

Office for Nuclear Regulation (ONR) Site Report for Chapelcross

Report for period 1 October – 31 December 2021

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 Chapelcross Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend Chapelcross Site 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

Dates of inspection

The ONR site inspector made inspections at the Chapelcross (CHX) site on the following dates during the report period 1 October – 31 December 2021:

- 20 - 21 October 2021
- 9 - 11 November 2021

2 Routine Matters

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.

In this period, ONR carried out the following planned inspections at CHX:

Licence Condition (LC) compliance inspections focus on single LC compliance sampled from areas across the site. Each area may include multiple systems. The LCs inspected during this period were:

- LC7 Incidents
- LC26 Control & supervision of operations

System Based Inspection (SBI):

SBIs are an essential element of ONR's inspection activities on a nuclear site and consist of a series of inspections that 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.

During an SBI, ONR inspectors check the SSS against six licence condition arrangements typically LCs 10, 23, 24, 27, 28 & 34. The SBI is not a review of the Licensee's arrangements but an inspection of the adequacy of their implementation that will allow a judgement of whether the SSS will adequately meet the requirements of the safety case. The LCs inspected during this SBI were:

- LC10 Training
- LC23 Operating Rules
- LC24 Operating Instructions
- LC27 Safety Mechanisms, Devices & Circuits
- LC28 Examination, Inspection, Maintenance & Testing
- LC34 Leakage & Escape of Radioactive Material and Radioactive Waste

In October I carried out a SBI on CHX's implementation of their LC10, 23, 24, 27, 28 and 34 arrangements for Miscellaneous Activated Components (MAC) Intermediate Level Waste (ILW) retrievals. From the documentation sampled and the areas inspected during the SBI, I found that CHX's implementation of its LC 10, 23, 24, 27, 28, and 34 arrangements was adequate and that the MAC retrievals SSS adequately fulfils the requirements of the safety case.

During the reporting period, ONR judged the arrangements made and implemented by the site in response to safety requirements to be satisfactory in the areas inspected. Where improvements have been identified, the licensee has made a commitment to address those issues, and ONR inspectors will closely monitor progress during future site inspections. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales. 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 on our website www.onr.org.uk. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

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.

COVID-19

In response to the Covid-19 pandemic all 12 of Magnox Ltd.'s (ML) licensed sites have put arrangements in place to ensure their workplaces are COVID-secure sites. The sites have returned to a new "normal" with many staff combining working from home and at site as appropriate, with project work restarted to ensure the safe and timely decommissioning of these sites. In this quarter, CHX has continued with a controlled return to service with a number of staff working from home and at site as appropriate and has progressed a significant way through their plans. The ML Internal Oversight team has checked independently that the pandemic and restart arrangements have been properly implemented.

Emergency preparedness is being maintained through a duty cover team at each site in accordance with ONR approved emergency arrangements. These arrangements include the provision to call in additional personnel and the emergency services onto site to assist ML staff. These plans have been regularly rehearsed and observed by ONR inspectors during emergency exercises in the past.

Overall ONR is content with the actions taken by ML to make safe the CHX site under these exceptional circumstances. The site inspector is in touch regularly with CHX personnel to discuss any changes to the arrangements and any potential emerging safety or regulatory issues.

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

For the latest news and information from the Office for Nuclear Regulation, please read and subscribe to our regular email newsletter 'ONR News' at www.onr.org.uk/onrnews

6 Contacts

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