



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

Report for period 1 July – 30 September 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/lrc/>).

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:

July	7, 11, 12, 19 & 28
August	2 & 8
September	15, 20 & 22

## 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, routine inspections of Springfields Fuels Limited covered the following:

#### **Licence Condition 10, Training.**

On 28 July, I inspected aspects of the licensee's compliance arrangements for Licence Condition 10 (Training), followed by an inspection of their implementation at a decommissioning project on the site. The licensee's compliance arrangements were inspected with a range of licensee staff and were shown to be of an adequate standard. The arrangements encompassed the training of contractors, the National Nuclear Laboratory Limited (NNL) tenant staff working on the licensed site, as well as the licensee's own staff. I concluded that the licensee had adequate compliance arrangements and evidence was observed of the implementation of the arrangements, including for a site decommissioning project.

#### **Licence Condition 11, Emergency arrangements.**

On 14 September, I participated in the Emergency Planning Consultative Committee meeting, held near the site, providing regulatory advice on a range of 'off site' emergency planning matters.

On 15 September, ONR inspectors observed the annual 'Level One' (on site) demonstration emergency exercise. I concluded that this Level One emergency exercise adequately demonstrated aspects of the licensee's 'on site' emergency arrangements, including arrangements for addressing aspects of the recovery phase of a significant event. I

concluded that an inspection rating of green, adequate with some aspects being of a good standard, was warranted for this emergency exercise.

### **Disposal of Radioactive Waste (Licence Condition 33) and (Licence Condition 35) Decommissioning.**

On 2 August, I conducted a planned inspection of aspects of the implementation of the licensee's decommissioning arrangements, including the provision of regulatory advice to NDA on their uranic strategy review, during joint discussions and a site visit involving the licensee, the Nuclear Decommissioning Authority (NDA) and the Environment Agency. This was also informed by a meeting between ONR, the Environment Agency and the licensee, at Springfields on 7 July 2016, as well as a meeting between ONR, the Environment Agency and NDA, at Penrith on 15 July 2016. This was a useful discussion between the licensee, NDA, ONR and the Environment Agency, primarily to discuss the proposed longevity of uranic residue processing at Springfields, together with the licensee's proposed decommissioning programme. I provided regulatory advice, which also informed the NDA uranics strategy review. The regulatory advice provided was supportive of the licensee's ongoing hazard reduction work, through legacy uranic residues processing, using the UK's only facilities, at Springfields, to achieve a more stable, less hazardous form of uranium, which would be suitable for safe longer term storage. If uranic residues processing was to be curtailed, then the regulatory expectations associated with a potential declaration of these residues as radioactive wastes were explained to both the licensee and NDA.

A quarterly regulatory review meeting was held on 22 September, between the licensee, the regulators and the National Nuclear Laboratory Limited (NNL) tenant organisation. A range of topics of regulatory interest were discussed. The longevity of future legacy uranic residue processing operations, largely funded by NDA, continues to be discussed at meetings with the licensee's Managing Director and NDA. ONR seeks to influence the extent of continuing NDA funding of hazard reduction operations at Springfields, both by maximising the processing of the legacy uranic residues and also for the decommissioning of redundant facilities on the site. This topic will continue to inform future ONR site interventions.

### **Licence Condition 32, (Accumulation of Radioactive Waste).**

On 20 September, I conducted a planned inspection of the implementation of the licensee's Licence Condition 32 arrangements. This was informed by the potential curtailment of legacy uranic residue processing, as a result of funding constraints applied by the Nuclear Decommissioning Authority, one consequence of which would be that materials currently regarded as uranic residues awaiting processing by the licensee will be declared as radioactive waste. I therefore inspected the licensee's compliance arrangements relating to radioactive waste and aspects of the implementation of those arrangements, with an adequate outcome.

### **Annual Review meeting.**

On 11 July, ONR inspectors participated in the annual review of safety meeting, which was combined with an annual review of security and environmental matters, (with the Environment Agency). The licensee (and the tenant organisation, NNL) effectively reviewed their performance over the period April 2015 to March 2016, presenting the findings to ONR. Overall, both the licensee and the tenant had delivered an adequate performance and this was effectively demonstrated through a broad range of performance metrics and supporting information. A few minor shortfalls were also reported, which the licensee was taking prompt remedial action to address. Following the review meeting, an inspection was made of the licensee's cylinder washing facility, where the licensee had recently completed the emptying of one particular type of legacy uranium hexafluoride cylinders, together with other legacy uranium hexafluoride cylinders, which reduced the hazard on the site.

