



Office for Nuclear Regulation (ONR) Site Report for Dungeness B

Report for period 1 April to 30 June 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 of the Dungeness Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/lrc/>).

Site inspectors from ONR usually attend Dungeness Site 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

1. ONR inspectors undertook inspections at Dungeness B Power Station, on the following dates during the quarter:
 - 9 -13 April
 - 30 April - 4 May
 - 30 - 31 May
 - 11 - 13 June
 - 29 June

2 ROUTINE MATTERS

2.1 Inspections

2. 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).
3. The inspections entail monitoring the 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.
4. In this period, routine inspections at Dungeness B covered the following compliance inspections:
 - Licence condition 6 – Documents, records, authorities and certificates
 - Licence condition 11 – Emergency arrangements - Level 1 Exercise demonstration
5. The LC6 inspection noted that the station was able to demonstrate successful retrieval of all records. However, significant shortfalls against records management relevant good practice were observed, specifically around record schedule completeness, indexing and recording practices. A previous compliance inspection undertaken in October 2014 identified shortfalls regarding the adequacy of the site's record schedule and as a result a level 4 regulatory issue was raised. In light of the continued shortfalls, ONR have assigned a rating of AMBER for this compliance inspection and are seeking improvement. The ONR regulatory issue has been elevated to raise its attention. As a result of this inspection ONR issued a letter seeking the station's commitment to expedite its improvement action plan to resolve this shortfall.
6. The LC11 emergency exercise demonstration to ONR consisted of a nuclear emergency initiated by a seismic event and included casualty recovery. The scenario was a challenging one, with a range of different problems for the site staff to deal with and required support from numerous external emergency services. Whilst the site dealt with these adequately, ONR observed a number of improvement opportunities. An inspection

rating of Green (no formal action) was given on the basis an adequate demonstration of the licensee's emergency arrangements.

System Based Inspections (SBI)

7. In addition to our compliance inspections based on the conditions attached to the nuclear site licence, ONR inspectors also inspect operating reactors against safety-related systems. Each site has a safety case that demonstrates how it operates safely. For Advanced Gas-cooled Reactors, each of the twenty-five key systems will be inspected against the claims made upon them by the safety case. The aim is to systematically inspect all the significant safety related systems within a five-year cycle. ONR considers that this will provide additional assurance that operations on the Dungeness site are safe. Each of these system inspections considers the relevant licence conditions below:
 - Licence condition 10: Training
 - Licence condition 23: Operating rules
 - Licence condition 24: Operating instructions
 - Licence condition 27: Safety mechanisms
 - Licence condition 28: Examination, inspection, maintenance and testing
 - Licence condition 34: Leakage and escape of radioactive material and radioactive waste
8. During the reporting period, the following safety related systems were inspected:
 - Fuelling Machine and Decay Store
 - Fire Detection, Suppression, Barriers, Doors and Dampers
9. SBI 12 - Fuelling Machine and Decay Store - Based on the areas sampled during this system based inspection, ONR judged that the licensee has implemented adequate arrangements to ensure that the fuelling machine is maintained and operated in accordance with the safety case. This was supported by observations made by ONR Inspectors during the plant walk down and discussions with the licensee's staff.
10. The inspection identified a number of areas of good practice such as the System Engineer's knowledge of the system and both the Central Control Room and Fuelling Machine Operators' knowledge of operating instructions and the associated safety case claims. Maintenance records had been signed off by the technician and system engineer. In addition, there was good evidence of challenge to work instruction record sheets and document modifications being implemented.
11. Improvements in addressing ageing and obsolescence were evident and recent surveys in accordance with NGL's processes had been undertaken. Overall ONR judged that the arrangements in respect of the fuelling machine generally met relevant good practice and therefore we have given an intervention rating of Green in relation to compliance with LCs 10, 23, 24, 27 and 28. LC34 was not considered applicable for this SBI.
12. SBI 11- Fire Protection System – This SBI was undertaken by ONR specialist inspectors who judged that there were no matters that have the potential to impact significantly on nuclear safety. Consequently, an overall rating of Green was awarded for the system as a whole in relation to compliance with LCs 10, 23, 24, 27 and 28. LC34 was not considered applicable for this SBI.
13. A planned LC 4 compliance inspection (Restrictions on nuclear matter on the site) was cancelled due to lack of station staff availability to undertake the inspection. This inspection was re-arranged by the site inspector to take place during the July 2018 site engagement week and will be reported on in period 3.

