



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

Report for period 1 July – 30 September 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 of the West Cumbria Sites Stakeholders Group Low Level Waste Repository Working Group and are available on the ONR website (<http://www.onr.org.uk/lrc/>).

The site inspector from ONR usually attends the 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 inspections

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

July	13, 14, 20 & 21
August	None
September	7 & 22

The Managing Director and Safety Director of the licensee also met with ONR at Bootle on 13 September, to outline future strategic plans for the Low Level Waste Repository operations in the medium to long term.

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 implementation.

In this period, routine inspections of Low Level Waste Repository Limited (LLWR) covered the following:

Licence Condition 11, Emergency Arrangements.

On 14 July, ONR inspectors observed a combined Level One ('on site') emergency and security exercise, with an adequate outcome. At the exercise, which had a challenging scenario, the licensee adequately demonstrated key aspects of the 'on site' emergency arrangements, as well as the licensee's arrangements for responding to an event with security challenges. Good cooperation was demonstrated with the external emergency services. Some minor opportunities for improvement were readily acknowledged by the licensee and a timely programme agreed with the licensee's independent inspector, to rectify the minor shortfalls, particularly with regard to contaminated casualty handling and to report the improvements to ONR. An ONR fire safety specialist inspector provided further regulatory advice at a 'follow up' site intervention on 22 September, observing a limited scale exercise. Improvements were noted in some aspects, whilst regulatory advice was provided on some other aspects of the implementation of emergency arrangements where further opportunities for improvement to a good standard were identified by the inspector.

Licence Condition 35, Decommissioning.

On 13 July, I participated in the periodic meeting between the licensee and the regulators, reviewing recent decommissioning project progress, with an acceptable outcome.

Annual Review Meeting.

On 13 July, ONR inspectors participated in the combined Annual Review meeting, to consider the licensee's safety, security and environmental performance (with the Environment Agency) over the preceding year. The licensee reported an acceptable range of nuclear safety performance metrics. The licensee was delivering the planned progress with key decommissioning projects, (monitored by ONR as formal regulatory issues) and was continuing to reduce the hazards on the site. I concluded that the licensee had carried out an adequate annual review and there was useful dialogue with the regulators regarding future planned developments on the licensed site.

Participation in the West Cumbria Site Stakeholder Group LLWR Working Group meeting.

On 20 July, the nominated site inspector provided information on recent ONR site interventions, at the evening meeting of the West Cumbria Site Stakeholder Group LLWR Working Group, held near to the site.

Control of Radiation Exposure intervention, (CORE), Ionising Radiations Regulations 1999, (IRR99).

On 20 and 21 July, ONR radiological protection specialist inspectors conducted a planned intervention, (part of a set of benchmarking inspections across all licensees), inspecting the implementation of the licensee's arrangements to control radiation exposure to people working on the site. The intervention was conducted principally under regulation 8 of the Ionising Radiations Regulations 1999 (IRR99). To ensure consistency with previous CORE inspections, the inspection was conducted using a standard questionnaire and follow up face-to-face question and answer session with key representatives at LLWR. During the intervention, ONR inspected the implementation of arrangements for controlling radiation exposure, making a number of visits to the magazine areas, vaults, the direct grouting facility, as well as storage buildings for waste drums arising from the decommissioning projects. Compliance with IRR99 was judged to be of an adequate standard, with some opportunities for further improvement identified, in order to achieve a closer alignment with published relevant good practice, being agreed with the licensee.

ONR Radioactive Materials Transport.

On transport package permissioning, the licensee is arranging the procurement of new transport packages, used to ship radioactive materials. ONR assessment for the approval for this package is ongoing. ONR will be conducting inspection of the manufacture and testing of the packages, including at the contractor's facility.

General comment.

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 held with the licensee's safety representatives during inspections by ONR and at the annual review meeting, to support their function of representing employees and by giving advice 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

ONR Response to BBC Panorama Documentary.

In early September 2016, the BBC's Panorama programme broadcast a 30-minute documentary titled 'Sellafield's Nuclear Safety Failings.' As an open and transparent regulator, ONR responded to requests from the documentary makers over many months and sought to offer context and balance to the issues wherever possible. From a regulatory perspective, the documentary raised a number of issues that are either already resolved, or are currently being addressed by Sellafield Limited, with ONR's regulatory oversight. Our position is clear: Sellafield is safe but presents many unique challenges due to the age and history of the site. A considerable amount of work is still required to clean up out of date facilities at Sellafield and decommission their older plants, but this does not mean they pose an immediate safety risk to workers or the public. Sellafield is the most intensely regulated nuclear site in the UK. We have more than 50 highly qualified and experienced inspectors in our Sellafield team scrutinising the site, to ensure it operates as safely and securely as possible. As the UK nuclear safety regulator, we set very high standards throughout the industry and we have seen Sellafield make significant progress in recent years. If we considered any plant to be unsafe we would shut it down or demand action to reduce that risk and return it to safety. Hazard and risk reduction at Sellafield remains ONR's number one regulatory priority and we will continue to play a key role in encouraging progress at the site and driving the pace of future hazard and risk reduction projects. There is still considerable work to be done at Sellafield over many years, but there is now a real momentum of progress which is already making the site safer for future generations.

6 CONTACTS

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