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Dounreay Materials Consolidation

**Agreement to Commence Active Commissioning of the Dounreay Exotics Storage
Facility to Receive Low Power Cans (<1W) from Dounreay**

Project Assessment Report ONR-SDFW-PAR-16-015
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EXECUTIVE SUMMARY

Title

Agreement to Commence Active Commissioning of DESF to Receive Low Power Cans (<1W) from Dounreay.

Permission Requested

Sellafield Ltd (SL) has requested the Office for Nuclear Regulation (ONR) agreement to commence active commissioning of the Dounreay Exotics Storage Facility (DESF) to receive low power cans (<1W) from Dounreay, in accordance with its arrangements made under Licence Condition (LC) 21.

Background

The United Kingdom (UK) Government/Nuclear Decommissioning Authority policy is to consolidate the UK's Special Nuclear Materials (SNM) in one location. As part of this initiative, unconditioned SNM from Dounreay will be transferred to Sellafield.

Dounreay Site Restoration Limited (DSRL) will be responsible for repacking and loading the SNM into its transport package before transporting it to Sellafield. SL will accept the shipment at its site boundary and then take over the long term management of the SNM. The transfer of SNM from Dounreay to Sellafield will be undertaken in a number of phases depending on the type and risk posed by the SNM.

SL's chosen storage location for the SNM is the newly constructed DESF within the Sellafield Mixed Oxide Plant (SMP). The equipment required to facilitate its import into SMP draws upon designs that are already in operation in Sellafield product stores and takes advantage of the learning from existing operations. Storage of the SNM in the DESF is for a nominal interim period of 25 years, pending the development and availability of a future conditioning capability before long term storage in a Sellafield Product and Residue Store.

This project assessment report (PAR) provides the ONR judgement on SL's request to commence active commissioning of the DESF to receive low power cans (<1W) from Dounreay, which is the first phase of shipments to DESF.

Assessment and inspection work carried out by ONR in consideration of this request

Following initial consideration of SL's proposal, I judged it proportionate to obtain specialist inspector advice based on the potential faults that could arise from this proposal. I therefore sought advice from mechanical engineering, fault studies, criticality, chemistry, radiological protection and human factors specialist inspectors.

In addition, ONR has also undertaken a readiness inspection of the DESF to assess SL's implementation of its LC 21 arrangements for its proposed activity to inform the permissioning decision.

Matters arising from ONR's work

A number of the specialist assessments raised recommendations associated with safety management, handling of failed/rogue packages and examination, inspection, maintenance and testing. As a result of ONR's engagement, SL has adequately addressed all these recommendations.

ONR's readiness inspection judged SL's implementation of its LC 21 arrangements for the proposed activity as 'green' with no significant shortfalls identified. The inspection did identify a number of actions, which SL has adequately addressed.

In addition, I sought assurance of SL's internal processes. SL has confirmed that the project has been subject to independent internal governance by its management safety and

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plutonium technical committees; and reviews by SL's internal regulator and quality assurance department. All have concluded that they have no objection to the project commencing active commissioning and operation, which provides additional regulatory confidence.

Conclusions

I am of the opinion that for the proposed activity, SL has provided an adequate level of evidence and assurance that:

- All ONR specialist inspectors and the Environment Agency have advised that they have no objection to SL's proposal and recommend that ONR issues the Licence Instrument (LI);
- It aligns with ONR's expectations of relevant good practice, specifically the relevant aspects of ONR's Technical Inspection Guide for LC 21 and Safety Assessment Principals, which were used as benchmark for the ONR specialist assessments and readiness inspection;
- It has a sufficiently robust process with adequate arrangements and governance to ensure that the correct SNM is sent such that it can be safely stored for the interim period;
- It has been under the control of plant management and will be adequately implemented in accordance with SL's established arrangements;
- There is a relatively low radiological risk posed by the <1W SNM, with all foreseeable faults assessed by SL as below or within its low consequence region;
- There are no significant shortfalls that should prevent its safe implementation.

Based on the evidence sampled, I judge that SL has reduced the risks to the public and workers As Low Reasonably Practicable (ALARP) and the people, process and plant for SL's proposal are adequate. As a result, there are no outstanding issues to prevent ONR agreeing to SL commencing active commissioning of DESF to receive low power cans (<1W) from Dounreay.

