

Environment Agency Report to the Hinkley Point Site Stakeholder Group

8th March 2019

Introduction

This report covers the Environment Agency's regulation of the Hinkley Point A & B nuclear sites and related issues for the period November 2018 to February 2019.

Radioactive substances regulation

We regulate radioactive waste disposals to the environment. We do this through environmental permits that contain limits and conditions aimed at minimising wastes and protecting the environment. We also check compliance with these permits by making regular inspections at Hinkley Point A & B.

Radioactive Substances Compliance Assessment Reports (RASCAR) detailing our inspections and any non-compliances found, are available on the Public Register^[1].

We maintain regular contact with the sites by telephone and e-mail in addition to our formal correspondence and visits to the sites.

Hinkley Point A

Our work at Hinkley Point A (HPA) has been focussed on the following themes and issues in the last four months:

- In February we conducted an inspection on management of equipment with an environmental protection function. This examined how the site identifies such equipment, how their examination, maintenance, inspection and testing regimes are derived and the arrangements for ensuring this is carried out. The system

in place appeared to be robust and no non-compliances with the permit were identified.

- In February we also carried out an inspection on how the site learns from experience, for example as a result of events or best practice on the site, at other sites or from other operators. There was good evidence that the site arrangements are robust and that learning was being applied. No non-compliances with the permit were identified. However, we have further questions on the trending and analysis of site events and we will be discussing these with the learning from experience team at Magnox Centre.
- In February we visited the construction site for the Modular Intermediate Level Waste Encapsulation Plant (MILWEP) and Interim Storage Facility (ISF) buildings. We discussed progress with the builds, commissioning plans and the future operation of the facilities.
- Our Nuclear Waste Assessment Team (NWAT) have reviewed the site's Radioactive Waste Management Case. This document underpins the site's plans for radioactive waste on the site and in particular Intermediate Level Waste (ILW). We plan to write to Magnox on the outcome of this review.

^[1] <https://www.gov.uk/access-the-public-register-for-environmental-information>

- We are currently undertaking an EA initiated variation to the site permit as a result of our new Guidance on Requirements for Release from Radioactive Substances Regulation (GRR)^[2] which sets out our requirements with regard to interim and final end states. These include submission of plans by the site in order to demonstrate that environmental protection standards are maintained now and into the future.

No changes to the existing site discharge limits for gaseous or liquid discharges are planned as part of the variation but the permit will be varied to recognise two new gaseous discharge points. These are for an existing building and MILWEP (the ISF is already recognised as a discharge point in the permit). The permit requires that the operations and discharges from both buildings demonstrate that they are using the Best Available Technique (BAT) to ensure minimisation of discharges to the environment. Assessments have been provided by the site to support these additions. For example, discharges from both buildings will be abated using high efficiency filters.

Hinkley Point B

Our work at Hinkley Point B (HPB) has been focussed on the following themes and issues in the last four months:

- In February we carried out a joint inspection with the Office for Nuclear Regulation on the management of change. We noted good practice with the commissioning of new analytical equipment at the off-site Combwich Laboratory. We did not identify any non-compliances but made a recommendation about better communication of BAT assessments.
- We are currently undertaking an EA initiated variation to the site permit as a result of our

new Guidance on Requirements for Release from Radioactive Substances Regulation (GRR) which sets out our requirements with regard to interim and final end states. These include submission of plans in order to demonstrate that environmental protection standards are maintained now and into the future. Unlike HPA, no other changes are planned to the permit as part of this variation.

Events and enforcement

No enforcement action has been necessary at Hinkley Point A or Hinkley Point B.

Discharge reports

The operators at Hinkley Point A and B are required to report liquid and gaseous discharges to the environment to us on a regular basis. We assess these to check compliance with the site permits. The site discharge reports and our assessments are placed on the public register.

Liquid and gaseous discharges from Hinkley Point A and B were within the permitted limits and notification levels during this period.

