

Environment Agency Report to Berkeley Site Stakeholder Group

For the SSG Meeting on 31 October 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 carried out an inspection of arrangements for the management of intermediate level waste at Berkeley, as part of this inspection, reviewed a sample of documents on the design and development of the R3 containerised waste project. We did not find any non-conformances with permit conditions during this inspection.

We will inspect Berkeley's arrangements for the characterisation of waste on 24 October. We intend to assess gaseous discharge management and clearance procedures for low level and non-radioactive wastes in the first quarter of 2019.

Other Work

We are continuing to work with Magnox on providing data via the Department for Business Enterprise and Industrial Strategy (BEIS) to the European Commission (EC) on the impact of emissions resulting from decommissioning work across the site.

A data submission to the EC is required whenever the permitted discharge limits at a nuclear site are increased. We expect to increase the annual permitted gaseous tritium discharge limit at Berkeley from 20 gigabecquerels to 2 terabecquerels as the site enters a new phase of decommissioning work to prepare for entry into Care & Maintenance.

The increase in prospective dose as a result of this increase is very small. We calculate that the annual local dose to the most exposed population group due to gaseous emissions at Berkeley will rise from 0.45 microsieverts to 2.4 microsieverts. For comparison the average annual dose from natural sources of radiation in the UK is about 2500 microsieverts.

Berkeley are redrafting their Article 37 data report in response to a number of questions posed by the EC. We are confident that a comprehensive data report will be ready for forwarding to BEIS by the end of November.

Discharge Reports

Berkeley site report their major radioactive liquid and gaseous discharges at quarterly intervals and report on discharges from minor points annually. The most recent available report on discharges is for the quarter April to June 2018. All discharges were within permitted limits during this time.

Site Permit Compliance

We have not taken any enforcement action against Berkeley in the period July to October since the previous SSG meeting.

Spreadsheet errors that led to permit non-compliances were reported at the previous SSG meeting. We reviewed the measures Berkeley have put in place to improve spreadsheet design and quality control. These measures included an audit of discharge spreadsheet carried out by staff based at Magnox Centre and a redesign of spreadsheets used for waste returns at Berkeley. We are satisfied that the spreadsheets are now compliant, and that management at Berkeley is focussed on ensuring spreadsheets remain compliant should modifications be made to the spreadsheets in future.

Permit Variations

We have held pre-application discussions with Berkeley to include the new gaseous waste discharge outlets for the Modular ILW Encapsulation Plant (MILWEP) later in the year.

We expect to receive a permit variation application by the end of the year and to issue a varied CEAR in November in response to an application received earlier in the year.

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 on 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 website¹.

Nuclear Regulator

Peter Reynolds is the Nuclear Regulator for Berkeley Site. His contact details are:

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

Email: peter.reynolds@environment-agency.gov.uk

Telephone: 020302 57931

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