

# **Office for Nuclear Regulation (ONR) Quarterly Site Report for Bradwell**

**Report for period 1 October 2014 to 31 December 2014**

## **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 quarterly to members of the Bradwell Site Local Community Liaison Committee and are also available on the ONR website ([www.hse.gov.uk/nuclear/lc](http://www.hse.gov.uk/nuclear/lc)).

Site inspectors from ONR usually attend Bradwell Site Local Community Liaison Committee meetings and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

## 1 INSPECTIONS

### 1.1 Dates of inspection

1. ONR inspectors made inspections on the following dates during the quarter:

20 – 23 October

18 – 20 November

## 2 ROUTINE MATTERS

### 2.1 Inspections

2. 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 Health and Safety at Work Act 1974 (HSWA74);
- The Energy Act 2013; and
- Regulations made under HSWA74, for example the Ionising Radiations Regulations 1999 (IRR99) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

3. 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. In this period, routine inspections of Bradwell covered the following:

- Organisational Capability
- A system inspection of the Fuel Element Debris (FED) Dissolution plant covering:
  - Training
  - Operating Rules
  - Operating Instructions
  - Safety Mechanisms, Devices and Circuits
  - Examination, Inspection, Maintenance and Testing
  - Leakage and Escape of Radioactive Material and Radioactive Waste

4. Implementation of the site arrangements for licence condition 36 (Organisational Capability) were found to meet the requirements of the safety case and the required safety standards.

5. ONR undertook a system inspection of the FED Dissolution plant to confirm the requirements of the safety case for the plant and equipment were adequately incorporated into the arrangements for compliance with licence conditions. Some opportunities were identified to:

- Better clarify the operating rules for adverse weather events applicable to the FED plant,
  - Improve the demonstration of the control and supervision of plant operations whilst it is operated under the site testing and commissioning panel arrangements.
6. In both cases, the licensee made satisfactory commitments to address the issues, and the site inspector will monitor progress during future visits.

### 3 NON-ROUTINE MATTERS

7. 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.
8. Matters and events of particular note during the period were:
9. The previous quarterly report noted the occurrence of a release of radioactive material from the Aqueous Discharges Abatement Plant (ADAP). The event has been confirmed as an INES Level 1<sup>1</sup>. It arose due to the failure of several safety provisions designed to prevent a release and occurred due a failure by Bradwell to adequately control the construction and installation of ADAP. No injuries to workers occurred and the release did not present a hazard beyond the immediate area of ADAP. The quantity of radioactive liquor released was significantly below the notification levels specified in Schedule 8 of the Ionising Radiations Regulations, 1999.
10. ONR has reviewed, and is content with, the findings of the formal investigation carried out by Bradwell and with the corrective action being taken to control the return to service of ADAP. ONR considered the need for further regulatory action. In view of the scale of the release and robust response made by Bradwell to prevent recurrence, it was appropriate to issue a letter recording ONR's regulatory decision on this matter.
11. Other matters:
12. Cavendish Fluor Partnership (CFP) assumed full control as the Parent Body Organisation (PBO) of the Magnox Ltd and Research Sites Restoration Limited nuclear site licence companies on 1 September 2014. Since then there have been no significant proposals for organisational changes at Bradwell (noting that LCLCs have already been made aware of changes to PBO posts within Magnox Limited licensed sites). Should changes be proposed by CFP to ONR in the future, ONR will report on them in the following quarterly report.

Deleted:

### 4 REGULATORY ACTIVITY

13. 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 issue enforcement notices to secure improvements to safety.

Reports detailing regulatory decisions are available on the ONR website at <http://www.onr.org.uk/pars/>.

14. Two LIs were issued during the period:-

<sup>1</sup> International Nuclear and Radiological Event Scale (INES) is a tool for promptly communicating to the public in consistent terms the safety significance of reported nuclear and radiological incidents and accidents. On this scale INES Level 1 is considered an anomaly.

- LI No 510 was issued on 11 December 2014 granting ONR approval of an amendment to the Bradwell on-site emergency plan.
- LI No 501 was issued on 16 December 2014 providing ONR agreement to the arrangements for extension of maintenance intervals specified in the plant maintenance schedule.

## 5 NEWS FROM ONR

### Amended licence conditions

15. Amendments have been made to licence conditions 1 and 3.
16. Licence condition 1 (LC1, interpretation) provides a set of definitions. ONR decided to amend the definition of “radioactive material” and “radioactive waste” to ensure they are consistent with ONR’s regulatory requirements. The changes were necessary because other legislation, to which the licence conditions were linked, had amended the definitions. LC1 was further amended to add a definition of ‘property transaction’, made necessary by the introduction of the new LC3 (see below), and a definition of “ONR”.
17. Licence condition 3 (LC3, control of property transactions) requires the licensee to make and implement adequate arrangements to control property transactions on licensed nuclear sites. LC3 was prescriptive and required the licensee to obtain ONR permission (“consent”) before it let, conveyed, assigned or transferred any part of the licensed site to a third party. It made no allowance for the nuclear safety significance of transactions. Changes in the nature of the nuclear industry, with an increasing presence of contractors or other third parties on licensed sites, have resulted in growing numbers of LC3 applications, many of which have little or no nuclear safety significance. This has imposed an unintended regulatory burden on licensees and is an inefficient use of ONR’s specialist resource and time. The principal change is to require the licensee to make and implement adequate arrangements that control all property transactions affecting the site and include provision for the classification and management of all property transactions according to their safety significance and their impact on the licensee’s control of the site.
18. ONR’s licence condition handbook has been updated and is available via the ONR website at <http://www.onr.org.uk/silicon.pdf>

### Application to relicense the Harwell and Winfrith nuclear licensed sites

19. On 28 November 2014, ONR received an application to relicense the Harwell and Winfrith sites into a single site licence company alongside the ten Magnox sites. ONR is currently assessing this application in accordance with the criteria contained in its publication ‘Licensing Nuclear Installations’. The application includes a proposal to introduce a common Board and Executive structure, which is being trialled in a period of shadow working between 1 December 2014 and spring 2015. ONR is conducting a targeted and proportionate assessment of the applicant’s organisational capability, including an examination of the Board and Executive changes.
20. Insight into ONR’s work as an independent regulator of the nuclear industry can be found in ONR’s Quarterly News. The online publication (<http://www.onr.org.uk/onr-quarterly-report.htm>) reports on the key themes and developments in each of ONR’s regulatory programmes and provides an update about the on-going changes at ONR.

<http://www.onr.org.uk/index.htm>. 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>).

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