

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

Report for period 1 February 2020 to 31 May 2020

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/llc/).

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 February – 31st May) covers a four month period in order to reflect the frequency of AWE LLC meetings.

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1 INSPECTIONS

1.1 Dates of inspection

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

- February 10-13
- March 4-5, 9-12
- April 13-16, 21-22 (Remote inspections)
- May 11-14 (Remote inspections)

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 nuclear site 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):

- LC7 Incidents on the site
- LC10 Training
- LC12 Duly authorised and other suitably qualified and experienced persons
- LC27 Safety mechanisms, devices and circuits
- LC28 Examination, inspection, maintenance and testing
- LC34 Leakage and escape of radioactive material and radioactive waste

Also inspected:

- Conventional Health and Safety Inspection covering Electricity at Work Regulations
- Conventional Health and Safety Inspection covering Construction Design Management Regulations
- Conventional Health and Safety Inspection covering the Health and Safety at Work Act.

ONR judged the arrangements made and implemented by AWE in response to safety requirements to be adequate in the majority of areas inspected. ONR has requested further information regarding asbestos management at AWE and will continue this inspection into the

next reporting period. 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.

2.2 OTHER WORK

ONR is now engaging with AWE regarding its Holistic Strategic Approach (HSA). This is a wide ranging programme of improvement initiatives that will help demonstrate AWE's future readiness to move from enhanced to routine regulatory attention. The HSA encompasses the Structured Improvement Programme (SIP) described in previous LLC reports and a range of other work that together form a more complete picture of deliverables to enable exit from enhanced regulatory attention. The HSA is at a relatively early stage but progress within the SIP has provided a good platform for further progress. ONR will continue to monitor delivery of this important 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 performed a number of remote inspections and interventions during April and May due to the current Covid-19 restrictions. These have enabled ONR to continue to monitor performance, progress and delivery of key pieces of work. Accordingly, the ONR inspection plan for AWE has been amended to prioritise those inspections that can be undertaken remotely. Remote interventions have also taken place to gain assurance of AWE's working arrangements with respect to Covid-19 guidelines. This refers to task prioritisation, social distancing, PPE usage and other mitigation measures. ONR intends to return to site during July in order to recommence those planned inspections that cannot be conducted remotely. Whilst adjusted, the inspection plan has not excluded any inspections that were originally planned across the inspection year.

AWE reported a near miss electrical event in June 2019 where a flash over of electricity occurred from a 415V electrical source. The event occurred in a non-nuclear building and no workers were injured. ONR is now finalising its formal investigation into this event and will advise the LLC of progress in the next report.

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 two Licence Instruments were issued:

LI 535 - LC11(3) - Approval of Changes to Emergency Arrangements for AWE Burghfield - 27 February 2020

LI 536 - LC 11(3) - Approval of Changes to Emergency Arrangements for AWE Aldermaston - 27 February 2020

Within the last LLC report ONR noted a formal Enforcement Letter sent to AWE on 31st January 2020 regarding the non-compliance with LC15 (Periodic Review) during the second round of periodic reviews at both AWE sites. The letter also required the AWE Chief Operating Officer to attend a holding to account meeting with ONR and this took place during March 2020 where AWE committed to have credible plans, capacity and governance arrangements in place (or under development) to ensure that all future periodic reviews will be delivered in compliance with LC15.

In the previous LLC report ONR stated that two Improvement Notices (one for each AWE site) were issued against LC36 (Organisational Capability) to remedy shortfalls in AWE's arrangements under LC36(2), specifically relating to the way AWE undertakes risk assessments for organisational changes that may affect safety.

AWE has made progress in addressing the Improvement Notices but there remains a significant amount of work to be undertaken in order to be able to demonstrate compliance with the notices. This is currently scheduled for January 2021 and ONR continues to closely monitor progress.

NEWS FROM ONR

Below are summaries of key activities over the last three months. Further detail is available on our website.

Covid-19 (Coronavirus) (ONR position)

• ONR is continuing to protect society by securing safe nuclear operations during the Coronavirus pandemic. ONR staff continue to work from home, in line with government advice. We have considered our priorities, have deferred non-critical activities, and are carrying out as much of our work as possible via videoconference, phone and email. Our regulatory focus includes assurance, where appropriate, from site licensees that they are applying the public health measures introduced to reduce the spread of coronavirus. A limited number of our inspectors can, as key workers, continue to travel to site as necessary to conduct urgent and essential regulatory inspections. Nuclear sites have been reducing non-essential activities so as to protect staff, infrastructure, and the public. As always, we are regulating those activities to ensure they are carried out safely and securely. ONR's latest position can be found on our website.

Enforcement Action

- ONR served an <u>Enforcement Notice</u> on Urenco UK Ltd following a fire safety inspection at its Capenhurst Works in Cheshire during December 2019. The notice was issued in response to shortfalls identified in the fire alarm and detection systems at one of the site's facilities.
- In February ONR announced that <u>Sellafield Limited had complied</u> with an Improvement Notice relating to staff training, operating procedures and procedural adherence that they were served with in May 2019.

Regulatory Updates

- In January ONR published an update to its Safety Assessment Principles, to incorporate some relatively minor revisions including typographical corrections and updates to reflect changes to the UK's nuclear regulatory framework since 2014.
- In February ONR completed Step 3 of the Generic Design Assessment (GDA) of the UK HPR1000 design, and took the decision to progress to Step 4 of the GDA. During Step 3, ONR increased its regulatory scrutiny and undertook a more detailed assessment of the design, focusing on the methods and approaches used by the GDA Requesting Party to underpin their safety and security claims.
- In March we published the Quarterly <u>Statement of Civil Incidents</u> for the period 1 October to 31 December 2019. During this reporting period there were two civil incidents at nuclear licensed sites within Great Britain that met the Ministerial Reporting Criteria as defined within the Nuclear Installations (Dangerous Occurrences) Regulations 1965 and ONR guidance in relation to notifying and reporting incidents and events.

Stakeholder Engagement

- On 15 January ONR launched a four-week public consultation on its draft 2025 Strategy. Once agreed, the strategy will set our direction and priorities for the next five years. To support the public consultation we held a webinar for NGOs and other stakeholders in which our Chief Executive, Adriènne Kelbie, and Technical Director, Anthony Hart, gave an overview of the strategy and welcomed questions and comments. The strategy is due to be published in May 2020.
- In January, ONR achieved Level 3 Disability Confident (Leader) status, recognising our desire to put people first and create an environment in which everyone can thrive. The government-backed scheme encourages employers to think differently about disability and take action to improve how they recruit, retain and develop disabled people.
- In February, we announced the appointment of two new members to the ONR Board. Dr Janet Wilson took up the appointment on 1 April 2020 and Tracey Matthews will take up her appointment on 1 June 2020 – both appointments are for five year terms.
- In February more than 70 stakeholders involved in the transport of radioactive material attended a conference organised by ONR's Transport Competent Authority (TCA) team. The event provided a good opportunity for the TCA team to share their expectations on compliance with regulations governing the transport of radioactive material.

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