



Office for Nuclear Regulation (ONR) Site Report for AWE Aldermaston and Burghfield

Report for period 1 February 2019 to 31 May 2019

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the Aldermaston and Burghfield sites available to the public. Reports are distributed to members for the Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR usually attend Aldermaston and Burghfield Local Liaison Committee meetings and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR. The AWE Local Liaison Committee meeting has now moved to a four month frequency. This ONR report (period 1st February - 31st May) covers a four month period in order to meet with the new meeting frequency and provide the most current position.

TABLE OF CONTENTS

1	INSPECTIONS	3
2	ROUTINE MATTERS.....	3
3	NON-ROUTINE MATTERS.....	<u>54</u>
4	REGULATORY ACTIVITY	<u>54</u>
5	CONTACTS.....	<u>86</u>

1 INSPECTIONS

1.1 Dates of inspection

ONR inspectors carried out inspections on the following dates during the period:

- February 11-14, 20, 21, 26-28
- March 5, 6, 11-14, 21, 28
- April 8-11, 15, 23-26
- May 2, 7, 13-16, 22

2 ROUTINE MATTERS

2.1 Inspections at Aldermaston and Burghfield

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 36 conditions attached to the nuclear site licence in order to ensure legal compliance. Inspectors seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections at Aldermaston and Burghfield covered the following Licence Conditions (LC):

- LC7 Incidents on site
- LC10 Training
- LC12 Duly authorised and other suitably qualified and experienced persons
- LC14 Safety documentation
- LC15 Periodic review
- LC17 Management systems
- LC23 Operating rules
- LC24 Operating instructions
- LC26 Control and supervision of operations
- LC27 Safety mechanisms, devices and circuits
- LC28 Examination, inspection, maintenance and testing
- LC32 Accumulation of radioactive waste
- LC34 Leakage and escape of radioactive material and radioactive waste
- LC35 Decommissioning

Also inspected:

- Conventional Health and Safety Inspection covering Asbestos Management
- IRR (Ionising Radiation Regulations)

ONR judged the arrangements made and implemented by AWE in response to safety requirements to be adequate in the majority of areas inspected.

Where improvements are considered necessary following inspections, ONR may consider whether regulatory enforcement action is appropriate to ensure that remedial actions are taken in reasonably practicable timescales. ONR raised one regulatory issue relating to LC35 covering the need for AWE to maintain up to date decommissioning strategies.

A further four regulatory issues were raised following an amber rated inspection against LCs 10, 23, 27 and 28 as part of systems based inspection of the Burghfield fire protection system. The issues relate to the coverage of fire claims (LC28), condition of fire barriers (LC27), awareness of operational staff (LC23) and definition of scope for facility training (LC10).

At the end of the last reporting period ONR undertook an LC36 inspection. The rating for this inspection was not finalised until February 2019 when a red rating was assigned. ONR followed current guidance for red rated inspections and is currently reviewing the findings against the Enforcement Management Model before deciding on the most appropriate course of action.

2.2 Other work

ONR undertook a review during March 2019 across 10 Licence Conditions and in the area of electrical safety to assess AWE's readiness to exit enhanced regulatory attention during 2020. The review also encompassed compliance inspections, assessments and regulatory interface meetings from November 2018 to March 2019. Improvements were observed in some key areas, including aspects of leadership sufficient to drive safety performance, informed decision making on matters which may affect safety, learning and continual improvement to drive safety performance and in the management of events. This has contributed to some improvement in the delivery of facility upgrades and new build. Improvement is still required in some aspects of safety performance and compliance and the management of matters arising from enforcement. Significant improvement is required in timely delivery of adequate safety submissions and organisational capability to secure and maintain safety and compliance across AWE's wider activities. A further review will take place in October 2019 in line with ONR's new guidance on the judgement of regulatory attention levels.

AWE continues to progress engineered and documentary upgrades to address its shortfall findings from the second Burghfield Periodic Review of Safety (PRS2). ONR is content to support current operations in the short term whilst this work continues. To enable ONR to support operations in the longer term AWE will, in accordance with their LC15 arrangements, need to address PRS2 shortfalls and produce a PRS2 closeout report which includes a demonstration that risks have been reduced so far as is reasonably practicable. This report will be subject to ONR technical review, and ONR continues to work closely with AWE to gain assurance that the programme of work is progressing in a timely manner. The report is currently due to be submitted to ONR for assessment during July 2019.

ONR continues to engage with AWE's Structured Improvement Programme (SIP). The SIP is a key enabler to AWE demonstrating that it is ready to move from enhanced to routine regulatory attention. AWE is now implementing work across four key work streams and ONR continues to see tangible improvements during the reporting period. ONR will continue to monitor delivery of this extensive programme of 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 previous LLC report described an ONR Enforcement Letter concerning management of High Efficiency Particulate Air (HEPA) filters. This letter was sent jointly with the Environment Agency (EA). AWE has currently delivered against all commitments in a timely manner and both ONR and EA will monitor progress during 2019 to ensure that remaining commitments are also delivered in a timely manner.

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.

During the period no Licence Instruments were issued.

Two Enforcement Letters were sent to AWE. The first letter requested details of AWE corrosion management arrangements and the link to relevant good practice. The second letter covered a request for further detail on the implementation of work related to HEPA filters as described in section 3. The letters were sent in April and May respectively and ONR is awaiting the responses to both.

ONR News

Enforcement Action

A summary of enforcement action is provided below. Further detail is available on [our website](#).

