

Office for Nuclear Regulation (ONR)

Site Report for Dungeness B

Report for period 1 April to 30 June 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 of the Dungeness Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Dungeness Site Stakeholder Group 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.



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1 Inspections

Dates of inspection

ONR inspectors undertook inspections at Dungeness B Power Station on the following dates during the quarter:

- 27 - 30 April 2021
- 14 -18 June 2021

Some of the interventions that were undertaken in this period were conducted remotely due to the Covid-19 pandemic.

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 station's current arrangements have enabled more site-based inspections during this reporting period than in previous reporting periods. However, due to the COVID-19 pandemic, parts of the compliance inspections were undertaken remotely using Skype video conferencing. The licensee is still required to make and implement adequate arrangements under the licence conditions attached to the licence to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

Compliance Inspections

The station continues to manage its pandemic arrangements so far as is reasonably practicable, has protected its own staff and ensured that there was no degradation in nuclear safety.

In this period, routine inspections at Dungeness B covered the following topics:

- Licence Condition 11 – Emergency arrangements
- Licence condition 9 - Instructions to persons on site
- Licence condition 10 - Training

27 – 30 April 2021

Licence Condition 11 – Emergency arrangements

The purpose of this intervention was to assess Dungeness B's (DNB's) was to observe the station's emergency exercise demonstration "JENNER". Due to the COVID 19 pandemic arrangements, this exercise was largely a desktop exercise but covered all the essential command areas such as Simulator, Access Control Point (ACP) and the Emergency Control Centre (ECC). The scenario involved the following a nuclear off-site emergency initiated by the loss of reactor coolant in the reactor basement area, a fire in the essential diesel generators with severe weather causing marine debris to block the drum screens. Casualty recovery and repairs were simulated.

The scenario was challenging, a range of decision-making processes were required to deal with the emerging situation. The station provided a good demonstration of its emergency arrangements making full use of its dual simulator capability, the confidence in using new unit desk engineers for the demonstration and the adaptation of facilities to demonstrate the station's arrangements. The station also made arrangements for ONR observers to either visit each of the command areas directly or observe remotely.

From ONR's observations, we have rated the LC11 level 1 emergency exercise demonstration as Green.

14 -16 June 2021

Compliance inspections of LC 9 (Instructions to persons on site), LC10 (Training)

For the Licence Condition 9 compliance inspection, ONR inspectors noted positive feedback from the individuals interviewed who had either undertaken the unescorted site access training online or had been provided instructions as to who was escorting them during their station visit. From ONR's sampled inspection of the station's arrangements, ONR rated this compliance inspection as green.

During the Licence Condition 9 compliance inspection, ONR inspectors elected to sample several workorder cards that were active for painting work being undertaken. ONR noted that dates had been used to tippex out the original issue date on the work order cards. ONR also identified that the required maintenance instruction hold points had not been signed off in one work order card, and that work continued without completion of the formal hold points. Considering the minor procedural use and adherence shortfalls, ONR has raised a regulatory issue to track the station's progress in addressing the actions raised from these observations.

For the Licence Condition 10 compliance inspection, ONR inspectors observed three training courses either delivered online via Skype or at the station. ONR also sampled several station staff role profiles and the essential training requirements to meet the needs of the role. From ONR's sampled inspection, the compliance inspection was rated green.

System-based inspections

In addition to our compliance inspections based on the conditions attached to the nuclear site licence, ONR also inspects operating reactors against safety-related systems. Each site has a safety case that demonstrates how it operates safely. For Advanced Gas-cooled Reactors, each of the key systems will be inspected against the claims made upon them by the safety case. The aim is to systematically inspect all the significant safety related systems within a five-year cycle. ONR considers that this will provide additional assurance that operations on the Dungeness site are safe. Each of these system inspections considers the relevant licence conditions below:

- Licence condition 10: Training
- Licence condition 23: Operating rules
- Licence condition 24: Operating instructions
- Licence condition 27: Safety mechanisms
- Licence condition 28: Examination, inspection, maintenance and testing
- Licence condition 34: Leakage and escape of radioactive material and radioactive waste

No systems-based inspections were undertaken during this period.

Other work

Dungeness B Performance Improvement

ONR currently regards Dungeness B as being in 'enhanced attention' and has allocated extra resources to advise and support the station as it improves its performance further and monitor the safety performance of the station as evidenced by our regulatory programme and the station's operating experience.

