



Office for Nuclear Regulation (ONR) Quarterly Site Report for Harwell

Report for period 1 April–30 June 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 for the Harwell Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/lrc/>).

Site inspectors from ONR usually attend Harwell Site Stakeholder Group 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

The ONR site inspector made inspections on the following dates during the quarter:

9 to 11 April 2014

The ONR site inspector also attended a number of meetings to monitor delivery of improvements at Harwell on:

13 and 14 May 2014

An ONR fire safety site inspector undertook inspection of the Harwell site on:

21 May 2014

An ONR radiation protection inspector undertook inspection to explore potential improvements in decontamination facilities on:

23 April 2014

2 ROUTINE MATTERS

2.1 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 etc. Act 1974 (HSWA74); 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).

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 Harwell covered the following:

- Licence Condition 21: Commissioning;
- Licence Condition 22: Modifications or experiment on existing plant;

In general, ONR judged the arrangements made and implemented by the site in response to safety requirements to be adequate in the areas inspected. However, where improvements were considered necessary, the licensee made satisfactory commitments to address the issues, and the site inspector will monitor progress during future visits. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

Licence Condition 21 inspections of Research Sites Restoration Ltd's (RSRL's) arrangements and subsequent implementation in the Waste Encapsulation Plant (WEP) project concluded

that it is evident that RSRL has made and implemented adequate arrangements for the commissioning of plant or processes. There are some areas for improvement in the clarity of the documented arrangements and alignment with regulatory expectations.

Licence Condition 22 inspections concluded that RSRL has made and implemented adequate arrangements for the modification or experiment on existing plant. There are some areas for improvement in the clarity of the documented arrangements and alignment with regulatory expectations. Inspection of implementation of the arrangements based on sampling a modification confirmed that implementation is consistent with arrangements. Some areas for more robust implementation were observed and discussed with RSRL.

Both Licence Condition 21 and 22 inspections found that there is a lack of any process for providing responses to ONR primary powers. However, further inspection has identified this is a generic issue for the majority of RSRL arrangements and it is considered to be a result of weaknesses in Licence Condition 17, Quality Management, compliance. RSRL has put in place actions to address this matter.

Delicensing of B353 and Vec Field Areas at Harwell

The ONR site inspector with RSRL's End State Manager and Property Manager confirmed that the revised site boundary had been adequately marked in preparation for the requested variation to RSRL's site licence. The inspection identified a number of matters that would need to be addressed before a variation to exclude these areas from the site licence could be issued. RSRL agreed to address these matters.

B462 Contact Handled Intermediate Level Waste (CHILW) Periodic Review of Safety

ONR site inspector met with RSRL safety case authors currently undertaking the delivery of the B462 CHILW Periodic Review of Safety (PRS). They provided some overheads detailing the approach being adopted. The current overarching plan is that the PRS will be submitted to the RSRL Safety Working Party (SWP) in January 2015 and submitted to ONR for formal consideration (if required) in March 2015. RSRL then expects to implement all safety significant improvements within 12 months of acceptance by the SWP.

RSRL Modification Categorisation and Fault Analysis

The ONR site inspector, supported by ONR fault studies inspector met with RSRL safety case specialists to discuss the licensee's approach to fault identification and inclusion in safety case categorisation and assessment. ONR concluded that it is clear that there is scope for potential improvements to RSRL's fault analysis and modification categorisation process to improve safety and enable a timelier implementation of improvements to improved hazard reduction across the sites. RSRL agreed that it should consider the discussions held and propose a more structured engagement with ONR outlining their current and proposed arrangements they would like to adopt. This will enable ONR to expose RSRL's arrangements to a broader range of inspectors who will be able to provide specific feedback from their areas of expertise.

IRR99 Inspection of Decontamination Facility

AN ONR radiation protection inspector met with RSRL staff to ascertain the current Radiological Protection (RP) arrangements for the operations in a Harwell decontamination facility. The inspection concluded that although controls may be appropriate, the documentary evidence inspected does not provide a clear argument to demonstrate that the risk of exposures during operations within the facility are reduced "so far as is reasonably practicable".. A number of actions were discussed with the site and the matter will be progressed during the following quarter.

Fire Safety Inspection

An ONR fire safety inspector undertook an inspection as part of a series of planned interventions nationally to ensure compliance with the Regulatory Reform (Fire Safety) Order 2005. ONR found personnel had a good attitude to fire safety and there appears to be in

place sufficient resource to ensure fire safety issues on site are properly addressed. Good control of design was evident through the Estates Development Control, (EDC), and included a positive contribution from the Fire Safety Coordinator. Storage of flammable materials in storage cabinets could be improved and the general reduction in fire loading was agreed as a positive aim. Actions highlighted throughout the inspection were readily accepted and assurance given that all matters identified would be dealt with.

2.2 Other work

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.

There was one such matter of significance during the period

Change of Parent Body Organisation for Nuclear Site Licence Companies

At the end of March 2014 the Nuclear Decommissioning Authority (NDA) announced that the Cavendish Fluor Partnership (CFP) was the preferred bidder to take over the Parent Body Organisation (PBO) role at Magnox Limited and RSRL. A transition process is taking place until the end of August 2014, with CFP assuming full control of the nuclear site licence companies on 1 September 2014. In the interim, ONR and the environment agencies have been in dialogue with CFP and NDA to ensure that:

- The PBO will be ready to take over control of the ten Magnox Limited and two RSRL licensed sites;
- The PBO will have suitable persons in place to take up nominated roles at the sites;
- The sites will continue to comply with safety, security, transport, safeguards, and environmental regulatory requirements; and
- Appropriate consultation with the site licence companies is taking place.

ONR will provide further updates in future SSG reports on progress to complete the transition process and report on any significant organisational changes at the sites proposed by the replacement PBO.

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 issue Enforcement Notices to secure improvements to safety.

No LIs have been issued during the period.

5 NEWS FROM ONR

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 ongoing 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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