



Office for Nuclear Regulation (ONR) Site Report for Dounreay

Report for period 1 January to 31 March 2021

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/lrc/>).

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 visits to site on the following dates during the report period 1st January to 31st March 2021:

- 23rd to 25th March 2021

ONR inspectors also conducted remote inspections [as a consequence of COVID-19 restrictions] on:

- 18th to 21st January 2021
- 22nd to 25th February 2021

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.

Reporting of incidents on site and learning from operational experience: DSRL has undertaken a comprehensive programme of work to improve their understanding of matters raised from previous ONR inspections. From observations conducted as part of a schedule of plant visits, ONR is satisfied that DSRL has implemented amended arrangements that have successfully addressed the key areas of previous concern. DSRL remains committed to an assurance improvement programme that includes reviewing the current site investigation process. Overall, ONR is satisfied that DSRL's arrangements for the reporting of incidents on site and the identification and sharing of learning from operational experience reflects relevant good practice.

Control and supervision of operations: ONR observed activities within key facilities across each of the operational areas on site. These activities ranged from key decommissioning projects, waste operations, essential maintenance, and construction activities. ONR's assessment also considered the observations undertaken since June 2020 to assess the control and supervision of the restart of operations following an extended shutdown period as a consequence of the Covid-19 pandemic. Overall, ONR is satisfied that DSRL continues to demonstrate adequate control and supervision of its activities.

Management of radioactive waste: ONR is satisfied that DSRL's arrangements for the management of the accumulation and disposal of radioactive waste are consistent with relevant good practice. In the event there was a leakage and escape of radioactive material

or waste, we are satisfied that the licensee has adequate arrangements in place to deal effectively with the consequences.

2.2 Other work

Technical assessment work: ONR has continued to undertake assessment activities necessary to support the release of regulatory hold-points placed on a number of the projects on site. Specifically, ONR has continued to hold regular technical review meetings with the Shaft and Silo Project Team and remains confident to be in a position to release the regulatory hold-point placed on the commencement of construction activities later this year.

Management of Regulatory Issues: ONR is satisfied that DSRL continues to make satisfactory progress to address the formal regulatory issues raised during previous inspections. ONR has improved confidence in the site's arrangements for the development and management of their decommissioning programme and will be conducting a formal review of the resultant Long-Term and Near-Term Working Plans during the next quarter. ONR also acknowledges the difficulties the site has experienced in developing and implementing revised arrangements for command and control at the scene of an incident as a consequence of the long-standing COVID-19 restrictions. ONR has agreed to follow up on this issue once restrictions ease sufficiently to enable DSRL to proceed with this activity.

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 of significance 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). In addition, inspectors may take a range of enforcement actions, including the issuing of an Enforcement Notice.

No Licence Instruments, Enforcement Notices or Formal Letters were issued during this period.

5 NEWS FROM ONR

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

Covid-19 (Coronavirus) (ONR position)

We are continuing to obtain assurance that nuclear site licensees and other duty-holders are adequately resourced to continue to carry out their activities safely and securely. We remain satisfied with industry's response at this time and there has been no significant change to duty-holders' 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. Our latest position can be found on our [website](#).

Enforcement Action

In January, we agreed to extend two [Improvement Notices](#) served on the Atomic Weapons Establishment (AWE), recognising the good progress made so far. The Notices, which were

served in June 2019, relate to the way the company controls changes to organisational structure and resources which may affect safety.

In January, we served an [Improvement Notice](#) on Sellafield Ltd following a number of electrical safety incidents across the site. While we are satisfied that Sellafield Ltd is currently meeting the high standards expected with regards to nuclear safety, as a regulator we require sustained improvements in the area of electrical safety.

In February, we served an [Improvement Notice](#) on Morgan Sindall Construction and Infrastructure Ltd after workers came close to striking a live high voltage electric cable during excavation work at the Sellafield site. Nobody was harmed in the incident on 7 October 2020, and there was no impact on the public or the environment. However, the incident posed a serious risk to workers who were operating within one metre of the 11kV cable.

Regulatory Updates

In March, we published a response on our [website](#) to a BBC report relating to Sellafield. We were naturally concerned to hear the claims, particularly any suggestion that staff have been subjected to racist abuse of any kind. As a regulator, if we had any concerns or evidence that bullying and harassment was impacting safety at the site, we would take robust action to ensure this is addressed as a matter of urgency.

In March, we [published](#) an article about how we responded to the serious nuclear accident at the Fukushima Dai-ichi nuclear power plant in 2011 to mark the 10th anniversary.

In March, we gave [EDF permission](#) for Reactors 3 and 4 at Hinkley Point B power station to return to service for a limited period of operation. Permission for Reactor 3 will allow it to operate to a core utilisation of 17.55 terawatt days, while permission for Reactor 4 is to operate to a core utilisation of 17.3 terawatt days, which equates to two periods of approximately six months operation for each reactor.

Stakeholder Engagement

In February, we encouraged interested parties to take part in a [Nuclear Energy Agency \(NEA\)](#) survey about building and maintaining trust between nuclear safety regulators and the stakeholders they engage with.

Corporate updates

In February, we provided an update about the [leadership structural changes](#) we initially announced in December 2020. Under existing contractual arrangements, current Chief Executive Adrienne Kelbie CBE was always expected to step down as her extended term of office comes to an end in January 2022. Mark Foy will step into the new combined role on 1 June 2021, when the new leadership structure will come into full effect.

In February, we announced that we had appointed [Donald Urquhart](#) to the newly-created role of Executive Director of Operations, which will form part of our new leadership structure. As Executive Director of Operations, Donald will be responsible for leading our regulatory work.

In March, we announced that as part of our new leadership arrangements, we had [appointed three new deputy chief nuclear inspectors](#) (DCIs) to our regulatory and senior leadership teams: Jane Bowie, Paul Dicks and Steve Vinton, currently all senior superintending inspectors at ONR. All three new DCIs have a strong track record of delivering regulation across the organisation and will help us maintain a focus on our Strategy 2020-25.

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Published 04/2021