

Office for Nuclear Regulation (ONR)

Site Report for Hartlepool Power Station

Report for period 1 July to 30 September 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 of the Hartlepool Local Community Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend Hartlepool Local Community Liaison Committee 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

Dates of inspection

ONR inspectors undertook interventions relevant to Hartlepool Power Station on the following dates during the report period:

- 20-22 July (remote)
- 10-12 August (onsite)
- 18-19 August (onsite)
- 31 August – 2 September (onsite)
- 28 – 30 September (onsite)

Some site interactions in this period were conducted remotely as a result of the coronavirus pandemic.

2 Routine Matters

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 the 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 this period, routine inspections of (site/station) covered the following:

- July – LC7/24/26 Themed Inspection on procedural quality use and adherence;
- August – Fire Safety Audit and LC17 (Management Systems);
- September – Level 1 Emergency Exercise and Annual Review of Safety.

LC 7/24/26 Inspection: This was a planned Procedural Quality, Use and Adherence (PQU&A) and Configuration Control themed inspection. Themed Licence Condition (LC) inspections target multiple LCs that comprise a specific theme. For Hartlepool, LC24 (Operating Instructions) and LC26 (Control and Supervision of Operations) were targeted to cover the themes of PQU&A and Configuration Control. This themed inspection was based on fleetwide intelligence (predominantly INF1s) received by ONR that has identified multiple shortfalls relating to PQU&A and Configuration Control. At a station level, Hartlepool has reported events in line with this trend, therefore a planned LC7 inspection was also incorporated into this intervention.

Intervention ratings of Green were assigned for LC7 and LC26. An intervention rating of Amber was assigned to LC24, relating to shortfalls in ensuring that full, complete operating instructions are provided to support reliable operations. The main shortfalls against LC24 are:

- Investigations at Hartlepool are indicating procedural quality is contributing and causing events, with the sampled event demonstrating incomplete operating procedures with key information missing.
- There is no systematic approach to reviewing the quality of important operating instructions across station.

A number of findings were raised which will form the basis of a level 3 Regulatory Issue under LC24, allowing the resolution of the identified shortfalls to be tracked to completion. Two minor shortfalls were also raised as level 4 Regulatory Issues under LC7. Several observations were also raised which will be followed up through Hartlepool normal business. There were no findings from this inspection that could significantly undermine nuclear safety.

Fire Audit: The purpose of the inspection was to ensure that the licensee was demonstrating compliance with the requirements of the Regulatory Reform (Fire Safety) Order 2005 to ensure the safety of people from the danger of fire. The work and arrangements introduced on site in April 2020 to maintain fire safety management standards during the Covid-19 pandemic precautions remain in place, with site demonstrating a clear understanding the ongoing requirements for ensuring life fire safety across the site. During this intervention there were no significant departures identified from compliance, and no matters were identified as requiring immediate regulatory attention during the engagement. The inspector concluded that the fire safety arrangements and management procedures sampled during the intervention are compliant with the legislation, and therefore rated this inspection green,

LC17 – Management Systems: The purpose of LC17 is to ensure the licensee has established and implemented management systems which give due priority to safety and within its management systems, make and implement adequate quality management arrangements in respect of all matters which may affect safety. Overall, from the evidence sampled, the inspector judged that the licensee adequately demonstrated compliance with the requirements of LC17 and therefore rated this inspection as Green, no formal action. A number of low-level supply chain and quality

shortfalls were identified, which the station has started to address. Two Level 4 Regulatory Issues have been raised to monitor progress addressing these shortfalls

Level 1 Emergency Exercise: On the 1 September a team of ONR inspectors observed the annual Level 1 emergency exercise. The ONR team were satisfied that the performance of the site adequately demonstrated that they were capable of dealing with a genuine emergency on site.

Annual Review of Safety: The purpose of this meeting was for ONR to attend the Hartlepool (HRA) Annual Review of Safety, Security and Environment (ARoSE). ONR were represented at the meeting by the Head of Operating Reactors and the nominated site safety inspector. The ARoSE was conducted in accordance with EDF Energy's internal process and was compatible with ONR guidance document NS-INSP-GD-058.

