



Office for Nuclear Regulation (ONR) Site Report for Dounreay

Report for period 1 July to 30 September 2020

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.

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1 INSPECTIONS

1.1 Dates of inspection

The ONR site inspectors have made visits to site on the following dates during the report period 1st June to 30th September 2020:

- 13th to 16th July 2020
- 11th to 13th August 2020
- 15th to 17th September 2020

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 2017 (IRR17) 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.

Arrangements for the return of staff to site and their continued protection from the risk of infection from Covid-19: The arrangements for the safe return of staff to site and their continued protection from the risk of infection from Covid-19 were assessed during a site inspection visit conducted in July. There is clear evidence that the site has implemented suitable arrangements to comply with current UK and Scottish Government Guidance and to meet their legislative duty under the Health and Safety at Work etc Act 1974. These arrangements have been supported by an effective communications plan comprising 'social media, an App, videos, teleconferences and familiarisation visits to provide staff with the information necessary to support their return to site. Return to work is also controlled via a series of checklists to ensure personnel receive the necessary briefings and other additional training required to support their return to work.

The site remains in a state of reduced staffing with only those personnel necessary to support operational activities present on the site. The significant majority of personnel continue to work from home.

Arrangements for the restart of operational activities: ONR conducted inspection visits in July, August and September to assess the arrangements in place to support the restart of operational activities in the following areas:

- Reactors Decommissioning
- Waste Operations
- Construction

These visits also provided the opportunity to observe activities that had recently recommenced focusing on the implementation of revisions due to Covid-19 and revised plant status. ONR is

satisfied, that the level of control and supervision witnessed supports the safe restart of operations following a period of prolonged plant shut down.

Overall, within the operational areas inspected, ONR is satisfied that there was clear evidence of a systematic approach to the safe restart of operations. The arrangements in place demonstrated a considered review of the status of the plant, the competency and currency of the personnel and, the suitability of the operating documentation. Additionally ONR is satisfied that the governance associated with the restart of operations has been robust and transparent.

2.2 Other work

Technical assessment work: ONR has continued to undertake assessment activities necessary to support the release of regulatory hold-points placed on a number of the projects on site. Specifically ONR has continued to hold regular technical review meetings with the Shaft and Silo Project Team and remains confident to be in a position to release the regulatory hold-point placed on the commencement of construction activities later this year or early next year.

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 was only one matter notified to ONR during this period:

- Lifting operations: ONR was informed of an incident where an operator failed to detach himself from the inertia reel attached to the crane hook before signalling the commencement of the lift. The operator realised the error immediately and was able to stop the lift before he was lifted into the air. The site immediately halted all activities on the construction site and undertook a detailed investigation. This is the second incident notified to ONR involving the inadvertent lifting of an operator during crane operations this year. In response the ONR Site Inspectors supported by ONR Conventional Health & Safety (CHS) and Lifting Specialist Inspectors set up a series of teleconferences with site to discuss the learning from these two incidents and the actions necessary for DSRL to demonstrate adequate safety and control of subsequent lifting activities across site. ONR also undertook a detailed examination of all documentation relating to these lifting operations and the subsequent revisions to DSRL's arrangements. ONR followed this up with a visit to site to formally assess the implementation of the revised arrangements and to observe lifting activities within the construction enclave. Based on the evidence provided by these activities, ONR is satisfied that DSRL has responded positively and appropriately to this latest incident and can demonstrate significant improvements in a number of key areas including, planning, training, control and supervision. Consequently ONR has no objection to the resumption of lifting operations and has formally closed the Regulatory Issue raised in response to this incident.

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, including the issuing of an Enforcement Notice.

No Licence Instruments, Enforcement Notices or Formal Letters were issued during this period.

5 NEWS FROM ONR

Covid-19 (Coronavirus) (ONR position)

ONR is continuing to obtain assurance that nuclear site licensees and other dutyholders are adequately resourced to continue to safely and securely carry out their activities.

