



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

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 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:

April	4 & 30
May	8 & 13
June	5 & 17

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:

Emergency Preparedness.

On 4 April, ONR inspectors met with the licensee, to provide regulatory advice on the objectives, success criteria and proposed scenario for the annual 'on site' demonstration exercise, (which was observed by ONR inspectors on 13 May).

On 13 May, a team of ONR inspectors observed the implementation of the licensee's arrangements, during a planned annual demonstration exercise. The nuclear safety aspects were focused on a demonstration of the licensee's response to a simulated release of uranium hexafluoride, including casualties, from a damaged transport cylinder, at a facility on the site. All of the external 'blue lights' emergency services fully participated, which added considerable value to the licensee's exercise. ONR concluded that the licensee would have coped adequately, in the unlikely event of the exercise scenario being a real event. A number of good points were observed, together with some minor opportunities for improvement, which were readily recognised by the licensee and which the licensee is promptly addressing. ONR confirmed our exercise observations in a letter sent to the licensee on 15 May.

On 5 June, an ONR Emergency arrangements specialist inspector met with the licensee, to review the licensee's video footage of recent site emergency exercises. The licensee

provided ONR with some of this video footage, which shall be used to demonstrate aspects of good practice, for the training of new ONR inspectors in the assessment of site emergency exercises.

Organisational Capability.

On 31 March, the licensee had 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, before being placed into 'Care and Maintenance' in early 2015. ONR will continue to regulate the licensee's related management of organisational changes, associated with this early plant closure, through the nuclear site licence conditions.

On 8 May, the nominated site inspector, accompanied by two specialist organisational change inspectors, met with the licensee, to inspect the licensee's proposed management of the consequential phased site wide workforce reductions. A site wide voluntary severance programme had been initiated, aiming to release personnel from all aspects of site operations, although all key nuclear safety related posts would be backfilled by personnel moving across the site, in compliance with the requirements of the 'Organisational Capability' nuclear site licence condition.

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 17 June, 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 and the National Nuclear Laboratory Limited tenant. The purpose was to review the licensee's progress across a range of matters of regulatory interest, including the processing of both legacy uranium residues and uranium residues arising from site operations.

The licensee reported continuing steady progress with the processing, to a safer, more stable form of uranium, of a broad range of legacy and operational uranic residue materials. This serves to reduce the nuclear hazard at Springfields. Acceptable progress was also noted with the processing of a number of residues arising from other nuclear sites, utilising the unique national asset uranium processing facilities at Springfields, prior to the shutdown of these ageing site facilities. The licensee's progress with a number of site wide decommissioning projects was reviewed with the licensee. Overall, adequate progress continued to be made, the licensee demolishing buildings, including the concrete base slabs, in most cases, which results in a very effective decommissioning of redundant site facilities.

ONR Safeguards.

There have been three Euratom safeguards inspections during this period. Each of these inspections were successful, with the inspection letters stating '...following the inspector's report, the safeguards activities do not give rise to any particular comments on the part of Euratom safeguards.' During this period, the weigh scale in the uranium hexafluoride production plant became operational. Euratom was able to obtain an independent signal, to assist in their verification of the weight of the uranium hexafluoride cylinders.

ONR Transport Programme.

The ONR Transport Programme 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 (UX30), and AGR fuel transport containers. ONR Transport inspectors have held a number of discussions with the licensee and their supply chain to progress these matters. Bilateral engagement between the ONR Transport Programme and both the licensee and Uranium Asset Management Limited, at all levels, is judged to have improved.

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 continue to be routinely held with the licensee's 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. ONR inspectors consulted safety representatives, regarding the arrangements to reduce the site workforce, at a site meeting held on 8 May.

The exemplary work of the safety representatives continues to make a valuable contribution to the site safety culture.

Springfields Site Stakeholder Group.

The nominated site inspector participated in the meeting held near the site on the afternoon of 30 April. The nominated site inspector addressed some questions relating to recent quarterly reports from ONR.

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.

On 30 April, the ONR nominated site inspector, accompanied by the Environment Agency nuclear regulator, conducted a reactive intervention, in response to a minor site event promptly reported on 23 April. This event involved a small weepage of uranium hexafluoride residue, from within two ageing legacy uranium hexafluoride transport containers. This type of container is no longer authorised for transport off the site. These two transport container had been stored on an external storage raft, alongside other similar containers, but were subsequently brought into ventilated, monitored cells, within a container processing building, for the forthcoming emptying of the transport container contents. The licensee was considered to have made a timely response. The licensee exercised an appropriate combination of urgency, balanced with implementing appropriate safety measures, in order to transfer these containers to internal storage safely. The licensee was accelerating proposals

to transfer and empty the site inventory of this type of legacy uranium hexafluoride transport containers, to an acceptable and funded programme.

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. No Licence Instruments were issued in this period:

Reports detailing 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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