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| ONR Site Report  Sellafield Ltd – Sellafield |



ONR Site Report

Sellafield Ltd - Sellafield

Report for period: 01 October 2023 – 31 March 2024

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Approved by: Superintending Inspector

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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 West Cumbria Sites Stakeholder Group (WCSSG) and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend West Cumbria Sites 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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List of abbrevations:

|  |  |
| --- | --- |
| AHF | Active Handling Facility |
| ALARP | As Low As Reasonably Practicable |
| BEP | Box Encapsulation Plant |
| BEPPS/DIF | Box Encapsulation Plant Product Store/Direct Import Facility |
| CA | Competent Authority |
| CDM | Construction (Design and Management) Regulations 2015 |
| COMAH | Control Of Major Accident Hazard (Regulations 2015) |
| COSHH | Control Of Substances Hazardous to Health Regulations |
| DSEAR | Dangerous Substances and Explosive Atmospheres Regulations |
| EA | Environment Agency |
| EDNUP | Electrical Distribution Network Upgrade Project |
| EPS | Encapsulation Product Store |
| ERA | Enhanced Regulatory Attention |
| FGFL | First Generation Finishing Line |
| FGMSP | First Generation Magnox Storage Pond |
| HALES | Highly Active Liquor Evaporation and Storage |
| HAST | Highly Active Storage Tank |
| HLWP | High Level Waste Plants |
| HSWA74 | Health and Safety at Work Act 1974 |
| ILW | Intermediate Level Waste |
| INES | International Nuclear Event Scale |
| IRR17 | Ionising Radiations Regulations 2017 |
| ISF | Interim Storage Facility |
| KDM | Key Decommissioning Milestone |
| LAEMG | Low Active Effluent Management Group |
| LC | Licence Conditions |
| LOLER | Lifting Operations and Lifting Equipment Regulations 1998 |
| MEP | Magnox Encapsulation Plant |
| MER | Magnox East River |
| MHSWR99 | Management of Health and Safety at Work Regulations 1999 |
| MRF | Magnox Reprocessing Facility |
| MSSS | Magnox Swarf Storage Silo |
| NDA | Nuclear Decommissioning Authority |
| NIA65 | Nuclear Installation Act 1965 |
| NSHS | Nuclear Site Health and Safety |
| OFSG | Oxide Fuel Storage Group |
| ONR | Office for Nuclear Regulation |
| OR | Operating Rule |
| PFCS | Pile Fuel Cladding Silo |
| PFSP | Pile Fuel Storage Pond |
| PPP | Programme and Project Partner |
| PSR | Periodic Safety Review |
| REPPIR | Radiation Emergency Preparedness and Public Information Regulations |
| RCW | Recirculating Cooling Water |
| RI | Regulatory Issue |
| SCIE | Sellafield Compliance, Inspection and Enforcement |
| SEMS | Sellafield Enterprise Management System |
| SEP2 | Silo Emptying Plant No2 |
| SFAIRP | So Far As Is Reasonably Practicable |
| SFM | Spent Fuel Management |
| SMF | Silo Maintenance Facility |
| SNM | Special Nuclear Materials |
| SQEP | Suitably Qualified and Experienced Person |
| SSB | Self Shielded Boxes |
| SRP | Sellafield Product and Residue Store Retreatment Plant |
| THORP | Thermal Oxide Reprocessing Plant |
| WTR | Waste Transfer Route |
| WVP | Waste Vitrification Plant |

**Licence conditions**

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2 Marking of the site boundary

3 Control of property transactions

4 Restrictions on nuclear matter on the site

5 Consignment of nuclear matter

6 Documents, records, authorities and certificates

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32 Accumulation of radioactive waste