Environmental impact

Nuclear sites are required to carry out a rigorous environmental monitoring programme that requires the operator to monitor and assess the impact of their discharges on the environment.

Additionally, the Environment Agencies and Food Standards Agency carry out independent environmental monitoring around nuclear sites. The results of this work are published in our annual Radioactivity in Food and the Environment (RIFE) report^[3].

In the RIFE report the Hinkley Point sites are considered together for the purposes of environmental monitoring because the effects of both are on the same area. The report

^[2] For a non-technical summary of this guidance please see: www.sepa.org.uk/media/365894/grr-non-technical-summary.pdf

^[3] <https://www.gov.uk/monitoring-radioactivity>

presents a yearly assessment of radiological dose to the group of people in the local population who are most exposed to radiation from the sites. In the latest report for 2017 (RIFE-23), the total radiation dose to this group of people as a result of discharges and radiation shine from the sites was very low at 0.032 mSv/year. This is about 3% of the Government dose limit of 1 mSv/year and an even smaller percentage of the average amount of radiation we all receive from natural sources, which is approximately 2.2 mSv/year.

The dose reported in RIFE for 2017 is an increase from that reported for 2016 of 0.013 mSv/year. The main reason for this is not an increase in discharges from the sites but findings of the recent Habits Survey^[4], which identified increases in local fish consumption along with small changes in mollusc and crustacean consumption rates, as well as occupancy rates over mud (see page 125 of the RIFE report).

Change in nuclear regulators for Hinkley Point A & B sites.

Dr MacGregor has regulated the HPA site since 2014 and in-line with the EA's policy of changing site inspectors every 3-5 years, is passing regulation of the site to Ms Tracy Braithwaite from 1st April 2019.

Mr Lee has regulated the HPB site since April 2016. He is passing on regulation of the site to Ms Victoria Thomas, also from 1st April 2019.

Geological Disposal Facility

On 19th December 2018, BEIS published a new policy paper^[5]. This document sets out the Government's overarching policy framework for managing higher activity radioactive waste through implementing geological disposal and how they will work with communities to find a location for a geological disposal facility (GDF). Alongside this policy paper, the Government also launched a new national consent-based process in England to find a site to host a GDF. Radioactive Waste Management Limited (RWM) is responsible for implementing geological disposal and they will lead the siting process.

The Environment Agency will regulate a GDF jointly with the Office for Nuclear Regulation (ONR). The Environment Agency is responsible for making sure that the developer and operator of a geological disposal facility (GDF) in England meets the high standards we have set to protect people and the environment, both now and in the future. Our role is described in more detail at:

<https://www.gov.uk/guidance/regulating-the-geological-disposal-of-radioactive-waste-environmental-protection>.

The Environment Agency will not be involved in the decision to select a potential site for a GDF although we will be available to provide information and advice to communities on environmental protection.

If you require further information about our role, or if you would like to be on our mailing list, you can contact us by e-mail at:

nuclear@environment-agency.gov.uk.

^[4] The Habits Survey was discussed in our previous reports. It was carried out in 2017 and published in 2018.

^[5] <https://tinyurl.com/yy73pglo>

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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 section^[6] of the GOV.UK website.

The Environment Agency's Lead Regulator for the Hinkley Point A site from 1st April 2019 is Tracy Braithwaite. The Environment Agency's Lead Regulator for the Hinkley Point B site is transferring to Victoria Thomas on 1st April 2019.

Tracy and Victoria are Nuclear Regulators and part of the national Nuclear Regulation Group (South) which is based at the Environment Agency's Wallingford office in Oxfordshire.

The EA's Nuclear Regulators undertake environmental regulation of radioactive substances on nuclear licensed sites in southern England. They work closely with the local Environment Agency teams in those areas as well as external bodies such as the Office for Nuclear Regulation.

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^[6] <https://www.gov.uk/government/publications/nuclear-regulation-in-the-environment-agency>

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