



Office for Nuclear Regulation (ONR) Quarterly Site Report for Springfields Fuels Limited

Report for period 1 January – 31 March 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 Springfields Fuels Limited Site Stakeholder Group and are available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend the Springfields Fuels Limited Site Stakeholder Group 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:

January	13, 14, 21, 26 & 29
February	23 & 25
March	8 & 17

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 their implementation.

In this period, routine inspections of Springfields Fuels Limited covered the following:

Emergency arrangements.

On 1 March, a table top 'off site' emergency exercise was observed by HSE Staff (acting on behalf of ONR), with Lancashire County Council emergency planners, at which aspects of the licensee's arrangements to comply with the COMAH 2015 regulations were demonstrated, with an acceptable outcome.

On 17 March, I discussed aspects of the proposed scope of the licensee's Level One ('on site') observed emergency exercise, to be held later in 2016.

Disposal of radioactive waste and decommissioning.

At the quarterly regulatory review meeting between the licensee, the regulators and the National Nuclear Laboratory Limited tenant organisation, held on 8 March, the licensee reported continuing acceptable performance in maintaining authorised disposals of low and very low level solid radioactive wastes from the site, as well as adequate responses to a range of other topics of regulatory interest, including the licensee's continuing progress with decommissioning projects and uranic residue processing, funded by the Nuclear Decommissioning Authority, (NDA). The longevity of future legacy uranic residue processing operations, largely funded by NDA, has also been discussed with the licensee's Managing Director.

Organisational Capability.

On 26 January, accompanied by an ONR specialist inspector, I inspected the licensee's implementation of licence condition 36 (organisational capability) arrangements, particularly with regard to the recent reductions in staff numbers at the National Nuclear Laboratory Limited (NNL) tenanted facility at Springfields.

The purpose of the meeting was to form a regulatory view on the NNL staff reductions, regarding the maintenance of the NNL capability to support the licensee. NNL supports the licensee by providing specialist knowledge and capability in criticality and safety case assessment, together with strong technical support for uranic residue process development. Overall, I was content that the licensee was paying due attention to matters of safety significance whilst duly supervising the NNL tenant manpower reductions.

The Ionising Radiations Regulations.

I conducted a site intervention on 17 March, inspecting the storage arrangements for radioactive sources. The hazard reduction resulting from the disposal of redundant radiation sources from the site is of regulatory interest. The licensee had disposed of a range of redundant radiation sources in 2015, hence this intervention was arranged to review the licensee's progress with the disposal of the remaining redundant radiation sources. The licensee's Radiation Protection Adviser, who leads on the management and disposal of radioactive sources, justified the work undertaken by the licensee since my previous intervention on this topic, with an acceptable outcome.

ONR Radioactive Materials Transport.

On 8 March, a Radioactive Materials Transport specialist inspector held discussions regarding the proposed transfer of Advanced Uranium Assets Management Limited transport staff to the licensee, with an acceptable outcome.

ONR Safeguards.

ONR Safeguards accompanied the Euratom inspections performed in January, February and March. The January inspection follow up a letter included a minor comment about a new weigh scale at the uranium hexafluoride storage rafts. The February and March inspections elicited no comments. The new Euratom Head of Unit attended the February inspection, which provided a good foundation on which to build his site familiarisation.

Potential Small Modular Reactor (SMR) fuel manufacture at Springfields.

A press release had been issued on 7 January, stating that the Springfields site had been assessed as having the capability to produce the fuel for the Westinghouse SMR. I arranged to meet with the licensee on 29 January, to understand the context of that proposal. The proposed SMR fuel element manufacturing process was reported to have been the subject of a two day walk down study in the Oxide Fuels Complex. The SMR fuel elements were likely to be very similar, albeit shorter than the Light Water Reactor fuel elements currently manufactured in the Oxide Fuels Complex. The enrichment was planned to be within the level bounded by the extant safety case for the Oxide Fuels Complex. This was an informative visit and established a degree of regulatory confidence in the licensee's ability to eventually be able to compile an adequate nuclear safety case for the manufacture of SMR fuel in the Oxide Fuels Complex.