33 Disposal of radioactive waste

34 Leakage and escape of radioactive material and radioactive waste

35 Decommissioning

36 Organisational capability

# Inspections

## Date(s) of Inspection

The ONR site inspectors made inspections on the following dates during the report period 01 October 2023 – 31 March 2024:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **October 2023** | **November 2023** | **December 2023** | **January 2024** | **February 2024** | **March 2024** |
| **Special Nuclear Materials (SNM)** | 10, 11 | 8, 9 |  | 10, 11 | 7, 8, 14, 28 | 20 |
| **Retrievals** | 3,4 | 14-16 | 5,6 |  |  | 25,26 |
| **Remediation** | 3,4,10,23 | 7,11,23 | 6,7,12 |  | 27, 28 |  |
| **Spent Fuel Management (SFM)** | 4,5,10,11 | 7,8 | 13 |  | 7 |  |
| **Site Management** |  | 23 | 7 |  |  |  |
| **Corporate** | 3-5, 10, 19, 23 |  |  |  |  | 6, 7, 13, 14, 27, 28 |

# 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 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 Sellafield covered the following:

**Special Nuclear Materials Value Stream (SNM)**

**SNM North**

Four planned compliance inspections were conducted to confirm Sellafield Limited’s compliance with its arrangements for Licence Conditions (LCs) 10, 12, 23, 26, 27 and 28. ONR judged that compliance with the LCs was adequate and awarded Green (no formal action) inspection ratings with the exception of LC28. For LC 28, specifically in relation to nuclear fire safety, shortfalls were identified regarding plant maintenance schedule availability and maintenance records for those key structures, systems and components listed in the Engineering Schedule. Discrepancies were also found between the inspection periodicity listed in the Engineering Schedule and the maintenance records provided. An inspection rating of Amber (seek improvement) was given and a level 3 regulatory issue was raised to track improvements.

In addition, a planned compliance inspection was conducted against the Regulatory Reform (Fire Safety) Order 2005, which was judged as adequate and awarded a Green (no formal action) inspection rating.

**SNM South**

Two planned compliance inspections were conducted to confirm Sellafield Limited’s compliance to its arrangements for LC28 and 36. ONR judged that compliance was adequate and awarded a Green (no formal action) inspection rating.

In February/March 2024, a readiness inspection under LC19 (Commissioning) and Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) for the lifting and installation of eleven ~75 Te roof trusses was conducted at the Sellafield Product and Residue Store Retreatment Plant (SRP). Compliance with the LC and LOLER was judged as adequate and a Green (no formal action) inspection rating was assigned.

**Retrievals Value Stream**

During the reporting period within the retrievals value stream, ONR carried out three LC compliance inspections and two System Based Inspections (SBIs) covering LCs 10, 11, 12, 23, 24, 26, 27, 28, 32, 34, 35 and 36.

**Pile Fuel Cladding Silo (PFCS)**

A SBI was undertaken on the ventilation system in PFCS. ONR judged that compliance with the licence conditions met the legal standard and assigned green (no formal action) inspection ratings. The overall judgement was that the ventilation system in PFCS fulfils the requirements of the safety case.

A unannounced compliance inspection was also undertaken at PFCS. The advantage of an unannounced inspection is that the immediate state of the facility and the way that it is being operated can be observed. The purpose of this inspection was to confirm Sellafield Limited’s compliance with its arrangements for LC 11. ONR judged that compliance met the legal standard and assigned a green (no formal action) inspection rating.

**Legacy Ponds**

A planned compliance inspection was undertaken in Legacy Ponds to confirm Sellafield Limited’s compliance with its corporate arrangements for LC 12, LC 26 and LC 36. For LC 12 and 26, ONR judged that compliance with the LCs met the legal standard and assigned green (no formal action) inspection ratings.

An inspection rating of amber (seek improvement) was appropriate against LC 36 based on the lack of a clear operating plan within First Generation Magnox Storage Pond (FGMSP) at the time of the inspection and failure to meet Minimum Safe Staffing Levels (MSSLs). However, ONR recognised that work is currently being undertaken by FGMSP to develop their operating plan (and associated resource plan) and to address capability issues. These activities are being overseen via a specific level 3 regulatory issue and no further enforcement action was taken since ONR was content that the shortfalls identified during the inspection were adequately covered by the extant level 3 regulatory issue.