2.2 Other work

14. Following the flask processing event in May 2017 (which has previously been reported), a flask transport compliance inspection was undertaken to examine what actions had been taken and whether sufficient improvement had been made to address ONR's enforcement actions. The site inspector noted significant improvements with all actions completed and with further enhancements planned. During the intervention, completed compliance packs were sampled and were found to be comprehensive and complete and in accordance with the revised documentation suite.
15. During this reporting period the site inspector held several engagement meetings relating to the progress of regulatory issues, plant performance, meetings with the station safety representatives and a recent incident on station, involving three individuals working at height (See below Non Routine Matters).

3 NON-ROUTINE MATTERS

16. On 5th April 2018, three personnel accessed a building roof using a vertical ladder. No edge protection was present and there was no protection around the skylights that were present. The working party were seen on the roof from across the site and a member of staff in the building was contacted to immediately stop the work and direct the working party to leave the roof. No-one was injured.
17. ONR conducted follow-up enquiries to the event on 3 May 2018. The follow-up enquiries involved discussion with the industrial safety engineer, review of the roof risk register document and a visit to the roof access area. Since ONR's follow-up enquires the station has now implemented satisfactory control measures that mitigate unauthorised roof access.

4 REGULATORY ACTIVITY

18. 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.

5 NEWS FROM ONR

Stakeholder Engagement

- On 9 May we held our ONR annual Industry Conference, with the theme - 'Public Safety – everyone's responsibility.' Delegates from more than 45 different organisations attended, and we were delighted that Richard Harrington, Parliamentary under Secretary of State, Minister for Business and Industry, was able to join us to deliver a keynote speech. The conference provided us with an opportunity to engage directly with senior representatives from across industry and government on a number of topical and strategic issues affecting the sector.
- As part of our continued stakeholder engagement work, we welcomed finance professionals from a number of nuclear site licensees and dutyholders to

seminars in London and Birmingham in June. Led by our Finance Director, Sarah High, we hosted the seminars to provide the industry with a better understanding of our charging methodology, the principles we apply, and how the charging process works. To accompany the seminars we have also published a new booklet – [How we charge for Nuclear Regulation](#) – which is available on our [website](#).

- The next ONR/NGO engagement forum will take 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 Non-Governmental Organisation, 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

Regulatory News

- A delegation from ONR, led by Chief Nuclear Inspector Mark Foy, supported the UK's contribution to the 6th Joint Convention review meeting in Vienna. Bringing together 78 countries from around the world, the Joint Convention on the Safety of Spent Fuel Management and the Safety of Radioactive Waste Management is the world's leading international forum for ensuring society and the environment are protected from hazards arising from spent fuel and radioactive waste. Further details can be found on the [IAEA website](#).
- In August, Mark Foy will host a webinar on the outcome of the UK report to the joint convention. Further details on how to sign up for the webinar will be advertised on our website and social media channels over the coming weeks.
- We have notified Sellafield Ltd of our intention to prosecute the company for offences under Section 2 (1) of the Health and Safety at Work etc. Act (1974). The charge relates to an incident on 5 February, 2017, at a facility which handles special nuclear materials, which resulted in personal contamination to a Sellafield Ltd employee. The decision to prosecute follows an ONR investigation into the incident.
- In May we awarded the contract for delivery of the UK Nuclear Safeguards Information Management and Reporting System (SIMRS) to Axis 12 Ltd. The IT system is necessary for us to establish a domestic safeguards regime after the UK's withdrawal from the Euratom Treaty. The government has now launched the consultation on Nuclear Safeguards Regulation, further details can be found on our [website](#).

Corporate News

- In May we published a self-assessment exercise to update on how well our activity currently aligns with the Regulators' Code, which came into effect in April 2014 to provide a framework for how regulators should engage with those they regulate. The full report is available on our [website](#).
- In June we published our Annual Report and Accounts highlighting the extent of our regulatory activities. During the 17/18 year over 1,000 inspections were carried out across 36 licensed sites and transport dutyholders, ensuring the required standards of safety and security were met to protect the public and workers. The full report is available on our [website](#).

- 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.

6 CONTACTS

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Published 07/18

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