



# Office for Nuclear Regulation (ONR) Quarterly Site Report for Dounreay

Report for period 01 April – 30 June 2016

## 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 Dounreay Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/lrc/>).

Site inspectors from ONR usually attend Dounreay 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.

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## 1 INSPECTIONS

### 1.1 Dates of inspection

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

11 to 14 April 2016  
26 to 28 April 2016  
17 to 19 May 2016  
6 to 9 June 2016

## 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 Dounreay covered the following:

Retention of records;  
Incidents on site;  
Nuclear safety committee;  
Management systems and operational records;  
Emergency arrangements;  
Organisational capability.

#### Retention of records

Licence condition 6 requires the licensee to ensure that documents and records produced in accordance with conditions of the licence are preserved for the stated period. The inspector met with the Records Manager at the Dounreay Archive. The inspection provided evidence that records are being adequately managed. Retention periods have been appropriately determined and they are stored under appropriate environmental conditions. The inspector sampled the records management system and was able to locate the chosen records.

#### Incidents on Site

The site inspector reviewed recent events and determined that they were being investigated in a manner appropriate to their significance which is in accordance with ONR expectations. DSRL is continuing to review its processes with the aim of making enhancements to improve

the consistency of investigations and its learning from experience. Overall the inspector considered that DSRL meets ONR's expectations as set out in its guidance.

### **Nuclear safety committee**

Licence condition 13 (nuclear safety committee) requires the licensee to establish a nuclear safety committee to consider and advise on relevant matters. At Dounreay this includes construction and modification to nuclear plant that if inadequately conceived or executed could have a significant impact on safety. The inspector discussed the functioning of the committee with the chairperson. This supported her view based on scrutiny of meeting minutes and observation of a meeting that the committee provided a robust challenge and was appropriately informed on site matters.

### **Management systems and operational records**

Licence condition 17 (management systems) requires the licensee to ensure that its management systems give adequate priority to safety and that it has adequate quality management arrangements in respect of all matters which might affect safety. The ONR nuclear safety and specialist transport inspector examined a number of the site's processes. They wished to be assured that DSRL management systems align the requirements of the nuclear site licence and transport regulations. It was their judgement that the licensee manages the interface between safety and transport requirements well.

Licence condition 25 (operational records) requires the licensee to make adequate records of the operation, inspection and maintenance of any plant that might affect safety. The inspectors examined a number of records supporting moves made as part of the Dounreay materials consolidation programme. They considered them to provide suitable evidence that process steps have been completed satisfactorily and have been appropriately verified. Where independent verification was provided, it was clear what has been considered and what conclusions had been derived.

### **Emergency arrangements**

Licence condition 11 (emergency arrangements) requires the licensee to have adequate arrangements to deal with any accident or emergency on site. A team of ONR inspectors observed Exercise Delta 52 which was DSRL's annual demonstration of on-site emergency response. In parallel the exercise scenario was also used to drive the local authority's triennial demonstration of off-site response. The inspectors considered it to be a challenging scenario exercising response to a postulated significant radiation safety event and a conventional safety event. In all areas observed by the inspectors they considered DSRL to have demonstrated an adequate standard of emergency response.

### **Organisational capability**

Licence condition 36 (organisational capability) requires the licensee to provide adequate resources to operate the site safely. DSRL is proposing a number of changes to its organisational structure. The site inspector wished to gain assurance that the changes were being adequately justified. He considered that DSRL has robustly applied its arrangements to comply with licence condition 36. The potential impacts of the proposals were being analysed so that suitable checks could be put in place to mitigate against any adverse outcomes. In addition the process had been augmented by an optioneering study that took account of feedback from a number of workshops held to develop some aspects of the proposals.

## 2.2 Other work

### Annual review of safety and security (ARoSS)

The ONR Deputy Chief Inspector and site inspectors participated in the ARoSS. It was a focussed meeting where DSRL Directors provided an evaluation of the previous year's performance and looked forward to the challenges ahead. The evaluation was balanced and looked at both good examples of safety performance and areas for improvement. The inspectors considered that DSRL's evaluation generally concurred with their own view. The safety representative's views at the meeting also provided a valuable contribution.

## 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 were no such matters or events of significance during the period.

## 4 REGULATORY ACTIVITY

ONR 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 or Enforcement Notices were issued during the period.

**Table 1**

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

Date	Type	Ref No	Description

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 ongoing 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 NUCLEAR INSPECTOR'S ANNUAL STATEMENT

ONR published its Annual Report and Accounts 2015/16 on 7 July. As well as reporting on ONR's performance, the report includes the Chief Nuclear Inspector's annual statement, which provides a judgement on the regulatory attention necessary for each licensed site, dependent on the level of hazard and risk posted by the facility. The Annual Report and Accounts can be viewed on the ONR website.

## NEW REGULATORY STRUCTURE

ONR has recently reviewed its organisational arrangements to ensure that our regulatory structure is appropriately focused to deliver front-line regulation over the next few years. To maintain effective and proportionate regulation, and to address potential and actual imbalances in the current workloads of the programmes, we have created three nuclear safety programmes, each led by a Deputy Chief Inspector. These programmes are:

- A new reactors programme dealing with design assessment, licensing and construction of civil reactors.
- An operating facilities programme dealing with operating reactors, defence sites and other operating facilities.
- A Sellafield, decommissioning, fuel and waste programme dealing predominantly in decommissioning and waste.

You can view ONR's organisational structure and full regulatory structure on our website.

## CHIEF NUCLEAR INSPECTOR SUMMARY PLAN FOR 2016/17

The CNI Summary Plan outlines high level regulatory milestones to deliver ONR's Strategic Plan to 2020 and ONR's approach to the delivery of safety and security regulation across the UK's nuclear reactors and facilities. It is expected to be published in July and will be available on the ONR website.

## 6 CONTACTS

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