



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

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 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.

TABLE OF CONTENTS

1	INSPECTIONS	3
2	ROUTINE MATTERS	3, 4 & 5
3	NON-ROUTINE MATTERS	5
4	REGULATORY ACTIVITY	6
5	NEWS FROM ONR	6
6	CONTACTS	6

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	10.11, 25 & 26
November	15
December	13 & 14

On 22 November, at a meeting at the ONR office in Bootle, senior staff from the National Nuclear Laboratory Limited, a tenant organisation on the Springfields licensed site, requested regulatory advice from ONR staff, regarding some forthcoming organisational changes, being planned within the tenant organisation.

A number of ONR administration staff conducted a site familiarisation visit on 29 November, as part of the ONR training programme.

As part of the planned periodic rotation of ONR 'Nominated Site Inspectors', a handover visit was conducted in December, from the outgoing, to the incoming, Nominated Site Inspector. As well as meeting key licensee staff, plant familiarisation visits were paid to the Oxide Fuels Complex and to the Legacy Uranic Residue Processing facilities. The Emergency Control Centre and the Alternative Emergency Control Centre were also both visited, with a satisfactory outcome.

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:

System Based Inspection of the safety case implementation for the kilns and furnaces in the Oxide Fuels Complex.

On 10 and 11 October, a system based inspection of the implementation of the safety case for the kilns and furnaces was conducted at the Oxide Fuels Complex. The inspection entailed examination of the site's arrangements for implementation of the safety case as required by

the conditions of the site's nuclear licence, and a plant inspection to assess compliance with these arrangements.

The licensee delivered a presentation and provided documentation to explain the key points of the extant safety case for the kilns and furnaces, and the arrangements for implementing the safety case. The opinion of the inspectors was that the arrangements presented adequately meet the requirements of the relevant ONR guidance. A plant inspection was carried out in the Oxide Fuels Complex. Discussions were held with plant operators and maintenance personnel, and records of training, work instructions and maintenance activities were sampled. It was concluded from this inspection that the licensee adequately demonstrated compliance with its arrangements for the implementation of the safety case. During the inspection regulatory advice was provided to enable the licensee to make further improvements in examination, inspection, maintenance and testing of the plant to further enhance safety.

The inspection team concluded that the licensee has adequately implemented its nuclear safety case for the kilns and furnaces in the Oxide Fuels Complex.

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

A quarterly regulatory review meeting was held on 13 December, 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.

Licence Condition 34, (Leakage and escape of radioactive material and radioactive waste).

On 15 November, I conducted a planned joint inspection of the implementation of the licensee's Licence Condition 34 arrangements, with the Environment Agency. This was at a meeting to inspect the remediation of historic very low levels of uranium contamination in the ground beneath part of the site. I inspected aspects of the licensee's implementation of compliance arrangements relating to the containment of radioactive material, concluding that the licensee was making adequate progress towards remediating this issue.

The Ionising Radiations Regulations 1999, Control of Radiation Exposure.

On 25 & 26 October, two ONR specialist radiation protection inspectors conducted a planned intervention, to assess aspects of the licensee's and NNL tenant organisation's control of radiation exposure to people working on the Springfields licensed site. This intervention was part of a programme of such interventions made by ONR across all nuclear licensed sites.

The intervention was conducted principally to inspect compliance with regulation 8, 'Restriction of Exposure', of The Ionising Radiations Regulations 1999, (IRR 99). To ensure consistency with previous inspections, the inspection was conducted using a standard questionnaire and the responses from both the licensee and the NNL tenant were inspected. The inspection inspected compliance with the arrangements for controlling radiation exposure, visiting a number of areas, including processing plants and radioactive materials storage buildings.

Compliance with the requirements of aspects of IRR 99 was judged overall to be adequate. ONR provided some regulatory advice on some areas where minor improvements could be made, in order to achieve a closer alignment with published relevant good practice.

On 15 November, I inspected the licensee's investigation into a recent event, where a plant operator had incurred a small internal radiation dose. I was satisfied that the licensee had

duly rigorously investigated this matter and had promptly implemented some improvements which would reduce the likelihood of a recurrence.

Springfields Site Stakeholder Group.

On 15 November, I participated in a meeting of the Springfields Site Stakeholder Group, held near to the site. I reported on recent ONR interventions at the Springfields site and responded to queries from stakeholders.

ONR Transport.

Permissioning: - Work is ongoing work by ONR Transport to validate a French package for use at Springfields.

Incidents: - Two Incidents this quarter, both administrative issues with incorrect or missing labels and markings. Both were not safety significant to the public. There was a second occurrence of mislabelling, being investigated by the licensee and will be followed up at the next planned ONR Transport site intervention in March 2017.

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. A meeting was held between the safety representatives and the incoming and outgoing nominated site inspectors on 14 December.

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. One Licence Instrument was issued in this period.

<u>Date</u>	<u>Type</u>	<u>Number</u>	<u>Description</u>
7 December 2016	Licence Condition 11(3) Approval	523	Approval of a revised 'On Site' Emergency Plan.

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.

6 CONTACTS

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