

Environment Agency Nuclear Regulation Report to Dungeness Site Stakeholder Group



May – September 2015

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 has been handing over the site regulation of Dungeness A to Phil Fahey who has joined us from our non-nuclear Radioactive Substances Regulation team. Phil takes over as lead regulator for A site on 1 October.

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

Phil 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 27 - 28 July, 10 – 12 August and 14-16 September.

We made site visits to Dungeness B on 19-20 May, 9-10 July, 5-6 August and 28-29 Sept.

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.

Environment Agency Environmental Monitoring Programme

We published guidance in 2010 which sets out our expectations for environmental monitoring for when we design our own independent monitoring programmes and also for when we review an operator's programme. Our guidance sets out how we can target our routine environmental monitoring based on objectives such as to provide reassurance, understand how radionuclides behave in the environment or check that the operator's own programme is appropriate. Our programme, based on this guidance, allows us to identify the levels of radioactivity arising from nuclear site discharges and so assess dose to the public to ensure that this remains within statutory limits. Information about our monitoring around nuclear sites is published annually in the Radioactivity in Food and the Environment report (RIFE), in conjunction with Natural Resources Wales, Scottish Environmental Protection Agency, Northern Ireland Environment Agency and Food Standards Agency.

We have reviewed our environmental monitoring programme for each of the nuclear sites in England to ensure these remain consistent with our guidance. For sites with more than one nuclear licensed site, such as Dungeness, we reviewed the programme taking account of potential impacts from each site. Our review of the current programme at Dungeness concluded that it meets the relevant objectives of our guidance.

We have added sampling of grass to our monitoring programme. The operator is already monitor grass as part of their programme and we wanted to replicate this in our own as it is a good indicator of gaseous deposition from the station

operations. This will not involve a 'step' change to the programme and the change identified will be introduced into the programme over the coming months. The results of our programme will continue to be published in RIFE.

Overall we are satisfied that, following this review, the future monitoring programme will be appropriate for Dungeness.

Current regulatory issues

Dungeness A

A station is gearing up to decommission the reactor ponds. This will involve removing items stored in the pond including skips and other items of radioactive waste. Magnox are running several trials at various sites around the country which will facilitate the ponds decommissioning. This includes using divers to cut up material in the ponds. This trial will take place in the ponds at A station. We have been liaising with A station to understand how the trials will work and have discussed disposal options for radioactive waste.

The plant that treats fuel element debris (FED) waste is still processing waste from the ponds. However it is planned to stop treating FED in the next few weeks after which the plant will be placed into a safe state for future decommissioning.

We have undertaken several visits to site including 2 compliance inspections. We inspected the management arrangements for the ponds decommissioning program. We also inspected the arrangements surrounding the Environmental monitoring program (EMP). The District Survey laboratory, which is managed by B station, carries out the EMP for A station under a contractual arrangement. A station is still responsible for compliance with its own permit. There were no non compliances noted on the inspections.

The operator obtained the Environment Agency Monitoring Certification Scheme (MCERTS) re-accreditation in July 2015.

Dungeness B

Tritium in groundwater

In December 2014 the operator notified us that they had received an elevated tritium in

groundwater reading (just above the 100Bq/l investigation level) adjacent to the boiler water storage tanks. We reviewed the investigation carried out by the operator as well as relevant operating procedures. We determined that there had been breaches of the environmental permit as the operating procedures were not adequate and the plant had not been maintained to the level which we would have expected. Based on this assessment we issued the operator with a warning letter.

We have stipulated a number of actions which will need to be completed by the operator by end of December 2015 to demonstrate compliance with the environmental permit conditions. The Station Director sent us a letter confirming that these actions would be completed within the defined time-scales.

Gaseous Radioactive Discharges

The problems with maintaining the gaseous sampling cubicles were discussed in detail with the operator. The operator has carried out an investigation into all of the issues to identify any common modes of failure as well as the root causes. We are satisfied that the operator has carried out a thorough investigation of the problems experienced with the gaseous sampling cubicles. We will be reviewing progress with implementing the actions identified in the investigation report.

Aqueous Radioactive Discharges

We carried out an inspection of the aqueous radioactive waste operations and management systems. The operator was able to provide evidence to demonstrate how they minimise radioactive waste generation from reactor operations through to the abatement systems in the Active Effluent Treatment Plant (AETP). We have identified a couple of areas for improvement which we will be following up in subsequent inspections.

The operator confirmed that the MCERTS inspection of their discharge monitoring gauges and flow monitors will be carried out in November 2015.

Eels Regulations

We received a copy of the cost benefit assessment of best available techniques report from the operator in compliance with the 30 September deadline set in the environmental permit. We are currently reviewing the content of this report to determine whether it meets with our requirements. We expect to complete our initial assessment of this report by 31 October 2015. We will provide more information on this review at the next SSG meeting.

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