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| ONR Site Report  Urenco UK Ltd. (UUK) – Capenhurst Site |



ONR Site Report

Urenco UK Ltd. (UUK) - Capenhurst Site

Report for period: 1 January – 31 March 2024

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Approved by: DFW Delivery Lead

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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 Capenhurst Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Capenhurst 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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# Inspections

## Date(s) of Inspection

ONR inspectors made inspections on the following dates during the reporting period 1 January – 31 March 2024:

5 to 6 February 2024;

26 February 2024;

1 March 2024; and

28 March 2024

# Routine Matters

## Inspections

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

* the Energy Act 2013;
* regulations made under the Energy Act 2013, for example the Nuclear Industries Security Regulations 2003 and the Nuclear Safeguards (EU Exit) Regulations 2019;
* the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
* the Health and Safety at Work etc. 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), etc.

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 legal compliance. 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 ONR inspections of the Capenhurst site covered:

* Life fire safety;
* Nuclear fire safety;
* A safety walkdown of an enrichment plant currently in outage; and
* A handover of duties between ONR nuclear security inspectors, including a general overview of protective security measures.

Members of the public, who would like further information on ONR’s inspection activities during the reporting period, can view site intervention reports at [Publication search | Office for Nuclear Regulation (onr.org.uk.)](https://www.onr.org.uk./publications/publication-search/?type=inspectionRecordPublication) on our website [www.onr.org.uk](http://www.onr.org.uk).

Should you have any queries regarding our inspection activities, please email [contact@onr.gov.uk](mailto:contact@onr.gov.uk).

## Other Work

Site inspectors continue to conduct formal quarterly reviews of the site’s progress in delivering a number of agreed improvement activities. Topics include:

* Capenhurst’s asset management arrangements;
* Refurbishment works for the site-wide fire fighting main; and
* UUK’s oragnisational structure, with respect to maintaining compliance with the Construction, Design and Management Regulations 2015.

UUK is proposing to change its organisational structure later this year, implementing a site-wide transformation programme known as ‘One Capenhurst’. ONR is regulating this change under Licence Condition 36: Organisational Capability; and throughout this quarter has continued to engage with UUK to discuss their progress with the change and ONR’s regulatory expectations.

UUK also has plans to make modifications to several facilities across the site, as part of the Low Enriched Uranium Plus Project. ONR has engaged with UUK to discuss their proposals, and has informed UUK that regulatory oversight of the project will be secured by placing a hold-point on active commissioning.

During this period ONR has also held meetings to discuss:

* The approach to, and progress with, the site’s proposed expansion of the Tails Management Facility (TMF), operated by Urenco ChemPlants Ltd. (UCP), a tenant on the Capenhurst Nuclear Licensed Site. TMF is a nuclear chemical plant used to convert one of the byproducts, uranium hexafluoride tails, arising from the uranium enrichment process.
* Several projects focused on making improvements to the site’s infrastructure, including a new incident management system and improvements in emergency response; namely, a new emeregncy control centre.

Site inspectors hold periodic meetings with safety representatives to support their function of representing employees and receiving information on matters affecting their health, safety, and welfare at work. ONR’s Nominated Site Inspector for the Capenhurst site conducted such a meeting on 26 March 2024.

# Non-Routine Matters

Licensees are required to have arrangements in place 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.

Within this period, Capenhurst reported the following safety events to ONR, which occurred at the TMF, operated by UCP:

* On the 31st January 2024 three drips containing low levels of radiological contamination were found outside a contamination controlled area. Access to the area was restricted until they were removed, and a survey of the wider area for radiological contamination had been undertaken. ONR was content with the dutyholder’s response to this event.
* On the 7th Ferbuary 2024 a bucket containing radiologically contaminated waste swabs/wipes (several hunderded Bq/cm2 Beta), which are used to clean fittings while performing connections of cylinders containing uranium hexaflouride, was discovered outside a contamination controlled area. As a discrete event, ONR considered the incident to be of relatively minor safety signifcance. However, as indicated by the first event above, ONR has noted an adverse trend in events concerning UCP’s approach to managaing radiological contamination and temporary controlled areas. This is being followed up by ONR’s Nominated Site Inspector.
* ONR has launched an investigation following an incident on the 5th February 2024 at the TMF, involving a container of uranium powder. ONR considers there was no signifcant risk to members of the public as a result of the event. Following incident, the dutyholder has implemented changes to the way they handle containers of uranium powder at the facility, including new operating instructions. ONR will report on the outcome of the investigation in due course.

# 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. In addition, inspectors may take a range of enforcement actions, including issuing an enforcement notice. Within this period, ONR has:

* Served an improvement notice (ONR-IN-23-009) on UUK for contravening Regulation 5 of The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG09). ONR’s inspector was of the opinion that UUK, when acting as a consignor or agent to other consignors, caused Class 7 dangerous goods to be transported in contravention of Regulation 5 of CDG09, and that this contravention was likely to continue. ONR inspectors judged there were shortfalls in UUK’s radiation risk assessment (RRA), and that the associated RRAs held by the relevant carriers were not suitable or sufficient to meet the requirements of Regulation 8 of IRR17 and CDG09 Schedule 2, Part 1, Paragraph 2. Shortfalls were also discovered with UUK’s emergency plan,and the relevant carriers were also unable to provide emergency plans. UUK’s most recent audits of these carriers had not identified these shortfalls. Consistent with ONR’s Enforcement Policy Statement, it was concluded an improvement notice should be issued to remedy these contraventions. UUK has until 31 May 2024 to comply with the improvement notice.
* Issued an rnforcement letter (ONR-EL-23-054) to UUK concerning the outcome of ONR’s fire safety inspection conducted on 5-6 February 2024, and UUK’s subsquent decision to suspend uranium enrichment operations at one of the uranium enrichment facilities inspected. The enforcement letter concerns contraventions of Sections 2(1) and 3(1) of the Health and Safety at Work etc. Act 1974, and Licence Conditions 15(1) and 23(1) of the Nuclear Installations Act 1965 (as amended). UUK is required to provide an action plan by the end of July 2024, to address the shortfalls. ONR continues to engage with UUK on these matters to ensure appropriate resolution. Consistent with ONR’s enforcement guidance, a “holding to account meeting” is being convened with UUK to discuss the shortfalls and make clear ONR’s regulatory expectations.

Under Licence Condition 11: On-site Emergency Arrangements, UUK is proposing to make changes to its on-site emergency plan. The changes and a revised on-site emergency plan have been submitted to ONR for review. In accordance with UUK’s licence condition compliance arrangements, they have requested ONR’s ‘Approval’ of the updated on-site emergency plan, and withdrawal of ONR’s ‘Approval’ of the previous version of the same. ONR has commenced work to assess the proposed changes.

# News from ONR

For the latest news and information from ONR, please read and subscribe to our regular email newsletter ‘ONR News’ at [Latest news | Office for Nuclear Regulation (onr.org.uk)](https://www.onr.org.uk/news/).

# Contacts

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