



Office for Nuclear Regulation (ONR) Quarterly Site Report for Hunterston A

1 January – 31 March 2019

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed quarterly to members of the Hunterston Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend Hunterston Site Stakeholder Group meetings and will respond to any questions when there. Otherwise, any person wishing to enquire about matters covered by this report should contact ONR (<http://www.onr.org.uk/feedback.htm>).

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1 INSPECTIONS

1.1 Dates of inspection

ONR attended Hunterston A (HNA) site on the following dates: -

- 28 - 31 January 2019
- 12 – 14 March 2019

Some of the inspections were carried out with inspectors from the Licensee's internal regulatory organisation and the Scottish Environmental Protection Agency (SEPA).

2 ROUTINE MATTERS

2.1 Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- The conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- The Health and Safety at Work Act 1974 (HSWA74);
- The Energy Act 2013; and
- Regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The inspections entail monitoring licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, ONR carried out the following planned inspections at HNA:

Licence Condition (LC) Compliance Inspections: - Compliance Inspections focus on single LC compliance sampled from areas across the site. Each area may include multiple systems. The LCs inspected during this period were: -

- LC13 Nuclear Safety Committee
- LC17 Management Systems
- LC32 Accumulation of radioactive waste
- LC36 Organisational capability

For these LC Compliance Inspections, ONR judged that no formal action was required by the site in regard to the arrangements made and implemented by the site in response to safety requirements.

Where other improvements were considered necessary, the licensee made satisfactory commitments to address the issues, and the site inspector will monitor progress during future visits. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

2.2 Permissions

Withdrawal of Hunterston A Operating Rule Approval

Magnox Limited (ML) wrote to ONR requesting withdrawal of the approval of HNA Operating Rule 1 in order to make progress with waste retrievals from the Solid Active Waste (SAW) Bunker No.1. Intermediate Level Waste (ILW) has been stored in five concrete bunkers at

HNA for many years and so far all of the wastes in Bunkers 2 - 5 have been safely retrieved into packages and stored on site.

ML provided ONR with a safety submission and supporting documentation that made the case for the withdrawal of the approval of Operating Rule 1. ONR's assessment of the submission concluded that the operating rule was no longer required in the interests of safety. We inspected the waste retrievals from SAW Bunkers 2 – 5 to obtain confidence in the control of work procedures and remote techniques which would be employed for the Bunker 1 breakthrough and retrievals. ONR also considered that should the Operating Rule 1 not be withdrawn before the start of SAW Bunker 1 waste retrievals, this could potentially introduce delays into the HNA hazard reduction programme.

ONR was content with the claims, arguments and evidence that ML presented and judged that the appropriate regulatory action was to permission the withdrawal of the approval of HNA's Operating Rule 1.

SAW Bunker release of regulatory hold point

This inspection was to inform the release of the regulatory hold point that will enable the licensee at Hunterston A (HNA) to break through the wall between SAW Bunker No. 2 and Bunker No.1 to allow ILW retrieval operations to commence. ONR carried out a compliance inspection of HNA's arrangements and their implementation for SAW Bunker No. 1 breakthrough and ILW retrieval operations that focussed on the following elements:

- to evaluate ML's governance of the Solid Active Waste Bunker Retrievals (SAWBR) project;
- to carry out a SAWBR plant visit and discuss the breakthrough and retrieval operations with the plant Duly Authorised Person (DAP) and operators; and
- to sample the ML Regional Site Inspector's Operational Readiness Review (ORR) to confirm that HNA is ready to start Bunker 1 retrievals and that any actions required before breakthrough have been completed.

During the inspection, ONR confirmed that the scope of ML's review and level of internal challenge was sufficient. We found extensive evidence of plant readiness and ONR is confident that the DAP and operators are Suitably Qualified and Experienced Persons (SQEP) to carry out the breakthrough and ILW retrieval operations. ONR reviewed the ML HNA Site Inspector's ORR report and judged that ML had undertaken a comprehensive independent review.

From the evidence gathered during the inspection related to readiness for SAW Bunker 1 breakthrough and FED retrieval operations, ONR is content that the arrangements are adequate. Consequently, ONR judged that the appropriate regulatory action was to release the regulatory hold point to enable HNA to commence SAW Bunker No. 1 breakthrough and ILW retrieval operations.

3 NON-ROUTINE MATTERS

Licensees are required to have arrangements to respond to non-routine matters and incidents. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

There were no significant safety matters reported by HNA during this period.

