TRAWSFYNYDD DECOMISSIONING SITE, GWYNEDD, WALES (MAGNOX LIMITED)

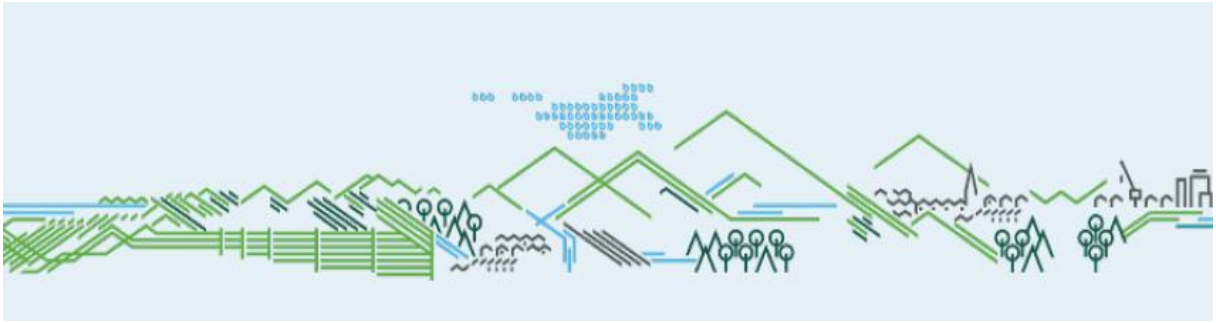
REPORT TO THE SITE STAKEHOLDER GROUP

06 JUNE 2019

FOREWORD

This report is issued to the Site Stakeholder Group (SSG) to provide a summary of the regulatory activities of Natural Resources Wales (NRW) at the Trawsfynydd Decommissioning Nuclear Site.

In terms of radioactive substances regulation, the primary role of NRW centres on the generation and disposal of radioactive waste. The environmental permit stipulates a number of conditions and limits within which the site must operate. Please see Annex 1 for further information on our role.



Introduction

This report covers the period since the last Site Stakeholder Group (SSG) meeting, 03 December 2018 – 21 May 2019.

Change in Lead Nuclear Regulator

Accountability for the regulation of nuclear sites in Wales is held by "Natural Resources Wales" on behalf of the Welsh Government. NRW and the Environment Agency (EA) have in place a contractual arrangement which enables NRW to draw upon the resources of the EA Nuclear Regulation Group, to assist in the delivery of on-site inspection / assessment work under the Environmental Permitting Regulations 2016 (EPR 2016). Mike Baggs is now the Lead Nuclear Regulator. Richard Clarke previously held this role since 2014. Richard remains involved in our regulatory work at Trawsfynydd, in terms of the application of GRR and end-state development work, but Mike is now your lead regulator contact, with Julia Frost from NRW.

Radioactive substances regulation

We regulate radioactive waste disposals through environmental permits that contain limits and conditions aimed at minimising the volume of wastes produced and protecting the environment.

We check compliance with the permit by making regular inspections. These are recorded on "Radioactive Substances Compliance Assessment Reports" (RASCARs) which are placed on the Public Register.

We also maintain regular contact with the operator, at meetings, by telephone or email, in addition to formal correspondence.

Radioactive discharges

We receive quarterly reports from Trawsfynydd site on their monthly radioactive discharges. These are also placed on the Public Register.

All radioactive discharges from Trawsfynydd remain within the limits set in our radioactive substances permit.

Environmental monitoring

Magnox Ltd is required to carry out routine environmental monitoring under their radioactive substances permit. This involves taking a wide range of environmental samples from locations in the vicinity of the site and analysing them for radioactivity content.

The Environment Agency (on behalf of NRW) also undertakes an independent programme of environmental monitoring across Wales & England. The results are reported in the Radioactivity in Food and the Environment (RIFE) report: the latest report (covering calendar year 2017) was published in October 2018 and can be found here: https://www.food.gov.uk/research/radioactivity-in-food-and-the-environment/radioactivity-in-food-and-the-environment-rife-report-2017

Recent results from both programmes are generally in line with previous periods and show no cause for concern.

ENFORCEMENT ACTIVITY

None undertaken during the reporting period.