**Magnox Swarf Storage Silo (MSSS)**

A SBI was undertaken on the cooling system in MSSS. ONR judged that compliance with all the six standard LCs met the legal standard and assigned green (no formal action) inspection ratings. The overall judgement was that the cooling system in MSSS fulfils the requirements of the safety case.

A planned compliance inspection was also undertaken in MSSS to confirm compliance with arrangements for LC 32 and LC 35. ONR judged that compliance with the LCs met the legal standard and assigned green (no formal action) inspection ratings.

ONR released line 592 of Hold Point Control Plan (HPCP) Issue 113.1 in February 2024 which related to modifications to MSSS heat management capability and safety case claims on external sources of Recirculating Cooling Water (RCW). The hold point was linked to an enforcement letter (ONR-EL-22-029 SEL77808R) and associated level 2 regulatory issue. The letter related to increased compartment temperatures and the subsequent delays to commission a new RCW system. The actions within this letter required the implementation of the capability to supply chilled water as part of managing compartment heat within MSSS. The level 2 regulatory issue was used to track this work. Following the successful implementation of the system and the subsequent decrease in compartment temperatures ONR closed the issue and released the hold point.

**Remediation Value Stream**

ONR conducted a LC 23, 24 & 26 inspection on the MOX Demonstration Facility (MDF) to seek assurance that the facility complied with the site’s arrangements for these nuclear site LCs. ONR assigned a green rating for each of the three LCs with no further regulatory action required and no regulatory issues raised.

ONR also conducted a LC 35 inspection on the Prototype Fast Reactor (PFR) facility. The inspection focused on the preliminary decommissioning plan (PDP) including:

* The milestones and priorities in the plan;
* The procedures which ensure that the plan is reviewed, maintained and kept up to date;
* The identified end states for PFR;
* Waste arising from decommissioning and any challenges in managing this waste;
* Management of redundant equipment / ageing and degrading facilities; and
* How knowledge of the facility is generated, recorded and maintained to inform future decommissioning activities.

On the basis of the evidence sampled, ONR judged that there was an adequate plan for the decommissioning of the PFR in line with the relevant Sellafield Ltd arrangements, the decommissioning work was being progressed appropriately, and assigned a green rating with no further regulatory action required and no regulatory issues raised.

An inspection of LC 27, 28 & 34 was undertaken on the Plutonium Purification Plant (PPP). ONR focused the inspection on the aging management and interface with decommissioning as PPP is a historic and aging facility with significant radiological challenges in decommissioning. On the basis of evidence sampled at the time of the inspection, ONR considered that the PPP had complied with the relevant Sellafield Ltd arrangements for LC 27, 28 & 34 and assigned a green rating for each of the three LCs with no further regulatory action required and no regulatory issues raised.

**Spent Fuel Management Value Stream**

Three inspections were undertaken at Spent Fuel Services; two LC compliance and one system based inspection (SBI) covering LCs 10, 11, 23, 24, 27, 28, 34 and 36. One of the compliance inspections was an unannounced inspection (LC11). The SBI and LC11 were rated green, while an amber rating was awarded for the LC 36 inspection, a level 3 regulatory issue was raised as a result of this inspection and has subsequently been closed out.

**Highly Active Liquor Evaporation and Storage (HALES) and High Level Waste Plants (HLWP)**

One planned compliance inspection was conducted in HLWP to confirm Sellafield Ltd’s compliance with its arrangements for the Ionising Radiation Regulations 2017 (IRR17). ONR judged that compliance with IRR17 as met and assigned a green (no formal action) inspection rating.

For HALES, two planned inspections were conducted. One of these was conducted to confirm Sellafield Ltd’s compliance with its corporate arrangements for IRR17. The second inspection was a SBI to confirm the adequate implementation of the safety case for the HALES pipebridge systems and to confirm compliance with LCs 10, 23, 24, 27, 28 and 34. For all the planned LC compliance inspections ONR judged that Sellafield Ltd had met the required standard and assigned green (no formal action) inspection ratings. It was also judged that the HALES safety case for its pipebridge systems had been adequately implemented.