Recommendation

ONR should issue LI 905 agreeing to SL's request to commence active commissioning of DESF to receive low power cans (<1W) from Dounreay.

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LIST OF ABBREVIATIONS

ALARP	As Low As Reasonably Practicable
AML	Alpha Materials Laboratory
CfA	Conditions for Acceptance
DESF	Dounreay Exotic Storage Facility
DSRL	Dounreay Site Restoration Limited
EA	Environment Agency
EAC	Endorsement for Active Commissioning
EIM&T	Examination, Inspection, Maintenance and Testing
HOW2	(Office for Nuclear Regulation) Business Management System
HPCP	Hold Point Control Plan
LC	Licence Condition
LI	Licence Instrument
MSC	Management Safety Committee
NDA	Non-Destructive Assay
ONR	Office for Nuclear Regulation
PAR	Project Assessment Report
PMF	Plutonium Management Facilities
PTC	Plutonium Technical Committee
SAFEKEG	A double-containment stainless steel transport package
SL	Sellafield Limited
SMP	Sellafield MOX Plant
SNM	Special Nuclear Material
Sv	Sieverts
UK	United Kingdom
W	Watt

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1 PERMISSION REQUESTED

1. Sellafield Ltd (SL) has requested the Office for Nuclear Regulation's (ONR) agreement to commence active commissioning of the Dounreay Exotics Storage Facility (DESF) to receive low power cans (<1W) from Dounreay, in accordance with its arrangements made under Licence Condition (LC) 21 (Ref. 1).
2. This project assessment report (PAR) provides the ONR judgement on SL's proposal to commence active commissioning of DESF to receive low power cans (<1W) from Dounreay. It has been produced in accordance with ONR HOW2 guidance (Ref. 2) and programme specific permissioning guidance (Ref. 3). In accordance with this guidance, the permissioning strategy for this regulatory hold point has been previously agreed with the ONR Sellafield Programme sub-programme delivery lead (Ref. 4).

2 BACKGROUND

3. The United Kingdom (UK) Government/Nuclear Decommissioning Authority policy is to consolidate the UK's Special Nuclear Materials (SNM) in one location. As part of this initiative, unconditioned SNM from Dounreay will be transferred to Sellafield.
4. The SNM currently held at Dounreay is held in one of two types of container; Alpha Materials Laboratory (AML) welded cans and non-welded 'fruit tins'. Dounreay Site Restoration Limited (DSRL) will be responsible for loading the unconditioned SNM in its original containers into two new layers of breathable containment and a transport package before transporting it to Sellafield. SL will accept the shipment at its site boundary and then take over the long term management of the SNM. The transfer of SNM from Dounreay to Sellafield will be undertaken in a number of phases depending on the type and risk posed by the SNM.
5. SL's chosen storage location for the SNM is the newly constructed DESF within the Sellafield Mixed Oxide (MOX) Plant (SMP). The equipment required to facilitate its import into SMP draws upon designs that are already in operation in Sellafield product stores and takes advantage of the learning from existing operations. Storage of the SNM in the DESF is for a nominal interim period of 25 years, pending the development and availability of a future conditioning capability before long term storage in a Sellafield Product and Residue Store.
6. In accordance with SL's request (Ref. 1), the scope of this PAR is limited to the import and storage of the first phase of SNM that complies with SL's Conditions for Acceptance (CfA) for the DESF (Ref. 5).
7. SL's proposal is supported by a safety assessment that refers to a 5 Watt (W) SNM package limit and CfA that refers to a 3W limit. This is due to the schedule driven nature of the programme and staged development of SL's submission, during which it was identified that further technical underpinning is required for the long term storage of SNM at <5W and then <3W. As a result, the proposed activity that SL has requested ONR's agreement for is specifically the DESF import and storage of AML SNM cans of heat output <1W (Ref. 1). This has also been confirmed between SL and DSRL (Ref. 6).
8. In support of its request (Ref. 1), SL has presented additional technical evidence to support the proposed activity (Ref. 7), which has been the subject of assessment by ONR specialist mechanical and chemistry inspectors.
9. As a result, the import and storage into the DESF of AML cans and fruit tins outside of SL's request (Ref. 1) will be subject to separate SL proposals and regulatory hold

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points as identified by SL's Hold Point Control Plan (HPCP) (Ref. 8). The scope of this PAR also excludes the operations at Dounreay and transport to Sellafield, which are subject to separate regulatory engagements with the respective ONR programmes.

