

Environment Agency Report to Berkeley Site Stakeholder Group

For SSG Meeting 28 October 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. Review progress with the Berkeley Intermediate Level Waste vault retrievals, conditioning and interim storage
2. Review the Berkeley Management of Change programme
3. Undertake an Annual Review of Safety, Security and Environment, jointly with the Office for Nuclear Regulation (ONR)

Our next inspection is planned for November when we will be looking at the sites approach to managing and maintaining critical assets.

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 the discharge trends are consistent and continue to remain well within permitted limits.

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

- Continue to work with the 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 equipment maintenance

Site Permit Compliance

Since the last SSG, there have been no non compliances and we have continued to provide advice and guidance to the site in relation to our observations during site inspections.

We have been working closely with the ONR to assess the sites resources baseline. We are satisfied that arrangements are adequate to maintain operational compliance. However, we will continue to monitor this as a significant challenge during a period of staff change. In particular we will be looking closely at the combined role of Head of Radiation Protection and Head of Environment to evaluate it effectiveness.

Permit Variations

There have been no recent variations to the permit.

Environmental Monitoring

The site's radioactive substances permit contains a specification for the operator to undertake an environmental monitoring programme, to monitor and assess the impact of their discharges on the environment. Due to their proximity, the Berkeley and Oldbury monitoring work is undertaken jointly by the sites.

We have received the current environmental monitoring programme and we have assessed this to be adequate. We will continue to review the monitoring programme over the coming months in conjunction with our own independent monitoring.

As reported at previous meetings, we have also reviewed our own independent environmental monitoring programme for each of the nuclear sites in England to ensure they remain targeted and appropriate.

We have now completed the review of our monitoring programme at Berkeley and Oldbury. Berkeley site is still considered to fall within the lowest monitoring risk category and our combined environmental monitoring programme reflects this. The programme will therefore remain largely unchanged.

We will stop monitoring drinking water as this work is already undertaken by the Drinking Water Inspectorate who are responsible for the regulation of drinking water quality.

The environmental reporting from site and corroborated evidence through our independent monitoring, indicates that the dose to individuals and members of the public from discharges from the site 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.

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

ILW Management

Intermediate Level Waste (ILW) retrieval and conditioning work is progressing at pace.

This work will significantly de-risk and address legacy hazards and we are working closely with the Office for Nuclear Regulation (ONR) to assess the retrieval and conditioning work to ensure this work is appropriate and that best available techniques (BAT) are used to minimise discharges and impact to the environment.

Joint discussions between the ONR, EA and Berkeley site take place every 2 weeks as a good practice approach to managing the different work campaigns.

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 the Environment Agency page in the UK government website².

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