



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

Report for period 1 July to 30 September 2018

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

Site inspectors from ONR usually attend Dounreay Stakeholder Group meetings where these reports are presented 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 inspectors made inspections on the following dates during the report period 1 July to 30 September:

9 to 12 July;  
13 to 16 August;  
10 to 13 September.

## 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 2017 (IRR17) 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:

Emergency preparedness: we inspected the provision of information to people on site, including site induction training, provision of escorts and warning signs. On 12 September the licensee held its annual Level 1 demonstration emergency exercise. Overall we considered that the exercise provided an adequate demonstration of the site's emergency arrangements and their capability to deal with a nuclear and radiological emergency on site.

Incidents on the site: our inspection focused on learning from the causes of incidents. There is clear evidence that the licensee has implemented a number of initiatives recently to improve the learning gained from operational experience and these will be assessed during future inspections. In particular, we acknowledge the licensee's commitment to ensuring that all personnel on site undergo MINDSAFETY training with a number of site personnel trained as MINDSAFETY coaches. We also acknowledge the licensee's on-going review of the courses available within the construction industry to improve the training and competency of project supervisors in the area of control and supervision of operations.

Radiological protection: we carried out an inspection against IRR17, focussing on the progress to date in updating arrangements against the requirements of IRR17 and the organisational structure supporting those arrangements. In each of the areas inspected we identified that a suitable and sufficient level of suitably qualified and experienced resource was available and that training was in date. In addition there was evidence of programmes in place to develop and qualify a number of new health physicists and radiation protection advisors. During our plant visits we examined the local rules and found them all to have been updated

to reflect the requirements of IRR17. We also examined a sample of the contamination monitoring equipment and found it to be fit for purpose and in date for calibration

Decommissioning: we examined the current state of development of the licensee's overarching decommissioning programme with a specific focus on the interdependencies between the various individual, facility decommissioning programmes and the site's infrastructure and capabilities. Although it is clear that the programme is at a relatively mature state of development, the licensee is in the process of conducting a series of verification activities to ensure that these interdependencies have been identified and captured on the programme. Progress on these activities will be examined during a future planned inspection.

Conventional (non-nuclear) health and safety: the ONR site inspector and two conventional health and safety specialist inspectors had discussions with the licensee regarding site arrangements for planning work at height; management arrangements for workplace transport; and arrangements for compliance with the Construction (Design and Manufacture) Regulations. These were followed by plant walk-downs in a number of locations to evaluate the effectiveness of the arrangements.

We also carried out a systems-based inspection in D2001. We examined the staff's understanding of the key outcomes from the safety assessment of the inspection and storage of irradiated fuel. We then examined how the limits and conditions identified within the safety assessment had been captured and reflected in the associated operating instructions and the maintenance of safety related plant and equipment. This inspection included a plant visit to D2001 where we took the opportunity to assess the understanding operators had regarding the hazards and associated limits and conditions associated with the activities being undertaken at that time. Finally we sampled the training undertaken by the facility manager and operations staff and examined how the arrangements sampled addressed the requirements regarding the leakage and escape of radioactive material and radioactive waste.

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**

The site inspectors held a periodic meeting with safety representatives, 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. 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 take a range of enforcement actions, to include issuing an Enforcement Notice.

No LIs, Enforcement Notices or letters were issued during this period.

## 5 NEWS FROM ONR

### 5.1 Stakeholder Engagement

In August our Chief Nuclear Inspector Mark Foy and Deputy Chief Inspector Mina Golshan, hosted a webinar for stakeholders on the outcomes of the UK report to the Joint Convention. This is a new channel of communication which we have introduced, and further webinars are planned for November and February 2019. If you would like to find out more, please contact the ONR Communications team at [contact@onr.gov.uk](mailto:contact@onr.gov.uk)

The ONR/Non-Governmental Organisation (NGO) engagement forum took place on 11 October in London. This is a forum to discuss strategic, cross-cutting regulatory matters. Site specific matters are normally addressed via Site Stakeholder Groups. We are always keen to engage with a range of stakeholders and groups on nuclear safety and security issues, so if you do represent a nuclear-interest NGO, and are not already involved through our forum or via a Site Stakeholder Group, then please get in touch with the ONR Communications team for further details, via [contact@onr.gov.uk](mailto:contact@onr.gov.uk)

### 5.2 Regulatory News

On 25 July we announced our decision to prosecute the Atomic Weapons Establishment for offences under Section 2 (1)\* of the Health and Safety at Work etc. Act (1974). This charge related to an electrical incident on 27 June, 2017, which resulted in injury to an AWE employee. The incident was a conventional health and safety matter and there was no radiological risk to workers or the public. At a court hearing on 18 September, AWE pleaded guilty to the charge and sentencing was adjourned until 9 November, 2018.

In a separate case brought by ONR, EDF Energy Nuclear Generation Ltd and Doosan Babcock Ltd pleaded guilty on 10 October, 2018) to offences under the Health & Safety at Work etc. Act 1974, section 3(1) and the Work at Height Regulations 2005, Regulation 4(1) respectively. The charges relate to an incident on 12 April 2017 at the Hinkley Point B nuclear power station, which resulted in a serious injury to a Doosan Babcock Ltd employee. Following a hearing at Taunton Magistrates Court, the case was committed for sentencing at Taunton Crown Court with an initial hearing date set for 16 November 2018, although this date is subject to change.

Both of these cases related to conventional, industrial-type incidents that would have been subject to regulation by the Health and Safety executive prior to ONR's creation four years ago, when we gained responsibility for such matters on licensed sites. There was no radiological risk to workers or the public.

Updates on each case will be published on our website [www.onr.org.uk](http://www.onr.org.uk)

We have recently published our [Statement of civil incidents](#) meeting the Ministerial Reportable Criteria (MRC) reported to ONR - Q2 2018 (1 April 2018 to 30 June 2018). Full details are available on our [website](#).

### 5.3 Corporate News

In July we published our second [gender pay report](#). The organisation-wide results show that ONR has a mean gender pay gap of 35.2%, which is wider than last year, although it is broadly similar to the rest of the UK nuclear industry and anticipated given our workforce profile, and that of the industries from which we have historically recruited. ONR is committed to addressing this issue and continues to focus on improving diversity and inclusion.

Our Chief Executive, Adrienne Kelbie, has agreed a three-year contract extension, taking her term of employment to January 2022.

The Department for Work and Pensions has started the process for recruiting a new ONR Chair (further details can be found on the [public appointments website](#)). Our current Chair, Nick Baldwin CBE, will remain in office until 31 March, 2019.

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