

Environment Agency Nuclear Regulation Report to Dungeness Site Stakeholder Group



May to October 2014

Introduction

This report covers the Environment Agency's regulation of both Dungeness A and B sites and related environmental subject matter.

Nuclear regulation

Andrew Pynn is the lead regulator for the Dungeness A site.

Jo Moakes is the lead regulator for the Dungeness B site.

Andrew and Jo work in the Nuclear Regulation Group (South) and liaise with colleagues based in Kent in regulating the Dungeness sites.

Attendance at site

We regulate radioactive waste disposals through environmental permits that contain limits and conditions aimed at minimising wastes and protecting the environment. We check compliance with the permit by making regular inspections. These are recorded on Radioactive Substances Compliance Assessment Reports (RASCAR) which details our inspections and any non-compliance found; they are placed on the Public Register.

We undertook site visits to Dungeness A on 29 May and 18-19 June 2014.

We made site visits to Dungeness B on 29-30 April, 29-30 May and 29 September-1 October. On 24 June we met with ONR and EDF E NGL at their corporate offices to discuss the Neutron Scatter Plug storage and the Annual Review of Safety and Environment took place on 25-26 June.

Regular contact is also maintained with the site by telephone and email in addition to formal correspondence.

Discharge reports

Both Dungeness sites are required to report to us liquid and gaseous discharges to the environment and transfers of radioactive wastes to other sites on a regular basis. These reports are placed on the public register. Liquid and gaseous discharges from both Dungeness sites remain within the limits set by our Environmental Permit.

New Parent Body for Magnox

On 1 September 2014 NDA formally appointed Cavendish Fluor Partnership (CFP) as the new Parent Body Organisation for Magnox Ltd and Research Sites Restoration Ltd (RSRL).

We have assessed jointly with Office for Nuclear Regulation the suitability and training of incoming Parent Body Organisation staff. We have received a notification of change under our permit for this change and have issued a note of no objection.

Current regulatory issues

Dungeness A

Sampling and Analysis Inspection

We have undertaken a routine compliance inspection on the subject of sampling and analysis. This focussed on the operator's arrangements for the collection, handling, processing and analysis of samples from aqueous and gaseous discharges. We also conducted an assessment into the adequacy of site procedures for the interpretation, quality assurance and reporting of analytical data. We concluded that site arrangements were adequate with no non-compliances identified. We provided advice and guidance to the operator on how their processes and procedures could be improved.

Near miss for radioactive waste clearance

We have been made aware of a near miss involving the clearance of waste items from within the radiological controlled area of the site. This involved 2 separate waste articles being incorrectly categorised by radiological monitoring personnel. In both situations the waste articles

contained radioactive contamination which was not detected by the clearance monitoring process undertaken at the time. Both articles were subsequently discovered, re-monitored and correctly categorised before they left the site.

A thorough investigation has been undertaken by Magnox and several improvements to the waste characterisation and clearance procedure have now been implemented. A site wide re-training programme has also been completed. Use of the new procedure is being closely monitored.

In response to this, we have recorded 2 minor non-compliances against the Environmental Permit for failing to initially characterise the waste correctly. There is no environmental impact associated with this event and the level of contamination present on the waste articles was very low. The permit breaches relate to procedural failures only.

FED treatment plant

A permit application had been submitted to us to vary the chemical discharge permit in preparation for future transfers of FED material from Bradwell. This has now been put on hold pending a final decision by the new Parent Body Organisation.

Dungeness B

Radioactive Waste Management Arrangements Inspection

We carried out a themed inspection at Dungeness B to review their arrangements on the management of radioactive liquid, gaseous and solid waste. This also involved looking at the arrangements in place to avoid and minimise arisings as well as managing waste appropriately prior to treatment and disposal. These themed inspections are being carried out on all nuclear sites so that we can review areas for improvement and good practice across the industry.

Tritium in groundwater

We received notification from the operator in July 2014 that groundwater samples taken from borehole 66 was well above the investigation level of 100 Bq/l. [It should be noted that the investigation level is not a limit set in the Environmental Permit but an agreed level of activity that the operator will investigate based on the UK Drinking Water Inspectorate guidance]. This borehole was sampled as part of the ongoing programme to identify the cause of the

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elevated tritium levels in the three other boreholes on the site. Additional monitoring by the operator demonstrated that the elevated tritium levels were isolated to one area of the site and were not moving towards the northern boundary of the site. This is because groundwater movement is towards the sea. The operator believes that they have identified the cause of the leak which we are investigating with the Office for Nuclear Regulation who have jurisdiction on radioactive contaminated ground. We will provide you with any updates following the completion of the investigation at the next meeting.

Liquid discharges

The operator has fitted sampling devices on their liquid effluent discharges from the final delay tanks which meet our requirements set out in the Monitoring Certification Scheme (MCERTs). There have been a few minor problems with the sampling system which are being resolved by the operator. Once the sampling devices are working appropriately they will be assessed by one of the MCERTs inspectors to gain accreditation.

Spent fuel ponds

The demineralised water supply to the flask sprinkler system in the ponds is being completed, thereby ensuring that the operator has better control of the chemistry. This modification will mean that liquid radiological discharges to the environment will be minimised.

Eels Regulations

We received the report which assesses whether the operator can meet with the best practice requirements on 25 September as required by the environmental permit. We will be reviewing the contents of the report against our cost benefit analysis where appropriate over the next three months to determine whether it complies with the Eels Regulations. Once this is completed, we will determine whether another Improvement Condition needs to be added to the permit. For further information on the Eels Regulations please visit our website: <https://www.gov.uk/government/publications/safe-passage-for-eels>

Exercises

We have just started preparing the Level 2 emergency exercise which is planned for March 2015 with the Emergency Planning Coordinating Committee.

Beach Feeding

We are in the process of finalising the legal agreements which are required to meet with the planning condition set by Kent County Council. We expect to commence beach feeding before Christmas.

Flood risk management

We issued a flood warning to Dungeness B on Friday 1 August as a precaution due to a storm hitting southern England that had developed in the Atlantic. Although the operator installed their dam boards and closed the access gates in the flood wall there were no issues caused by the storm. We are in the process of reviewing and revising our Flood Risk Contingency Plan for Dungeness A, B and the National Grid switching station following the completion of the flood wall. We will be discussing what arrangements need to be in place with each of these stakeholders to ensure that we maintain appropriate communications.

Delays to the RIFE report

The latest copy of the Radioactivity in Food and the Environment (RIFE) report will be delayed. This report summarises our environmental monitoring programme for the previous year and is usually published in October but this year it will be published in December due to delays in the provision of food monitoring data from the Food Standards Agency, which have now been resolved.

Other areas of interest

Find out more about Generic Design Assessment of Hitachi-GE's UK Advanced Boiling Water Reactor here: <http://www.onr.org.uk/new-reactors/reports/public-and-stakeholder-engagement-june-2014.pdf>

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