



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

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 for the Winfrith Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Winfrith 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.

1 INSPECTIONS

1.1 Dates of inspection

The ONR site inspector made inspections on the following dates during the quarter:

18, 19, 20, 21, 22 August 2014

ONR Fire Safety Inspector made inspections on 10 September 2014 to assess compliance with the Regulatory Reform (Fire Safety) Order 2005 by sampling selected fire safety themes.

ONR Conventional Health and Safety (CHS) inspectors made inspections on 25 and 26 September to inspect management of asbestos waste treatment within Tradebe Inutec facilities on the licensed site and to review progress with improvements raised during previous CHS inspections.

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 etc. 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 Winfrith covered the following:

- marking of the site boundary;
- incidents on the site;
- control and supervision of operations;
- review of regulatory issues; and,
- conventional health and safety.

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.

Licence Condition Compliance Inspections

The licensee, Reactor Sites Restoration Ltd (RSRL) is progressing improvements to arrangements for marking of the site boundary and proposes to undertake inspection of the site boundary at Winfrith using the improved arrangements already used at Harwell.

Inspection instructions are considered to be of a good standard and in general, arrangements are considered adequate.

Current arrangements for incident reporting are adequate with some minor opportunities for improvement in clarity of information within the arrangements. Winfrith staff have had additional training in the revised arrangements, and demonstrated a good understanding of the arrangements and expectations for reporting incidents and undertaking investigations.

Whilst it is apparent that RSRL does have arrangements in place to implement appropriate control and supervision of operations, the clarity of these could be improved. A review of two recent incidents highlighted weaknesses in the implementation of the work control arrangements within the Steam Generating Heavy Water Reactor (SGHWR). RSRL was previously requested to make improvements to monitoring, audit and review of work control systems; it appears that this is not yet being delivered at the facility level. RSRL was advised to undertake a comprehensive inspection of the implementation of work control at Winfrith to establish consistent and adequate implementation of arrangements.

Review of Regulatory Issues

A review of regulatory issues identified two that could be closed, civil/structural maintenance of SGHWR and land quality assessment of an area occupied by Tradebe Inutec. Progress against remaining issues remains satisfactory and will be reviewed as part of ongoing regulatory interactions.

Conventional Health and Safety

Fire Safety Inspection

Inspection of the fire safety arrangements for the SGHWR, Dragon reactor, and premises occupied by Tradebe Inutec were undertaken. The buildings were inspected to evaluate the effectiveness of the protective measures for life safety and also their value in providing protection to nuclear integrity. There were several observations to improve existing standards of fire protection measures, but overall, during discussions around preventative and protective measures a wide range of good examples of pro-active fire safety management were identified. From the evidence gathered during this inspection, no deficiencies that seriously impact on fire safety were identified.

Radioactive Asbestos

A joint HSE / ONR inspection was undertaken to gain fuller understanding of Tradebe Inutec's undertaking and inspect management and handling procedures for radioactive asbestos (RA). This was part of a wider ONR initiative: 'Management of RA in the nuclear industry', in particular, the compaction of RA, and any potential asbestos contamination resulting there from. No matters of immediate or evident concern, or requiring formal enforcement action were noted. A number of actions were placed with Tradebe Inutec to ensure that risks from these operations are reduced as low as reasonably practicable.

Follow-up from Previous CHS Inspections

During CHS inspections undertaken in June 2014 a number of issues were raised with RSRL to address some matters of immediate concern. This inspection involved a review of RSRL's progress and the adequacy of the improvements.

RSRL has made significant improvements to crane access/working at height arrangements in Dragon to reduce the risk of falls from height when accessing the overhead polar crane. Also, in the Dragon facility, significant improvements have been made to dust control, to minimise dust levels arising during decommissioning and potential impact on operators. Following an extensive programme of cleaning, a dust level monitoring regime has also been introduced.