**Magnox Reprocessing Facility (MRF)**

One planned compliance inspection was conducted at the MRF facility to confirm Sellafield Ltd’s compliance with its arrangements for LC 27 and LC 28. ONR judged that compliance with these LCs was met and assigned a green (no formal action) inspection rating.

One inspection was carried out at the Low Active Effluent Management Group (LAEMG), a licence condition inspection covering LC 36. It was judged that compliance with the LC met the legal standard and the assigned rating was green (no formal action). Minor shortfalls were found against the Minimum Safe Staffing Level arrangements and implementation. These related to the opportunity to improve clarity of the associated paperwork and will be tracked via a level 4 regulatory issue.

**Site Management**

A planned compliance inspection was undertaken at Fellside Combined Heat and Power Plant on LC 26 and Regulation 5 of Management of Health and Safety at Work Regulations 1999. ONR concluded that in the areas sampled relevant good practice was met. A number of minor observations were made regarding causal analysis in an investigation and on recognised examples of good practice associated with the use of coloured tags to indicate the status of valves. Overall, ONR assigned a green (no formal action) inspection rating.

**Corporate**

Undertaking risk, hazard and regulatory intelligence informed corporate LC inspections and overseeing strategic enterprise change at Sellafield, including leadership and culture remain ONR’s corporate inspection areas of focus.

During the previous period it was reported that a corporate LC 25 inspection which had taken place at the end of that period and which had been rated amber (seek improvement) and noted that ONR’s Enforcement Management Model (EMM) was being applied. This has now been applied and the decided enforcement outcome was an enforcement letter to be tracked by a level 3 regulatory issue. The enforcement letter will be issued shortly and will be referenced in the next WCSSG report.

An inspection of LC 10 and LC 12 has been completed, targeted at training and demonstration of SQEP status relating to Sellafield Ltd’s updated safety case process. This inspection was undertaken (along with other inspections and engagements) since “Nuclear safety case adequacy and currency” is in Enhanced Regulatory Attention for Sellafield. Both LC 10 and LC 12 were rated green (no formal action).

An inspection of LC 12 was undertaken, covering both persons appointed as Duly Authorised Persons (DAPs) across the site and, in particular, SQEPs appointed across the site to control and supervise operations and to control and supervise Examination, Inspection, Maintenance & Testing (EIM&T). Since “Capable Organisation” is in Enhanced Regulatory Attention for Sellafield the scope of this inspection explicitly included consideration of the training and demonstration of SQEP status work which Sellafield Ltd has undertaken to improve Minimum Safe Staffing Level (MSSL) resilience. LC 12 was rated green (no formal action).

A corporate LC 14 inspection was undertaken, targeted at Sellafield Ltd’s safety case process and methods improvement plan. Like the aforementioned corporate inspection of LC 10 and LC 12, this corporate inspection was undertaken since “Nuclear safety case adequacy and currency” is in Enhanced Regulatory Attention for Sellafield. LC 14 was rated green (no formal action).

A corporate inspection of LC 35 was undertaken, covering the revision of the Sellafield Decommissioning Plan and its implementation and governance. This inspection was informed by an assessment of the aforementioned plan. LC 35 was rated green (no formal action).

During the reporting period, we also continued to monitor improvement actions being taken by Sellafield Ltd in response to previous corporate LC inspections.

**Strategic Enterprise Change**

Sellafield Ltd is implementing a portfolio of wide-ranging business change aligned to its “2-for-20” enterprise strategy. During the reporting period ONR has continued to maintain oversight of several strategic enterprise changes including:

* Continued development of Sellafield Ltd’s intelligent customer organisation for the Programme and Project Partners contracts;
* Development of the new Sellafield Enterprise Management System;
* Roll-out of new digital tools to support operations delivery;
* Strategic direction and ‘transition’ to new and/or replacement major procurement frameworks to support high hazard risk reduction, i.e.; Decommissioning Nuclear Waste Partners (DNWP), Infrastructure Delivery Partnership (IDP) and Projects and Asset Care Execution (PACE);
* Continued development of Sellafield Ltd’s intelligent customer organisation and arrangements for the Manufactured Products Organisation (MPO) to support the management and introduction of products manufactured in volume; and
* Development of the required enterprise-wide organisation capability to deliver the operating plan.

