



Office for Nuclear Regulation (ONR) Quarterly Site Report for Hunterston A

Report for period 01 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 Hunterston Site Stakeholder Group and are also available on the ONR website (www.hse.gov.uk/nuclear/llc).

Site inspectors from ONR usually attend Hunterston 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

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

17-21 November

For the inspection, the inspector was accompanied for most of the time by an external hazards specialist.

2 ROUTINE MATTERS

2.1 Inspections

2. Inspections are undertaken as part of the process for monitoring compliance with:
 - the conditions attached by HSE/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 Hunterston A covered the following:
 - Incidents on site
 - Emergency arrangements
 - Modification or experiment on existing plant
4. The external hazards specialist inspector and site inspector carried out inspection on emergency arrangements including the site implementation of improvements for emergency response Post Fukushima and ONR judged this to meet the intent of the safety case and the required safety standards.
5. The external hazards specialist inspector and the site inspector carried out inspection on incidents on site and found that the site was not aligned with the Magnox corporate standard for investigation of such incidents. On this basis ONR judged the compliance with the arrangements to be below standard. The site has provided commitments to address this area and engagement is on going to confirm adoption of the corporate standard.
6. The external hazards specialist inspector and the site inspector carried out inspection on modification or experiment on existing plant. Modifications are categorised on the basis of hazard potential and consequences to ensure proportionate scrutiny and oversight is delivered, with modifications of a higher hazard potential and consequence to receiving significantly greater scrutiny. ONR judges the arrangements to be below the required standard. ONR observed procedural weaknesses and a lack of clarity

relating to the governance process for the high category modifications in terms of documentary arrangements. Despite these weaknesses, ONR believes the fundamental requirements of the licence condition are being met and that the weaknesses can be easily addressed. The site has provided commitments to address this area and engagement is ongoing. It should be noted that ONR found the certain parts of the arrangements, including the definitions supporting categorisation of nuclear modifications to be of a good standard.

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. There were no such matters or events of significance during the quarter.

4 REGULATORY ACTIVITY

9. 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' (LI), but can take other forms. In addition, inspectors may issue enforcement notices to secure improvements to safety. No LIs or Enforcement notices have been issued during the period.

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

5 NEWS FROM ONR

5.1 Amended Licence conditions

10. Amendments have been made to Licence Conditions 1 and 3.
11. Licence Condition 1 (LC 1, Interpretation) provided a set of definitions. ONR decided to amend the definitions 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. LC 1 was further amended to add a definition of "property transaction", made necessary by the introduction of the new LC 3 (see below), and a definition of "ONR".
12. Licence Condition 3 (LC 3, Control of Property Transactions) requires the licensee to make and implement adequate arrangements to control property transactions on licensed nuclear sites. LC 3 was prescriptive and required the licensee to obtain ONR permission ("consent") before it let, conveyed assigned or transferred any part of the licensed nuclear 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 number of LC 3 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 according to their safety significance and their impact on the licensee's control of the site.

13. ONR's licence condition handbook has been updated and is available via the ONR website at <http://www.onr.org.uk/silicon.pdf>
14. 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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