

Office for Nuclear Regulation (ONR) Site Report for Hunterston A

Report for period 1 July – 30 September 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 Hunterston Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Hunterston 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 Hunterston A (HNA) site on the following dates during the report period 1 July – 30 September 2021:

- 14 – 16 September 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, routine inspections of HNA covered the following:

System Based Inspection (SBI): -

SBIs are an essential element of ONR's inspection activities and consist of inspections that are intended to establish that the limits and conditions in the site/facility safety case are implemented in practice and that they will fulfil their safety functional requirements.

During an SBI, ONR Inspectors check against a range of licence condition arrangements. 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

ONR carried out this SBI at the Solid Active Waste Building (SAWB) Intermediate Level Waste (ILW) retrievals. From the documentation examined and the areas inspected during the SBI, we found that HNA's implementation of its arrangements was adequate and that the SAWB retrievals systems 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, HNA 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 HNA site under these exceptional circumstances. The site inspector is in touch regularly with HNA 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

Enforcement action

- In July, we served an improvement notice on Devonport Royal Dockyard Ltd (DRDL) for shortfalls in its health and safety arrangements. The notice was served after DRDL failed to demonstrate consistent and effective arrangements to control and monitor the risks associated with working at height at its Devonport site. DRDL must comply with the requirements of the improvement notice by 31 March 2022.
- In August, we announced that Morgan Sindall Infrastructure Ltd had complied with an improvement notice served in January 2021 after workers came close to striking a live high voltage electric cable during excavation work at the Sellafield site.

COVID-19: 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; there has been no significant change to dutyholders' safety and security resilience.
- We have measures in place to try and prevent asymptomatic ONR staff unwittingly conveying the virus onto a regulated site. We require all staff to take a circular 1 health (C1H) antigen test in advance of them visiting a site. In addition to the C1H test, we also require them to take a lateral flow test on the morning of their planned site visit. We are keeping our COVID-19 testing guidance under regular review, in-line with the changing national context and any further developments in industry approaches to testing arrangements.

Other

- In July, our project to become the UK's domestic safeguards regulator was named the public sector's [Project of the Year at the National Project Awards](#).
- In September we invited stakeholders to submit comments on our updated reference papers for Coastal Flood Hazards and Meteorological Hazards for Nuclear Sites. Although supplementary to our normal governance process, we are doing this due to stakeholder interest in these topics and our commitment to being an open and transparent regulator.

The reference papers provide additional detail on the analysis of the external hazards for nuclear sites and have been produced by our [Expert Panel on Natural Hazards](#), a group of academic and industry technical specialists working under contract to provide us with independent expert advice. You can

find out more about how to get involved and comment on these papers on our [website](#).

6 Contacts

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