- On 1 February, following ONR's prosecution, EDF Energy Nuclear Generation Ltd and Doosan Babcock Ltd were fined £200,000 and £150,000 respectively following an incident where a worker fell from height at Hinkley Point B power station in 2017.
- Two improvement notices issued to two transport logistics companies on 4 February following breaches in regulations for the safe transport of radioactive materials.
- Two improvement notices issued to EDF Energy on 20 February following an incident on 19 November 2018 at Heysham 1, which resulted in injury to three EDF Employees.
- On 2 April Sellafield Ltd were fined £380,000 following ONR's prosecution for safety breaches relating to equipment used for the processing of plutonium.
- ONR notified Devonport Royal Dockyard (DRDL) of its intention to prosecute following an incident involving a crane that occurred in September 2018. Proceedings are scheduled to commence at Plymouth Magistrates' Court on 23 July 2019.
- Improvement notice issued to Sellafield Ltd in April 2019 following an incident in the waste vitrification plan in February 2019 where a container was not welded shut.

Regulatory updates

Following the introduction of new integrated [Environmental Authorisations Regulations in Scotland](#), the [MOU between ONR and the Scottish Environmental Protection Agency](#) has been updated. The MOU ensures effective cooperation and collaboration in the regulation of nuclear safety, security, radioactive materials transport, nuclear safeguards and environmental protection on nuclear licensed sites and at other sites where both ONR and SEPA have regulatory functions.

In February, [a new nuclear site licence was granted to Tradebe Inutec](#) for their Winfrith site in Dorset. A new site licence was required following Tradebe Inutec's acquisition of buildings and land at the Winfrith site from the Nuclear Decommissioning Authority (NDA) in February 2019.

We published a report detailing safety “events” that took place in the UK between 2015-2017 in March. The report details the 56 safety significant events that took place between April 2015 and December 2017 – describing each event, the dutyholder's response, and the actions taken by the ONR. The full report is available on our [website](#).

In April we announced the appointment of two NGOs to the Chief Nuclear Inspector's Independent Advisory Panel (IAP) to increase diversity of views and strengthen our openness and transparency. We introduced the Chief Nuclear Inspector's IAP in 2016 to provide us with independent advice on nuclear matters.

Stakeholder Engagement

In February, our Chief Nuclear Inspector, Mark Foy and Technical Director, Anthony Hart hosted a webinar which focused on the first Topical Peer Review of 'Ageing management of nuclear power plants and research reactors.' Further details about the webinar are available on our [website](#). On 23 May, Mark Foy, hosted a further webinar, focusing on the work we do to regulate the industry in how it manages the risks arising from external hazards.

We published our [2018 Stakeholder Survey report](#), in February following the survey in October/November last year. Stakeholders from across the sector were invited to take part in the survey with 329 responses received, providing valuable insight into how we are viewed by our stakeholders. The full report is available on our [website](#).

On 28 March, we held our NGO Forum in Manchester and were delighted to welcome 15 NGO representatives from 12 organisations. The minutes, agenda, presentations and pre-event briefing papers are available on our website (<http://www.onr.org.uk/events.htm>)

In May we published our strategic framework for international engagement, setting out the priority objectives and criteria for international engagement up to 2025. The framework is available on our website.

Corporate news

In February we announced the appointment of Mark McAllister as the new Chair of ONR. Mark joined ONR on 1 April, succeeding Nick Baldwin CBE.

We were delighted that our Chief Executive was recognised as Transformational Leader at the Northern Power Women Awards 2019, an event that celebrates the women and men working towards accelerating gender diversity across the Northern Powerhouse. Adrienne won the award in recognition of her work in leading ONR through significant change while, in parallel, driving gender balance.

ONR has been recognised for its commitment to equality, diversity and inclusion by gaining accreditation to the National Equality Standards (NES).

In April, we published our Corporate Plan for 2019/20, setting out our priorities and objectives for 2019/20. Maintaining the delivery of core regulatory functions and holding industry to account on behalf of the public remain at the heart of everything we do. The plan is available on our website (<http://www.onr.org.uk/corporate-publications.htm>)

We are embarking on the final year of our ONR Strategic Plan 2016-2020. So we are now starting to look ahead to what the next five years will bring and beginning to develop our new strategy for 2020-25. We're not doing this alone; we've already started talking to our staff and we are asking our stakeholders for their views to shape our plans. We are really keen to hear from SSG and LLC members and attendees to help us develop our strategic aims and objectives. We'd like to know:

- What is working well that we should keep doing and/or do more of?
- What do you think our top regulatory priorities should be in the 2020s?
- What do you think is missing from our current Strategic Plan that needs to feature in the next one?

We intend to consult on our draft strategy in the autumn, but in the meantime, if you'd like to share your comments and suggestions please email us at: contact@onr.gov.uk.

We look forward to hearing from you.

All our latest news is available on our website www.onr.org.uk

CONTACTS

Office for Nuclear Regulation

Redgrave Court

Merton Road

Bootle

Merseyside

L20 7HS

website: www.onr.org.uk

email: contact@onr.gov.uk

This document is issued by the Office for Nuclear Regulation (ONR). For further information about ONR, or to report inconsistencies or inaccuracies in this publication please visit

<http://www.onr.org.uk/feedback.htm>.

© Office for Nuclear Regulation, 2015

If you wish to reuse this information visit www.onr.org.uk/copyright for details.

Published 08/14

For published documents, the electronic copy on the ONR website remains the most current publicly available version and copying or printing renders this document uncontrolled.