



Office for Nuclear Regulation (ONR) Site Report for Dounreay

Report for period 1 April to 30 June 2018

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 to members for the Dounreay Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Dounreay Stakeholder Group meetings where these reports are presented 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
3	NON-ROUTINE MATTERS.....	4
4	REGULATORY ACTIVITY	5
5	NEWS FROM ONR.....	5
6	CONTACTS.....	6

1 INSPECTIONS

(Guidance for completing this site report can be found at ONR Instruction - NS-COM-IN-001 Revision 6)

1.1 Dates of inspection

The ONR site inspector made inspections on the following dates during the report period 1 April to 30 June 2018:

- 23 to 26 April;
- 7 to 10 May;
- 14 to 17 May;
- 5 to 6 June;
- 11 to 15 June.

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 Dounreay covered the following:

- Safety case processes;
- Periodic safety review;
- Modifications to plant, equipment and safety cases;
- Management of operations including control and supervision;
- Organisational changes;
- Conventional (non-nuclear) health and safety.

We inspected the arrangements for the development, categorisation, periodic review and independent assessment of safety submissions at DSRL, and the arrangements for the development and periodic review of safety submissions. Overall we were satisfied that those arrangements sampled demonstrated compliance against the licence conditions and the regulatory expectations enshrined within ONR's guidance. We found evidence of robust challenge provided throughout the development of safety submissions. Additionally, DSRL demonstrated that personnel with safety documentation development, management, or assessment roles were suitably qualified and experienced.

We examined the arrangements for the control of modifications undertaken as part of the east pond decommissioning project in the Dounreay Fast Reactor (DFR), and the floc project within the Fuel Cycle Area (FCA). We confirmed that these arrangements aligned with other aspects

of the management system relating to safety submission development and commissioning, and that there were adequate arrangements to ensure the categorisation applied also considered the aggregation of modifications. We were satisfied that the safety justifications for the projects inspected had been appropriately categorised. Accountabilities were well established, with the Authority to Operate (ATO) Holder retaining control over all operations conducted within their area of accountability. Personnel associated with the delivery and control of the projects were demonstrably suitably qualified and experienced. There was also a clear demonstration of the effective use of suitable hold-points, ensuring that the ATO Holder retained control at key stages of the project. Overall we were satisfied that the arrangements sampled demonstrate compliance with licence conditions and the regulatory expectations enshrined within ONR's guidance.

We carried out themed inspections in the Dounreay Cementation Plant (DCP) and D1204 looking at the limits and conditions of the safety case, the way those limits and conditions were translated into operating instructions, and the way that safe delivery of those operating instructions was assured through effective control and supervision. We noted that operating rules were clearly identified and justified in the safety documentation, and were carried over to the operating instructions. We determined that the control and supervision of the tasks was adequate based on sampling a number of check sheets and interviewing project supervisors.

We have continued to focus on those activities in place to manage the DSRL voluntary early release (VER) programme. We discussed the role of the transition board and examined the information generated and used by this board to ensure the programme is conducted in accordance with DSRL's management of change arrangements; this board also ensures that adequate mitigation is in place to address any potential concerns identified during the scrutiny of the management of change proposals for each of the individual areas across DSRL. We also examined the knowledge capture and management arrangements implemented to support the release programme. Overall we were satisfied that DSRL had adequate arrangements in place to manage the impact of the VER programme on the continued safe operation of the site. While we still considered there to be shortfalls with regard to the analysis of the cumulative impact of the programme, we considered that the transition board should allow the licensee to mitigate the impact of those shortfalls.

We reviewed the current fire risk assessments for the site, and discussed the methodology used in their compilation, and conducted full walk-downs of the DFR and Prototype Fast Reactor (PFR) buildings. There were no issues identified during the intervention, and we considered that the site has a good appreciation of how important fire safety is and what impact a fire would have on site, as evidenced by a suitable and sufficient fire risk assessment process.

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

The site inspector held a periodic meeting with safety representatives, 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.

There were no such matters or events of significance during the period.

4 REGULATORY ACTIVITY

ONR 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 take a range of enforcement actions, to include issuing an Enforcement Notice.

No LIs, Enforcement Notices or Enforcement letters were issued during this period.

5 NEWS FROM ONR

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>).

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 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.

6 CONTACTS

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

website: www.onr.org.uk

email: ONREnquiries@onr.gsi.gov.uk

This document is issued by the Office for Nuclear Regulation (ONR). For further information about ONR, or to report inconsistencies or inaccuracies in this publication please visit <http://www.onr.org.uk/feedback.htm>.

© Office for Nuclear Regulation, 2018

If you wish to reuse this information visit www.onr.org.uk/copyright.htm for details.

Published 08/18

For published documents, the electronic copy on the ONR website remains the most current publicly available version and copying or printing renders this document uncontrolled.