Current regulatory issues & good practice

- We undertook routine inspection visits in Dec 18 and March 19. No non-compliances were recorded.
- We also completed a Themed Inspection on "High Activity Waste" (HAW) during a further visit in March 19. This was completed jointly with ONR: from our perspective, the arrangements for the management of HAW at Trawsfynydd were robust, in accordance with Magnox procedures and consistent with the joint regulatory guidance. No non-compliances were noted during the inspection, although we did record 2 Recommendations (which the site should address in order to avoid non-compliance in future) and 10 Observations for consideration by the site. We will follow these up as part of our routine regulation during FY19/20 in collaboration with relevant colleagues.
- We will continue to pay close attention to staffing baselines: that site staff are demonstrably Suitably Qualified Experienced Persons (SQEP), and sufficient in number, without reliance placed on "singletons".
- ***GRR: Guidance for the Release from Regulation of Nuclear Sites***

In conjunction with ONR, NDA, as well as planning representatives for Snowdonia National Park and Gwynedd Council we continue to work with Trawsfynydd site on this.

Non-Radioactive Substances Regulation (NRW)

We will continue to liaise with the operator on its plans / timescales for asset improvements to the sewerage plant (also an EPR-RSR discharge point).

EPR-RSR Permit Update

We anticipate varying the permit to include the additional conditions associated with the GRR during Summer 2019.

NON-ROUTINE MATTERS

Events / Incidents / Investigations

- Nothing to report.

CONTACT DETAILS

Should you have any queries please do not hesitate to contact:

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ANNEX 1

THE ROLE OF NATURAL RESOURCES WALES AT NUCLEAR SITES

Operating and cleaning up nuclear sites generates radioactive and non-radioactive wastes. Our role as the environmental regulator in Wales is to ensure that the impact of those wastes on people and the environment, now and in the future, is as small as it can be.

We inspect nuclear sites and assess proposals from operators in order to provide assurance that the operator is complying with the limits and conditions of the permits we issue under the Environmental Permitting Regulations, 2016 and other relevant legislation and policy.

We supplement direct regulation with a partnership approach, working with the nuclear operators and others to solve problems jointly.

We expect operators to comply fully with all relevant legislative requirements and permits. If this does not happen, we will not hesitate to use our enforcement powers to ensure that action is taken to protect the environment or to secure compliance.

In summary our key objectives include:

- Assess compliance with the permits
- Reduce risks to the environment and avoid creating further legacies
- Ensure that integrated waste strategies continue to improve
- Ensure that solid waste is packaged in a form suitable for disposal
- Ensure that infrastructure and assets are maintained to minimise environmental impact
- Monitor and assess organisational change to ensure that environmental performance is maintained
- Influence NDA so that they provide appropriate direction to operators

See also:

https://naturalresources.wales/guidance-and-advice/environmental-topics/waste-management/management-of-radioactive-waste-guidance/?lang=en

https://www.gov.uk/government/publications/the-decommissioning-of-nuclear-facilities

SAFLE DATGOMISIYNU TRAWSFYNYDD, GWYNEDD, CYMRU (MAGNOX LIMITED)

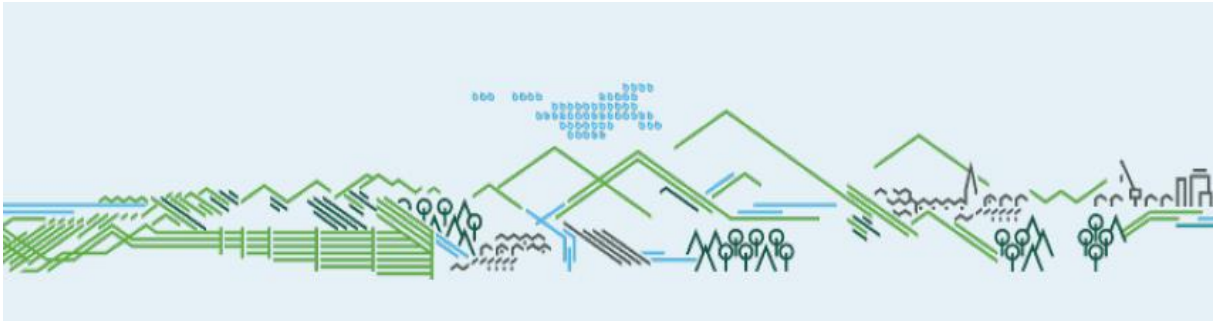
ADRODDIAD AR GYFER GRŴP RHANDDEILIAID Y SAFLE

06 MEHEFIN 2019

RHAGAIR

Mae'r adroddiad hwn wedi'i gyflwyno i Grŵp Rhanddeiliaid y Safle i ddarparu crynodeb o weithgareddau rheoleiddiol Cyfoeth Naturiol Cymru ar Safle Datgomisiynu Niwclear Trawsfynydd.

O ran rheoleiddio sylweddau ymbelydrol, prif swyddogaeth Cyfoeth Naturiol Cymru yw canolbwyntio ar gynhyrchu a gwaredu gwastraff ymbelydrol. Mae'r drwydded amgylcheddol yn pennu nifer o amodau a chyfyngiadau y mae'n rhaid i'r safle weithredu oddi mewn iddyn nhw. Gweler Atodiad 1 am fwy o wybodaeth ynglŷn â'n swyddogaeth.



