



# Office for Nuclear Regulation (ONR) Quarterly Site Report for Springfields Fuels Limited

Report for period 1 January – 31 March 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 Springfields Fuels Limited Site Stakeholder Group and are available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend the Springfields Fuels Limited 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.

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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:

January	6, 21 & 29
February	14, 26 & 27
March	8, 25, 26 & 27

The nominated site inspector also attended the Springfields Emergency Planning Consultative Committee meeting at Lancashire Constabulary HQ, Hutton on 11 February, to provide regulatory advice on a range of 'off site' emergency planning matters.

## 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, routine inspections of Springfields Fuels Limited covered the following:

#### **System inspection of the implementation of the nuclear safety case at the Light Water Reactor Fuel Manufacturing Facility.**

On 27 February, a planned systems inspection was conducted, to inspect the implementation of the nuclear safety case at the Light Water Reactor Fuel Manufacturing Facility, with a positive outcome. The inspection focused on the implementation of Licence Condition 23 Operating Rules and Licence Condition 24 Operating Instructions, which were used to implement key aspects of the safety case. An initial meeting discussed the critical aspects of the nuclear safety case, defined within the operational clearance certificate. This was the primary means by which the key requirements of the safety case, such as operating rules, were communicated to the plant operators, through written operating instructions. My plant inspection, enhanced by the participation of an enthusiastic and knowledgeable safety representative, as well as the demonstrably strong plant management, confirmed that the safety case was effectively implemented. Appropriate operating rules and operating instructions were in place, particularly to protect people against the potential nuclear criticality hazard.

### **Meeting and site inspections to review the licensee's progress with the processing and recycling of legacy and operational uranium residues, together with decommissioning projects.**

On 26 February, the ONR nominated site inspector, an ONR specialist inspector, the HSE-Hazardous Installations Directorate, (HSE-HID) site inspector and the Environment Agency site inspector met with the licensee, to review the licensee's progress across a range of matters of regulatory interest, including the processing of both legacy uranium residues and operational uranium residues arising from site operations. The licensee reported a range of nuclear safety related metrics. Adequate progress was being made with the processing of legacy uranic residues to lower hazard materials, together with the decommissioning of redundant site facilities, which was also reducing hazards on the site.

### **Emergency Preparedness.**

On 11 February, the ONR nominated site inspector participated in the Emergency Planning Consultative Committee (EPCC) meeting held at Lancashire Constabulary HQ at Hutton, accompanied by a Regulatory Compliance Officer of HSE-HID. The EPCC meeting was held between the licensee and a range of other agencies involved in emergency planning relating to the Springfields site. It was the usual constructive, open forum, with good participation by a number of organisations involved in the impending periodic review of the Springfields 'off site' emergency plan. A meeting was also held to discuss COMAH related aspects of the Springfields 'off site' emergency plan, a review of which had recently been initiated by Lancashire County Council. This meeting was useful in clarifying the expectations of the various parties, expected to assist in the periodic review of the 'off site' emergency plan.

### **Organisational Capability.**

An organisational change is to be made to the licensee's 'on site' Fire & Rescue Service. Essentially, the licensee proposed to maintain a continuous cover of at least six fully trained and fit fire fighters, to operate the 'on site' Fire & Rescue Service, whilst reducing by five the overall number of trained fire fighters within the site team.

ONR specialist inspectors assessed organisational capability and operational fire safety aspects of this proposed change. A site meeting was held on 21 January, to discuss the outcome of the ONR assessment of operational fire safety aspects of the proposed organisational change. It was acknowledged by ONR that the documents provided by the licensee clearly represented a significant amount of work and it was pleasing to see that the approach had been thorough, with the methodology meeting ONR's expectations. The licensee had reviewed the nature of the fire risk, including taking account of building structures at Springfields. Site specific credible worst case scenarios had been considered and a tactical analysis undertaken for responding to fire, chemo toxic, radiological, criticality nuclear safety and conventional safety issues, all of which had informed the risk assessment, utilising national standards and duly referring to relevant good practice. I concluded that the licensee had compiled a thorough written safety justification, which had been peer reviewed by a county Fire & Rescue Service. The licensee had comprehensively considered the key operational emergency response aspects of the proposed change to the 'on site' Fire & Rescue Service.

A further site meeting was held on 29 January, to discuss the findings of the related ONR assessment of organisational change aspects. Regulatory advice was provided on the draft safety documentation, which the licensee readily accepted and agreed to incorporate within the finalised safety documentation. I concluded that the licensee had duly implemented the relevant licence condition 36 arrangements, when preparing the organisational capability safety justification.

