



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

Report for period 1 October – 31 December 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	6 & 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:

October	6, 7 & 13
November	4, 18, 19, 26 & 30
December	1, 9 & 17

A group of ONR administration, communications and new inspector staff paid a site familiarisation visit to Springfields on 26 November.

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:

Emergency arrangements.

ONR observation of a combined Level One ('on site') and Level Two ('off site') emergency exercise, 'Heron 6'.

On 7 October, a combined Level One and Level Two emergency exercise was observed by teams of ONR inspectors, both at the Springfields site and at the Strategic Coordination Centre at Lancashire Constabulary HQ, Hutton. The 'on site' emergency exercise scenario was based on a criticality event, at one of the uranium processing facilities on the site. Aspects of the licensee's emergency response, including effective cooperation between the 'on site' and local authority fire and rescue services, the operation of the recently relocated Criticality Assembly Point facility and site mustering, were demonstrated to an adequate standard. The licensee adequately demonstrated a range of other aspects of the 'on site' emergency arrangements, with a number of minor matters arising during observation of the exercise being readily agreed with the licensee as matters for continuous improvement and confirmed in writing by ONR, to which the licensee has provided an acceptable response. Following the observation of the Level Two emergency exercise aspects and participation in a 'cold debrief' meeting on 30 November, ONR wrote to the local authority, confirming that the

exercise was a test of the 'off site' emergency plan, in compliance with the REPPiR (Radiation Emergency Preparedness and Public Information Regulations) 2001.

“Capability Map” Review.

On 1 December, I was accompanied by two ONR specialist inspectors, at a review of the licensee's "capability map". From this review, I concluded that the licensee had submitted a comprehensive document, appropriately detailing the rationale and evidence for all the questions which informed the "capability map". Although it was considered that the version of the map submitted could have been used as the basis for the ONR assessment, it was agreed that the licensee should revise some of the responses, to further inform the subsequent ONR assessment of the "capability map". The licensee provided an enhanced "capability map" in December, as agreed with 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 18 November, the licensee reported 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 and uranic residue processing, funded by the Nuclear Decommissioning Authority, (NDA).

Joint intervention with the Environment Agency.

On 19 November, a joint intervention was conducted with the Environment Agency, to inspect aspects of the licensee's containment of radioactive material. The licensee is working with a specialist contractor, to investigate and quantify low levels of ground contamination beneath the site. The licensee is proceeding with work aimed at timely remediation.

Organisational Capability.

On 30 November, accompanied by an ONR specialist inspector, I focused on the licensee's implementation of licence condition 36 (organisational capability) arrangements, particularly with regard to the current reductions in staff numbers at Springfields. The implementation of the licensee's arrangements was inspected in several areas where staff reductions were currently being proposed, including the 'on site' Fire & Rescue Service, (where 24/7 shift team strength is being maintained), shift health physics monitors and the site laundry. The specialist inspector provided regulatory advice regarding some further enhancements to the implementation of the licensee's arrangements, which was readily accepted by the licensee. Overall, I was content that the licensee was paying due attention to matters of safety significance when implementing the manpower reductions.

Commissioning.

On 17 December, two inspectors conducted an intervention to inspect aspects of the commissioning of a new facility, recently constructed to process some legacy uranic residues. The licensee had implemented an appropriate safety case for this new facility. The safety case had been applied to modify the initial design of the facility, in order to minimise the key hazards of criticality and fire. The key safety measures derived from the safety case had been clearly identified and translated into duly categorised plant safety features and safety related equipment, a number of which were observed during the plant inspection. The licensee had appropriately engaged technical support from the National Nuclear Laboratory Limited tenant on the site, both for process development and for technical support to the commissioning of the facility. Arrangements for training the plant operators, for the commissioning of this facility,

were effective. The facility management were seen to have established high standards at the outset of commissioning, which I considered supported the safety standards of the facility. Robust arrangements were being applied to control the commissioning process, through the use of clearly defined hold points. In view of the licensee's clear explanation of the safety case and the range of safety measures which were observed during the inspection of the facility, complemented by the discussions with the commissioning staff, ONR formed the view that the licensee's overall implementation of commissioning arrangements was of a good standard.

ONR Radioactive Materials Transport.

On 13 October, two ONR Radioactive Materials Transport specialist inspectors conducted an intervention at the site. This related to the licencing of a new transport package, to transport fuel to the UK Advanced Gas Cooled Reactor (AGR) power stations. The licencing of this transport package is ongoing.

There were no transport incidents involving consignments from the licensee in this quarter and one reportable event of a consignment from Magnox (Harwell site) to Springfields. This minor event had no safety significance to the workers or the public.

Safety Culture.

On 9 November, an ONR specialist inspector participated in a meeting, requested by the licensee, to provide regulatory advice on aspects of safety culture. This was to inform a nuclear industry working group, established by the Society for Radiological Protection (SRP) and led by the licensee, (the Radiation Safety Culture Working Group). The group had been established to "Develop and Promote Radiological Culture in the UK". ONR provided regulatory advice on research undertaken by ONR on cultural / organisational factors, advising how the outcome of the ONR research could be applied to inform the development of an enhanced 'Radiological Protection Safety Culture'.

COMAH Regulation.

On 15 December, two inspectors conducted a follow up intervention to a mechanical engineering inspection in February 2014, primarily to inspect site management systems for managing ageing plant integrity / functionality, in accordance with recommended good practice and also to verify aspects of the COMAH Safety Report assessment. The actions identified at the earlier ageing plant intervention, in February 2014, had been resolved or were being adequately progressed. Overall, the licensee was able to demonstrate improvements in the management of safety critical equipment. It was concluded that the licensee at least met industry recognised good practice and there was evidence of the improvements implemented since February 2014.

Springfields Site Stakeholder Group Meeting.

On 18 November, the ONR nominated site inspector attended the meeting of the Springfields Site Stakeholder Group. I reported on recent ONR interventions and responded to some queries from the Stakeholder Group members.

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

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

Regulation Matters magazine.

Insight into ONR's work as an independent regulator of the nuclear industry can be found in Regulation Matters. This quarterly online publication (<http://www.onr.org.uk/regulation-matters.htm>) reports on the key themes and developments in each of ONR's regulatory programmes and provides an update about the on-going changes at ONR. For the latest news and updates from ONR, you can also visit the website and sign up for our e-bulletin: <http://www.onr.org.uk/index.htm>.

Chief Executive

Adrienne Kelbie has been appointed Chief Executive of ONR and will take up the appointment on 18 January 2016. Adrienne is currently the Chief Executive of the Disclosure and Barring Service, and prior to this has had a varied career including periods as Deputy Chief Executive in a local authority and as Director of Operations responsible for national and international funding at the Big Lottery Fund.

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

This document is issued by the Office for Nuclear Regulation (ONR). For further information about ONR, or to report inconsistencies or inaccuracies in this publication, please visit <http://www.onr.org.uk/feedback.htm>.

© Office for Nuclear Regulation, 2016

If you wish to reuse this information visit www.onr.org.uk/copyright for details.

Published January 2016

For published documents, the electronic copy on the ONR website remains the most current publicly available version and copying or printing renders this document uncontrolled.