



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

Report for period 1 October 2019 to 31 January 2020

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 October – 31st January) covers a four month period in order to reflect the frequency of AWE LLC meetings.

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1 INSPECTIONS

1.1 Dates of inspection

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

- October 8-10, 14-17, 24
- November 14-14, 19, 25, 28
- December 2-5, 9-12
- January 13-16, 21-22, 28

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):

- LC11 Emergency arrangements
- LC17 Management systems
- LC19 Construction or installation of new plant
- LC35 Decommissioning

Also inspected:

- Conventional Health and Safety Inspection covering fire safety
- Conventional Health and Safety Inspection covering Electricity at Work Regulations
- Conventional Health and Safety Inspection covering Construction Design Management Regulations
- Conventional Health and Safety Inspection covering the Health and Safety at Work Act.

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 LC17 covering the need for AWE to undertake a review, learn and improve exercise regarding how the management systems have allowed the Aldermaston Site Wide Periodic Review of Safety to be delayed by approximately 18 months.

2.2 Other work

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 continues to progress work across four key work streams and ONR continues to see tangible improvements during the reporting period. Further work remains and 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.

AWE reported a near miss electrical event in June 2019 where a contract worker caused a flash over of electricity from a 415V electrical source. The event occurred in a non-nuclear building and no workers were injured. ONR is continuing its formal investigation into this event and will advise the LLC of the outcome in due course.

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.

ONR wrote a formal Enforcement Letter to AWE on 31st January 2020 regarding the non-compliance with LC15 (Periodic Review) during the second round of periodic reviews at both AWE sites. The letter reflected previous a previous enforcement letter during the first round of periodic reviews and continuing non-compliance during the second round of periodic reviews, which resulted in the current Enforcement Letter. The second letter also requires the AWE Chief Operating Officer to attend a holding to account meeting during March 2020 where ONR will be seeking evidence that AWE has credible plans, capacity and governance arrangements in place (or under development) to ensure that all future periodic reviews will be delivered in compliance with LC15.

In the previous LLC report ONR stated that two Improvement Notices (one for each AWE site) were issued against LC36 (Organisational Capability) to remedy failures in the implementation of adequate arrangements under LC36(2), specifically relating to the way AWE undertakes risk assessments for organisational changes that may affect safety.

AWE has made progress in addressing the Improvement Notices but there remains a significant amount of work to be undertaken in order to close the notices. This is currently scheduled for early 2021.

NEWS FROM ONR

Enforcement Action

EDF Energy has complied [with two ONR Improvement Notices](#) relating to the way it maintains auxiliary steam systems and instructs staff operating these systems. The Notices were issued in January 2019 following a serious incident at Heysham 1 power station in November 2018, when a valve failed on a steam system resulting in injury to three EDF employees. Further details are available on our [website](#).

Regulatory updates

In October, our Chief Nuclear Inspector (CNI) Mark Foy published his view on the performance of Great Britain's nuclear industry during 2018/19. In the first [report](#) of its kind, the review provides an independent, authoritative view of safety, security and safeguards performance across the nuclear industry over the last year. The report is accessible via our website homepage www.onr.org.uk

Throughout October we hosted an [Integrated Regulatory Review Service Mission](#) that saw a team of 18 independent experts from across the globe scrutinising the regulation of nuclear and radiological safety across 15 different regulatory bodies. The final report is expected in February/March 2020.

Along with the Environment Agency and Natural Resources Wales (NRW) we have published [new Generic Design Assessment \(GDA\) guidance](#) for Requesting Parties. It reflects the changes seen in the nuclear industry in the decade since GDA was introduced, in particular the Nuclear Sector Deal and the potential for Small Modular Reactor (SMR) designs to enter GDA in the future. The new guidance also incorporates lessons learnt from previous GDAs.

Together with the Environment Agency, we have also published a [joint annual report](#) on our scrutiny of Radioactive Waste Management's (RWM) work to develop geological disposal. This report summarises our work relating to the geological disposal of radioactive waste.

We have formally concluded the [licence revocation for the Cardiff Nuclear Licensed Site](#) in Wales, thereby de-licensing the site. This follows many years of nuclear site decommissioning and work to clean up the site and is the first time ONR has de-licensed a site completely, although several sites have been de-licensed by ONR's predecessor organisation, the Nuclear Installations Inspectorate.

Stakeholder engagement

In November, we hosted our second NGO Forum of the year and were delighted to welcome 18 NGO attendees from 14 different organisations. Agenda items included our work at Sellafield, ageing management of reactors and our relationship with the Defence Nuclear Safety Regulator. Presentations and minutes from all our [NGO Forum meetings](#) are made available on our website. If you represent an NGO group and would like to get involved with our NGO Forum, please get in touch with our Communications team (contact@onr.gov.uk) for further details.

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