Following receipt of the licensee's finalised application in February, which had incorporated the regulatory advice, I issued a letter of concurrence to the proposed organisational change on 3 March 2014.

On 31 March, the licensee informed ONR and the workforce that the closure of the uranium hexafluoride production plant, and its supporting facilities, had been brought forward from 2016, such that production operations would cease in August 2014. The plant will then have the radioactive materials promptly cleaned out. ONR will continue to regulate the licensee's related management of organisational changes, site wide, associated with this early plant closure, through the nuclear site licence conditions.

#### **Periodic Review of Safety Cases.**

On 29 October 2013, the licensee requested a delay to the full implementation of the recently reviewed uranium hexafluoride production plant Long Term Periodic Review, (LTPR) safety case. I agreed to the licensee's request for a three month delay to the implementation of the reviewed safety case, at the uranium hexafluoride production plant. The licensee subsequently confirmed in writing that the revised safety case had been implemented at the plant, by the agreed date of 31 January 2014, including having implemented a number of safety significant engineering improvements.

#### **ONR Radioactive Materials Transport Programme, (RMT).**

ONR RMT is in the process of relicensing a number of package designs, which are crucial to the licensee's business. These relate to uranium dioxide powder, uranium hexafluoride and AGR fuel transport. ONR RMT has held a number of discussions with the licensee and their supply chain to progress these matters. ONR RMT had also carried out two transport inspections at Springfields in 2013: one of the licensee and one of Uranium Asset Management, (UAM), a tenant on the site. ONR RMT has now successfully closed out the inspection of both the licensee and UAM, at an inspection on 7 March. Bilateral engagement between ONR RMT and both the licensee and UAM at all levels is judged to have improved.

On 27 March, I accompanied two ONR RMT inspectors, at an inspection to discuss the implications for the licensee of the recent failure of a lifting lug, on a French manufactured uranium hexafluoride transport package, at a facility in France. In response, the licensee was found to be clearly aware of this issue and appropriately reviewing the manufacturing records of similar transport packages stored and used by Springfields. The licensee also demonstrated to ONR the ongoing testing of lifting lug weld quality, on similar cylinders held at Springfields. The use of transport packages manufactured by the company that had produced the package with the failed lifting lug had been appropriately embargoed by the licensee, pending further detailed investigations, being conducted in close cooperation with other users of this particular type of transport package.

#### **ONR - Safeguards.**

ONR Safeguards inspectors visited site on 14 February to discuss a range of Safeguards uranium materials accountancy matters, with an acceptable outcome.

#### **Fire Safety.**

ONR fire safety specialist inspectors discussed operational fire safety aspects of the proposed organisational changes to the 'on site' Fire & Rescue service, accompanied by the nominated site inspector, on 21 January. There was very constructive engagement with the licensee on the proposed change to the staffing of the 'on site' Fire & Rescue Service. ONR continues to inspect a range of conventional fire safety matters. The licensee continues to be receptive to the regulatory advice provided, across a range of conventional fire safety matters.

### **Conventional Industrial Safety inspections.**

On 25 and 26 March, an ONR conventional industrial safety inspector inspected a range of facilities, inspecting the implementation of arrangements to control legionella risks and inspecting some asbestos removal work, being undertaken by a specialist asbestos removal contractor. Some regulatory advice was provided on what were found to be generally robust arrangements, implemented by the licensee, to protect against legionella risks, associated with cooling tower equipment on the site. Some shortfalls were observed in the asbestos removal work by the contractor, which resulted in an enforcement letter being sent by the ONR inspector to the contractor, providing regulatory advice and requiring a timely response by the contractor to the letter from ONR. The licensee's control and supervision of contractors is planned to be reinspected by ONR in July 2014.

### **General comment.**

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.

## **2.2 Other work**

### **Meetings with the safety representatives.**

Meetings are routinely held with the licensee's team of safety representatives and during plant inspections by ONR inspectors, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

The exemplary work of the safety representatives continues to make a valuable contribution to the site safety culture. ONR also consulted with the local safety representative during a system inspection of the implementation of the nuclear safety case, conducted at the Light Water Reactor Fuel Manufacturing Facility on 27 February 2014.

## **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 were no such matters or events of significance during the period.

## **4 REGULATORY ACTIVITY**

ONR inspectors, specialist inspectors and HSE 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.

No enforcement notices were issued in this period. One Licence Instrument was issued in this period:

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

Date	Type	Ref No	Description
9 January 2014	Licence Condition 3 Consent	522	Consent to the issue by the licensee of a Licence to Occupy an office building to Uranium Asset Management Limited.

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

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