We remain satisfied with industry's response at this time and there has been no significant change to duty-holders' safety and security resilience.

As COVID-19 restrictions change, our focus is on the preparedness for the weeks and months ahead and maintaining safe and secure operations in the face of any further escalation in

COVID-19 transmission.

Most ONR staff continue to work from home. However we are increasing our on-site regulatory work in accordance with public health advice. We'll also continue to inspect, assess and permission remotely where necessary to protect staff, workers on site, and the public around sites.

Enforcement Action

In July we publicised the serving of an [Improvement Notice on Rolls-Royce Submarines Ltd \(RRSL\)](#) for procedural safety breaches at its Derby site. The notice was served after shortfalls were identified against the safety case requirements at a nuclear fuel production facility on the site.

In September we announced that an [Improvement Notice had been served on EDF Energy Nuclear Generation Ltd \(EDF NGL\)](#) for shortfalls in safety procedures at its Heysham 2 Power Station in Lancashire. The notice was served after some of the equipment which is used to measure reactor power was incorrectly configured during the reactor's restart process following a planned outage in April 2020.

In September we announced that an [Improvement Notice had also been served on Devonport Royal Dockyard Ltd](#) for shortfalls in maintenance procedures at its Plymouth site. The notice was served after Devonport Royal Dockyard failed to carry out scheduled maintenance tests on an effluent extraction system which is used to support maintenance and repair activities within the licensed site.

In September we publicised our intention [to prosecute AWE plc under Section 3 of the Health and Safety at Work etc. Act \(1974\)](#). The charge relates to an incident on 20 June, 2019, at the AWE Aldermaston site which resulted in a contractor narrowly avoiding injury when a flash over of electricity occurred from a 415V electrical source. The incident was a conventional health and safety matter and took place in a 'non-nuclear' building, so there was no radiological risk to workers or the public.

Regulatory updates

In July the Government published its response to the International Atomic Energy Agency's final report on the [Integrated Regulatory Review Service \(IRRS\) mission to the UK](#). The IRRS mission took place between 14 – 25 October 2019 was hosted by ONR, and saw a team of 18 independent experts from across the globe scrutinising the regulation of nuclear and radiological safety.

In August we provided EDF NGL with permission for [Reactor 3 at its Hunterston B site to return to service](#) for a limited period of operation (16.425 Terawatt days, approximately six months' operation). In September we also gave [permission for Reactor 4 at the same site](#) to return to service for a limited period of operation (16.25 terawatt days, which is approximately six months operation). The decision to permission the restart of these reactors was given after extensive and detailed assessments of the respective safety cases by specialist ONR inspectors.

Corporate updates

In July we published our new [2020-25 Strategy](#), which sets out our direction and priorities for the next five years. It builds on our strengths and continues to focus on protecting society, and addressing the changing demands we will face as the UK's nuclear regulator.

In late September we published our [Annual Report and Accounts](#) highlighting our performance and key achievements for 2019/20.

The report notes that we continued to deliver our mission of protecting society by securing safe nuclear operations and that the majority of dutyholders have continued to meet the high standards of safety and security required. Where dutyholders have fallen short of such standards, we are satisfied that their facilities remain safe and that our regulatory focus has had a positive impact on their performance.

During the year, we completed more than 800 compliance inspections across 36 licensed sites during 2019/20, granting permission for 30 nuclear-related activities, serving three improvement notices and instigating one prosecution.

ONR Chair Mark McAllister said: "I am pleased to report that we have again delivered our mission and achieved our 2020 vision. As we look ahead, I have every confidence in our senior leadership team to see through the strategic improvement projects already underway that will enhance the organisation's information and knowledge management system, and successfully deliver the aspirations of our new strategy."

In September we announced that [Jean Llewellyn OBE](#) had been appointed to the ONR Board as the new Security Non-Executive member. Jean will take up her appointment on 1 October 2020 for a three year term and will Chair ONR's Security Committee.

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