With the exception of the latter bullet point, ONR is satisfied that Sellafield Ltd is controlling the changes in line with legal requirements including LC 36 (Organisational capability). In respect of the latter bullet point, and informed by a significant body of evidence of shortfalls in organisational capability across the Sellafield Ltd enterprise, the “Capable Organisation” supporting indicator of the “Safety Leadership and Culture” attribute of the Regulatory Attention Levels framework has been assigned Enhanced Regulatory Attention . During the reporting period, written regulatory advice has been provided in two letters to the licensee; one specifically concerning shortfalls in system engineering resources and a second concerning the wider enterprise-wide shortfalls in organisational capability. ONR continues to monitor the actions being taken by Sellafield Ltd to address the identified shortfalls.

During this period, ONR also continued to monitor Sellafield Ltd’s progress against regulatory findings identified during assessments of: (1) safety leadership; and (2) the corporate governance of safety (details of both assessments are provided in previous reports to the WCSSG). ONR met the respective Sellafield Ltd process owners and is satisfied that the required improvements have now been made and have therefore closed the associated regulatory issues.

**Supply Chain and Quality**

During the reporting period one planned inspection was undertaken to sample the adequacy of Sellafield Ltd’s Infrastructure Strategic Alliance (ISA) supply chain management arrangements for the delivery of the Electrical Distribution Network Upgrade Project (EDNUP). The LCs in the inspection covered LC 17 (Management Systems) and LC 26 (Control and Supervision of operations)

LC 17 was rated amber (seek improvement) and LC26 was rated green (no formal action). Regulatory advice was provided for the LC 17 outcome which will be monitored by a level 3 regulatory issue. A level 4 regulatory issue was also issued to capture identified areas for improvement and monitor the delivery of the remedial actions.

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](http://www.onr.org.uk./intervention-records) on our website [www.onr.org.uk](http://www.onr.org.uk).

Should you have any queries regarding our inspection activities, please email [contact@onr.gov.uk](mailto:contact@onr.gov.uk).

## Other Work

**Special Nuclear Materials (SNM)**

ONR has continued to engage and influence the delivery of high hazard and risk reduction activities at the SNM facilities through three level 1 issues (the highest level of regulatory issue). Specifically, this includes asset care improvements on the First Generation Finishing Line (FGFL) facility and the delivery of capabilities to allow continued safe and secure storage of SNM.

Within this period Sellafield Ltd has provided sufficient evidence with respect to completion of FGFL asset improvements (electrical and containment upgrade tasks) within the SNM (North) complex, that the associated level 1 regulatory issue (RI 4931) has been closed.

Sellafield Ltd has also continued to make significant progress with regard to the previously permissioned activities for inspection, retrieval and repackaging of acute risk SNM packages. The reduction in risk and evidence provided has allowed us to also close the associated level 1 regulatory issue (RI 4995).

ONR issued a Licence Instrument (covered in the previous WCSSG report) to allow inerted retrievals from a legacy store. Commencement of these retrievals provided the necessary assurance to contribute to closure of the above level 1 regulatory issue (RI 4995). However, a level 3 regulatory issue has been raised as a means to ensure timely retrieval of the remaining inventory.

A level 1 regulatory issue remains extant for SNM which relates to safe and secure storage of the Ex-Dounreay material transported to Sellafield under the Dounreay Exotics Consolidation Programme which ONR is continuing to engage on.

The on-going construction of the Sellafield Product and Residue Store Retreatment Plant (SRP) is fundamental to the success of the future state programme and forms part of continued engagement with Sellafield Ltd to ensure the timely implementation of capabilities required for the safe longer-term storage of SNM inventory, including that which has been consolidated from Dounreay to Sellafield.