Cyflwyniad

Mae'r adroddiad hwn yn cwmpasu'r cyfnod ers cyfarfod diwethaf y Grŵp Rhanddeiliaid Safle, 03 Rhagfyr 2018 – 21 Mai 2019.

Newid Prif Reoleiddiwr Niwclear

"Cyfoeth Naturiol Cymru" sy'n atebol am reoleiddio safleoedd niwclear yng Nghymru ar ran Llywodraeth Cymru. Mae gan CNC ac Asiantaeth yr Amgylchedd gytundeb contractiol sy'n galluogi CNC i fanteisio ar adnoddau Grŵp Rheoleiddio Niwclear Asiantaeth yr Amgylchedd, i gynorthwyo i ddarparu gwaith arolygu/asesu ar safle o dan Reoliadau Trwyddedu Amgylcheddol 2016 (EPR 2016). Mike Baggs yw'r Prif Reoleiddiwr Niwclear bellach. Cyn hynny, roedd Richard Clarke wedi bod yn y swydd ers 2014. Mae Richard yn parhau i gyfrannu at y gwaith rheoleiddio yn Nhrawsfynydd, o ran cymhwyso'r GRR a gwaith datblygu diwedd stad, ond Mike yw'ch prif gyswllt rheoleiddio bellach, gyda Julia Frost o CNC.

Rheoleiddio sylweddau ymbelydrol

Rydym yn rheoleiddio gwarediadau gwastraff drwy drwyddedau amgylcheddol sy'n cynnwys terfynau ac amodau sydd â'r nod o leihau'r gwastraff sy'n cael ei gynhyrchu a diogelu'r amgylchedd.

Rydym yn gwirio cydymffurfiaeth â'r drwydded drwy gynnal arolygiadau rheolaidd. Cofnodir y rhain ar ffurf "Adroddiadau Asesu Cydymffurfiaeth Sylweddau Ymbelydrol" (RASCAR) sy'n cael eu gosod ar y Gofrestr Gyhoeddus.

Rydym hefyd yn cynnal cysylltiad rheolaidd â'r gweithredwr, mewn cyfarfodydd, ar y ffôn neu ar e-bost, yn ogystal â gohebiaeth ffurfiol.

Gollyngiadau ymbelydrol

Rydym yn derbyn adroddiadau chwarterol o safle Trawsfynydd ar eu gollyngiadau ymbelydrol misol. Mae'r rhain yn cael eu gosod ar y Gofrestr Gyhoeddus hefyd.

Mae'r holl ollyngiadau ymbelydrol o Drawsfynydd yn aros o fewn y terfynau a nodir yn ein trwydded sylweddau ymbelydrol.

Monitro amgylcheddol

Mae'n ofynnol i Magnox Ltd gynnal gwaith monitro amgylcheddol rheolaidd o dan eu trwydded sylweddau ymbelydrol. Mae hyn yn cynnwys cymryd ystod eang o samplau amgylcheddol o leoliadau yng nghyffiniau'r safle a'u dadansoddi am gynnwys ymbelydrol.

Mae Asiantaeth yr Amgylchedd (ar ran CNC) hefyd yn cynnal rhaglen monitro amgylcheddol annibynnol ledled Cymru a Lloegr. Mae'r canlyniadau yn cael eu hadrodd yn yr adroddiad *Radioactivity in Food and the Environment (RIFE)*: cyhoeddwyd yr adroddiad diweddaraf (yn cwmpasu blwyddyn galendr 2017) ym mis Hydref 2018 ac mae ar gael yma: https://www.food.gov.uk/research/radioactivity-in-food-and-the-environment/radioactivity-in-food-and-the-environment-rife-report-2017

Mae'r canlyniadau diweddar o'r ddwy raglen yn gyson â chyfnodau blaenorol ar y cyfan ac nid ydynt achosi pryder.

GWEITHGARWCH GORFODI

Ni chynhaliwyd unrhyw weithgarwch yn ystod y cyfnod adrodd.

