



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

Report for period 1 April 2020 – 30 September 2020

## 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 for the Trawsfynydd Site Stakeholder Group (SSG) and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend the Trawsfynydd SSG meetings where these reports are presented and will respond to any questions raised there. Any person wishing to enquire about matters covered by this report should contact ONR.

## TABLE OF CONTENTS

1	INSPECTIONS .....	3
2	ROUTINE MATTERS.....	3
3	NON-ROUTINE MATTERS.....	4
4	REGULATORY ACTIVITY .....	4
5	NEWS FROM ONR.....	5
6	CONTACTS.....	7

## 1 INSPECTIONS

### 1.1 Dates of inspection

ONR inspectors undertook inspections on the following dates during this report period:

- 11 August 2020;
- 8 to 10 September 2020; and
- 29 September 2020.

## 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);
- Regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99); and
- Nuclear Industries Security Regulations (NISR) 2003 (as amended).

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 to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, ONR carried out the following inspections at Trawsfynydd:

- The licensee's implementation of Covid-19 risk reduction measures
- LC2: Marking of the site boundary
- LC10: Training
- LC12: Duly authorised and other suitably qualified and experienced persons
- LC26: Control and supervision of operations
- LC28: Examination, Inspection, Maintenance and Testing
- LC36: Organisational capability
- Nuclear Industries Security Regulations (NISR) 2003 (as amended)

ONR judged the arrangements made and implemented by the site in response to safety and security requirements to be adequate in the areas inspected. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

### 2.2 Other work

Throughout this reporting period - including the period of national lockdown - ONR's nominated site safety inspector held weekly telephone meetings with a Trawsfynydd leadership team representative. These meetings were held to maintain situational awareness of matters related to nuclear safety, security, safeguards, transport and conventional and health and safety, including: workforce resilience, emergency arrangements resilience, supply

chain resilience, events on the site and activities taking place on the site. No significant issues were highlighted to ONR and therefore since August the frequency of these telephone meetings has reduced to fortnightly.

ONR re-commenced site inspection visits to Trawsfynydd in August 2020. ONR is keeping its engagements with Trawsfynydd under review and is alert to the need to balance completion of planned inspections with Welsh Government and local area Covid-19 rules. This includes now undertaking some interactions by conference call/Skype/Zoom to optimise physical presence on the site.

At the beginning of September 2020 ONR agreed that Trawsfynydd has successfully achieved the completion of one of its key decommissioning milestones associated with the retrieval and passivation of all wet intermediate level waste ready for final disposal.

### **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.

There was one safety related incident reported to ONR during this reporting period that had occurred at the end of the previous reporting period (delayed reporting due to site going into pause):

- On 20 March 2020 a planned power outage to complete essential maintenance prior to the site entering a pause period resulted in the unplanned unavailability of site communication systems including those that support Trawsfynydd's accident and emergency arrangements. There was a similar issue in 2017 at Trawsfynydd concerning loss of site communications during planned electrical maintenance work. ONR followed up this latest incident with the site and has raised a regulatory issue which seeks to improve the resilience of site communication systems to faults/power loss and sustain overall availability; including, updating site documents, records, instructions etc to reflect the site communications system configuration.

In response to the Covid-19 pandemic all 12 of Magnox Limited's licensed sites were put into a quiescent safe-state in mid-March 2020 with all decommissioning and radioactive waste handling activities having ceased. Since June 2020 Trawsfynydd has undertaken a planned phased return to normal operations and has progressed well through its plans; with a target to complete in October 2020 (subject to changes in applicable Covid-19 restrictions). This has included reviewing the need for staff being physically located on the site and resulted in a number of staff combining working from home with working on the site.

Emergency preparedness is being maintained through a duty cover team in accordance with ONR approved emergency arrangements. These arrangements include the provision to call in additional personnel and the emergency services onto site to assist ML staff. These plans have been regularly rehearsed and observed by ONR inspectors during emergency exercises in the recent past. ML has not reported any supply chain issues that may affect the sites safe status.

### **4 REGULATORY ACTIVITY**

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site Licence Conditions (LC) ONR issues regulatory documents which either permit an activity or require some form of action to be taken. These are collectively termed 'Licence Instruments' (LIs). In addition, inspectors may issue Enforcement Notices to secure

improvements to safety. There was one LI and no enforcement notices issued during this reporting period.

