



Office for Nuclear Regulation (ONR) Quarterly Site Report for Cyclife UK Limited Metal Recycling Facility

Report for period 1 October – 31 December 2016

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 quarterly to members of the Cyclife UK Limited Local Liaison Panel and are available on the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR usually attend the Cyclife UK Limited Local Liaison Panel meetings and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

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1 INSPECTIONS

1.1 Dates of inspections

The ONR Nominated Site Inspector and other ONR Inspectors conducted interventions on the following dates during the quarter:

October	None
November	22 & 24
December	None

For the months when no site interventions are made, a teleconference is held between the licensee and ONR, to review safety performance metrics and other matters of regulatory interest.

The licensee requested an information exchange meeting with the ONR Programme Director and the Nominated Site Inspector, which was held at the ONR Head Office at Bootle on 28 November 2016.

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 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 the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and implementation.

In this period, two planned site interventions at Cyclife UK Limited addressed the following:

On 22 November, an ONR health physics specialist assessment inspector met with the licensee, to discuss aspects of the licensee's safety report, aiming to demonstrate compliance with the Radiation (Emergency Preparedness and Public Information) Regulations 2001, (REPPiR). Regulatory advice was provided to the licensee, requesting a timely review of the licensee's report, to take account of the regulatory advice on the requirements of REPPiR provided by the specialist inspector and this request was confirmed in a letter from ONR.

On 24 November, I participated in a planned periodic Information exchange meeting with the licensee and the Environment Agency, reviewing the licensee's safety performance metrics, which I concluded to be adequate. This was followed by a joint system inspection, also with the Environment Agency, at which I inspected the licensee's implementation of the safety case governing the containment of radioactive material on the licensed site. A plant inspection was made, followed by a meeting and a sample review of the licensee's safety documentation.

Training records were sampled and there was evidence of appropriate maintenance and testing of safety related equipment, in compliance with maintenance instructions. An adequate standard of containment was demonstrated at the hot cutting booth. Overall, I judged that the licensee had adequately implemented the safety case in the areas inspected. The inspection findings have been communicated to the licensee and a programme established to address the minor opportunities for improvement which I identified during the system inspection.

ONR Transport.

Interactions: None this quarter.

Permissioning: None this quarter.

Incidents: One incident reported involving the receipt of empty “excepted packages” from a third party, various packages were found to be damaged, had missing parts or contained rain water. These were empty transport packages. No safety significance to the public.

ONR Safeguards.

ONR Safeguards have been working with and providing support and guidance to Cyclife UK Limited on whether or not they should come under Euratom safeguards. (Euratom, the European Atomic Energy Community, relates to a European Treaty which provides for the accountancy of some types of nuclear materials). Work continues between the licensee and ONR to establish viable arguments and evidence for possibly not being under Euratom inspection and verification. This work will continue, including interactions with Euratom, in the early months of 2017.

General comment.

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 interventions. 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

Local Liaison Panel meeting.

The ONR Nominated Site Inspector participated in the Local Liaison Panel meeting, held at the site on 24 November, reporting on recent ONR interventions at the licensed site.

Meetings with the safety representatives.

Meetings will continue to be held with the licensee’s safety representatives during inspections by ONR, to support their function of representing employees by giving advice on matters affecting their health, safety and welfare at 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. In December 2016, the licensee reported the results of quarterly site perimeter radiation monitoring, for the period July to September 2016. The

radiation levels were elevated when compared to previous levels, as a result of the temporary storage of some low level irradiated scrap metal (waiting processing) close to the site boundary. This irradiated scrap metal has since been relocated to an area within the licensed site, reducing the site boundary radiation levels. The licensee's arrangements for controlling the perimeter radiation levels, which the licensee is reviewing, are the topic of a forthcoming ONR intervention. Given the minor nature of the other events reported to ONR during this quarter, they did not warrant further investigation by ONR.

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.

No enforcement notices were issued in this period. No Licence Instruments were issued in this period.

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

5 NEWS FROM ONR

External Stakeholder events.

On 1 November 2016, ONR held its Industry Conference in London, which brought together senior leaders from across the nuclear sector. We were pleased to welcome Baroness Neville-Rolfe DBE CMG, Minister of State at the Department for Business, Energy and Industrial Strategy (BEIS) to this year's conference who delivered the [keynote speech](#). A special edition of [Regulation matters](#) has been published following the conference, which provides a summary of how the day unfolded.

As part of our commitment to engage regularly with all our stakeholder groups, we were pleased to welcome 17 representatives from a number of organisations to our ONR / Non Governmental Organisation (NGO) forum on 30 November in London. The event provided an opportunity for NGO representatives to meet with a number of senior ONR leaders, including our Chief Executive and Chief Nuclear Inspector, to discuss a number of priority issues.

Insight into ONR's work as an independent regulator of the nuclear industry can be found in ONR's Regulation Matters. The online publication (<http://www.onr.org.uk/regulation-matters.htm>) reports on the key themes and developments in each of ONR's regulatory programmes and provides an update about the ongoing changes at ONR. <http://www.onr.org.uk/index.htm>. For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

6 CONTACTS

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
Website: www.onr.org.uk
Email: ONREnquiries@onr.gov.uk

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