Office for Nuclear Regulation

[redacted]

Telephone: [redacted]
Email [redacted]

Our Reference: 2021/0033110

Unique Number: ONR-EL-21-001
Letter Number: SEL77765R

Your Reference:[ ]
Unique Number:[ ]

Date: 19 April 2021

For the attention of [redacted] Head of Operations - Estates

ONR ENFORCEMENT LETTER

Dear [redacted]

Subject: Sellafield Ltd – Compliance with Scaffolding standards

I am writing to you following event reference SIR-11-21 that occurred on 25 March 2021, when [redacted] fell down scaffolding steps used to access the [redacted] Welfare Cabin. The fall resulted in injuries reportable by the employer under RIDDOR Reg. 4(1)(a).

Regulation 12(1) of the Workplace (Health Safety and Welfare) Regulations 1992 requires that every traffic route (including stairs) to be suitable for the purpose for which it is used. This general duty is clarified further in Regulation 12(2)(a), in that the traffic route should not be so uneven as to expose any person to a risk to their health and safety.

Where, as in this case, a staircase is constructed using scaffolding components, this legal requirement can be interpreted through BS EN 12811-1:2003, a British and European standard related to the performance requirements and general design of scaffolding. The National Access and Scaffolding Confederation (NASC) produce technical guidance notes, including TG20:13 Guide to Good Practice for Tube and Fitting Scaffolding (currently under transition to TG20:21), which further clarifies expectations in this area.

In order to accommodate a comfortable stepping motion, the going (or step length) should relate to the rise (or step height) and each should be consistent over the full distance of the stairs. The guidance highlighted above gives appropriate dimensions. The rise of scaffolding steps should be within the range of 175 mm – 225 mm., with the length of the going defined by the height of rise adopted. (The value of the going plus twice the rise should be between 540mm and 660mm). TG20 gives further information on this, including specifically addressing the use of scaffolding boards as steps.

In the case of the scaffold stairs giving access to the [redacted] welfare cabin there was a lack of consistency with the rise height of the steps. In addition, there were a number of steps with a rise greater than 225 mm and others where this was below 175 mm. In addition, the handrail did not meet the required height of 960 mm in all locations around [redacted].

Both BS EN 12811-1:2003 and NASC technical guidance are considered to be industry good practice and ONR would expect scaffolding on site to be compliant with these standards.

<u>Action required by Sellafield Ltd</u>:

I require that:

1. Sellafield Ltd ensures that the scaffolding steps at the [redacted] Welfare Dome, where [redacted] injury occurred, are made safe and provides evidence to ONR that this work has been completed.

2. Sellafield Ltd confirms that similar scaffolding steps erected by Enigma Industrial Services Limited across site are compliant with the standards above and provides evidence to ONR that this work has been completed.

ONR's investigation is ongoing and this enforcement letter does not preclude the potential for further enforcement action both during and on completion of the investigation.

I would like you to note my appreciation for the high level of co-operation shown by Sellafield Limited to date on this matter.

Information for employees

Paragraph 23 of Schedule 8 of the Energy Act 2013 requires me to give information to your employees about matters affecting their health, safety and/or welfare. I, therefore, request that you send a copy of this letter to the Sellafield Ltd safety representatives for their information.

A copy of this letter has been forwarded to the Environment Agency.

Yours sincerely

[redacted]

[redacted]
ONR Principal Inspector
Nuclear Internal Hazards and Site Safety (NIHSS)

Distribution (Sellafield Ltd):

Company Secretary
Regulatory Liaison Office

[redacted]

Distribution (ONR):

All Sellafield-facing SDFW Inspectors

[redacted]