



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

Report for period 1<sup>st</sup> October 2019 – 31<sup>st</sup> March 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/llic/>).

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.

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## 1 INSPECTIONS

### 1.1 Dates of inspection

The ONR nominated site inspector attended the site on the following dates:

- 18 November 2019.
- 3 – 5 December 2019.
- 12 and 13 February 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); 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 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:

- LC7 Incidents on the site
- LC 12 Duly authorised and other SQEP
- LC 26 Control and supervision of operations
- Ionising Radiation Regulations 2017 (IRR17) compliance
- Leadership and management for safety

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.

### 2.2 Other work

ONR's site inspector discussed Trawsfynydd's implementation of its re-baselined decommissioning safety case (RDSC) and was content with progress. The RDSC will form the basis of the site's reference safety case (RSC) to keep the site in a quiescent state for the period up to the start of the planned care and maintenance (C&M) period; and reflects the significant reduction in Trawsfynydd's nuclear (radiological) hazard resulting from decommissioning work already completed.

Following introduction of the radiation (emergency preparedness and public information) regulations (REPPIR) 2019, Trawsfynydd is required to have a 1km outline planning zone (OPZ). This is because of a new requirement to consider very low likelihood events that have the potential to result in an off-site release of radioactivity. Trawsfynydd will be captured under these regulations until ongoing work to retrieve and passivate intermediate level waste (ILW) on the site is completed (estimated to be by the end of 2020). At the time of writing restrictions to prevent the spread of Covid-19 means that Trawsfynydd has halted all operations and this will impact timescales for completion of ILW retrievals and passivation work.

ONR's site inspector also discussed Trawsfynydd's progress in preparing its periodic safety review which is scheduled for submission to ONR in December 2020 (under licence condition 15, periodic review). We discussed the current progress Trawsfynydd has made in developing the submission and ONR was assured that the PSR submission would be completed on time. Please note my previous comment on Trawsfynydd's response to the Covid-19 pandemic which has the potential to delay this submission.

### 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 were two incidents reported to ONR in the period, as follows:

- On 2 January 2020 a whole body monitor detected contamination that further monitoring found to be attached to a workers sock. Further investigation of the sock concluded that the activity was a single particle. Analysis of the particle concluded that it could not have originated from Trawsfynydd. A possible source of the particle was suggested as cross contamination of Trawsfynydd's radiological personal protective equipment (PPE) at an off-site radiological laundry facility. That facility has been informed of the event. ONR inspectors discussed this incident with Trawsfynydd's relevant staff during a subsequent IRR17 inspection and were satisfied that Trawsfynydd had acted promptly and were satisfied that they had taken the actions to help prevent a recurrence.
- On 28 February 2020 a worker crossed a controlled area barrier without a filter attached to their respirator. Wearing a respirator was a requirement of the area's local rules. The missing filter was noticed by colleagues already in the area when the worker arrived and before any work had commenced. ONR's site inspector discussed this event with Trawsfynydd's HoRP and was satisfied with the investigation carried out and the actions taken to help prevent a recurrence, including standing down workers to reinforce checking procedures before entering controlled areas.

In response to the Covid-19 pandemic, all decommissioning and radioactive waste handling activities have stopped on site. This interim pause in operations has allowed the number of personnel to be reduced to a minimum level so that only monitoring and surveillance of plant is being undertaken, such as periodically emptying sumps and checking ventilation systems, and that security can be sustained. The majority of personnel are now working from home. ML wrote to ONR on 26 March 2020 confirming this position. The ML Internal Oversight team has checked independently that the pandemic arrangements have been properly implemented.

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
20/12/2019	Licence Instrument	535	Specification under licence condition 25(4). Trawsfynydd to furnish ONR with records of high activity sealed sources (HASS) reflecting changes in Regulations.

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

#### 5 NEWS FROM ONR

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

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

ONR is continuing to protect society by securing safe nuclear operations during the Coronavirus pandemic. ONR staff continue to work from home, in line with government advice. We have considered our priorities, have deferred non-critical activities, and are carrying out as much of our work as possible via videoconference, phone and email. Our regulatory focus includes assurance, where appropriate, from site licensees that they are applying the public health measures introduced to reduce the spread of coronavirus. A limited number of our inspectors can, as key workers, continue to travel to site as necessary to conduct urgent and essential regulatory inspections. Nuclear sites have been reducing non-essential activities so as to protect staff, infrastructure, and the public. As always, we are regulating those activities to ensure they are carried out safely and securely.

##### Enforcement Action

ONR served an [Enforcement Notice](#) on Urenco UK Ltd following a fire safety inspection at its Capenhurst Works in Cheshire during December 2019. The notice was issued in response to shortfalls identified in the fire alarm and detection systems at one of the site's facilities.

In February ONR announced that [Sellafield Limited had complied](#) with an Improvement Notice relating to staff training, operating procedures and procedural adherence that they were served with in May 2019.

##### Regulatory Updates

In January ONR published an update to its Safety Assessment Principles, to incorporate some relatively minor revisions including typographical corrections and updates to reflect changes to the UK's nuclear regulatory framework since 2014.

In February ONR completed Step 3 of the Generic Design Assessment (GDA) of the UK HPR1000 design, and took the decision to progress to Step 4 of the GDA. During Step 3, ONR increased its regulatory scrutiny and undertook a more detailed assessment of the design, focusing on the methods and approaches used by the GDA Requesting Party to underpin their safety and security claims.

In March we published the Quarterly [Statement of Civil Incidents](#) for the period 1 October to 31 December 2019. During this reporting period there were two civil incidents at nuclear licensed sites within Great Britain that met the Ministerial Reporting Criteria as defined within the Nuclear Installations (Dangerous Occurrences) Regulations 1965 and ONR guidance in relation to notifying and reporting incidents and events.

## **Stakeholder Engagement**

On 15 January ONR launched a four-week public consultation on its draft 2025 Strategy. Once agreed, the strategy will set our direction and priorities for the next five years. To support the public consultation we held a webinar for NGOs and other stakeholders in which our Chief Executive, Adrienne Kelbie, and Technical Director, Anthony Hart, gave an overview of the strategy and welcomed questions and comments. The strategy is due to be published in May 2020.

In January, ONR achieved Level 3 Disability Confident (Leader) status, recognising our desire to put people first and create an environment in which everyone can thrive. The government-backed scheme encourages employers to think differently about disability and take action to improve how they recruit, retain and develop disabled people.

In February, we announced the appointment of two new members to the ONR Board. Dr Janet Wilson took up the appointment on 1 April 2020 and Tracey Matthews will take up her appointment on 1 June 2020 – both appointments are for five year terms.

In February more than 70 stakeholders involved in the transport of radioactive material attended a conference organised by ONR's Transport Competent Authority (TCA) team. The event provided a good opportunity for the TCA team to share their expectations on compliance with regulations governing the transport of radioactive material.

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