



Office for Nuclear Regulation (ONR)

Site Report for Hartlepool Power Station

Report for period 1 July – 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 of the Hartlepool Local Community Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend Hartlepool Local Community Liaison Committee meetings where these reports are presented and will respond to any questions raised there. Any person wishing to enquire about matters covered by this report should contact ONR.

TABLE OF CONTENTS

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

1 INSPECTIONS

1.1 Dates of Intervention

ONR inspectors undertook interventions relevant to Hartlepool Power Station on the following dates during the report period:

- 1st July – 20th August (remotely),
- 18-21st August (on site),
- 21-28 September (remotely)

Some interventions in this period were conducted remotely as a result of the coronavirus pandemic.

2 ROUTINE MATTERS

2.1 Compliance 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 etc. 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 the licensee's (EDF Energy Nuclear Generation Ltd, NGL) 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 Hartlepool Power Station covered the following:

- Management systems
- Control and Supervision of Operations
- Handover arrangements of nominated ONR site safety inspector
- CO2 Processing and Blowdown

2.2 System Based Inspections (SBI)

SBIs consist of a series of inspections which are intended to establish that the basic elements of a site/facility safety case as implemented in Safety Systems and Structures (SSS) are fit for purpose and that they will fulfil their safety functional requirements. In an SBI, the adequacy of implementation of the licensee's arrangements for six Licence Conditions (LC) (10, 23, 24, 27, 28 & 34) is tested for the SSS chosen.

2.2.1 CO2 Processing and Blowdown

This Systems-based inspection was conducted remotely due to the COVID 19 restrictions implemented at Hartlepool in September. ONR utilised the station independent nuclear assurance to conduct system walk downs to support this remote inspection.

Due to the availability of staff during the inspection week this SBI has not yet complete however there were no concerns raised during the completed sessions that give concern to the ability of the system to meet the requirement of the safety case.

2.3 Other Matters

During the period the site inspector worked remotely to monitor the performance of the site by:

- Reviewing the open regulatory issues associated with Hartlepool with the Technical and Safety Support Manager (TSSM). Generally, good progress is being made on the majority of issues; some delays are evident with lower priority issues, but at present, we have no significant concern.
- Meeting with the TSSM during twice-weekly meetings, to discuss the station's response to, and the impact of, the coronavirus pandemic.
- Meeting on a weekly basis with the site-based Independent Nuclear Assurance team to ensure the internal regulator function remains effective and verifying information provided by the station.
- Increasing the number of meetings attended, including senior leadership team morning meetings (where the station's priorities are set), maintenance requirements review group meetings (where the impact of potential or actual staff shortfalls on safety-significant maintenance are managed) and operational focus meetings (where the day-to-day threats to safety and operation are discussed).

As a result of the above remote interactions, the site inspector considers that the site has managed its response to the pandemic during the period in a manner that, so far as is reasonably practicable, protected its own staff and ensured that there was no degradation in nuclear safety.

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

3 NON-ROUTINE MATTERS

3.1 Events

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.

Matters and events of note during the period were:

- 2020/445 – Reactor 1
On 6th July 2020 Flask E96 was being loaded on to flatrol 9040-4. While attempting to lower the flask it impacted on the flatrol cover. It was discovered that the cover on flatrol (9040-4) located in the flatrol bay was closed, which resulted in the Flask impacting on the flatrol cover causing damage to the cover. An HR investigation was concluded, and it has been identified as a failure to complete the task as required by an individual. Action has been taken in line with EDF HR process.
- 2020/556 – AFSF PSSR Compliance
Since March 2019, 24 out of 32 Additional Fuel Storage Facility (AFSF) buffer storage tubes have had their Safety Relief Valves (SRV) replaced. As part of this replacement a Pressure Systems Safety Regulation (PSSR) Thorough Inspection should be completed. It has been discovered that 12 out of the 24 did not have the Thorough Inspection completed as per the Written Scheme of Examination (WSE). All pressurised operations at the AFSF were suspended. The 12 SRVs with no inspection certificate have been removed & inspected as per the WSE requirements with no issues identified. The stations have also replaced the remaining 8 of 32 SRVs and they have been inspected as per the WSE. All 20 SRVs which have been removed/replaced will have lift tests completed prior to resuming pressurised operations.

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.

Table 1
Licence Instruments and Enforcement Notices Issued by ONR during this period

Date	Type	Ref No	Description
N/A			

5 NEWS FROM ONR

5.1 COVID-19

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 dutyholders' 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.

ONR staff continue to work at home, primarily. 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.

5.2 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 power 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.

5.3 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.

5.4 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.

6 CONTACTS

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

website: www.onr.org.uk
email: ONREnquiries@onr.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, 2020

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

Published 10/20

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.