4 REGULATORY ACTIVITY

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site Licence Conditions (LC - <http://www.onr.org.uk/documents/licence-condition-handbook.pdf>) ONR issues regulatory documents which either permit an activity or require some form of action to be taken; these are usually collectively termed 'licence instruments'

(LI), but can take other forms. In addition, inspectors may issue enforcement notices to secure improvements to safety.

Table 1

Licence Instruments and Enforcement Notices Issued by ONR during this period

Date	Type	Ref No	Description
21/02/19	Licence Instrument	LI 529	Withdrawal of Approval of Hunterston A Operating Rule 1

Reports detailing regulatory decisions are available on the ONR website at <http://www.onr.org.uk/pars/>.

5 NEWS FROM ONR

Enforcement Action

A summary of enforcement action is provided below. Further detail is available on [our website](#).

- Improvement notice issued to Sellafield Ltd on 4 January 2019 – requires improvements to be made in its principal contractor arrangements for construction, design and management.
- On 1 February, following ONR's prosecution, EDF Energy Nuclear Generation Ltd and Doosan Babcock Ltd were fined £200,000 and £150,000 respectively following an incident where a worker fell from height at Hinkley Point B power station in 2017.
- Two improvement notices issued to two transport logistics companies on 4 February following breaches in regulations for the safe transport of radioactive materials.
- Two improvement notices issued to EDF Energy on 20 February following an incident on 19 November 2018 at Heysham 1, which resulted in injury to three EDF Employees.

**Although outside the current reporting period, we can confirm that on 2 April 2019, Sellafield Ltd were fined £380,000 following ONR's prosecution for safety breaches relating to equipment used for the processing of plutonium.*

Regulatory updates

Following the introduction of new integrated [Environmental Authorisations Regulations in Scotland](#), the [MOU between ONR and the Scottish Environmental Protection Agency](#) has been updated. The MOU ensures effective cooperation and collaboration in the regulation of nuclear safety, security, radioactive materials transport, nuclear safeguards and environmental protection on nuclear licensed sites and at other sites where both ONR and SEPA have regulatory functions.

In February, [a new nuclear site licence was granted to Tradebe Inutec](#) for their Winfrith site in Dorset. A new site licence was required following Tradebe Inutec's acquisition of buildings and land at the Winfrith site from the Nuclear Decommissioning Authority (NDA) in February 2019.

In March 2019 we published a report detailing safety "events" that took place in the UK between 2015-2017. The report details the 56 safety significant events that took place between April 2015 and December 2017 – describing each event, the dutyholder's response, and the actions taken by the ONR. The full report is available on our [website](#).

Stakeholder Engagement

In February, our Chief Nuclear Inspector, Mark Foy and Technical Director, Anthony Hart hosted a webinar which focused on the first Topical Peer Review of 'Ageing management of

nuclear power plants and research reactors.’ Further details about the webinar are available on our [website](#).

We published our [2018 Stakeholder Survey report](#), in February following the survey in October/November last year. Stakeholders from across the sector were invited to take part in the survey with 329 responses received, providing valuable insight into how we are viewed by our stakeholders. The full report is available on our [website](#).

On 28 March, we held our NGO Forum in Manchester and were delighted to welcome 15 NGO representatives from 12 organisations. We’ll be making the minutes, agenda, presentations and pre-event briefing papers available on our website over the coming weeks.

Corporate news

In February we announced the appointment of Mark McAllister as the new Chair of ONR. Mark will join ONR from 1 April, succeeding Nick Baldwin CBE.

We were delighted that our Chief Executive was recognised as Transformational Leader at the Northern Power Women Awards 2019, an event that celebrates the women and men working towards accelerating gender diversity across the Northern Powerhouse. Adrienne won the award in recognition of her work in leading ONR through significant change while, in parallel, driving gender balance.

ONR has been recognised for its commitment to equality, diversity and inclusion by gaining accreditation to the National Equality Standards (NES).

We are embarking on the final year of our ONR Strategic Plan 2016-2020. So we are now starting to look ahead to what the next five years will bring and beginning to develop our new strategy for 2020-25. We’re not doing this alone; we’ve already started talking to our staff and we are asking our stakeholders for their views to shape our plans. We are really keen to hear from SSG and LLC members and attendees to help us develop our strategic aims and objectives. We’d like to know:

- What is working well that we should keep doing and/or do more of?
- What do you think our top regulatory priorities should be in the 2020s?
- What do you think is missing from our current Strategic Plan that needs to feature in the next one?

We intend to consult on our draft strategy in the autumn, but in the meantime, if you’d like to share your comments and suggestions please email us at: contact@onr.gov.uk . We look forward to hearing from you.

All our latest news is available on our website www.onr.org.uk.

6 CONTACTS

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