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records on our website www.onr.org.uk. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

Other work

The site inspector attended the Hartlepool Local Community Liaison Committee meeting during the reporting period and provided an overview of the previous quarterly report.

The site inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

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.

Matters and events of particular note during the period were:

- INF1 2021/583: A flask was despatched and transported using Direct Rail Services to Sellafield without the accompanying consignment paperwork. An adverse cause investigation was carried out to determine the apparent cause of the event. The site inspector has reviewed the follow up report and the associated site investigation that was completed following this incident and is content that the actions identified should ensure a more rigorous handover between those involved in the chain of custody of flasks leaving HRA (Fuel route team leader, security and DRS driver).
- INF1 1094: Hartlepool Reactor 2 was manually shutdown due to a Turbine Hall steam leak causing multiple fire alarms to initiate. Site operators took the conservative decision to manually trip unit 2. Post trip cooling was established. A site incident was declared, and all personnel were successfully mustered and accounted for. It was confirmed that an impulse line had fractured on the reducer to the primary impulse line isolation valve on TG2 causing a steam leak within the turbine hall. A SACI will be initiated by EDF to determine the root cause of the event which will be reviewed by ONR when complete.
- INF1 1133: Hartlepool Reactor 1 was manually shutdown due to insufficient availability of Gas Turbines for continued operation. Post trip cooling was established on all four boilers. ONR will conduct a focused intervention on GT availability at HRA in the upcoming statutory outage (October). EDF have initiated an investigation into GT availability which will be reviewed by ONR on completion.

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 LIs, Enforcement Notices or Enforcement letters were issued during this period.

5 News from ONR

For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

Enforcement action

- In July, we served an improvement notice on Devonport Royal Dockyard Ltd (DRDL) for shortfalls in its health and safety arrangements. The notice was served after DRDL failed to demonstrate consistent and effective arrangements to control and monitor the risks associated with working at height at its Devonport site. DRDL must comply with the requirements of the improvement notice by 31 March 2022.
- In August, we announced that Morgan Sindall Infrastructure Ltd had complied with an improvement notice served in January 2021 after workers came close to striking a live high voltage electric cable during excavation work at the Sellafield site. Since this incident occurred, Morgan Sindall has put in place measures to prevent similar occurrences, and we are satisfied that they have complied with the requirements of the improvement notice.

COVID-19: ONR Position

- We are 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; there has been no significant change to dutyholders' safety and security resilience.
- We have measures in place to try and prevent asymptomatic ONR staff unwittingly conveying the virus onto a regulated site. We require all staff to take a circular 1 health (C1H) antigen test in advance of them visiting a site. In addition to the C1H test, we also require them to take a lateral flow test on the morning of their planned site visit. We are keeping our COVID-19 testing guidance under regular review, in-line with the changing national context and any further developments in industry approaches to testing arrangements.

Other

- In July, our project to become the UK's domestic safeguards regulator was named the public sector's [Project of the Year at the National Project Awards](#).
- In September we invited stakeholders to submit comments on our updated reference papers for Coastal Flood Hazards and Meteorological Hazards for Nuclear Sites. Although supplementary to our normal governance process, we are doing this due to stakeholder interest in these topics and our commitment to being an open and transparent regulator.

The reference papers provide additional detail on the analysis of the external hazards for nuclear sites and have been produced by our [Expert Panel on Natural Hazards](#), a group of academic and industry technical specialists working under contract to provide us with independent expert advice. You can find out more about how to get involved and comment on these papers on our [website](#)

6 Contacts

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
website: www.onr.org.uk
email: Contact@onr.gov.uk

This document is issued by the Office for Nuclear Regulation (ONR). For further information about ONR, or to report inconsistencies or inaccuracies in this publication please visit <http://www.onr.org.uk/feedback.htm>.

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