



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

Report for period 1 October - 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 Harwell Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

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.

TABLE OF CONTENTS

1	INSPECTIONS	3
2	ROUTINE MATTERS	3
3	NON-ROUTINE MATTERS	4
4	REGULATORY ACTIVITY	4
5	NEWS FROM ONR	5
6	CONTACTS	6

1 INSPECTIONS

1.1 Dates of inspection

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

20, 21, 22, 23, 24 October 2014
3, 4, 5 December 2014

An ONR mechanical engineering specialist inspector made an inspection on the following date during the quarter:

21 October 2014 (support to operating rules inspection)

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:

- operating rules (Licence Condition 23);
- operating instructions (Licence Condition 24);
- examination, inspection, maintenance and testing (Licence Condition 28);
- leakage and escape of radioactive material and radioactive waste (Licence Condition 34);
- decommissioning (Licence Condition 35).

For each of the Licence Conditions 23, 28, 34 and 35 I considered two topics. Research Sites Restoration Limited's (RSRL's) compliance arrangements and implementation of the arrangements. For each of these inspections I judged that the position met the intent/requirements of the safety case and the required safety standards. Several improvement issues were however noted and recorded in ONR's issues database.

For Licence Condition 24 I also considered compliance arrangements and implementation at the B462 Complex, the main purpose of which is the processing and storage of low and intermediate level radioactive waste. I focussed my inspections on maintenance instructions. I judged that the position did not meet the intent/requirements of the safety case and the required safety standards. I raised an issue in ONR's issues database which I have since closed, based on the provision of a suitable improvement programme from RSRL.

More information on all of these routine inspections is in the Executive Summary of ONR Intervention Records which are published on our website <http://www.onr.org.uk/intervention-records/2014/index.htm>.

2.2 Other work

I attended the Harwell SSG meeting on 5 December 2014.

I 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.

I held a routine review of ONR issues for Harwell, Winfrith and RSRL corporate.

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.

Matters and events of particular note during the period were:

- During the quarter, an event was reported in which Oxfordshire Fire and Rescue Service (OFRS) was summoned to site on 17 November to attend a potential fire in the B462 Complex radiologically controlled area. The event was caused by overheating of electrical equipment and no actual fire occurred. I have undertaken an initial follow up and I am satisfied that electrical overload protection would have made fire ignition unlikely and that in the event of a fire, there were limited combustibles present. Since my initial follow up, RSRL has completed its own investigation. I do not plan to discuss this event in future SSG reports.

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.

Table 1
Licence Instruments and Enforcement Notices Issued by ONR during this period

Date	Type	Ref No	Description
1/10/2014	Variation to the Site Licence	No 2	The Variation introduces, for Harwell, amendments to Licence Conditions 1 and 3. Since the same amendments have been made to all nuclear site licences, more information is provided in "News From ONR" below. The Variation was granted and came into force on 1 October 2014.

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

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>).

Amended Licence Conditions

Amendments have been made to licence conditions 1 and 3.

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".

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.

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

On 1 September 2014, Cavendish Flour Partnership (CFP) took control of two separate site licence companies: Magnox Limited and RSRL. As the next stage of organisational change, on 28 November 2014 Magnox Limited applied to ONR to relicense the RSRL Harwell and RSRL Winfrith sites into a single site licence company alongside the ten Magnox reactor sites. ONR is currently conducting a targeted and proportional assessment of this application in accordance with its publication 'Licensing Nuclear Installations'. Organisational capability is a particular focus of ONR's assessment. Additional but more limited ONR work streams include safety cases, licence condition compliance arrangements, decommissioning strategies, plans and programmes and consultation.

6 CONTACTS

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