



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

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 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 & 6
3	NON-ROUTINE MATTERS	6
4	REGULATORY ACTIVITY	6
5	NEWS FROM ONR	7
6	CONTACTS.....	7

1 INSPECTIONS

1.1 Dates of inspections

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

April	13, 15, 22 & 28
May	1, 14, 20 & 29
June	3, 18, 25 & 26

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:

System Inspection of the Implementation of the Nuclear Safety Case.

On 25 June, the nominated site inspector, accompanied by an ONR radioactive materials transport specialist inspector conducted a planned system inspection of the licensee's implementation of the nuclear safety case at the Oxide Fuels Complex. A meeting to review the implementation of the Oxide Fuels Complex safety case, at two separate facilities, was followed by a plant inspection of both of those plant facilities. The facilities inspected were the enriched uranium oxide powder packing area, (where radioactive materials are packaged for export overseas), together with the Light Water Reactor fuel area, (where light water reactor fuel is manufactured, for export overseas). The intervention was focused on inspection of the six key licence conditions which related to a system inspection of the implementation of the safety case. The plant inspection included discussions with plant operations and maintenance staff, as well as a plant safety representative. The nominated site inspector concluded that the licensee had adequately demonstrated the implementation of the nuclear safety case at both facilities inspected at the Oxide Fuels Complex. Regulatory advice was provided relating to some minor matters which arose during the inspection.

Arrangements for the licensee's periodic review of nuclear safety cases.

Licensees periodically review the nuclear safety cases which justify the nuclear safety of their facilities, typically conducting a major review every ten years and with interim periodic reviews of a more limited scope. On 1 May, I discussed the licensee's implementation of arrangements for the recent translation of the uranium hexafluoride production safety case from 'operational' to 'care and maintenance' mode. I also discussed the licensee's proposed revised arrangements for the periodic review of safety cases, which were encouragingly consistent with the methodology being developed at the 'Safety Case Review Forum' between the nuclear licensees and ONR.

Disposal of radioactive waste and decommissioning.

At the quarterly regulatory review meeting between the licensee, the regulators and the National Nuclear Laboratory Limited tenant organisation, held on 28 April, the licensee reported to ONR continuing acceptable performance in maintaining authorised disposals of low and very low level solid radioactive wastes from the site, as well as an adequate response to a range of other topics of regulatory interest, including the licensee's continuing progress with decommissioning projects, funded by the Nuclear Decommissioning Authority, (NDA). There was the usual useful dialogue between the licensee, the tenant organisation and the regulators, the licensee being receptive to the regulatory advice provided by ONR. In response to earlier prompting by ONR, the licensee also reported good progress in disposing of a number of redundant radiation sources from the site, using an approved specialist contractor, which reduces the radiation hazard on part of the site.

Organisational Capability.

On 31 March 2014, 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 has now completed the process of having the radioactive materials cleaned out and has been placed into a 'Care and Maintenance' regime, pending a potential medium term future restart of production. A project to potentially restart the plant at a future date was discussed with the nominated site inspector on 18 June, with an acceptable outcome. As a consequence of the cessation of uranium hexafluoride production, reductions in the workforce were implemented in two tranches, at the end of December 2014 and at the end of March 2015. ONR remained content with the licensee's management of the nuclear safety aspects of these organisational changes, associated with reductions in the site workforce.

The licensee proposed an organisational change to implement a reduction in the size of the 'on site' Fire & Rescue team. The justification was founded upon the recent cessation of uranium hexafluoride production at the site, which had resulted in revised risk assessments, produced in cooperation with a specialist contractor. This proposal was initially discussed with an ONR fire safety specialist inspector during a site intervention on 14 May, followed by a further site meeting with the nominated site inspector, a specialist fire safety inspector and an organisational change specialist inspector on 3 June. The licensee was receptive to the regulatory advice provided by ONR. ONR also undertook two unannounced inspections of aspects relating to the proposed changes, at the Emergency Control Centre, on 3 and 18 June, both with acceptable outcomes, which informed ONR assessment of the proposed organisational change. Following ONR assessment of the licensee's finalised organisational change safety justification, ONR permissioned the organisational change on 29 June.

Emergency Arrangements.

Separate aspects of parts of the licensee's 'on site' emergency arrangements were satisfactorily demonstrated to ONR inspectors at site interventions on both 20 May and 26

June. The licensee is currently proposing to change the location of the Criticality Assembly Point to a more modern facility. This facility would be used, in the extremely unlikely event of a criticality event occurring on the site, to promptly assess people evacuating from the part of the site where a criticality event may have occurred. The proposed new facility was inspected on 1 May and this was followed up by an inspection by three ONR inspectors of a small scale demonstration emergency exercise, on 26 June, at which the operation of the proposed new Criticality Assembly Point was successfully demonstrated to ONR. These inspections served to enhance regulatory confidence in the adequacy of the licensee's implementation of the 'on site' emergency plan arrangements.

Construction Design & Management Regulations 2015.

In response to a request from the licensee, an ONR specialist conventional health and safety inspector provided regulatory advice to a group of the licensee's staff, at a site meeting, on 15 April. The licensee's duties and the regulatory expectations of the various role holders, such as when undertaking site projects using contractors, were explained to the licensee's staff.

ONR Transport Compliance & Transport Permissioning.

ONR regulates radioactive materials transport through the Transport Compliance and Transport Permissioning sub-programmes, within the Cross ONR Programme.

There were two separate minor events reported to ONR in this quarter relating to different minor shortfalls in the labelling of enriched uranium oxide powder shipments, transported from the site for export. The licensee is promptly addressing these shortfalls to prevent a recurrence.

The ONR Transport site inspector conducted three interventions during this quarter

- participation in the Springfields Site Stakeholder Group meeting.
- a site discussion regarding transport arrangements and shipments from the site.
- a joint system inspection of product being prepared for consignment from the site.

No transport regulatory issues arose during these Interventions.

ONR Safeguards.

Over the period April to June, there were six Euratom safeguards inspections. The current approach is to have two inspections per month, one a planned inspection, with the activities agreed beforehand, and the other pseudo-unannounced, at which the inspector informs the licensee on arrival which parts of the facility will be inspected. Euratom also carried out visits to attach containment seals for shipments outside the UK. No safeguards issues were raised during these inspections.

COMAH regulation.

Springfields remains an upper tier COMAH site, where COMAH is regulated by the 'joint competent authority' of ONR and the Environment Agency. The COMAH 2015 Regulations (The Control of Major Accident Hazards Regulations 2015) were implemented on 1 June and the site has been informed of some minor additional compliance requirements arising from the updated COMAH Regulations, which the site is promptly addressing.

Springfields Site Stakeholder Group meeting.

The nominated site inspector participated in the meeting of the Springfields Site Stakeholder Group on 13 April, reporting on aspects of ONR interventions at Springfields over the

preceding six months, as well as explaining key ONR priorities for the regulation of the site. I explained the importance to ONR of the longevity of the Springfields uranic residue processing facilities, which were reducing the hazard on the site, as well as processing legacy residues from other sites and these facilities remain a unique national asset, warranting the maintenance of funding for their operation by NDA. The importance of maintaining timely progress with the ongoing decommissioning projects was also outlined.

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, most recently on 25 June, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

The effective work of the safety representatives continues to make a very 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. The licensee reported some minor events to ONR in this quarter, in compliance with the licensee's arrangements, which were promptly investigated by the licensee, with follow up reports within sixty days of the event being provided to ONR. Given the minor nature of the events reported to ONR during this quarter, they did not warrant further investigation by ONR.

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.

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

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Published July 2015

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