### **Nuclear Criticality Safety intervention.**

On 8 August, ONR criticality safety specialist inspectors conducted a planned intervention at the site, one of a series of benchmarking interventions by ONR, inspecting across all licensees where criticality safety formed an important element of the licensee's safety case. An inspection was made of the licensee's use of a standard computer code, used to perform criticality safety calculations. The findings of this intervention provided adequate confidence in aspects of the licensee's arrangements for managing their criticality safety case documentation, the licensee and a specialist contractor performing the related calculations. A number of examples of good practice were demonstrated by the licensee during this intervention.

### **ONR Radioactive Materials Transport.**

On 12 July, a technical meeting was held with ONR Transport specialist inspectors, which included a site inspection, to inspect issues concerning the criticality safety demonstration of a radioactive materials transport package, (currently being assessed by ONR Transport specialist inspectors). This package is used for the transport of uranium dioxide powders, both domestically and internationally. This transport package currently has a valid approval from ONR, but only for a reduced payload. The licensee sought to increase the permitted payload and this intervention agreed some further information to be provided by the licensee to ONR, such that ONR could then complete the transport package assessment, with a view to permissioning an increased package payload.

In the last quarter, ONR has carried out one Intervention; this was a desk top review of Springfields' consignment arrangements, no issues were identified. Springfields notified ONR two minor transport events, which were investigated. Both events were minor in nature and did not affect routine transport safety. Regarding permissioning, ONR issued the approval for the new AGR ('Sabre') fuel transport package earlier in 2016; in addition, ONR has re-certificated the current "new fuel" package for a further year, to allow a phased approach to the introduction of the 'Sabre' package.

### **Control of Major Accident Hazards Regulations 2015, (COMAH) Intervention.**

On 19 July, two HSE COMAH Specialist Inspectors conducted a planned COMAH human factors, alarm management and 'permit to work' site intervention, on behalf of the COMAH 'joint competent authority' of ONR and the Environment Agency. The intervention concluded that the licensee was adequately complying with aspects of the requirements of COMAH, with only minor improvements being required, which were agreed with the licensee.

### **ONR Safeguards.**

Routine inspections have been carried out during the period, with no significant safeguards concerns raised.

### **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 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**

### **Meetings with the safety representatives.**

Meetings continue to be routinely held with the licensee's safety representatives and during inspections by ONR inspectors, to support their function of representing employees and 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. 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**

#### **ONR Response to BBC Panorama Documentary.**

In early September 2016, the BBC's Panorama programme broadcast a 30-minute documentary titled 'Sellafield's Nuclear Safety Failings.' As an open and transparent regulator, ONR responded to requests from the documentary makers over many months and sought to offer context and balance to the issues wherever possible. From a regulatory perspective, the documentary raised a number of issues that are either already resolved, or are currently being addressed by Sellafield Limited, with ONR's regulatory oversight. Our position is clear: Sellafield is safe but presents many unique challenges due to the age and history of the site. A considerable amount of work is still required to clean up out of date facilities at Sellafield and decommission their older plants, but this does not mean they pose an immediate safety risk to workers or the public. Sellafield is the most intensely regulated nuclear site in the UK. We have more than 50 highly qualified and experienced inspectors in our Sellafield team scrutinising the site, to ensure it operates as safely and securely as possible. As the UK nuclear safety regulator, we set very high standards throughout the industry and we have seen Sellafield make significant progress in recent years. If we considered any plant to be unsafe we would shut it down or demand action to reduce that risk and return it to safety. Hazard and risk reduction at Sellafield remains ONR's number one regulatory priority and we will continue to play a key role in encouraging progress at the site and driving the pace of future hazard and risk reduction projects. There is still considerable work to be done at Sellafield over many years, but there is now a real momentum of progress, which is already making the site safer for future generations.

### **6 CONTACTS**

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