



Office for Nuclear Regulation (ONR) Quarterly Site Report for Trawsfynydd

Report for period 1 October 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 for the Trawsfynydd SSG and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Trawsfynydd SSG 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 made inspections on the following dates during the quarter:

- 6 to 9 October
- 12 November
- 1 to 4 December

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 Trawsfynydd covered the following:

- Examination, maintenance, inspection and testing;
- Management of operations including control and supervision;
- Modifications to plant, equipment and safety cases;
- Organisational changes;

In general, ONR judged the arrangements made and implemented by the site meet the requirements of the relevant safety cases and the required safety standards.

Following a satisfactory demonstration of on-site emergency arrangements (Level 1 demonstration exercise) in July 2014, ONR placed a number of minor actions on the licensee to further improve their emergency arrangements at Trawsfynydd. One such action was to demonstrate the control of responders entering and leaving the incident scene, to ensure they are adequately protected and to minimise the spread of contamination on site. The licensee held an exercise for this purpose on 12 November 2014. The ONR site inspector and a specialist inspector attended this exercise and considered the site's performance to be adequate.

2.2 Other work

Cavendish Fluor Partnership (CFP) assumed full control as the Parent Body Organisation (PBO) of the Magnox Ltd and Research Sites Restoration Limited nuclear site licence companies on 1st September 2014. Since then there have been no significant proposals for organisational changes at Trawsfynydd (noting that SSGs have already been made aware of changes to PBO posts within Magnox Ltd licensed sites). Should changes be proposed by

the new management organisation to ONR in the future, ONR will report on them in the appropriate quarterly report

On 28 November 2014, ONR received an application to relicence the Harwell and Winfrith sites into a single site licence company alongside the ten Magnox sites. ONR is currently assessing this application in accordance with the criteria contained in its publication 'Licensing Nuclear Installations'. The application includes a proposal to introduce a common Board and Executive structure, which is being trialled in a period of shadow working between 1 December 2014 and Spring 2015. ONR is conducting a targeted and proportionate assessment of the applicant's organisational capability, including an examination of the Board and Executive changes.

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.

Matters and events of particular note during the period were:

- The licensee has identified a significant number of issues relating to the completion of compliance maintenance schedule records. Failure to correctly complete these records has compromised the site's ability to fully demonstrate compliance with Licence Condition 28 (examination, inspection, maintenance and testing). The licensee's preliminary investigation suggests that the issue is not related to the completion of maintenance activities, but to the recording of them. The licensee is proposing to provide refresher training and re-authorisation for all staff currently authorised to carry out LC 28 compliance activities. ONR considers this to be a robust response to the issues identified.
- Two portable radiation detection instruments, used for health physics monitoring, were sent from site to a maintenance contractor. These instruments had external levels of contamination which were not notified to the contractor, and which did not meet the contractor's acceptance criteria. The instruments were, however, despatched as radiological consigned packages, recognising that the instruments had been used in contamination controlled areas. In this instance, the instruments were not heavily contaminated but the licensee has conservatively investigated the event on the basis that the possibility existed for the instruments to be more contaminated. I am satisfied that the licensee has identified the likely cause of the incident and is putting in place measures to prevent its reoccurrence.

4 REGULATORY ACTIVITY

4.1 Licence Instruments and Enforcement Notices

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' (LIs), 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.

4.2 Amended Licence Conditions

Amendments have been made to licence conditions 1 and 3.

Licence Condition 1 (LC1, Interpretation) provides a set of definitions. ONR decided to amend the definition 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.

Licence Condition 3 (LC3, Control of Property Transactions) requires the licensee to make and implement adequate arrangements to control property transactions on licensed nuclear sites. LC3 was prescriptive and required the licensee to obtain ONR permission (“consent”) before it let, conveyed, assigned or transferred any part of the licensed 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 numbers of LC3 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 affecting the site and include provision for the classification and management of all property transactions according to their safety significance and their impact on the licensee’s control of the site.

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

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>).

6 CONTACTS

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

website: www.onr.org.uk

email: ONREnquiries@onr.gsi.gov.uk

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