



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

Report for period 1 July – 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 quarterly to members for the Harwell Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR usually attend the Harwell 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.

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## 1 INSPECTIONS

### 1.1 Dates of inspection

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

- 11 July 2018
- 2, 15, 16, 23, 29 and 30 August 2018
- 25 September 2018

## 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 Harwell covered the following Licence Conditions (LC):

- LC 4 Restrictions on nuclear matter on site
- LC7 Incidents on the site
- LC 11 Emergency Arrangements
- LC 21 Commissioning
- LC 35 Decommissioning

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.

The licensee's Annual Review of Safety for Harwell and Winfrith was held at Harwell on 16<sup>th</sup> August 2018 and was attended by the Site and Superintending inspector. After the meeting the inspectors undertook a site inspection at Harwell with the facility managers. The inspectors concluded that, based on the areas visited, the licensee is maintaining plant and facilities in a safe manner. The inspectors did not identify any safety concerns.

The licensee provided a report of its safety performance at both sites during the last year and identified improvements to be carried out this year. The ONR inspectors considered the report to be sufficiently self-critical and the licensee identified appropriate areas for improvement.

In relation to LC11, the licensee has written to ONR requesting approval of a revised emergency plan. The licensee undertook an exercise to demonstrate its proposed emergency arrangements. ONR judged that whilst a number of good points and a number of areas for improvement were identified, it was an adequate demonstration of the proposed emergency arrangements.

## 2.2 Other work

A certificate of approval for special arrangement for carriage of radioactive material was issued on the 20 July 2018 to allow consolidation of radioactive waste on the Liquid Effluent Treatment Plant site to the main part of Harwell licensed site. The move was conducted on the 2 August 2018 when the ONR site inspector was on site.

The project inspector for the Liquid Effluent Treatment Plant delicensing project is continuing to meet, supported by ONR specialist inspectors, with the project staff at Harwell.

The site inspector, supported by specialist inspectors, continues to engage with the Waste Encapsulation Plant project team to ensure that adequate regulatory oversight is maintained to permission the plant into active commissioning.

## 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.

Matters and events of particular note during the period were:

### Loss of telephone system for the 2222 emergency number

An incident resulted in the Harwell Site landlines being unavailable, including the emergency number 2222. The site's personnel were notified of the issue through Broadcast System (via e-mail) with alternative contact number for 2222 given for emergencies to be reported. The arrangements for loss of the landlines were in the Harwell emergency handbook in the past but during the project to change from an external emergency services provider in September 2016 they were missed. Magnox Ltd Harwell will put the section back into the emergency handbook.

### Castell safety key interlock failed to operate correctly on a gamma gate

During routine checks on a gamma gate interlock safety system, the system failed to meet all the check requirements for inadvertent removal of control keys (called Castell keys). The investigation and consultation with the manufacturer has resulted in upgrades to the securing of retaining nuts and appropriate amendments will be made to the maintenance instructions for similar items. The site inspector physically checked that appropriate maintenance had been undertaken on the gamma gate to prevent reoccurrence.

### Novapak Type B package issues

During dimensional assessment of a waste transport package (called a Novapak) some features were found to be out of specification. Subsequent checks of all other Novapak have revealed the same issue. The Design Authority has undertaken an immediate impact assessment and has confirmed that this will not affect the energy absorption capability of the package. All Novapak transport moves have now been suspended and ONR are conducting follow-up enquires into the circumstances surrounding this finding.

## 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.

Reports detailing the above regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

## 5 NEWS FROM ONR

For the latest news and updates from ONR, please visit the ONR website and sign up for our e-bulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

### **Stakeholder Engagement**

As part of our continued stakeholder engagement work, in June we welcomed finance professionals from a number of nuclear site licensees and duty-holders to seminars in London and Birmingham. 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](#).

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 ([contact@onr.gov.uk](mailto:contact@onr.gov.uk))

The next ONR/NGO engagement forum will take place on 11 October 2018 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](mailto:contact@onr.gov.uk)

### **Regulatory News**

On 25 July we announced our decision to prosecute the Atomic Weapons E 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. Sentencing has been adjourned until 9 November 2018.

## **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.

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](#).

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](#)). The current Chair, Nick Baldwin CBE, will remain in office until 31 March 2019.

## **6 CONTACTS**

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