Adequate improvements have been introduced in SGHWR following an incident of a drum lifting operation being undertaken with poor supervision in place, resulting in two operators standing in the drop zone of the lifted item.

Inspections in SGHWR had previously identified that the arrangements for gaining access on to the 60te overhead crane from the gantry, when the crane is not in its correct position, could have led to significant personal injury. Voluntary cessation of crane use was agreed until interim control measures are fitted, whilst a long term solution is identified and commissioned. The long term solution is not yet fitted, although RSRL was able to provide evidence by way of email correspondence that progress had been made in sourcing a design solution, but that the supply and fit company had recently withdrawn from the contract. A new supplier has been identified and RSRL has been advised that failure to have a permanent solution in place within eight weeks could result in enforcement action being taken by ONR.

2.2 Other work

Interaction with Safety Representatives

The site inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

Change of ONR Nominated Site Nuclear Safety Inspector

From the 1 October 2014, Dr V Green will take over the nominated site nuclear safety inspector role from Mr N Blackburn. Dr Green intends to attend the next SSG meeting in November 2014, and will introduce himself to the group during the meeting.

SGHWR Decommissioning

A review of the position with regard to currently agreed hold points was undertaken.

Hold Point 1 – Preliminary Safety Report (PSR) for scheme design – RSRL expect to be able to provide this to ONR early in September. ONR will arrange a project meeting involving RSRL and ONR specialists to discuss and identify any regulatory expectations.

Hold point 2 – Core Sampling modification. RSRL expect to submit this to ONR at the end of December 2014. It was agreed that this should also be considered during a project meeting involving specialists during October.

Hold Point 3 – Thorium transfer. RSRL is currently pursuing sale of the material as a preferred option. In parallel, they are developing a contingency option, to export the thorium to the Treated Radwaste Store on Winfrith site and subsequently off site if required.

General discussion of progress, with identifying disposal routes for asbestos, confirmed that the only issue resides with disposal of the lagging boxes that are packed with brown asbestos. Site is also exploring European routes for treatment techniques/disposal options. A sampling plan for the lagging boxes, both metal and contents, is being developed. RSRL expect to have a clearer understanding of the inventory and be able to share with ONR by the end of November 2015. Whilst ONR has no specific objection to removal of the lagging boxes, a clear strategy for eventual disposal is required before removal commences. The Low Level Waste Repository (LLWR) is considering storing the material while disposal options are developed. RSRL considers this may result in the possibility of the lagging boxes being removed early, with the benefit of a significant hazard reduction within primary containment.

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 is one matter of interest to report during the period:

Whilst undertaking inspections concerns regarding emergency rescue training for Winfrith Rescue Service (WRS) (an in-house rescue team) were raised with, and investigated by, the ONR CHS Inspector. It had been alleged that refresher training for WRS team members with access to the 'Gotcha' rescue system had been cancelled, resulting in them being no longer qualified to use this system.

It was confirmed that the refresher training had been cancelled. The RSRL Manager with line management responsibility for WRS had made a decision to cancel the refresher training for WRS personnel following conversation with RSRL Harwell, who had withdrawn use of the Gotcha equipment from their own site emergency arrangements. The decision to cease use of the Gotcha system at Winfrith had been taken without an adequate management review of emergency rescue arrangements at the Winfrith site; without the knowledge of senior management or the safety team; and without discussion with the WRS crew. The decision was also made without consideration for interim rescue arrangements that would be provided in the case of a rescue at height.

ONR CHS Inspector arranged for the Gotcha equipment to be locked away, preventing its use by users with lapsed (or no) training, and raised the matter with the RSRL Head of Safety and Winfrith Site Closure Director, requiring from them:

- (i) immediate personal attention to the situation; and,
- (ii) provision of interim arrangements for crane rescue scenarios until refresher training can be provided.

ONR CHS Inspector advised that failure to have adequate emergency rescue arrangements in place for crane rescue could result in enforcement action being taken with respect to use of the crane.

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 LIs issued during the period.

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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