



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

Report for period 1 April – 30 June 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:

April	9 th , 21 st , 22 nd
May	21 st , 27 th
June	5 th , 17 th , 18 th , 19 th

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 observed the LLWR Licence Condition (LC) 11 "Emergency Arrangements" Demonstration Emergency Exercise Theta 8. Overall the ONR observers considered that the exercise participants would have adequately coped with the incident exercised. However part way through the exercise an exercise "direction/control" problem occurred which the ONR observers considered did allow some of the participants to fully demonstrate their capability during the exercise. ONR will now witness a further planned LLWR exercise to further observe those aspects which were particularly affected by the exercise management issues.

The ONR Site Inspector carried out a follow up inspection on the ONR inspection of the LLWR Licence Condition 22 (LC22) "Modification or experiment on existing plant" arrangements carried out in January 2015. Overall, the ONR Site Inspector considered that LLWR had adequately considered the issues raised during the original inspection and had embarked on a number of initiatives to address them. The information obtained will be utilised in the planning of a further inspection of the implementation of the arrangements which will be undertaken later in 2015/16 inspection plan programme.

Another follow up inspection was undertaken during this report period relating to the findings from the LLWR Licence Condition 24 (LC24) "Operating Instructions" inspection carried out in October 2014. Overall the ONR Site Inspector considered that the LLWR LC24 arrangements and their implementation were adequate. It was considered that LLWR had made adequate

progress in addressing the issues raised and were proactively implementing improvements to the LLWR LC24 arrangements.

2.2 Other work

During the period, the LLWR Annual Review of Safety Meeting for 2014/15 was held. Overall the ONR considered that LLWR had adequately reflected highlights and issues arising from 2014/15 operations and that LLWR had adequately identified and were progressing work to address the problems encountered. The ONR attendees also considered that LLWR had continued to make improvements to their Annual Review processes and reports, which now covers all aspects of LLWR operations, ie. nuclear and conventional safety, environmental performance, radiological safety, transport and security etc. LLWR also presented a “forward look” on the planned LLWR work programmes during 2015/16 and some of the associated challenges were discussed eg potential impact on LLWR project work from the anticipated funding constraints, procurement of Type B transport containers, Plutonium Contaminated Material (PCM) drum processing and storage.

In addition to the discussions at the LLWR Annual Review of Safety meeting other LLWR/ONR/NDA discussions have been held during the report period relating to the options for LLWR work programmes depending on future LLWR funding scenarios. The PCM Decommissioning Project work remains a priority work area for ONR and the potential impact on the forward programme will be discussed further with LLWR during the next report period.

ONR/LLWR discussions continued on the LLWR PCM Decommissioning Project work. LLWR are commencing the next stage of the Magazine 3 Decommissioning Project work and during the report period the ONR Site Inspector participated in the planned readiness review prior to the commencement of decommissioning operations in Magazine 3. Overall the ONR Site Inspector considered that LLWR had undertaken a comprehensive and thorough readiness review. It was considered that LLWR had adequately challenged the project team and that there had been a detailed discussion of known issues and outstanding work areas. The ONR Site Inspector will inspect the progress made on the Magazine decommissioning work during future site visits.

ONR continues to discuss with LLWR the options for the interim storage of PCM drums arising from the decommissioning project pending the resolution of the issues associated with the availability of suitable transport containers. In addition discussions continue regarding the options relating to the number of “legacy” drums currently stored within the LLWR drum store facility.

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

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.

Discussions with LLWR have continued on the number of events that continue to be recorded associated with problems with the breathing air compressor systems and the air fed suits utilised in the Magazine decommissioning work. LLWR have stated that the number of events recorded should fall in the future reflecting the impact of the various improvements introduced by LLWR and changes to operational procedures. 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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