10. An overview of the import operations within SMP/DESF is summarised as follows:
 - Receipt of the loaded delivery vehicle into the SMP compound;
 - Removal of stillages from the delivery vehicle (4 stillages per iso-freight container, each stillage loaded with 6 SAFKEG transport containers);
 - Removal and inspection of the cans from the SAFKEG containers (two cans per SAFKEG);
 - Loading of the cans into DESF storage channels;
 - Storage of the cans for an interim period (anticipated to be 25 years).

3 ASSESSMENT AND INSPECTION WORK CARRIED OUT BY ONR IN CONSIDERATION OF THIS REQUEST

11. In support of SL's request to commence the proposed activity (Ref. 1), it has submitted an associated Endorsement for Active Commissioning (EAC) (Ref. 9), which has been subjected to consideration and approval at the Plutonium Management Facilities (PMF) Management Safety Committee (MSC) (Ref. 10).
12. The greatest potential hazard within the scope of SL's proposal is that posed by can damage and loss of containment during individual can handling operations. This fault sequence has the potential to result in operator doses within SL's Low Consequence Methodology range (i.e. 2-20mSv) and public doses as negligible (Ref. 11).
13. Given that the radiological risk will increase during the transition from DESF inactive to active operations when the SNM is committed to the store, I judged it proportionate to obtain specialist inspector advice. I therefore sought advice from the following specialist areas:
 - Fault Studies
 - Mechanical Engineering
 - Human Factors
 - Chemistry
 - Criticality
 - Radiological Protection
14. Following initial consideration of SL's proposal, I targeted the above specialist advice given the operations:
 - Have the potential to result in fault scenarios that could result in elevated doses to operators;
 - Have significant reliance on mechanical systems, structures and components to deliver key safety functions;
 - Have significant reliance on operators during both normal and fault conditions;
 - Have significant reliance on the understanding of the SNM chemical behaviour for safe long term storage;
 - Include SNM of varying enrichments;
 - Have significant reliance on shielding and procedures during manual handling of the SNM into the DESF.
15. To initiate the regulatory engagement on this project, a series of meetings were held between SL and ONR that focussed on safety case overview and familiarisation visit on DESF, including an overview of operations (Ref.'s 12 and 13).

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16. In addition to the above and to support the permissioning decision, ONR has also undertaken a readiness inspection of DESF to assess the adequacy of SL's implementation of its LC 21 arrangements for the proposed activity (Ref. 14).

4 MATTERS ARISING FROM ONR'S WORK

4.1 ONR ASSESSMENT

17. Having sought specialist assessment advice on SL's submission, their advice and conclusions are summarised as follows.
18. The fault studies inspector has undertaken an assessment of SL's submission predominantly focussing on SL's hazard identification process and consequence assessment of the potential faults including a dropped can and loss of cooling. In conclusion, the inspector is satisfied that SL has presented an adequate assessment of the potential hazards and faults and is content that there are no design basis faults and that the risks to the public and workers from these operations will be acceptably low. As a result, no fault studies recommendations were raised and the inspector supports release of the regulatory hold point (Ref. 15).
19. The specialist human factors inspector has undertaken an assessment of SL's submission predominantly focussing on human factors input to the design of the operations and underpinning of the safety assessment. In conclusion, the inspector considers that SL has taken a structured and proportionate approach to its human factors assessment and is content with the conclusions drawn in support of the claimed operational designations (Ref. 16).
20. However, the inspector did raise two recommendations associated with DESF safety management and outstanding human factors actions. These recommendations were discussed as part of the ONR readiness inspection of the DESF where SL provided evidence of close out (Ref. 14), which the human factors inspector has judged as adequate (Ref. 17).
21. The specialist mechanical engineering inspector has undertaken an assessment of SL's submission predominantly focusing on the key hazards and protective measures associated with loss of the containment boundary of the structures, systems and components associated with the planned activities and operations. In conclusion, the inspector considers that SL's proposal is adequately justified and it has followed due process (Ref. 18).
22. However, the inspector did raise two recommendations associated with adequate confirmation of the proposed arrangements for Examination, Inspection, Maintenance and Testing (EIM&T) and the handling of failed/rogue packages. These recommendations were discussed as part of the ONR readiness inspection of the DESF (Ref. 14) and SL has now provided evidence of their close out (Ref. 19), which the mechanical engineering inspector has judged as adequate (Ref. 20). I have also raised a regulatory issue to ensure SL adequately implements its EIM&T strategy as the DESF is gradually loaded to full capacity (Ref. No. 4658).
23. The specialist criticality inspector has undertaken an assessment of SL's submission predominantly focussing on fissile mass, store segregation and latent uncertainties in the inventory. In conclusion, the inspector judged that the risk of criticality associated with SAFKEG storage and unloading, and can handling, transfer and storage within the DESF is acceptably low for the identified Dounreay exotics materials based on the engineering and protective measures identified (Ref. 21).