**Remediation Value Stream - Decommissioning Projects**

Regulatory engagements continue with the key remediation projects, including on two active demonstrators (the alpha glovebox dismantler and the sort and segregate demonstrator). The glovebox demonstrator is developing an efficient and effective capability to semi-remotely decommission alpha-active gloveboxes using laser cutting technology. The sort and segregate demonstrator is trialling an approach to separate the intermediate active wastes from plutonium contaminated material, for a more efficient management of legacy crates. Both these demonstrators will be subject to formal permissioning by ONR in 2024 and 2024/2025. ONR is also engaging on other future demonstrators, in cooperation with the ONR innovation cell.

Early engagement is now underway regarding the removal of the barrel section of the pile 1 chimney, which will be subject to ONR permission. Engagements also continue with Sellafield Ltd regarding the approach for floc removal from legacy tanks to longer term storage tanks. This plant modification proposal will be subject to ONR permissioning in 2024/2025.

Engagement has also resumed on a new major construction project, i.e. lightly shielded stores, for permissioning in the medium term.

**Magnox Swarf Storage Silo (MSSS)**

Sellafield Ltd. has made progress on retrievals of Miscellaneous Beta Gamma Waste from Compartment 10 following ONR permission during April 2022. Commencement of bulk waste retrievals from MSSS original building and first extension, and third extension silo compartments is currently due to commence in 2025/26 financial year and around 2030 respectively.

**MSSS - Original Building leakage**

As of March 2024, the MSSS Original Building (OB) liquor loss rate has remained relatively unchanged at around 2.3-2.5m3/day. It is possible that the leakage will continue until retrieval of bulk waste from OB silos has been completed.

There are currently no radiological consequences for the public or workforce resulting from the MSSS OB leakage to ground. Ground modelling and underpinning research concludes that the higher activity radioactive species are bound close to the facility. Migration of significant contamination through the ground is predicted to take decades and any risk to the environment and public would be very low and over an extended timescale. This exceeds the time it will take to remove and remediate the MSSS facility.

**Box Encapsulation Plant Product Store/Direct Import Facility (BEPPS-DIF)**

BEPPS-DIF is a critical enabler for hazard and risk reduction, storing the filled waste packages retrieved from the silos and other legacy facilities. On 15 December 2023 ONR permissioned the facility to commence active commissioning. This permission enabled the first material from PFCS to enter BEPPS-DIF where it was placed into vault 2. Active commissioning of the facility is continuing, further PFCS packages are due to enter the facility in early April 2024. Once active commissioning has been concluded, the facility will move directly into active operations.

**Pile Fuel Cladding Silo (PFCS) radioactive waste retrieval programme**

In August 2023 Sellafield Ltd commenced early retrievals from compartment 5. Waste was removed and placed into a 3m3 box and was transported to BEPPS-DIF on the 15 December 2024. Since this date PFCS has been unable to undertake further retrievals from compartment 5 due to a number of technical issues associated with its waste retrievals crane. Sellafield Ltd is confident that the commencement of waste retrievals will begin in April 2024.

**First Generation Magnox Storage Pond (FGMSP)**

On 9 February 2024, ONR issued Licence Instrument 547 (see Section 4) to allow active commissioning of the FGMSP export facility and the Interim Storage Facility (ISF) to handle and store self-shielded boxes (SSBs) containing zeolite skips. Retrieval of zeolite skips commenced in March 2024 and FGMSP Key Decommissioning Milestone (KDM) M14 (Export of first zeolite skip from FGMSP to the ISF) was subsequently completed in March 2024.

ONR continues to engage with Sellafield Ltd on the FGMSP Enforcement Letter (ONR-EL-23-009, SEL77827R as described in the previous WCSSG report) in relation to delivery of FGMSP KDM M14 and the associated compliance gap with Regulation 5 of the Management of Health and Safety Regulations 1999. Progress is being monitored through a level 3 regulatory issue (11513) and completion has been extended through 2024 recognising organisational changes being made across the legacy ponds.

