected. However, ONR did rate an LC7 inspection as AMBER. A regulatory issue is in the process of being raised covering the shortfalls identified during the inspection which included the adequacy of AWE's;

- training for individuals undertaking investigations;
- guidance on root cause analysis; and

- use of learning from experience (LFE) to improve operations and prevent reoccurrence.

ONR will track this issue through to completion as part of normal regulatory business.

Where improvements are considered necessary following inspections, ONR may consider whether regulatory enforcement action is appropriate to ensure that remedial actions are taken in reasonably practicable timescales. ONR has now completed an inspection at AWE on asbestos management which was mentioned in the previous LLC report. Shortfalls have been identified and ONR is considering the appropriate regulatory action.

2.2 OTHER WORK

ONR is now engaging with AWE regarding its Holistic Strategic Approach (HSA). This is a wide ranging programme of improvement initiatives that will help demonstrate AWE's future readiness to move from enhanced to routine regulatory attention. The HSA encompasses the Structured Improvement Programme (SIP) described in previous LLC reports and a range of other work that together form a more complete picture of improvements in safety performance which should enable exit from enhanced regulatory attention.

During September, ONR commenced a programme review of the HSA which will continue into October. ONR will form a view based on this intervention and report progress as part of the next LLC report.

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.

ONR has continued to perform a number of remote and onsite inspections and interventions during the reporting period. These engagements have complied with the current Covid-19 restrictions and have enabled ONR to continue to monitor performance, progress and delivery of key pieces of work. Accordingly, the ONR inspection plan for AWE has been amended to prioritise those inspections that cannot be undertaken remotely. As part of the onsite inspections and interventions, ONR has taken cognisance of the measures AWE has implemented in response to the Covid-19 pandemic and, from the areas observed, ONR has no concerns with these arrangements.

ONR has now completed its investigation into an electrical near miss incident that occurred on 20 June, 2019. ONR has notified AWE plc that it will be prosecuted under Section 3 of the Health and Safety at Work etc. Act (1974). The charge relates to the incident where a contractor narrowly avoided injury when a flash over of electricity occurred from a 415V electrical source. The incident was a conventional health and safety matter and took place in a 'non-nuclear' building, so there was no radiological risk to workers or the public. The case is scheduled to be heard at High Wycombe Magistrates' Court on 7 December, 2020, at 2pm.

For legal reasons ONR is unable to comment further on the details of this case which is now the subject of live court proceedings. ONR will post updates on our website and social media channels as the case progresses.

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 collectively termed licence instruments (LIs), but can take other forms. In addition, inspectors may issue enforcement notices to secure improvements to safety.

During the period one Licence Instrument was issued:

- LI 541: LC22(1): Agreement to implement the facility safety justification, asset change request and modification safety report for solid Radwaste Stores operations, 10 August 2020.

The previous LLC report explained that ONR had issued two Improvement Notices (one for each AWE site) against LC36 (Organisational Capability) to remedy shortfalls in AWE's arrangements under LC36(2), specifically relating to the way AWE undertakes risk assessments for organisational changes that may affect safety. ONR has continued to monitor AWE's progress in seeking to address these two improvement notices, but considers there remains a significant amount of work to be undertaken in order to be able to demonstrate compliance with the notices. This work is currently scheduled for completion in January 2021 and ONR will report on this during the LLC report covering that period.

5 NEWS FROM ONR

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

News from ONR (July – September 2020)

Covid-19 (Coronavirus) (ONR position)

ONR is continuing to obtain assurance that nuclear site licensees and other dutyholders are adequately resourced to continue to safely and securely carry out their activities.

We remain satisfied with industry's response at this time and there has been no significant change to dutyholders' safety and security resilience.

As COVID-19 restrictions change, our focus is on the preparedness for the weeks and months ahead and maintaining safe and secure operations in the face of any further escalation in COVID-19 transmission.

ONR staff continue to work at home, primarily. We are increasing our on-site regulatory work in accordance with public health advice. We'll also continue to inspect,

assess and permission remotely where necessary to protect staff, workers on site, and the public around sites.

Enforcement Action

In July we publicised the serving of an [Improvement Notice on Rolls-Royce Submarines Ltd \(RRSL\)](#) for procedural safety breaches at its Derby site. The notice was served after shortfalls were identified against the safety case requirements at a nuclear fuel production facility on the site.

In September we announced that an [Improvement Notice had been served on EDF Energy Nuclear Generation Ltd \(EDF NGL\)](#) for shortfalls in safety procedures at its Heysham 2 Power Station in Lancashire. The notice was served after some of the equipment which is used to measure reactor power was incorrectly configured during the reactor's restart process following a planned outage in April 2020.

In September we announced that an [Improvement Notice had also been served on Devonport Royal Dockyard Ltd](#) for shortfalls in maintenance procedures at its Plymouth site. The notice was served after Devonport Royal Dockyard failed to carry out scheduled maintenance tests on an effluent extraction system which is used to support maintenance and repair activities within the licensed site.

In September we publicised our intention [to prosecute AWE plc under Section 3 of the Health and Safety at Work etc. Act \(1974\)](#). The charge relates to an incident on 20 June, 2019, at the AWE Aldermaston site which resulted in a contractor narrowly avoiding injury when a flash over of electricity occurred from a 415V electrical source. The incident was a conventional health and safety matter and took place in a 'non-nuclear' building, so there was no radiological risk to workers or the public.

Regulatory updates

In July the Government published its response to the International Atomic Energy Agency's final report on the [Integrated Regulatory Review Service \(IRRS\) mission to the UK](#). The IRRS mission took place between 14 – 25 October 2019 was hosted by ONR, and saw a team of 18 independent experts from across the globe scrutinising the regulation of nuclear and radiological safety.

In August we provided EDF NGL with permission for [Reactor 3 at its Hunterston B site to return to service](#) for a limited period of operation (16.425 Terawatt days, approximately six months' operation). In September we also gave [permission for Reactor 4 at the same site](#) to return to service for a limited period of operation (16.25 terawatt days, which is approximately six months operation). The decision to permit the restart of these reactors was given after extensive and detailed assessments of the respective safety cases by specialist ONR inspectors.

Corporate updates

In July we published our new [2020-25 Strategy](#), which sets out our direction and priorities for the next five years. It builds on our strengths and continues to focus on protecting society, and addressing the changing demands we will face as the UK's nuclear regulator.

In late September we published our [Annual Report and Accounts](#) highlighting our performance and key achievements for 2019/20.

The report notes that we continued to deliver our mission of protecting society by securing safe nuclear operations and that the majority of dutyholders have continued to meet the high standards of safety and security required. Where dutyholders have fallen short of such standards, we are satisfied that their facilities remain safe and that our regulatory focus has had a positive impact on their performance.

During the year, we completed more than 800 compliance inspections across 36 licensed sites during 2019/20, granting permission for 30 nuclear-related activities, serving three improvement notices and instigating one prosecution.

ONR Chair Mark McAllister said: "I am pleased to report that we have again delivered our mission and achieved our 2020 vision. As we look ahead, I have every confidence in our senior leadership team to see through the strategic improvement projects already underway that will enhance the organisation's information and knowledge management system, and successfully deliver the aspirations of our new strategy."

In September we announced that [Jean Llewellyn OBE](#) had been appointed to the ONR Board as the new Security Non-Executive member. Jean will take up her

appointment on 1 October 2020 for a three year term and will Chair ONR's Security Committee.

6 CONTACTS

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