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24. However, the inspector did raise two recommendations associated with outstanding recommendations from SL's criticality assessments and the future use of the DESF for a wider scope of SNM. With respect to the former, SL has provided evidence of their close out (Ref. 22), which the criticality inspector has judged as adequate (Ref. 23).
25. With respect to the future use of the DESF for a wider scope of SNM, the inspector recommends that a further criticality assessment should be undertaken by ONR if SL intends to expand the scope of SNM to be imported into the DESF beyond the proposed activity (as SL has not yet provided evidence that all other SNM types from DSRL are conservatively bounded). The use of the DESF for the wider SNM population is outside the scope of this PAR but is identified as separate regulatory hold points on SL's HPCP (Ref. 8) that will be subject to separate regulatory engagements. To address the inspector's concerns I have raised a regulatory issue (Ref. No. 4665) and communicated this to the criticality inspector (Ref. 22) who is satisfied that the intent of the recommendation will be met (Ref. 23).
26. The specialist radiological protection inspector has undertaken an assessment of SL's submission predominantly focussing on the evidence provided by SL to support the claim within its safety case that "the radiological risk to members of the public and workforce is argued to be demonstrably as low as reasonably practicable (ALARP)". In conclusion, the inspector is satisfied that, with regard to the numerical targets that quantify ONR's risk policy, the licensee has demonstrated that either the Basic Safety Objective for each relevant Target is met or, the risk is ALARP, for DSRL cans that have a thermal power rating of < 1 W. As a result, no radiological protection recommendations were raised and the inspector supports release of the regulatory hold point (Ref. 24).
27. The specialist chemistry inspector has undertaken an assessment of SL's submission predominantly focussing on can pressurisation, can corrosion and material sampling. In conclusion, the inspector is satisfied that SL has demonstrated that the risk of pressurisation and corrosion occurring during the storage period is ALARP and SL has produced an adequate safety case (Ref. 25).
28. However, the inspector did raise two recommendations that were consistent with those raised by the mechanical engineering inspector associated with adequate confirmation of the proposed arrangements for EIM&T and the handling of failed/rogue packages. These recommendations were discussed as part of the ONR readiness inspection of the DESF (Ref. 14) and SL has now provided evidence of close out (Ref. 19), which the chemistry inspector has judged as adequate (Ref. 20). I have also raised a regulatory issue to maintain oversight of SL's implementation (Ref. No. 4658).
29. In summary, all specialist inspectors have supported the issue of a Licence Instrument (LI) following adequate close out of the recommendations raised.
30. SL will take control of the SNM at its site boundary. I therefore sought assurance that SL had a clear understanding of the boundaries and interfaces for onsite movements from the site boundary to SMP and whether there was any impact on its extant arrangements. SL has undertaken a review and confirmed that (Ref. 26):
 - The 'handshakes' between the respective stakeholders are clear and understood for control of the shipments from the site boundary to SMP;
 - The onsite transport moves are bounded by the offsite transport safety case and its extant arrangements are adequate;
 - Its emergency arrangements remain extant.

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31. On the basis of the above, I do not consider it proportionate to assess on-site transport of the SNM from the site boundary to SMP. This judgement is based on the transport licence granted by ONR for transport of the SNM between DSRL and Sellafield (noting that off-site requirements bound those on-site), the successful shipment of the Phase 1 sub-assembly shipments via this route and the routine and well understood nature of on-site nuclear material transports, which are undertaken daily on the Sellafield site.
32. As this programme involves two licensees, the ONR site inspector for Dounreay has maintained oversight of the DSRL operations associated with this activity through routine engagements and planned interventions with no significant issues identified (Ref.'s 27-29).
33. In accordance with the ONR/Environment Agency (EA) Memorandum of Understanding, I have consulted with the EA whether it had any objections on environmental grounds to ONR granting the LI. The EA has confirmed that it has no objection (Ref. 30). Similarly, the ONR safeguards and civil nuclear security programmes have confirmed that they have no objection to ONR agreeing to SL's request and granting the LI (Ref.'s 31 and 32 respectively).

