



Office for Nuclear Regulation (ONR) Site Report for AWE Aldermaston and Burghfield

Report for period 1 April to 31 July 2018

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the Aldermaston and Burghfield sites available to the public. Reports are distributed to members for the Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend Aldermaston and Burghfield Local Liaison Committee meetings and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR. The AWE Local Liaison Committee meeting has now moved to a four month frequency. This ONR report (period 1st April - 31st July) and the ones that will follow now cover a four month period to align with the meeting frequency.

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1 INSPECTIONS

1.1 Dates of inspection

ONR inspectors carried out inspections on the following dates during the period:

- April 4-6, 10-13, 25,30
- May, 1-2, 14-17, 22-24, 30
- June 12-14, 27-28
- July 5, 9-12

2 ROUTINE MATTERS

2.1 Inspections at Aldermaston and Burghfield

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

In this period, routine inspections at Aldermaston and Burghfield covered the following Licence conditions (LC):

- LC10 Training
- LC11 Emergency arrangements
- LC15 Periodic review
- LC22 Modification or experiment on existing plant
- LC23 Operating rules
- LC24 Operating instructions
- LC27 Safety mechanisms, devices and circuits
- LC28 Examination, inspection, maintenance and testing
- LC34 Leakage and escape of radioactive material and radioactive waste

Also inspected:

- Convention Health and Safety Inspection covering Cooling Towers
- DSEAR (Dangerous Substances and Explosive Atmospheres Regulations)

ONR judged the arrangements made and implemented by AWE in response to safety requirements to be adequate in the majority of areas inspected.

Where improvements are considered necessary following inspections, ONR may consider whether regulatory enforcement action is appropriate to ensure that remedial actions are

taken in reasonably practicable timescales. ONR raised one regulatory issue relating to LC27. This was due to weaknesses in interlock arrangements for cargo door movements at the Burghfield site. A regulatory issue has been raised and AWE are responding to this directly and via their PRS2 (Periodic Review of Safety) closeout work for Burghfield.

2.2 Other work

AWE continues to progress work to close out its shortfall findings from the Burghfield Periodic Review of Safety (PRS2). Following our assessment of the licensee's periodic review of safety we have only been able to support a limited period of operations at Burghfield Assembly Technology Centre. To enable ONR to support operations in the longer term AWE will, in accordance with their LC15 arrangements, need to close out PRS2 shortfalls and produce a PRS2 closeout report which includes a demonstration that risks have been reduced so far as is reasonably practicable. This report will be subject to ONR technical review, and ONR is working closely with AWE to gain assurance that the programme of work is progressing in a timely manner.

AWE provided an adequate demonstration of its on-site LC11 emergency arrangements in the annual Burghfield Level 1 emergency exercise during June. Some strong performances were observed by ONR including well demonstrated Command and Control, especially at the Burghfield Command Post. Opportunities for improvement were also identified; however these were minor in nature and did not detract from an overall adequate rating. Learning from the 2017 Level 1 demonstration exercise had clearly been implemented, and this was also recognised by ONR.

ONR continues to engage with AWE's Structured Improvement Programme (SIP). If successfully implemented and delivered the SIP should help AWE demonstrate that it is ready to move from enhanced to normal regulatory attention during 2020. AWE has now completed the planning part of this work and is now implementing work across four work streams. ONR will continue monitor this extensive programme of 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.

ONR has notified the AWE of its intention to prosecute the company for offences under Section 2 (1)* of the Health and Safety at Work etc. Act (1974). The charge relates to an electrical incident on 27 June 2017 which resulted in injury to an AWE employee. The incident was a conventional health and safety matter and the ONR is satisfied that there was no radiological risk to workers or the public. The decision to prosecute follows an investigation into the incident by the ONR, the UK's independent nuclear safety regulator.

For legal reasons ONR is unable to comment further on the details of the case which is now the subject of active court proceedings.

* Section 2 (1) 'General duties of employers to their employees' of the Health and Safety at Work etc. Act (1974) reads: 'It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees.'

