

Harwell Site Stakeholder Group

Environment Agency report

December 2018

This report covers the Environment Agency's (EA) regulation of the Harwell Nuclear Licensed Site and related issues.

Permitting

Magnox holds two permits under the Environmental Permitting Regulations (EPR) at the Harwell site: one covers the nuclear licensed site (PB3598DX, the 'nuclear' EPR permit); the second covers smaller areas outside the nuclear licensed site boundary (PB3198DJ, the 'non-nuclear' EPR permit).

No changes have been made to either permit since the last SSG. Magnox has not applied for any variations to its permits in 2018.

Regulation

We check compliance with the permit by making regular inspections at Harwell. For all inspections we issue Radioactive Substances Compliance Assessment Forms (RASCARs). These reports summarise the inspection we carried out, describe any non-compliances found, and include actions, recommendations and observations of good practice. Copies of RASCARs are publically available on request.

We speak with the Environment Team frequently to ensure we are kept in touch with any emerging issues at Harwell and with progress on actions. We receive and assess a range of monthly reports from the site.

In September we visited Harwell to determine whether the conditions of its environmental permit are being met with regard to its disposals of solid radioactive waste. We were principally looking at lower activity waste streams. We inspected the Radiochemical Facility, the Liquid Effluent Treatment Plant (LETP) and a waste storage area housed within a temporary structure. We found no non-compliances with the permit. We made observations and gave advice on waste storage and management, and also made observations of good practice.

In October we attended the Environmental Regulators' Review Meeting along with colleagues from our specialist groundwater and contaminated land (GWCL)

team. This included a visit to observe works at the Liquid Effluent Treatment Plant. The groundwater treatment plant continues to operate and to remove solvents from the off-site plume. GWCL colleagues are content with the reports provided to them.

The site's redundant Offsite Discharge Pipeline (ODP) is included on the site Environmental Permit. In November we visited Sutton Courtenay to observe works to remove the ODP. We noted no non-compliances with the permit.

Also in November we visited the site to meet with the incoming Environment Manager. Our inspection plan for next year includes an inspection to focus on environmental capability at the site.

Environmental impact

The site environmental permit requires the operator to monitor and assess the impact of discharges on the environment. This monitoring demonstrates that the impact of the site on the environment is low.

The Environment Agencies and Food Standards Agency also carry out independent environmental monitoring around nuclear sites. The results of this work are published annually and the latest report, "Radioactivity in Food and the Environment 2017" (RIFE 2017), is published on the GOV.UK website at:

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

The RIFE report presents a yearly assessment of radiological dose to individuals in the local population who are most exposed to radiation from each nuclear licensed site. In 2017, the total dose to this 'representative person' from all pathways and sources of radiation (liquid & gaseous discharges and radiation) at the Harwell campus was 100 μ Sv. This is less than 5% of the annual dose limit of 1000 μ Sv/year. The average annual amount of radiation from natural sources (2700 μ Sv/year) is higher than in 2016, with radiation from wastes stored at Harwell. Magnox reviewed storage and handling practices, keeping doses as low as possible.

(ALARP) and the wastes have been moved. The contribution to the total dose from discharges regulated by the Environment Agency was 5 µSv, unchanged from 2016.

Incidents and enforcement

The Environment Agency monitors breaches of permit conditions using the Compliance Classification Scheme (CCS). This ranks non-compliances on a 1-4 scale, with category 1 being the most serious.

Since the last SSG meeting we have taken action over an event which occurred at the site. A misconsignment of waste from the site was averted by the final stage vehicle monitoring system. The event caused no harm to the environment, but indicated failings in the management system and implementation of arrangements. We categorised this as three separate non-compliances with the permit. All of the non-compliances were scored at a level 3 on our CCS scale, (considered to have the potential for minor impacts). In accordance with our procedures, we concluded that a Warning Letter was the appropriate response to the event, and this was served on 23 November.

The site was fully cooperative throughout the investigation process and provided us with a comprehensive report and a wide-ranging set of actions. We will track the actions with the site to ensure that all are completed. We now consider this closed unless any further information comes to light.

Discharge reports

The site's environmental permit requires Magnox to use the best available techniques (BAT) to produce the minimum amount of radioactive waste, and release as little as possible into the environment. Disposal of wastes – as solids, liquid or gases can only be made via permitted routes or to permitted sites. The site is required to report liquid and gaseous discharges to the environment on a regular basis. We examine these reports and produce a RASCAR for them. Copies of the discharge reports and the RASCARS are publicly available on request.

Liquid and gaseous discharges from Harwell continue to be at levels well within permitted limits.

Further information

A public register service is available on the GOV.UK website at:

<https://environment.data.gov.uk/public-register/view/index>

Alternatively you can request access to publicly available documents from the Customers and Engagement Team in the Wallingford office. Please email WTenquiries@environment-agency.gov.uk

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 pages of the Gov. UK website at:

<https://www.gov.uk/government/publications/nuclear-regulation-in-the-environment-agency>

Our enforcement and sanctions policy is publicly available on the GOV.UK website at <https://www.gov.uk/government/publications/environment-agency-enforcement-and-sanctions-policy/environment-agency-enforcement-and-sanctions-policy>

The Environment Agency's lead Nuclear Regulator for the Harwell site and its tenants is Rebecca Cleverley. Rebecca is part of the national Nuclear Regulation Group (South) (NRG(S)) which is based at the Environment Agency's Wallingford office in Oxfordshire.

NRG(S) undertakes environmental regulation of radioactive substances on nuclear licensed sites in southern England. It works closely with the local Environment Agency teams in those areas as well as external bodies such as the Office for Nuclear Regulation.

Members of the local Environment Agency team cover the site for general (non-radioactive substances) environment protection matters such as regulation of groundwater, contaminated land, waste management and water abstraction.

Address: Environment Agency
Red Kite House
Howbery Park
Wallingford
Oxfordshire
OX10 8BD

Email:
rebecca.cleverley@environment-agency.gov.uk

Telephone: 020302 59736

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
0345 988 1188
0845 988 1188

www.gov.uk/environment-agency