



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

Report for period 1 July – 30 September 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.

TABLE OF CONTENTS

1	INSPECTIONS	3
2	ROUTINE MATTERS	3,4,5
3	NON-ROUTINE MATTERS	6,6
4	REGULATORY ACTIVITY	6
5	NEWS FROM ONR	7
6	CONTACTS	7

1 INSPECTIONS

1.1 Dates of inspection

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

July	1 & 29
August	5, 6, 7, 20 & 28
September	11,17,18 & 23

The nominated site inspector and an ONR emergency arrangements specialist inspector also provided regulatory advice at a meeting with the licensee and Lancashire County Council emergency planning staff, held at Preston on 5 September. The nominated site inspector also provided regulatory advice at the Emergency Planning Consultative Committee meeting held at Hutton on 24 September.

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:

Nuclear Safety Case.

For activities at Springfields, a key component of the licensee's nuclear safety case relates to the implementation of measures to prevent a breach of nuclear criticality safety controls. On 20 August, two criticality safety specialist ONR inspectors conducted an inspection of aspects of the nuclear criticality safety arrangements. This intervention concluded that the licensee had generally good arrangements for ensuring that suitably qualified and experienced people were engaged in the production of nuclear criticality safety cases, including the support of experienced specialist contractors to assist criticality safety case production, the licensee sharing good practice with the nuclear industry. Regulatory advice was provided to ensure that the licensee implemented further arrangements to enhance the related independent nuclear safety assessment (INSA) process, this advice being readily agreed as an area for timely improvement by the licensee.

Emergency Preparedness.

The Off Site Emergency Plan for the Springfields site is prepared by Lancashire County Council and is currently undergoing a routine three yearly review. ONR participated in a very constructive meeting with both the licensee and Lancashire County Council, held in Preston on 5 September, to provide regulatory advice on this emergency plan, to incorporate learning from events on the site, which in turn informed revised emergency declaration levels and responses.

On 24 September, the nominated site inspector participated in a meeting of the Emergency Planning Consultative Committee, (EPCC), held at Lancashire Constabulary HQ at Hutton. Aspects of the off site emergency arrangements were discussed with the licensee, Lancashire County Council emergency planners and others.

Control and Supervision of Operations.

On 29 July, the nominated site inspector, accompanied by an ONR conventional safety inspector, conducted an inspection of the implementation of the licensee's measures to safely control and supervise contractors working on the site. Aspects inspected included the arrangements to control contractor working, such as a specialist asbestos removal company, as well as inspecting the work of contractors, during a plant visit to a uranic material processing facility. A safety representative was consulted during this inspection. Whilst the licensee's arrangements and their implementation were generally adequate, regulatory advice was provided during the inspection, to enable the licensee to enhance the arrangements for the control and supervision of the broad range of contractors working on the site.

Disposal of radioactive waste.

ONR provided regulatory advice on aspects of arrangements for the future disposal of solid low and very low level radioactive wastes, jointly with the Environment Agency, (EA), at meetings held at the site on 29 July, and 5 (jointly with EA) and 6 August, in response to a request from the licensee.

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 ceased at the end of August 2014. The plant is now having the radioactive materials promptly cleaned out, before being placed into 'Care and Maintenance' in early 2015. The facility is to be maintained for a possible restart of uranium hexafluoride production, at a future medium term date.

On 1 July, the nominated site inspector, accompanied by a specialist organisational change inspector, 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 trained personnel moving across the site, in compliance with the requirements of the 'Organisational Capability' nuclear site licence condition. The licensee's proposals to implement the requirements of this licence condition were assessed as acceptable, enabling ONR to concur to the proposed implementation, in a letter sent by ONR on 14 July.

Annual Review of Safety & Environment.

On 28 August, an ONR Superintending Inspector and the nominated site inspector, together with inspectors from the Environment Agency and HSE Hazardous Installations Directorate, (who regulate COMAH matters) met with the licensee and a tenant organisation, National Nuclear Laboratory Limited. The licensee's active safety representatives were consulted during this meeting. The purpose was to assess the licensee's overall review of the safety and environmental performance of the site, during the period of April 2013 to March 2014. As part of this review, inspections were also made at the fuel manufacturing facility and of a uranium residue processing plant.