Materion rheoleiddio ac arferion da presennol

- Cynhaliwyd ymweliadau arolygu rheolaidd ym mis Rhagfyr 2018 a mis Mawrth 2019. Ni adroddwyd unrhyw achos o ddiffyg cydymffurfio.
- Hefyd, cwblhawyd Arolygiad â Thema ar "Wastraff Gweithgaredd Uchel" (HAW) yn ystod ymweliad pellach ym mis Mawrth 2019. Gwnaed hyn ar y cyd gydag ONR: o'n safbwynt ni, roedd y trefniadau ar gyfer rheoli HAW yn Nhrawsfynydd yn gadarn, yn unol â gweithdrefnau Magnox ac yn gyson â chanllawiau rheoleiddio ar y cyd. Ni nodwyd unrhyw achos o ddiffyg cydymffurfio yn ystod yr arolygiad, er ein bod wedi cofnodi 2 Argymhelliad (y dylai'r safle fynd i'r afael â nhw er mwyn osgoi diffyg cydymffurfio yn y dyfodol) a 10 o Arsylwadau i'r safle eu hystyried. Byddwn yn cadw llygaid ar y rhain fel rhan o'n rheoleiddio rheolaidd yn ystod blwyddyn ariannol 2019/2020, mewn cydweithrediad â chydweithwyr perthnasol.
- Byddwn yn parhau i roi sylw manwl i linellau sylfaen staffio: bod y staff yn amlwg yn Unigolion â Phrofiad a Chymwysterau Addas, bod digon ohonynt, heb ddibynnu ar staff unigol.

- ***GRR: Guidance for the Release from Regulation of Nuclear Sites***
- Mewn cydweithrediad ag ONR, NDA a chynrychiolwyr cynllunio o Barc Cenedlaethol Eryri a Chyngor Gwynedd, rydym yn parhau i weithio gyda safle Trawsfynydd ar hyn.

Rheoliadau Sylweddau Anymbelydrol (CNC)

Byddwn yn parhau i gadw mewn cysylltiad â'r gweithredwr ar ei gynlluniau/amserlenni ar gyfer gwelliannau i asedau i'r safle carthffosiaeth (pwynt gollwng EPR-RSR hefyd).

Y Diweddaraf am Drwydded EPR-RSR

Rydym yn rhagweld amrywio'r drwydded i gynnwys yr amodau ychwanegol sy'n gysylltiedig â'r GRR yn ystod Haf 2019.

MATERION NAD YDYNT YN RHAI RHEOLAIDD

Digwyddiadau / Damweiniau / Ymchwiliadau

- Dim i'w adrodd.

MANYLION CYSWLLT

Os oes gennych chi unrhyw ymholiadau mae croeso i chi gysylltu:

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ATODIAD 1

SWYDDOGAETH CYFOETH NATURIOL CYMRU AR SAFLEOEDD NIWCLEAR

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Mae gweithredu a glanhau safleoedd niwclear yn cynhyrchu gwastraff ymbelydrol ac anymbelydrol. Ein swyddogaeth ni fel y rheoleiddiwr amgylcheddol yng Nghymru yw sicrhau bod effaith y gwastraff hynny ar bobl a'r amgylchedd, yn awr ac yn y dyfodol, mor fychan ag y gall fod.

Rydym yn archwilio safleoedd niwclear ac yn asesu cynigion gan weithredwyr er mwyn darparu sicrwydd fod y gweithredwr yn cydymffurfio â chyfyngiadau ac amodau'r trwyddedau yr ydym ni'n eu rhoi o dan Reoliadau Trwyddedu Amgylcheddol 2016 a deddfwriaeth a pholisi perthnasol arall

Rydym yn ategu rheoleiddio uniongyrchol gyda dull partneriaeth, gan weithio gyda'r gweithredwyr niwclear i ddatrys problemau gyda'n gilydd.

Rydym yn disgwyl i weithredwyr gydymffurfio'n llawn â'r holl ofynion deddfwriaethol perthnasol a thrwyddedau. Os nad yw hyn yn digwydd, rydym yn fwy na pharod i ddefnyddio ein pwerau gorfodi i sicrhau bod camau'n cael eu cymryd i ddiogelu'r amgylchedd neu i sicrhau cydymffurfiaeth.

Yn gryno, mae ein hamcanion allweddol yn cynnwys:

- Asesu cydymffurfiaeth â'r trwyddedau
- Lleihau'r risgiau i'r amgylchedd ac osgoi creu problemau pellach
- Sicrhau bod y strategaethau gwastraff integredig yn parhau i wella
- Sicrhau bod gwastraff solid yn cael ei becynnu ar ffurf sy'n addas i'w waredu
- Sicrhau bod seilwaith ac asedau yn cael eu cynnal i leihau'r effaith amgylcheddol
- Monitro ac asesu newid sefydliadol i sicrhau bod perfformiad amgylcheddol yn cael ei gynnal
- Dylanwadu ar NDA er mwyn iddynt roi cyfeiriad priodol i weithredwyr.

Gweler hefyd:

https://naturalresources.wales/guidance-and-advice/environmental-topics/waste-management/management-of-radioactive-waste/?lang=cy

https://www.gov.uk/government/publications/the-decommissioning-of-nuclear-facilities