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| ONR Site Report  Nuclear Restoration Services Ltd – Dounreay |



ONR Site Report

Nuclear Restoration Services Ltd - Dounreay

Report for period: 1 July – 30 September 2024

Authored by: Nominated Site Inspector

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

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.

Contents

[1. Inspections 4](#_Toc179557319)

[2. Routine matters 5](#_Toc179557320)

[3. Non-routine matters 7](#_Toc179557321)

[4. Regulatory activity 8](#_Toc179557322)

[5. News from ONR 9](#_Toc179557325)

[6. Contacts 9](#_Toc179557326)

# Inspections

## Date(s) of inspection

ONR site inspectors made inspections on the following dates during the reporting period 1 July to 30 September 2024:

* 23 to 25 July 2024
* 13 to 14 August 2024
* 19 to 22 August 2024
* 3 to 5 September 2024
* 24 to 26 September 2024

# Routine matters

## Inspections

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).

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 inspections of Dounreay covered the following:

* A visit to the site by ONR’s Chief Nuclear Inspector and Chair of ONR Board;
* Safeguard arrangements for training and organisational structure;
* Site Level 1 Safety Demonstration Exercise;
* Intervention on the site’s Ionising Radiation Regulations (IRRs) consents process for high activity sealed sources;
* Oversight of security suppliers;
* Security demonstration exercise; and
* ONR’s Chief Nuclear Inspector’s topical inspection on climate change.

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](http://www.onr.org.uk./intervention-records) on our website [www.onr.org.uk](http://www.onr.org.uk).

In addition, ONR remains informed of all major site activities that may affect nuclear safety, security and conventional health & safety and continues to undertake proportionate assessment activities necessary to support the release of regulatory hold-points placed on a number of the projects on site.

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

## Other work

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

* Dounreay’s asset management arrangements;
* Alkali metal storage and disposal arrangements;
* Dounreay’s arrangements for managing chemical inventories on site;
* Electrical safety;
* Asbestos management and safety;
* Establishing appropriate waste routes for hazardous waste materials;
* Reporting and investigation of incidents and organisational learning; and
* Dounreay’s decommissioning programme.

During the reporting period, ONR site inspectors held meetings with safety representatives to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

# 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.

Within this period Dounreay has reported the following events to ONR:

* NRS Dounreay monitors the water level within a redundant carbon bed filter located in an external area near the D2001 facility. This carbon bed filter is no longer in use and is awaiting decommissioning. Trending of the water level data showed that water is being lost from the system at a rate of around 1 litre per day. The rate of decrease has been steady for several months with no evidence of change. A release to the environment has not been detected by the current monitoring regime. A small leak is the most likely reason for the decrease in water level. Dounreay is in process of removing the water from the filters to prevent further leakage. ONR considers Dounreay’s response to this matter appropriate.
* An event has been reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) notifying ONR that a worker received a fracture to his foot during dismantling activities on the site. ONR remains informed on the site’s investigation into this matter.
* Three low-level waste packages that had been identified as having recordable amounts of nuclear material were found not to be recorded on the nuclear material safeguards accountancy system. They were subsequently missed during the facility physical inventory checks. ONR remains informed on the site’s investigation into this matter.

# 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.

ONR has increased the regulatory attention level for safety as a result of long-standing safety shortfalls, where action was not taken by the licensee and repeated enforcement actions were required by the regulator. These shortfalls are summarised as follows:

* Asset condition management: ONR has highlighted and conducted enforcement on a number of areas where improvements are sought on asset condition to meet legal standards, for example, sodium storage arrangements, site wide electrical equipment and infrastructure, building heating and watertight integrity.
* Conventional health and safety management: ONR has identified a significant number of issues with the overall management and governance of conventional health and safety regulations. These have resulted in enforcement, at various levels, with respect to the following regulations: Construction (Design and Management) Regulations 2015, Control of Major Accident Hazards Regulations 2015, Dangerous Substances and Explosive Atmospheres Regulations 2002, Electricity at Work Regulations 1989, Control of Substances Hazardous to Health, Workplace (Health, Safety and Welfare) Regulations 1992.
* Management and organisational change: Over the course of the last two years there has been a substantive amount of management and organisational change at the Dounreay site. This level of change is creating uncertainty in the safety culture and relationships with the workforce, which could result in further safety concerns.

Specific regulatory issues and interfaces have been set up on the key aspects of the above points with the intention of driving compliance on these aspects. ONR further expects NRS Dounreay to develop an overall improvement programme to establish the root causes of these shortfalls and develop a route to return to routine regulatory attention.

# News from ONR

For the latest news and information from ONR, please read and subscribe to our regular email newsletter ‘ONR News’ at [www.onr.org.uk/onrnews](http://www.onr.org.uk/onrnews).

# Contacts

Office for Nuclear Regulation

Redgrave Court

Merton Road

Bootle

Merseyside

L20 7HS

website: [www.onr.org.uk](http://www.onr.org.uk)

email: [Contact@onr.gov.uk](mailto:Contact@onr.gov.uk)

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