On balance, ONR concurred with the licensee's conclusion that the licensee's nuclear safety performance was generally good during this period, with some areas which were very good. Regulatory advice was provided regarding a potential minor improvement to the licensee's formalisation of the review process.

Leadership and Management for Safety.

On 1 July, an ONR 'Leadership and Management for Safety' specialist inspector accompanied the nominated site inspector, and the Environment Agency nuclear regulator, to provide regulatory advice on the licensee's recent review of management arrangements, with an acceptable outcome.

An ONR 'Leadership and Management for Safety' specialist inspector also inspected aspects of the licensee's safety management system, nuclear safety planning, monitoring and assurance arrangements, at interventions on the site on 7 August and 17 September, with an acceptable outcome.

Conventional Fire Safety.

On 23 September, an ONR conventional fire safety inspector met with the licensee's Chief Fire Officer, to review the information provided to the emergency services, when they respond to an incident on the site. The inspector had previously met with the county fire service, to obtain their perspective. The licensee was found to have acceptable arrangements and was working well with the county fire service, to further improve the quality of information provided. The very limited use of acetylene on the site was also reviewed and it was concluded that the licensee's arrangements and control measures were acceptable.

The Ionising Radiations Regulations 1999, (IRR 99).

On 6 August, the nominated site inspector, accompanied by an ONR specialist radiological protection inspector, conducted a site inspection of the implementation of measures to control the potential spread of radioactive contamination, arising from operations involving the processing of uranium. The licensee's current programme for implementation of revised Local Rules, (a requirement of IRR 99) was also discussed, adequately addressing a minor shortfall, which had been observed during a site inspection on 29 July.

ONR Transport Compliance & Transport Permissioning.

ONR regulates radioactive materials transport through the Transport Compliance and Transport Permissioning sub-programmes, within the Cross-ONR Programme. ONR has recently relicensed a number of package designs, which are crucial to the licensee's business and work is ongoing for others. 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 inspectors and both the licensee and Uranium Asset Management Limited, at all levels, is judged to be good.

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.

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

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, conducted a reactive intervention, in response to a minor site event 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. The licensee reported on 11 July that both of these containers had been safety washed out and the licensee remained on programme to empty the remaining ageing containers of this type within an acceptable timescale.

On 6 August, the ONR nominated site inspector and an ONR specialist radiological protection inspector, inspected aspects of the licensee's investigation into a minor event, when a plant operator had potentially ingested a very small amount of radioactivity, during a minor event at the Kiln Plant. ONR concluded that the licensee had adequately implemented the event investigation arrangements. Whilst a number of improvement measures had been implemented, to control radiation dose uptake to personnel, as well as enhancing some general radiological contamination control measures, ONR concluded that some further improvements should be made to minimise radiation dose uptake to personnel. This regulatory advice was confirmed in a letter sent to the licensee on 14 August.

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.

No enforcement notices were issued in this period. No Licence Instruments were issued in this period.

Changes to nuclear site licence conditions 1 and 3.

Licensees have been developing compliance arrangements in preparation for a change to licence condition 3, to be implemented on 1 October 2014. The new licence condition requires licensees to develop arrangements for handling property transactions, to allow for categorisation based on their nuclear safety significance. Licence condition 1 will also be amended, to include a new definition of 'property transaction'. Further changes to licence condition 1 are also being made, to clarify ONR's interpretation of 'radioactive material'. An amendment to the Environmental Permitting Regulations 2010 had the potential to exclude material ONR considers should be subject to nuclear safety regulation e.g. contaminated land. Variation number 2 to nuclear site licence 79 was issued by ONR on 23 September, for implementation on 1 October 2014.

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

5 NEWS FROM ONR

ONR is changing the way that it communicates enforcement action against licensees. With immediate effect, ONR will issue a press release to key journalists to communicate issue of prohibition notices (on the day the notice is issued), and improvement/other notices (after any applicable appeal period). The press release will be published on the [news centre](#) of the ONR website and via twitter, and will be reiterated in ONR's [Quarterly News](#).

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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