

# Environment Agency Report to Berkeley Site Stakeholder Group

For the SSG Meeting on 1 August 2018 - This report covers our regulation of Berkeley Nuclear Licensed site.

## Radioactive substances regulation

We check compliance with the permit by undertaking inspections at the site and review submissions made by the operator. We prepare Radioactive Substances Compliance Assessment Reports (RASCARs), detailing our inspections and any identified non-compliances. These reports are placed on our public register. In addition to our own inspection activities we also routinely review Magnox reports of events and incidents occurring on site - and follow these up where appropriate.

## Site Regulation

We have not carried out any site inspections since the previous SSG meeting in April.

Site inspections will be arranged in the next two quarters on ILW (intermediate level waste) management arrangements, gaseous discharge management and clearance procedures for low level and non-radioactive wastes.

## Other Work

We are continuing to work with Magnox on the following tasks:

- Data on the impact of emissions resulting from all decommissioning work across the site was supplied by and submitted in May by the Department for Business, Energy and Industrial Strategy (BEIS) to the European Commission (EC) under Article 37 of the Euratom Treaty. We received a query from the EC on the data and drafted a reply in June. We will keep the SSG updated on progress when we receive further information from the EC and BEIS.

## Discharge Reports

Berkeley site report their major radioactive liquid and gaseous discharges at quarterly intervals and report on discharges from minor points annually.

Over the past five years annual tritium gaseous discharges have usually been close to 50% of permitted limits, with a maximum of 70% in 2015 and minimum of 41% in 2017. Carbon 14 discharges have increased from 10% of annual limit in 2012 to 38% in 2017. Liquid discharges and gaseous discharges of beta emitting radionuclide in the form of particulate matter have remained below 1.5% of permitted limits

The most recent available report on discharges is for the quarter January to March 2018. All discharges were within permitted limits during this time.

## Site Permit Compliance

Potential minor non-compliance with permit conditions were reported in Q1 2018.

Spreadsheet errors that led to Berkeley site making errors in pollution inventory reporting and supplying inaccurate records for two consignments of waste disposed of to LLWR and landfill. The errors did not have a significant impact on the environment. The consigned waste did not breach the receiving sites' waste acceptance criteria.

We reviewed the incidents and recorded two CCS category 4 breaches against Berkeley site. (CCS category 4 is our lowest category breach, used for breaches of an environmental permit that have no environmental impact). Berkeley have put measures in place to improve spreadsheet design and quality control. We will review the effectiveness of these measures at site visits later in the year.

## Permit Variations

We have received an application from Berkeley to vary their CEAR (Compilation of Environment Agency Requirements) to include standard requirements for document retention being introduced across the Magnox fleet. We expect to issue and updated draft of the CEAR by the end of July, for implementation in August.

As previously reported we anticipate an application from Berkeley to include the new gaseous waste discharge outlets for the Modular ILW Encapsulation Plant (MILWEP) later in the year. We also expect that the Environment Agency will vary the permit during 2018 to include new conditions to support the implementation of GRR (guidance on requirements for release of nuclear sites from radioactive substances regulation).

## Environmental reporting

We carry out sampling and analysis under an independent environmental monitoring programme, in association with the Food Standards Agency. The results of this work are published in an annual Radioactivity in Food and the Environment (RIFE) report.

We make the information (from both Magnox's and our own environmental monitoring programmes) available on our public register. No new information has been generated since the last SSG meeting.

### **ILW Management**

We are continuing to work 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.

### **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 website<sup>1</sup>.

### **Nuclear Regulator**

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<sup>1</sup><https://www.gov.uk/government/organisations/environment-agency>