4.2 ONR READINESS INSPECTION

34. In support of the permissioning decision, ONR has undertaken a readiness inspection to assess the adequacy of SL's implementation of its LC 21 arrangements for the proposed activity. ONR's readiness inspection included specialist human factors and mechanical engineering inspectors and focussed on commissioning, EIM&T, training, project governance, safety management, learning from experience, emergency arrangements and a facility inspection.
35. Based on the evidence sampled, ONR judged that SLs' implementation of its LC 21 arrangements as 'green' (Ref. 14) as it was judged to align with relevant good practice, specifically the relevant aspects of ONR's Technical Inspection Guide for LC 21 (Ref. 33) and Safety Assessment Principals (Ref. 34). This judgement was based on SL's demonstration that:
 - There is a clear linkage between the safety commissioning schedule and the safety case requirements with the schedule supported by commissioning work sheets;
 - A report will be completed for each commissioning stage and considered by an appropriate overseeing body before commencement to the next commissioning stage;
 - Its maintenance schedule will take effect prior to the introduction of active material into DESF;
 - Operational experience has been used during commissioning;
 - There are adequate provisions for putting appropriate emergency arrangements into effect for commissioning activities.
36. No shortfalls were identified during the inspection that would prevent permission being granted for the proposed activity. However, the inspection did raise a number of actions on SL to support the permissioning decision. These were related to the validation of safety case assumptions on store conditions, re-packing capability for failed cans, non-delivery of EIM&T and completion of safety case recommendations. SL has now provided evidence of their closed out (Ref.'s 19 and 22), which ONR has judged as adequate (Ref.'s 20, 23 and 54).

4.3 INTERNAL ASSURANCE AND GOVERNANCE

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37. I have sought assurance of SL's arrangements that it can safely store the unconditioned SNM in the DESF for the proposed interim storage period. SL has developed CfA (Ref. 5) that the SNM from DSRL must comply with in order to be received, handled and accommodated safely within the DESF.
38. I have also sought assurance of SL's governance arrangements to ensure that the SNM packages will be received in accordance with the approved CfA. SL has subsequently confirmed that it has developed governance arrangements specifically for the receipt of canned SNM from DSRL (Ref. 35). In summary SL has confirmed:
- Its CfA has been subject to consideration and approval at its PMF MSC and Plutonium Technical Committee (PTC) (Ref. 5).
 - DSRL has produced a quality plan (Ref. 36) to demonstrate how it will comply with SL's CfA. This has been subject to consideration at the SL PMF MSC (Ref. 37), which raised a number of comments. These have since been confirmed as closed out by the SL Internal Regulator (Ref. 38).
 - Its Internal Regulator and Quality Assurance (QA) manager have undertaken a readiness review at Dounreay to assess DSRL's ability to comply with SL's CfA (Ref. 39). Based on the scope and duration of the review and the significant shortfalls identified (Ref. 39), I judge that SL has undertaken a sufficiently rigorous review of DSRL's readiness. SL has subsequently confirmed that DSRL has now adequately addressed these shortfalls (Ref. 38).
 - It has developed QA arrangements for independent SL oversight of DSRL packing operations at Dounreay (Ref. 40), which has been subject to approval at SL's PMF PTC. SL stated that it will independently verify DSRL's operations utilising these arrangements on an as required basis following consultation between stakeholders but will likely be undertaken for higher risk populations e.g. high power direct ship SNM and glove box SNM (Ref. 41), which appears proportionate given the relatively low radiological risk posed by <1W SNM. This judgement is supported by SL's safety assessment (Ref. 11), which assesses all foreseeable faults and concludes that none could result in a significant release of radioactive material and all fall below or within SL's low consequence region.
 - It has developed QA arrangements for the process of data transfer between DSRL and SL to demonstrate compliance with the CfA (Ref. 42), which has been subject to approval at SL's PMF PTC. These arrangements identify the provision of raw data/historical records, video/photographic evidence and Non-Destructive Assay (NDA) results from DSRL; and the independent verification checks that are to be undertaken by SL to confirm conformity with its CfA in advance of dispatch from DSRL.
 - In accordance with the above arrangements, it has a two-stage process to confirm the SNM package powers (Ref. 43). Initially, and in advance of the DSRL packing operations, SL has taken the raw data/historical records and conservatively calculated the anticipated thermal output of the SNM packages (Ref.'s 44 and 45) to 'pre-approve' the can for packing (Note: the first two shipments of SNM have been pre-approved by SL (Ref. 46)). The packages are then subject to a NDA check at DSRL to confirm the package power.
 - Established a product quality review committee (Ref. 47) to provide advice and review concessions from DSRL, which can be convened on an as required basis to respond to DSRL concession requests in a timely manner.
39. Based on the above, I judge that SL has a sufficiently robust process with adequate arrangements and governance to ensure that the correct SNM is sent such that it can be safely stored for the interim period.