In the light of the decision not to return to power generation (see below), the station's former performance improvement plan will no longer be run as a separate programme but will be included in the site-wide programme to prepare for defueling. ONR will continue to engage with these activities and to seek sustained improvements in safety performance.

3 Non-Routine Matters

Return to Service Update

In early June 2021, EDF made the decision to move Dungeness B power station into the defueling phase with immediate effect. Prior to this decision, the site had developed a scope of work to enable the reactors to return to service and this was being monitored and permissioned by ONR. Since June, EDF has been preparing a scope of work to prepare the station for the defueling phase. To ensure appropriate regulatory control is maintained during the preparations for defueling, ONR is engaging with EDF to understand the programme of work to enable a proportionate intervention and permissioning strategy to be implemented.

Both reactors are safely shut down and will not restart. Therefore, the agreement to the extend Reactor 21's operating period under LC 30(2) mentioned in previous SSG reports is no longer applicable. Therefore, ONR has concurred with the station's proposal to extend the maintenance intervals on R21 to January 2022 using the station's LC22 arrangements to develop the safety justification as described in the maintenance schedule preface.

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 issue Enforcement Notices to secure improvements to safety.

5 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)

We are 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.

All licensed sites are required to determine minimum staffing levels necessary to ensure safe and secure operations and contingency arrangements in the event that these levels are not met. This condition is specifically designed to ensure that industry can adequately manage and control activities that could impact on nuclear safety and security under all foreseeable circumstances, including pandemics.

Although ONR staff continue to work primarily at home, (carrying out as much of our work as possible via videoconference, phone and email), we are carefully and progressively increasing our site footprint. We continue to assess our on-site presence in line with government guidelines and our business needs, ensuring we have a balanced portfolio of on-site inspections and interventions, that are important to support effective regulation across our purposes.

Our latest position can be found on our [website](#).

Enforcement Action

- In April, we announced that EDF [complied](#) with a Direction we served on 14 December 2020, under the Pressure Systems Safety Regulations (2000). This followed an inspection, at which found a number of pressure system components at Heysham 1 Power Station were overdue their scheduled examination.
- In May, we agreed to [extend an improvement notice](#) served on EDF in September 2020, recognising the progress made so far. The notice was served after some of the equipment used to measure reactor power at Heysham 2 was incorrectly configured. We judged that Heysham 2 is able to operate safely, and that additional time to demonstrate the required improvements will not pose a risk to safety. EDF must now comply with the improvement notice by 31 July 2021.
- In June, we announced that Rolls-Royce Submarines Ltd (RRSL) had [complied](#) with an improvement notice served on 29 May 2020. The notice was served after RRSL operators brought 21 units of fissile material into the facility – which

exceeding the limit defined within the safety case and set out in the Criticality Control Certificate for the facility.

Stakeholder Engagement

- In April, we published an [article](#) introducing our newest board member, Jean Llewellyn, who joined us in October 2021, as security lead. Jean brings with her a wealth of experience, including serving as a non-executive director on the board of the World Institute for Nuclear Security since 2018 – which has given her a good understating of the global security challenges facing the nuclear industry.
- In May, we issued our e-bulletin '[ONR News](#)' to subscribers. This issue included farewell reflections from our outgoing chief executive, a leadership update, further information on our COVID -19 response, and the results of our latest stakeholder survey. You can sign up for our e-bulletin [here](#)
- On 1 June, we [announced](#) the full implementation of our new leadership structure. Mark Foy is now our combined Chief Executive and Chief Nuclear Inspector. He is supported by Sarah High as Deputy Chief Executive, and Donald Urquhart as Executive Director of Operations.
- In June, we published our new [Corporate Plan for 2021/22](#), which sets out our key priorities to protect the public by securing safe nuclear operations.
- In June, our State System of Accounting for and Control of Nuclear Material (SSAC) project - which saw ONR become the UK's national nuclear safeguards regulator from 31 December 2020, was [shortlisted for a national award](#) in the Project Management Institute's UK National Project Awards in the 'Project of the Year (Public Sector)' category.
Nuclear safeguards are measures to verify that countries comply with international obligations not to use nuclear materials from civil nuclear programmes for non-peaceful purposes.

6 Contacts

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