

# Environment Agency Report to Berkeley Site Stakeholder Group

For SSG Meeting 27 July 2016 - 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

Adam Davis is the Environment Agency Lead Site Regulator for the Berkeley site.

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## Site Inspection

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

1. Undertake a joint inspection with Environment Agency-Wessex Area operational staff (dealing with non-radioactive substances regulation) to consider non RSR sewage discharges and wastes management. The site were found to be compliant with the inspection requirements and several good waste management practices were noted during the inspection.

### Other Work

- We have attended a Magnox strategic meeting to review South West Sites waste plans. We will be attending the Gloucestershire County Council planning meeting on 28 July relating to the Berkeley site planning variation request to allow inter-site transfers of waste.

## 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 the 2016/17, 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 site decommissioning plans; particularly those associated with the vaults Intermediate Level Waste (ILW) retrieval, conditioning and storage programme
- Consider progress on the operators future application of Robust Concrete Boxes (RCB's) as a potential replacement for Ductile Cast Iron Containers for ILW storage within the Intermediate Storage facility (ISF)
- Consider waste management arrangements for radioactive and non radioactive wastes generated and released from the site

## Site Permit Compliance

Two learning events were self-reported by the operator that share common cause characteristics. They involve a failure to appropriately assess the radiological characteristics and properties of waste generated on the site.

These events have been assessed by the Environment Agency and are considered to

be a minor breach of the Environmental Permitting Regulations permit conditions. They were assigned a non-compliance CCS 4 score for inadequate management arrangements, under the Environment Agency Compliance Classification Scheme (CCS) (this is the lowest category breach and considered unlikely to result in significant environmental effect). The operator responded swiftly to both events and we consider the actions taken will limit the potential for further breaches of this nature. There is no further action to be taken by the Environment Agency. However, we will continue to monitor working practices during subsequent inspections.

## Permit Variations

There have been no recent variations to the permit.

## Environmental reporting

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; with a slight decrease on previous years data. Total dose from all pathways approximate to levels less than 1 % of the national dose limits set to protect members of the public<sup>1</sup>.

## ILW Management

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

Although this work will significantly de-risk and address legacy hazards, the retrievals project represents a difficult logistical challenge-very much a lead and learn process for the remainder of the Magnox fleet. We are working very 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

We will be attending the joint South West Sites Annual review of Safety and Environment in late autumn.

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 website<sup>2</sup>.

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<sup>1</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/472906/RIFE20.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/472906/RIFE20.pdf)

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