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.

During the period no Licence Instruments were issued.

ONR has sent an Enforcement Letter to AWE requesting information on the management of ageing High Efficiency Particulate Air (HEPA) filters at both sites. AWE provided an acknowledgement to the letter in May and will provide a more detailed response by the end of September 2018.

News from ONR

Stakeholder Engagement

- On 9 May we held our ONR annual Industry Conference, with the theme - 'Public Safety – everyone's responsibility.' Delegates from more than 45 different organisations attended, and we were delighted that Richard Harrington, Parliamentary Secretary under Secretary of State, Minister for Business and Industry, was able to join us to deliver a keynote speech. The conference provided us with an opportunity to engage directly with senior representatives from across industry and government on a number of topical and strategic issues affecting the sector.
- As part of our continued stakeholder engagement work, we welcomed finance professionals from a number of nuclear site licensees and dutyholders to seminars in London and Birmingham in June. Led by our Finance Director, Sarah High, we hosted the seminars to provide the industry with a better understanding of our charging methodology, the principles we apply, and how the charging process works. To accompany the seminars we have also published a new booklet – [How we charge for Nuclear Regulation](#) – which is available on our [website](#).
- The next ONR/NGO engagement forum will take place on 11 October in London. This is a forum to discuss strategic, cross-cutting regulatory matters. Site specific matters are normally addressed via Site Stakeholder Groups. We are always keen to engage with a range of stakeholders and groups on nuclear safety and security issues, so if you do represent a nuclear-interest Non-Governmental Organisation, and are not already involved through our forum or via a Site Stakeholder Group, then please get in touch with the ONR Communications team for further details, via contact@onr.gov.uk

Regulatory News

- A delegation from ONR, led by Chief Nuclear Inspector Mark Foy, supported the UK's contribution to the 6th Joint Convention review meeting in Vienna. Bringing together 78 countries from around the world, the Joint Convention on the Safety of Spent Fuel Management and the Safety of Radioactive Waste Management is the world's leading

international forum for ensuring society and the environment are protected from hazards arising from spent fuel and radioactive waste. Further details can be found on the [IAEA website](#).

- In August Mark Foy, will host a webinar on the outcome of the UK report to the joint convention. Further details on how to sign up for the webinar will be advertised on our website and social media channels over the coming weeks.
- We have notified Sellafield Ltd of our intention to prosecute the company for offences under Section 2 (1) of the Health and Safety at Work etc. Act (1974). The charge relates to an incident on 5 February, 2017, at a facility which handles special nuclear materials, which resulted in personal contamination to a Sellafield Ltd employee. The decision to prosecute follows an ONR investigation into the incident
- In May we awarded the contract for delivery of the UK Nuclear Safeguards Information Management and Reporting System (SIMRS) to Axis 12 Ltd. The IT system is necessary for us to establish a domestic safeguards regime after the UK's withdrawal from the Euratom Treaty. The government has now launched the consultation on Nuclear Safeguards Regulation, further details can be found on our [website](#).

Corporate News

- In May we published a self-assessment exercise to update on how well our activity currently aligns with the Regulators' Code, which came into effect in April 2014 to provide a framework for how regulators should engage with those they regulate. The full report is available on our [website](#).
- In June we published our Annual Report and Accounts highlighting the extent of our regulatory activities. During the 17/18 year over 1,000 inspections were carried out across 36 licensed sites and transport dutyholders, ensuring the required standards of safety and security were met to protect the public and workers. The full report is available on our [website](#).
- In July we published our second [gender pay report](#). The organisation-wide results show that ONR has a mean gender pay gap of 35.2%, which is wider than last year, although it is broadly similar to the rest of the UK nuclear industry and anticipated given our workforce profile, and that of the industries from which we have historically recruited. ONR is committed to addressing this issue and continues to focus on improving diversity and inclusion.
- Our Chief Executive, Adrienne Kelbie, has agreed a three-year contract extension, taking her term of employment to January 2022.

5 CONTACTS

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