

Environment Agency Report to Berkeley Site Stakeholder Group

For SSG Meeting 29 July 2015 - This report covers our
regulation of Berkeley Nuclear Licensed site.

Radioactive substances

We regulate radioactive waste disposals to the environment. We do this through an environmental permit that contains limits and conditions aimed at minimising wastes and protecting the environment. We check compliance with the authorisation by making regular inspections at Berkeley.

Nuclear Regulators

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Site Inspection

Since the last SSG, we have visited Berkeley site, to:

1. Assess the site's management of gaseous and liquid discharges.
2. Undertake a 2 day joint inspection with the Office for Nuclear Regulation (ONR) to review progress with Intermediate and Low Level Waste storage, and review the adequacy of site human resources necessary to maintain environmental controls and ensure compliance with the environmental permit.
3. Follow up a previous inspection in relation to the warning letter issued in April 2015, and carry out a joint inspection with the Magnox Berkeley Internal Assurance team to look at site clearance procedures for off-site disposal for very low level radioactive wastes

Our next inspection is planned for October.

We contributed staff to the Berkeley Emergency 'off site' exercise 'Blackbird' held in June. This included involvement of wider Environment Agency operational staff supporting the emergency exercise through an integrated Strategic Control Centre comprising of police, emergency services and local authorities.

We are currently reviewing the Environment Agency environmental monitoring programme. This is a combined programme with Oldbury. However, our review will take account of the intermediate storage facility (ISF) at Berkeley.

Although there are no significant changes to our programme, we are still finalising the details with our contractors.

Discharge Reports

Nuclear sites are required to routinely report their liquid and gaseous discharges and provide other data returns.

We review the data provided by the operator to assess compliance with the environmental permit. These are detailed in Radioactive Substances Compliance Assessment Report (RASCAR). These reports are placed on the public register.

During the last quarter, data reporting remained compliant with our reporting requirements. Discharge data indicate that discharges continue to remain well within permitted limits.

During 2015, our work will focus on the following themes and issues:

- Continue to work with The Office for Nuclear Regulation (ONR) to provide advice and guidance to site in relation to a range of site decommissioning plans; particularly those associated with the Intermediate Level Waste (ILW) retrieval, conditioning and storage programme
- Review progress on actions arising from earlier themed inspections on management arrangements

Site Permit Compliance

Since the last SSG, there have been no further non compliances and we have continued to provide advice and guidance to the site in relation to our observations during site inspections. We have reviewed the Berkeley management response to the issue of a warning letter in April 2015 (following a loss of management control of the disposal of solid wastes (reported at the previous SSG)). The site review identified several recommendations for improvement in relation to waste management arrangements, management procedures and staff training requirements. The site has implemented these recommendations and has satisfied the Environment Agency that their response has been managed adequately. The new procedures should minimise the potential for further events of this nature.

We are still awaiting a decision by Magnox Ltd on the recruitment of a new Berkeley Head of Environment. We consider this role to be an important position in the provision of oversight and ensuring permit compliance through co-ordination of site activities.

Permit Variations

There have been no recent variations to the permit.

Environmental Impacts

The site's radioactive substances permit contains a specification for the operator to carry out an environmental monitoring programme, to monitor and assess the impact of their discharges on the environment. Due to their proximity, the Berkeley and Oldbury sites are considered together.

The site has provided the environment agency with a copy of the environmental monitoring programme and we have assessed this as adequate. We will continue to review the monitoring programme over the coming months in conjunction with our own independent monitoring.

As reported in previous SSG's the environmental reporting indicates that the

dose to individuals and members of the public continue to remain very low, broadly similar to previous years and at levels less than 1% of the national dose limits set to protect members of the public¹.

ILW Management

As part of plans for Care and Maintenance, the site continues to develop arrangements Intermediate Level Wastes (ILW).

The site continues to develop best available techniques (BAT) to minimise discharges and the impact to the environment.

Working with the Office for Nuclear Regulation (ONR) we are considering the conditioning and storage of ILW generated from the site. Joint discussions between the ONR, EA and Berkeley site take place every 2 weeks. Berkeley is making good progress and we have visited the site to assess this work on several occasions in the last few months.

Environment Agency Changes

Martin Murray, the Environment Agency Nuclear Regulation Group Manager has recently been appointed as the programme executive for Nuclear New Build. His post has been temporarily filled by Sally Coble. Sally has worked at a senior management level within the Environment Agency and its predecessor bodies across a range of environmental protection and pollution control roles. She will be providing cover as departmental group manager, until a more formal recruitment process is completed (during 2015).

Further Information

Further information on our role in regulating the use of radioactive substances and related activities on nuclear licensed sites can be found on our website².

¹ <https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-2013-rife-19>

² <https://www.gov.uk/government/organisations/environment-agency>