

Introduction

This report covers the Environment Agency's regulation of Dungeness A and B sites and related environmental matters.

Nuclear regulation

Phil Fahey is the lead regulator for the Dungeness A site. Andrew Stone is the lead regulator for the Dungeness B site, assisted by Eddie Osondu.

Phil, Andrew and Eddie all work in the Nuclear Regulation Group (South). Officers from the Kent Area Environment Agency team also visit the site for general environmental protection matters such as groundwater, contaminated land, waste management and water abstraction.

We work closely with other regulators such as the Office for Nuclear Regulation (ONR) in areas of common interest.

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 Compliance Assessment Reports which detail our inspections and any non-compliance(s) found; these are placed on our Public Register.

We visited Dungeness A on 30 May, 9-10 July and 8 August 2018.

We visited Dungeness B on 30 May, 10-12 July and 24 July 2018. We also attended a review of the off-site emergency exercise that was held on 23 May 2018.

Regular contact is also maintained with the sites by telephone and e-mail in addition to formal correspondence.

Discharge reports

Both sites are required to report to us liquid and gaseous discharges to the environment and transfers of radioactive waste 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 the Environmental Permits.

Environmental monitoring

The Operators carry out monitoring of various environmental samples at periodic intervals and report the information to us. Dungeness B staff carry out the work on behalf of both sites. The programmes are slightly different to reflect the radionuclides that are being discharged, the historical discharges and the operational activities taking place at each site.

In addition to the Operators' environmental monitoring programme the Environment Agency participates in an independent UK-wide monitoring programme. The results of these monitoring programmes are published annually and are used to assess the dose received by members of the public in the vicinity of nuclear licensed sites. Radiation doses to people living around nuclear licensed sites from authorised releases of radioactivity were well below the UK national and European limit of 1000 micro Sieverts (μSv) per year in 2016.

Current regulatory issues

Dungeness A

We are in regular contact with the Head of Radiation Protection and Environment to ensure that we are kept in touch with progress on actions and any emerging issues at the site. We have been liaising recently with several projects such as the continuation of ponds decommissioning and the commencement of ILW retrieval, processing and dispatch to Bradwell.

Catch up Inspection.

We held a catch up meeting at site on 30th May where various decommissioning projects were discussed.

Event involving asbestos very low level waste.

In June 2018 we were informed by the Operator that there had been discrepancies noted in consignments of very low level waste from the asbestos removal project that were being prepared for shipment. We attended the site in July to investigate. During our visit it was revealed that the problem had affected several shipments that had left site. Printouts for measuring the activity of asbestos waste had not been kept with the correct bags. This had led to some consignments having incorrect activity assessments. Fortunately there was no mis-consignment of waste on this occasion. However the Operator was in breach of 2 conditions of their permit. The Operator did not use best available techniques to characterise, sort and segregate their solid radioactive waste to facilitate the disposal by optimised disposal routes and that the on-site written management system was not sufficient to prevent this occurring. We have classified these breaches as category 3 as the potential for mis-consignment of this type of waste could have led to a minor environmental impact. Also this is the 2nd event over the last year involving the asbestos waste project. Our enforcement response was to issue a formal warning letter on this occasion. We have given the Operator several actions to ensure such events do not reoccur at site.

Inspection on SQEP and environmental awareness 9-10 July 2018.

Following our investigation of the asbestos waste event above we performed an inspection on how staff become suitably qualified and experienced (SQEP) and how they are aware of permit compliance. The Operator agreed to permit training on environmental awareness as part of the actions of the previous event.

Inspection on low level waste streams 8th August.

We performed an inspection on how 2 waste streams are processed at site. We found no non compliances with the way the waste is processed.

Asset management.

We have received a response from the Operator following our asset management inspection in February 2018. We will be liaising with Magnox over the coming months on their plans for asset care at site.

Environmental performance review.

We received a copy of the report from the review which took place in March 2018. A similar review took place in 2016. We welcome the findings and expect the Operator to implement the actions over the next few months.

