



# Office for Nuclear Regulation (ONR) Quarterly Site Report for Low Level Waste Repository

Report for period 1 January – 31 March 2015

## 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 West Cumbria Sites Stakeholders Group Low Level Waste Repository Working Group and are also available on the ONR website (<http://www.onr.org.uk/lwc/>).

Site inspectors from ONR usually attend West Cumbria Sites Stakeholders Group Low Level Waste Repository Working 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	28 <sup>th</sup> , 29 <sup>th</sup>
February	13 <sup>th</sup>
March	

## 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 ONR Inspectors carried out an inspection of the LLWR Licence Condition (LC) 22 "Modification or experiment on existing plant" arrangements. Overall, the ONR Site Inspector considered that, with respect to the aspects covered in the inspection, the LLWR LC22 arrangements were generally adequate, with the LLWR arrangements meeting the ONR guidance requirements. A number of areas for further review and/or improvement were raised during the inspection and LLWR agreed to undertake work to review the issues raised. This inspection however concentrated on the top level arrangements and associated processes and did not include a detailed "deep dive" inspection of the implementation of the arrangements. These aspects will be covered in further inspections which will be programmed into the ONR 2015/16 LLWR Inspection plan.

### 2.2 Other work

One aspect of LLWR operations which is subject to on-going ONR/LLWR discussions is the Plutonium Contaminated Material (PCM) Decommissioning Project work. LLWR are preparing for the next stage of the Magazine 3 Decommissioning Project work and ONR has now considered the associated safety documentation. ONR has indicated that it will participate in the planned readiness review prior to the commencement of decommissioning operations in Magazine 3. LLWR has also now submitted to ONR the safety documentation associated with the forward decommissioning of Magazines 5, 9 and 10. This documentation is now being considered by ONR.

LLWR is undertaking a feasibility/option review for the processing and export of the number of “legacy” drums currently stored within the LLWR drum storage facility. It is envisaged that meetings to discuss the findings of the review will be undertaken during the next report period.

ONR has also discussed with LLWR the LLWR forward strategy for the use, storage and export/disposal of the number of sealed radioactive sources held on the LLWR site. Further ONR/LLWR meetings are envisaged to discuss the LLWR plans.

A LLWR/ONR meeting was convened by ONR as part of the programme of compliance oversight of licensees’ arrangements for the measurement and management of radiation fields present at their perimeter fences. A number of actions were placed on LLWR and the time-scales for completion agreed.

During the period discussions were held to update ONR on the LLWR Security Enhancement Programme.

In addition, during the report period, updates have been obtained, and discussions held on various other aspects of operations on the LLWR site. None of the matters discussed were considered to require immediate regulatory action. However, a number of aspects will be discussed further with LLWR during planned interventions with the site within the next report period.

### **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.

Information on the non routine matters and events that occurred on the LLWR site during the report period has been provided to ONR. ONR considers that LLWR has adequately investigated the events and taken appropriate measures to address issues arising. However, a number of actions being undertaken by LLWR to address some of the issues raised will be followed up by the ONR Site Inspector during the next report period.

As outlined in the previous period report, the LLWR site has suffered a number of site electrical distribution system events wherein the site electrical power has been lost/affected by “external” events, eg lightning strikes. Further discussions on the findings of the LLWR investigations into these events have been held. ONR will continue to monitor the implementation of identified actions to improve the resilience of the electrical distribution systems and plans to carry out an inspection of the LLWR electrical distribution system in September 2015.

In addition, events continue to be recorded associated with problems with the breathing air compressor systems and the air fed suits utilised in the Magazine decommissioning work. Various improvements are now being introduced by LLWR to reduce the occurrence of such events. The ONR Site Inspector will continue to monitor the situation.

### **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.

The following LIs and Enforcement Notices (Table 1) have been issued during the period:

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

Date	Type	Ref No	Description
			None issued this report period

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

## 6 CONTACTS

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Published Apr 2014

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