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40. Despite the defence in depth provided by SL's arrangements to ensure product quality, its supporting safety assessment does consider the unlikely event that an out-of-specification SNM can (i.e. >5W) is received in error at the DESF (noting its supporting safety assessment is based on a 5W limit). For this fault condition the worst case consequences are also assessed to fall within its low consequence region (Ref. 11).
41. The technical underpinning for SL's proposal is based on transportation at a maximum external ambient temperature of 20°C (averaged over 24 hours) (Ref. 48). I sought assurance of how this limit will be adhered to. SL stated that it should be part of the submission for the transport licence application (Ref. 43). I have subsequently confirmed with ONR Transport that DSRL has a protocol for complying with this limit (Ref. 49) and this has been submitted as part of the transport licence application and as such will be a key requirement of it (Ref. 50). I am therefore satisfied that there are adequate arrangements to comply with this requirement.
42. In accordance with SL's LC 21 arrangements, its proposal is supported by:
- An EAC (Ref. 9), which assesses the readiness of the project, plant, people and procedures and confirms that SL is in a state of readiness to commence the proposed activity subject to the completion of a number of outstanding commissioning actions (Ref. 51). The EAC has been subject to consideration and approval at the PMF MSC (Ref. 10).
 - A commissioning report (Ref. 51), which confirms completion of its inactive safety commissioning with no significant issues affecting commencement of the proposed activity. This has been subject to consideration and approval at the PMF MSC (Ref. 10). The commissioning report does however identify a number of outstanding actions, with a subset of these required prior to receipt of the first shipment. I am of the opinion that there are no significant issues associated with these actions that would affect the permissioning decision and am therefore content that SL will implement them under its own arrangements within the required timescales.
43. SL's proposal has also been subject to independent inspection and oversight by the SL Internal Regulator, the scope of which is identified by Reference 52. This has included a readiness review by a specialist team from internal regulation (Ref. 9). SL has confirmed that the actions raised as part of this review are satisfactorily completed and there are no significant outstanding issues affecting commencement of the proposed activity. (Ref. 9).
44. Based on the evidence sampled, I judge that SL's proposal has been subject to an adequate level of independent internal challenge and governance.

5 CONCLUSIONS

45. I am of the opinion that for the proposed activity, SL has provided an adequate level of evidence and assurance that:
- All ONR specialist inspectors and the EA have advised that they have no objection to SL's proposal and recommend that ONR issues the LI;
 - It aligns with ONR's expectations of relevant good practice, specifically the relevant aspects of ONR's Technical Inspection Guide for LC 21 and Safety Assessment Principals, which were used as benchmark for the ONR specialist assessments and readiness inspection;
 - It has a sufficiently robust process with adequate arrangements and governance to ensure that the correct SNM is sent such that it can be safely stored for the interim period;

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- It has been under the control of plant management and will be adequately implemented in accordance with SL's established arrangements;
 - There is a relatively low radiological risk posed by the <1W SNM, with all foreseeable faults assessed by SL as below or within its low consequence region;
 - There are no significant shortfalls that should prevent its safe implementation.
46. Based on the evidence sampled, I judge that SL has reduced the risks to the public and workers ALARP and the people, process and plant for SL's proposal are adequate. As a result, there are no outstanding issues to prevent ONR agreeing to SL commencing active commissioning of DESF to receive low power cans (<1W) from Dounreay.

6 RECOMMENDATIONS

47. ONR should issue LI 905 (Ref. 53) agreeing to SL's request to commence active commissioning of DESF to receive low power cans (<1W) from Dounreay (Ref. 1).

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