Modular active effluent treatment plant (MAETP).

We have been in discussion with the Operator regarding the installation of the MAETP at site. This new plant will be used so that the present AETP can be decommissioned. This will be the first installation at a Magnox site and we will be ensuring that the plant meets our expectations for best available techniques.

ARROSSE meeting.

On 9th August 2018 we attended the annual regional review of safety, security and environment with Magnox and the Office for Nuclear Regulation. This meeting reviews operations at Dungeness A, Sizewell A and Bradwell over the past year and enables a discussion on future decommissioning at the sites.

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Dungeness B

Combustion Plant

We were notified by the station in March that the routine programme of monitoring groundwater had identified diesel in samples from a borehole in the vicinity of East Tank Farm Road on the site. A small leak was identified on a fuel tank return pipe to an Essential Diesel Generator, which has subsequently been repaired. We are reviewing the station's investigation report and the impact assessment report.

Inspections

We carried out an inspection to look at the station's arrangements for preparing solid low level radioactive waste (LLW) for offsite disposals, following a non-compliant consignment of waste to Winfrith.

We believed that best available techniques were not being used to characterise, sort and segregate solid radioactive waste for disposal. We issued a Warning Letter to EDF because we believed that there had been breaches of conditions in the Environmental Permit. We are satisfied with the station's response and will monitor improvements that the station has committed to.

We carried out a joint inspection with ONR focussing on the Active Effluent Water Treatment Plant (AEWTP). We identified some good practices relating to the prevention of oil ingress in to the treatment system.

Emergency Preparedness

During the Level 2 emergency exercise on 23 May we tested our response to an accident at Dungeness B and our ability to respond to a pollution incident in the affected area. It was also an opportunity to practice working with other responding agencies.

Meetings

We joined the ONR for a meeting with the station to review safety and environmental performance during 2017.

Other News

Release of Sites from Regulation

The Environment Agencies in England, Scotland and Wales have published new Guidance on Requirements for Release from Radioactive Substances Regulation (GRR) offering extra options in agreeing interim and final end states. We expect to vary Permits for each site next year which will require submission of plans in order to demonstrate that environmental protection standards are maintained now and into the future.

A non-technical summary can be downloaded from the internet:

<https://www.sepa.org.uk/media/365894/grr-non-technical-summary.pdf>

UK Strategy for Radioactive Discharges

The 2018 review of the 2009 UK strategy for radioactive discharges has now been published: <https://www.gov.uk/government/publications/uk-strategy-for-radioactive-discharges-2018-review-of-the-2009-strategy>

The 2009 strategy laid out the UK Government policy on radioactive discharges: that the unnecessary introduction of radioactivity into the environment is undesirable, even at levels where doses to humans and other species are low and, on the basis of current knowledge, are unlikely to cause harm.

This publication is a review of outcomes and discharge profiles, and is not a new strategy, nor a revision of the overall approach to radioactive discharges. It takes account of developments in UK Government policy, commercial decisions within the nuclear industry, technological advances and improvements in our knowledge of the impacts of radionuclides in the marine environment.

The review demonstrates evidence of progress against the strategy outcomes (not to be misinterpreted as targets), and the objectives of the OSPAR Radioactive Substances Strategy.

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Flood Alert



What it means
Flooding is possible. Be prepared.

What to do

- Be prepared to act on your flood plan.
- Prepare a flood kit of essential items.
- Monitor local water levels and the flood forecast on our website.

Flood Warning



What it means
Flooding is expected. Immediate action required.

What to do

- Move family, pets and valuables to a safe place.
- Turn off gas, electricity and water supplies if safe to do so.
- Put flood protection equipment in place.

Severe Flood Warning



What it means
Severe flooding. Danger to life.

What to do

- Stay in a safe place with a means of escape.
- Be ready should you need to evacuate from your home.
- Co-operate with the emergency services.
- Call 999 if you are in immediate danger.

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