



Office for Nuclear Regulation (ONR) Quarterly Site Report for Dungeness A

Report for period 1 April to 30 June 2021

Foreword

This report is issued as part of our commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed quarterly to members for the Dungeness Site Stakeholder Group and are also available on our website (<http://www.onr.org.uk/lrc/>).

Our site inspectors may attend Dungeness Site Stakeholder Group meetings and will respond to any questions raised there. Anybody wishing to inquire about matters covered by this report should contact us.

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1 INSPECTIONS

1.1 Dates of inspection

Our safety site inspector and the divisional superintending inspector, as well as inspectors from CNSS division attended the Magnox SE Sites Annual Review of Safety, Security and the Environment at Dungeness on the 16 June. This was preceded by a site inspection on the 15 June.

1.2 We held meetings with Dungeness on the following dates during the quarter:

- 1 April 2021 (virtual)
- 14 April (virtual)
- 28 April (virtual)
- 12 May 2021 (on site)
- 9 June (virtual)

2 ROUTINE MATTERS

2.1 Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- the conditions we attach 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);
- 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 Nuclear Industry Security Regulations (NISR) 2003.

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 which meet the required standards under conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

No routine inspections were carried out in this period due to the regulatory burden on the site of preparing for and hosting the Magnox SE Sites Annual Review of Safety, Security and the Environment (AROSSE). Prior to the review an extensive site inspection was undertaken, during which the material condition of the boilers and associated annexes was observed. This confirmed our view that boiler removal is the correct option to remediate this hazard. It was also noted that over 50% of the wet Intermediate Level Waste (ILW), consisting of sludge and resin, has now been safely retrieved, packaged and despatched to Bradwell for long term storage. All staff involved in the inspection were very enthusiastic and knowledgeable. Improvement in the general condition of the site was also noted.

The AROSSE was a positive review, and it was noted that two decommissioning milestones have been achieved: draining of the ponds and completion of the bulk removal of asbestos from the reactor buildings. However, draining of the ponds has resulted in two difficult wastes: sludge from the washing of the pond walls and contaminated pond skips.

The pond skips were cut into sections by divers in the ponds, and the sections were packaged in ISO containers ready for transport off site some years ago. The containers are stored in a temporary facility on the southern part of the site. Magnox Ltd has identified a requirement to improve the radiological characterisation of pond skips across its fleet, and it has proposed a programme of sampling and analysis of the skips to meet this requirement. The skips at Dungeness are highly active, and we have advised Magnox Ltd that sampling of these skips may not meet the requirements of the Health & Safety at Work Act 1974. Discussions continue with Magnox Ltd on this issue.

The site inspector also attended (virtually) a quarterly regulatory update meeting. At this meeting the licensee appraised the regulators (ourselves and the Environment Agency) of the current status of the decommissioning projects and gave a three month look ahead for the projects. This was a useful meeting, overall we were satisfied with the progress being made with decommissioning at the site.

3 NON-ROUTINE MATTERS

Licensees are required to have arrangements to respond to non-routine matters and events and report significant events to us. Our inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

During this period two incidents were reported to us involving radiological contamination control. We will do an inspection of Magnox Ltd's arrangements for radiological protection under the Ionising Radiations Regulations 2017.

4 REGULATORY ACTIVITY

We may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, we issue regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'licence instruments' but can take other forms. In addition, inspectors may issue enforcement notices to secure improvements to safety.

During this reporting period no formal documents were issued.

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

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 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.

All licensed sites are required to determine minimum staffing levels necessary to ensure safe and secure operations and contingency arrangements in the event that these levels are not met. This condition is specifically designed to ensure that industry can adequately manage and control activities that could impact on nuclear safety and security under all foreseeable circumstances, including pandemics.

Although ONR staff continue to work primarily at home, (carrying out as much of our work as possible via videoconference, phone and email), we are carefully and progressively increasing our site footprint. We continue to assess our on-site presence in line with government guidelines and our business needs, ensuring we have a balanced portfolio of on-site inspections and interventions, that are important to support effective regulation across our purposes.

Our latest position can be found on our [website](#).

Enforcement Action

- In April, we announced that EDF [complied](#) with a Direction we served on 14 December 2020, under the Pressure Systems Safety Regulations (2000). This followed an inspection, at which found a number of pressure system components at Heysham 1 Power Station were overdue their scheduled examination.
- In May, we agreed to [extend an improvement notice](#) served on EDF in September 2020, recognising the progress made so far. The notice was served after some of the equipment used to measure reactor power at Heysham 2 was incorrectly configured. We judged that Heysham 2 is able to operate safely, and that additional time to demonstrate the required improvements will not pose a risk to safety. EDF must now comply with the improvement notice by 31 July 2021.
- In June, we announced that Rolls-Royce Submarines Ltd (RRSL) had [complied](#) with an improvement notice served on 29 May 2020. The notice was served after RRSL operators brought 21 units of fissile material into the facility – which exceeding the limit defined within the safety case and set out in the Criticality Control Certificate for the facility.

Stakeholder Engagement

- In April, we published an [article](#) introducing our newest board member, Jean Llewellyn, who joined us in October 2020, as security lead. Jean brings with her a wealth of experience, including serving as a non-executive director on the board of the World Institute for Nuclear Security since 2018 – which has given her a good understating of the global security challenges facing the nuclear industry.
- In May, we issued our e-bulletin '[ONR News](#)' to subscribers. This issue included farewell reflections from our outgoing chief executive, a leadership update, further information on our COVID -19 response, and the results of our latest stakeholder survey. You can sign up for our e-bulletin [here](#)
- On 1 June, we [announced](#) the full implementation of our new leadership structure. Mark Foy is now our combined Chief Executive and Chief Nuclear Inspector. He is supported by Sarah High as Deputy Chief Executive, and Donald Urquhart as Executive Director of Operations.
- In June, we published our new [Corporate Plan for 2021/22](#), which sets out our key priorities to protect the public by securing safe nuclear operations.
- In June, our State System of Accounting for and Control of Nuclear Material (SSAC) project - which saw ONR become the UK's national nuclear safeguards regulator from 31 December 2020, was [shortlisted for a national award](#) in the Project Management Institute's UK National Project Awards in the 'Project of the Year (Public Sector)' category.
Nuclear safeguards are measures to verify that countries comply with international obligations not to use nuclear materials from civil nuclear programmes for non-peaceful purposes.

6 CONTACTS

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