

Office for Nuclear Regulation (ONR)

Site Report for Hartlepool Power Station

Report for period 1 April to 30 June 2022

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 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 inquire about matters covered by this report should contact ONR.

Table of Contents

| | |
|------------------------------|---|
| 1. Inspections | 3 |
| 2. Routine Matters | 4 |
| 3. Non-Routine Matters..... | 7 |
| 4. Regulatory Activity | 8 |
| 5. News from ONR..... | 9 |
| 6. Contacts | 9 |

1. Inspections

1.1. Dates of Inspection

ONR inspectors made inspections on the following dates during the report period 1 April to 30 June 2022:

- 6 April (remote)
- 12-13 April (onsite)
- 10-11 May (onsite)
- 18 May (offsite)
- 24 May (onsite)
- 28-29 June (onsite)

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 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 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:

LC22 Modification or experiment on existing plant:

This planned inspection aimed to sample the station's compliance with Licence Condition 22 (Modification or experiment on existing plant). In particular this inspection focused on the management of temporary modifications. During a previous inspection in 2021 ONR had raised a Level 4 regulatory issue regarding the management of temporary modifications. During this inspection the improvements made in managing temporary modifications were reviewed against the extant arrangements and sufficient evidence was provided in order to close the ONR regulatory issue. The fleet arrangements for compliance with LC22 were considered adequate and a rating of GREEN was awarded.

Leadership and Performance Improvement review

The purpose of this site visit was to hold individual meetings with the site leadership team in preparation for a safety culture intervention to be held later in the year and also to engage with the newly appointed performance improvement (PI) manager. During this visit the site inspector was supported by an ONR leadership and management for safety (LMfS) specialist inspector and a human factors (HF) specialist inspector.

A series of introductory meetings with the station's management team were held with the aim of initiating a programme of engagement regarding performance improvement

plans. This will continue through the rest of the financial year including a safety culture intervention planned for October 2022.

We met the newly appointed performance improvement manager to discuss the effectiveness of the performance improvement department on site and the engagement across the lead team. Overall, the discussion with the PI team was beneficial and allowed for an open discussion on all aspects of the department responsibilities. We confirmed that ONR would conduct a rated LC7 compliance inspection later in 2022.

Level 2 Exercise

On 18 May, ONR witnessed Hartlepool Borough Council's demonstration exercise "Hydra". This exercise aimed to demonstrate the ability to implement Hartlepool Power Station's Off-Site Emergency Plan (OSEP) as per the requirements of the Radiation Emergency Preparedness and Public Information Regulations 2019 (REPP19), specifically Regulation 12: Reviewing and Testing of Emergency Plans.

Secondary Shutdown System Review

This intervention was to allow ONR inspectors to review the recently modified secondary shut down (SSD) system and to provide updates on related ONR regulatory issues. ONR visited the modified SSD and tertiary shut down (TSD) systems at Hartlepool. The visit was not a rated compliance inspection but provided an opportunity for ONR inspectors to review the modification of the system and to gather evidence on progress of open ONR regulatory issues.

LC28 – Pressure System Safety Regulations (PSSR)

This planned compliance inspection reviewed station activities undertaken to address enforcement action issued by ONR in 2020 relating to EDF's compliance with the Pressure System Safety Regulation 2000 (PSSR). The inspection was rated against Licence Condition 28 (examination, inspection, maintenance and testing) and was rated as RED (demand improvement) due to a number of self-identified shortfalls in compliance. ONR are closely engaging with EDF regarding further regulatory action to ensure the station returns to compliance as soon as reasonably practicable. This will be reported on further in the Q3 SSG report for Hartlepool Power station.

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.

2.2. Other Work

During the period the site inspector held routine meetings with station staff to monitor the performance of the site by:

- Reviewing the current plant status and all open regulatory issues associated with Hartlepool with the Technical and Safety Support Manager (TSSM).
- Meeting on a weekly basis with the site-based Independent Nuclear Assurance (INA) team to ensure the internal regulator function remains effective and verifying information provided by the station.
- Engaging with site 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.

Matters and events of particular note during the period were:

- INF-1899: On 28 April a configuration error on the Co2 plant resulted in Co2 standby boiler number 2 being unavailable at the same time that boiler number 3 was undergoing planned testing which resulted in an unplanned 36-hour action condition. The issue was quickly identified, and a full confirmation of plant status (COPS) check was carried out. The ONR site inspector has reviewed the station investigation and considered this to have been appropriate.
- INF-2063: On 18 June, the station declared an Operational Alert due to low Co2 standby boiler head tank water levels and the inability to fill them using the contract plant. A 4-hour shutdown condition was entered due to CO2 standby boiler water stocks falling below the required level. Initial investigations found that a defective solenoid valve failed open which caused the head tanks to drain. The station utilised other plant equipment on site to return the water stocks to the required level and the 4-hour shutdown condition was exited. ONR inspectors will review the internal investigation when complete.
- INF 1796: Safety Control Rod Inserted into the Core during control rod exchange: This event was reported on within the Q1 SSG report. EDF have subsequently completed their own internal investigation which was considered appropriate by ONR inspectors. However due to additional factors considered during the investigation EDF have increased the INES rating from a Level '0' (below scale) to a Level '1' (anomaly). ONR consider this rating appropriate however reiterate that there were no actual consequences to the event and all other shutdown safety systems were functional and that there was no risk to the public. ONR continue to monitor the investigation actions to ensure there are no reoccurrences of this event.

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.

Reports detailing the above regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

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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