Safety Culture.

On 13 January, an ONR specialist inspector participated in a meeting, requested by the licensee, to provide regulatory advice on aspects of safety culture. This was to inform a

nuclear industry working group, established by the Society for Radiological Protection (SRP) and led by the licensee, (the Radiation Safety Culture Working Group). The group had been established to “Develop and Promote Radiological Culture in the UK”. ONR provided regulatory advice on research undertaken by ONR on cultural / organisational factors, advising how the outcome of the ONR research could be applied to inform the development of an enhanced ‘Radiological Protection Safety Culture’.

Site familiarisation visit for the ONR Decommissioning, Fuel and Waste (DFW) Programme Director.

On 25 February, a site familiarisation visit was conducted for the DFW Programme Director and also served to enable the licensee’s Managing Director to discuss the extent of future funding by NDA of the hazardous legacy uranic residues and the longevity of the legacy uranic residue processing facility, (which is a “unique national asset”). This processing facility was visited, together with the AGR and Light Water Reactor fuel manufacturing facilities. The potential manufacture of AP1000 fuel for the three potential reactors at Moorside and potential manufacture of Westinghouse SMR fuel were also discussed. During the visit to the legacy uranic residues processing facility, it was encouraging to note that the licensee was now achieving some success with the processing of the challenging oily uranic residues.

General comment.

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

Conventional health and safety matters.

On 14 January, an ONR conventional fire safety specialist inspector conducted an inspection of fire safety. The inspection focused on fire safety management and practical fire safety provision. A number of issues from previous fire safety inspections were reviewed to confirm that adequate consideration had been given to them by the licensee. An inspection was made of the selected facilities, before concluding with a final meeting with management. The inspection identified a number of areas of industry good practice along with a several areas for the licensee to address. I concluded with an assessment of compliance with the legislation, and presented deficiencies and recognised areas of good practice at a wash-up meeting with members of the Springfield’s Management Team. The ONR specialist inspector concluded that there was a need to act on the findings of the licensee’s ‘fire risk assessment’, particularly in relation to the automatic fire detection provision within the building inspected. Regulatory advice was provided regarding some areas for improvement, acknowledged by the licensee, and this will be followed up by ONR.

Meetings with the safety representatives.

Meetings continue to be routinely held with the licensee’s safety representatives and during plant inspections by ONR inspectors, to support their function of representing employees and receiving information 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. The licensee reported some minor events to ONR in this quarter, in compliance with the licensee's arrangements, which were promptly investigated by the licensee, with follow up reports within sixty days of the event being provided to ONR. Given the minor nature of the 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

Chief Nuclear Inspector appointment.

ONR announced the appointment of Dr Richard Savage as its new Chief Nuclear Inspector (CNI) to lead our regulatory activity. Richard is a Chartered Engineer with an extensive background in nuclear safety and regulation. He served as Head of the Defence Nuclear Safety Regulator, Ministry of Defence, before being appointed to ONR as a Deputy Chief Nuclear Inspector in 2013. He was Acting CNI since Dr Andy Hall's retirement in November 2015. <http://news.onr.org.uk/2016/03/nuclear-regulator-appoints-new-chief-nuclear-inspector/>.

ONR Strategic Plan 2016-2020.

In March, ONR published its Strategic Plan covering 2016-2020. The plan sets out the factors that will influence our work and the assumptions we have made about regulating the nuclear sector in the next few years, as well as how we deliver the commitments we have made to the public, ministers and government, licensees, duty holders and our staff. The plan was laid in Parliament on 22 March and can be viewed on the ONR website at <http://news.onr.org.uk/2016/03/onr-publishes-strategic-plan/>.

6 CONTACTS

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Published April 2016

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