**Pile Fuel Storage Pond (PFSP)**

On 19 March 2024, Sellafield Ltd wrote to ONR to notify a change to Pile Fuel Storage (PFSP) KDM M22. The change relates the KDM scope which has been revised to focus on a risk reduction target for the remaining inventory. ONR have no objections with the revised KDM objectives and delivery dates.

**Nuclear Site Health and Safety (NSHS)**

Sellafield Ltd continue to be in Enhanced Regulatory Attention for NSHS across three areas: (1) leadership and culture; (2) maturity of NSHS risk profiling; and (3) safety leadership and culture. Focus continues to be around two key areas: improvements to NSHS risk profiling and task risk assessments; with a level 3 regulatory issue raised for risk profiling and level 4 regulatory issue raised for task risk assessments. Sellafield Ltd have committed to making continuous long-term improvements across NSHS management.

NSHS work included progressing extant regulatory issues: site wide asbestos management; asbestos management within estates and utilities; site wide DSEAR management (dangerous substances and explosives atmospheres regulations); COSHH management within Analytical Services (control of substances hazardous to health); and site wide management of chemicals.

The NSHS team undertook post-prosecution (March 2023 Magnox Reprocessing Facility) inspections around confined space working; this work will continue into 2024. The NSHS team have been involved in incident and accident investigations across site, with advice and enforcement action being taken through individual site inspectors and associated facilities. These are noted in Section 4.

Life Fire Safety

Sellafield Ltd continues to implement its Fire Safety Improvement Plan and has successfully closed several actions on the associated regulatory issue. ONR continues to engage regularly with Sellafield Ltd on fire safety matters, identifying opportunities for further improvement as required. Sellafield Ltd has made particular improvement in its management of fire performance data and leading safety indicators.

COMAH Control Of Major Accident Hazard (Regulations 2015)

Sellafield Ltd have continued work around extant COMAH related regulatory issues over the past year. Sellafield Ltd has continued to improve their demonstration of the management of safety critical Electrical Control & Instrumentation equipment, specific to COMAH plant. Sellafield Ltd has also identified several safety critical tasks that preset the risk of a release of nitric acid and are completing human reliability analysis on these tasks with a view to sharing learning across other facilities.

ONR are awaiting bursting disc maintenance frequencies for the Electrical Distribution Network Upgrade Project (EDNUP) diesel tanks, once received this RI can be closed. Additionally, we have started pre-receipt activities for the five-year safety report review. The pre-receipt meeting has been completed and pre-receipt agreement is in the process of being settled.

# 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:

**Site Management and Infrastructure**

A reactive inspection was undertaken at the Active Handling Facility in response to an event involving a lifting beam (INF-3452) in November 2023. This inspection identified deficiencies associated with the Management of Health and Safety at Work Regulations (MHSWR) 1999, Regulation 3 – Risk Assessment; The Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 Regulation 8 – Organisation of Lifting Operations; and The Provision and Use of Work Equipment Regulations (PUWER) 1998 Regulation 4 – Suitability of work equipment and Regulation 5 – Maintenance. An enforcement letter was subsequently issued to National Nuclear Laboratory (NNL). NNL’s initial response to the letter has been proactive but ONR will continue to monitor progress to gain assurance that the required improvements are completed.

# 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 |
| 9 February 2024 | Licence Instrument | LI-547  SEL77842N | Agreement to commence the active commissioning and handover to operations of modifications to the FGMSP export facility and the interim storage facility to handle and store self-shielded boxes containing FGMSP zeolite skips |
| 31 January 2024 | Enforcement Letter | ONR-EL-23-041 | Reactive inspection on lifting events at B13 (INF-3230 and INF-3452). Management of Health and Safety at Work Regulations (MHSWR) 1999, Regulation 3 – Risk Assessment; The Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 Regulation 8 – Organisation of Lifting Operations; and The Provision and Use of Work Equipment Regulations (PUWER) 1998 Regulation 4 – Suitability of work equipment and Regulation 5 – Maintenance. |

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

# News from ONR

For the latest news and information from ONR, please read and subscribe to our regular email newsletter ‘ONR News’ at [www.onr.org.uk/onrnews](http://www.onr.org.uk/onrnews).

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