### Licence Instruments and Enforcement Notices Issued by ONR during this period

Date	Type	Ref No	Description
2/07/2020	Approval	536	Issued for an alteration to Trawsfynydd's emergency arrangements to implement the new Radiation (Emergency Preparedness & Public Information) Regulations 2019 (REPPIR 2019).

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

## 5 NEWS FROM ONR (JULY – SEPTEMBER 2020)

### Covid-19 (Coronavirus) (ONR position)

ONR is continuing to obtain assurance that nuclear site licensees and other duty-holders are adequately resourced to continue to safely and securely carry out their activities.

We remain satisfied with industry's response at this time and there has been no significant change to duty-holders' safety and security resilience.

As COVID-19 restrictions change, our focus is on the preparedness for the weeks and months ahead and maintaining safe and secure operations in the face of any further escalation in COVID-19 transmission.

ONR staff continue to work at home, primarily. We are increasing our on-site regulatory work in accordance with public health advice. We'll also continue to inspect, assess and permission remotely where necessary to protect staff, workers on site, and the public around sites.

### Enforcement Action

In July we publicised the serving of an [Improvement Notice on Rolls-Royce Submarines Ltd \(RRSL\)](#) for procedural safety breaches at its Derby site. The notice was served after shortfalls were identified against the safety case requirements at a nuclear fuel production facility on the site.

In September we announced that an [Improvement Notice had been served on EDF Energy Nuclear Generation Ltd \(EDF NGL\)](#) for shortfalls in safety procedures at its Heysham 2 Power Station in Lancashire. The notice was served after some of the equipment which is used to measure reactor power was incorrectly configured during the reactor's restart process following a planned outage in April 2020.

In September we announced that an [Improvement Notice had also been served on Devonport Royal Dockyard Ltd](#) for shortfalls in maintenance procedures at its Plymouth site. The notice was served after Devonport Royal Dockyard failed to carry out scheduled maintenance tests on an effluent extraction system which is used to support maintenance and repair activities within the licensed site.

In September we publicised our intention [to prosecute AWE plc under Section 3 of the Health and Safety at Work etc. Act \(1974\)](#). The charge relates to an incident on 20 June, 2019, at the AWE Aldermaston site which resulted in a contractor narrowly avoiding injury when a flash over of electricity occurred from a 415V electrical source. The incident was a conventional health and safety matter and took place in a 'non-nuclear' building, so there was no radiological risk to workers or the public.

## Regulatory updates

In July the Government published its response to the International Atomic Energy Agency's final report on the [Integrated Regulatory Review Service \(IRRS\) mission to the UK](#). The IRRS mission took place between 14 – 25 October 2019 was hosted by ONR, and saw a team of 18 independent experts from across the globe scrutinising the regulation of nuclear and radiological safety.

In August we provided EDF NGL with permission for [Reactor 3 at its Hunterston B site to return to service](#) for a limited period of operation (16.425 Terawatt days, approximately six months' operation). In September we also gave [permission for Reactor 4 at the same site](#) to return to service for a limited period of operation (16.25 terawatt days, which is approximately six months operation). The decision to permit the restart of these reactors was given after extensive and detailed assessments of the respective safety cases by specialist ONR inspectors.

## Corporate updates

In July we published our new [2020-25 Strategy](#), which sets out our direction and priorities for the next five years. It builds on our strengths and continues to focus on protecting society, and addressing the changing demands we will face as the UK's nuclear regulator.

In late September we published our [Annual Report and Accounts](#) highlighting our performance and key achievements for 2019/20.

The report notes that we continued to deliver our mission of protecting society by securing safe nuclear operations and that the majority of dutyholders have continued to meet the high standards of safety and security required. Where dutyholders have fallen short of such standards, we are satisfied that their facilities remain safe and that our regulatory focus has had a positive impact on their performance.

During the year, we completed more than 800 compliance inspections across 36 licensed sites during 2019/20, granting permission for 30 nuclear-related activities, serving three improvement notices and instigating one prosecution.

ONR Chair Mark McAllister said: "I am pleased to report that we have again delivered our mission and achieved our 2020 vision. As we look ahead, I have every confidence in our senior leadership team to see through the strategic improvement projects already underway that will enhance the organisation's information and knowledge management system, and successfully deliver the aspirations of our new strategy."

In September we announced that [Jean Llewellyn OBE](#) had been appointed to the ONR Board as the new Security Non-Executive member. Jean will take up her appointment on 1 October 2020 for a three year term and will Chair ONR's Security Committee.

All our latest news is available on our website [www.onr.org.uk](http://www.onr.org.uk).

## 6 CONTACTS

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Published 10/20

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