



Office for Nuclear Regulation (ONR) Site Report for Springfields Works

Report for period April 2018 to August 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 routinely to members of the Springfields Fuels Limited Site Stakeholder Group and are made available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend the Springfields Fuels Limited 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 Inspections/Interventions

The ONR Nominated Site Inspector and other ONR Inspectors conducted interventions on the following dates during the period:

April	17,18
May	2
June	27
July	3,17,31
August	1,10, 23

2 ROUTINE MATTERS

2.1 Inspections and Interventions

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), Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR) 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 and interactions with Springfields Fuels Ltd (SFL) covered the following:

Annual Review of Safety, Security and Environment (ARoSSE).

The site presented its ARoSSE clearly demonstrating that SFL fully understand where improvement is required and how this is to be achieved. SFL has achieved a significant amount over the last 12 months, however there is still work to be undertaken and several challenges for the future, particularly with regard to maintaining experienced personnel and capability. SFL continued to demonstrate compliance in all areas and regulatory confidence remains high.

There is an open and transparent relationship between SFL and its regulators allowing efficient and effective regulation and dialogue. In addition, the SFL Internal Assurance function has been highly proactive, providing oversight, audit and assurance to the business.

Of particular note was the interaction with Safety Representatives, demonstrated by their inclusion in the ARoSSE, complemented by their presentation and feedback.

SFL now needs to ensure that it continues to maintain focus on all aspects of nuclear safety and security against increasing commercial pressures, potential funding restrictions and new ownership. Maintaining the capability and capacity of the organisation to deliver all areas of work, in a safe manner, is fundamental going forward.

Thematic Compliance Inspections

During this period, ONR carried out a number of thematic compliance inspections. These inspections focussed on leadership and management for safety, organisational structure, training, operating rules and instructions, internal assurance, reporting culture, learning from events and maintenance. Any observations/issues that arose from these inspections have been fully addressed by the licensee.

Security and Safeguards

SFL and NNL Preston have submitted their Security (SyAPs) aligned plans and these are currently undergoing assessment by ONR. There have been 4 interventions related to the assessment of the SyAPs aligned security plan within this reporting period. In addition, there have been a number of safeguards inspections and currently no issues have been raised by the European Commission as a result of any of these inspections.

Emergency Preparedness

During this period there has been one Emergency Preparedness Consultative Committee (EPCC) meeting and planning is ongoing for the Level 2 off-site nuclear emergency exercise, codenamed 'Heron'.

Conventional Health and Safety - Fire

ONR conducted one CH&S fire intervention during this period. The purpose of this Intervention was to assess general fire safety provisions and to confirm compliance with the requirements of the Regulatory Reform (Fire Safety) Order 2005. No regulatory issues were raised as a result of this intervention and the current fire strategy was deemed adequate.

2.2 Other work

ONR has been fully engaged with regard to the change in ownership of Westinghouse and any impacts that this may have now or in the future. ONR is content that this change has been appropriately implemented.

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 informed ONR of some minor incidents during this reporting period, all of which were promptly addressed by the licensee and the actions taken were deemed satisfactory 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 or LI's were issued in this period.

5 NEWS FROM ONR

Stakeholder Engagement

As part of our continued stakeholder engagement work, in June we welcomed finance professionals from a number of nuclear site licensees and dutyholders 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)

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

On 25 July we announced our decision to prosecute AWE 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.

On 22 August we announced our decision to prosecute EDF Energy Nuclear Generation Ltd and Doosan Babcock Ltd. The charge related to an incident on 12 April 2017 at Hinkley Point B which resulted in injury to a Doosan Babcock Ltd employee. The incident was a conventional health and safety matter and there was no radiological risk to workers or the public. A hearing is scheduled to take place on 10 October 2018 at Taunton Magistrates Court.

Corporate News

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 duty-holders, 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.

We have recently published our Statement of civil incidents meeting the Ministerial Reportable Criteria 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.

DWP 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 31.3.19.

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

6 CONTACTS

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
Website: www.onr.org.uk
Email: contact@onr.gov.uk

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