



Office for Nuclear Regulation (ONR) Quarterly Site Report for Low Level Waste Repository

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 for the West Cumbria Sites Stakeholders Group Low Level Waste Repository Working Group and are also available on the ONR website (<http://www.onr.org.uk/lwc/>).

Site inspectors from ONR usually attend West Cumbria Sites Stakeholders Group Low Level Waste Repository Working Group meetings and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

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1 INSPECTIONS

1.1 Dates of inspection

The ONR Site Inspector and other ONR Inspectors conducted interventions on the following dates during the quarter:

October	1 st , 22 nd
November	25 th , 26 th
December	11 th

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 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 ONR Inspectors carried out an inspection of the LLWR Licence Condition 24 (LC24) "Operating Instructions". Overall, the ONR Site Inspector considered that, with respect to the aspects covered by the inspection, the LLWR arrangements were generally adequate and met ONR guidance requirements. LLWR is also proactively implementing improvements to the LLWR LC24 arrangements. As not all aspects of the LC24 arrangements were covered in this specific inspection a further inspection will be programmed into the 2015/16 ONR LLWR Inspection plan.

The ONR Site Inspector also carried out an inspection of the LLWR Licence Condition 10 (LC10) "Training" and Licence Condition 12 (LC12) "Duly authorised and other suitably qualified persons" (DAP/SQEP) arrangements. Again the LLWR LC10/12 arrangements were generally considered to be adequate. LLWR confirmed that the LLWR arrangements are based on those "inherited" from Sellafield Ltd and outlined that they are currently reviewing and revising the arrangements to make them "more appropriate" for the smaller size of the LLWR organisation. LLWR confirmed that the review is planned to be substantially completed by April 2015. This ONR inspection concentrated on the "top level" arrangements and associated processes and did not include a detailed inspection of the implementation of the arrangements. These aspects will be covered in further inspections which will be programmed into the 2015/16 ONR LLWR Inspection plan.

2.2 Other work

As reported in previous ONR reports, one aspect of LLWR operations which is subject to ongoing discussions is the operational difficulties that could potentially arise due to the current unavailability of transport containers to export drums of Plutonium Contaminated Material (PCM). The various interim storage and transport options identified by LLWR have now been discussed with ONR. Following the discussions LLWR has agreed to carry out further review and evaluation of some of the options such that proposals for the way forward can be developed over the coming months. Further discussions with LLWR on this topic are envisaged.

LLWR are preparing for the next stage of the Magazine 3 Decommissioning Project work and has submitted the associated safety documentation for ONR consideration. ONR has now informed LLWR, under the LLWR flexible permissioning arrangements, that ONR had no objection to LLWR implementing the safety documentation in preparation for the commencement of the next phase of decommissioning. ONR did inform LLWR that ONR will undertake a readiness inspection prior to the commencement of the next stage of the decommissioning project work.

Discussions continue with the LLWR Emergency Arrangement Team relating to the future LLWR Emergency Exercise Programme and the LLWR Emergency Management Improvement Programme. In addition discussions have been held on the updated LLWR Report of assessment of the Hazard Identification and Risk Evaluation (HIRE) required under the Radiation (Emergency Preparedness & Public Information) Regulations 2001 (REPPiR). The LLWR update report again concludes that a Radiation Emergency from an on-site LLWR event affecting the public, as described by Regulation 2 of REPPiR, is not credible. ONR is currently reviewing the submitted LLWR updated HIRE report.

In addition during the report period updates have been obtained, and discussions held on various other aspects of operations on the LLWR site e.g. the condition of the site infrastructure systems, the LLWR systems engineering initiatives the LLWR Internal Inspection processes and programme etc. None of the matters discussed were considered to require immediate regulatory action. However a number of aspects will be discussed further with LLWR during planned interventions with the site within the next report period.

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.

Information on the non routine matters and events that occurred on the LLWR site during the report period has been provided to ONR. ONR considers that LLWR has adequately investigated the events and taken appropriate measures to address issues arising. However a number of actions being undertaken by LLWR to address some of the issues raised will be followed up by the ONR Site Inspector during the next report period.

Within this period LLWR has suffered a number of site electrical distribution system events wherein the site electrical power has been lost/affected by "external" events eg lightning strikes. The LLWR investigations into these events have been discussed with LLWR and further discussions are envisaged once LLWR has completed the associated investigations and reviews and when any modifications to improve the resilience of the electrical distribution have been identified.

In addition a number of events have been recorded associated with problems with the breathing air compressor systems and the air fed suits utilised in the Magazine decommissioning work. The results of the investigations into these events have been discussed with LLWR and proposed improvements are now being introduced by LLWR to reduce the occurrence of such events. The ONR Site Inspector will continue to monitor the situation.

4 REGULATORY ACTIVITY

ONR inspectors 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.

The following LIs and Enforcement Notices (Table 1) have been issued during the period:

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

Date	Type	Ref No	Description
			None issued this report period

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>).

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