

Hunterston Site Stakeholder Group

SEPA Update on Hunterston B

December 2020 by teleconference

Regulation

Environmental Authorisations (Scotland) Regulations (EASR) - radioactive substances

SEPA issued the station a warning letter on 22 September in relation to the unauthorised receipt of radioactive debris in fuel transport flasks.

SEPA staff have remotely inspected the station in relation to its EASR permit once since the last SSG meeting in September 2020. The inspection, carried on 22 October, focused on the Radioactive Waste Adviser body and the required number of appropriately qualified staff. No contraventions were noted.

In addition, in order to monitor the situation and keep abreast of any environmental developments during the pandemic, the following teleconferences were set up and are continuing at the time of writing:

- Weekly meetings with the station's Environmental Safety Group;
- Monthly meetings with EDF's corporate environment department (GEM) along with the EA;
- Monthly meetings with the EA's EDF corporate and site inspectors.

Other interactions relating to radioactive substances include attendance at the following:

- Level 3 meeting with EDF and EA on 7 September to discuss strategic regulatory issues across the EDF fleet;
- Level 4 meeting with EDF and EA on 14 September to discuss the End of Generation Regulatory Schedule;
- Level 4 meeting with EDF, ONR and EA on 23 September to discuss the Defueling Shut-down Reactor Safety Case;
- Level 4 meeting with EDF, ONR and EA on 19 October to discuss management of the asset through defueling and beyond;
- Level 4 meeting with EDF and EA on 2 November to discuss progress on environmental issues relating to defueling;
- Level 3 meeting with EDF and EA on 3 November to discuss EDF's Transformation Programme;
- Level 3 meeting with EDF internal regulator (INA) and EA on 18 November to discuss areas of common interest; and
- Level 4 meeting with EDF, ONR and EA on 1 and 2 December to discuss operational radioactive waste issues across the EDF fleet.

SEPA is progressing the application by EDF to vary the EASR permit to authorise the receipt of debris in the fuel flasks and subsequent transfer back to Sellafield. There is no change to the authorised aqueous and gaseous discharges as a result of this application. Due to the nature of the application, SEPA has decided that it does not require formal public consultation.

Pollution Prevention & Control (PPC)

There have been no issues relating to the station's PPC permit for its non-radioactive emissions from the emergency diesel generators, auxiliary boilers and waste oil burner since the last scheduled SSG meeting.

Control of Major Accidents Hazards (COMAH)

There have been no issues relating to COMAH since the last scheduled SSG meeting. Arrangements were put into place to allow higher quantities of hazardous chemicals to be stored on site in case of disruption to the supply chain during the Covid-19 lockdown measures. EDF do not intend to utilise the COMAH Temporary Regulatory Position Statement for Upper Tier storage beyond 21 November 2020.

Controlled Activities Regulations (CAR)

There have been no issues relating to the station's CAR licences for non-radioactive liquid discharges to the water environment since the last scheduled SSG meeting.

European Union Emission Trading Scheme (EUETS)

There were no issues relating to the station's EUETS permit since the last scheduled SSG meeting.

Events

The station experienced a leak of tritium from its effluent discharge line. The leak appears to have been confined within the secondary containment and has not entered the environment. The station has established an Event Recovery Team to find the leak and make the necessary repairs. SEPA continues to monitor the event.

There were no other reportable incidents, complaints or non-compliance events affecting SEPA's interests at the station known to have occurred since the last meeting of the SSG at the time of writing this report.

SEPA Household Survey into impact of Coronavirus on dietary consumption and recreational activity

Periodically, SEPA undertakes a radiological habits survey around the nuclear licensed sites across Scotland. These surveys are studies into the components of an individual's diet and what food comes from the local area. Additionally, the surveys look at where local people spend their time in the area, whether it is beaches, rambling or simply walking the dog. This information is extremely useful to SEPA in determining where our environmental monitoring programmes should seek to gather samples or measurements in the environment around the nuclear licensed sites. SEPA is aware that the coronavirus has had a major impact on the lives of everyone and we want to determine if this should lead to changes in our monitoring programme. Stirling University have been appointed by SEPA to undertake a short postal survey of individuals across Scotland to determine if and how the coronavirus pandemic has impacted on availability of locally grown/caught and wild food. Some people have reported shortages of certain foods or that they are moving to growing more fruit and vegetables at home. We are also interested to discover if people are spending more time engaging in leisure pursuits or staying closer to home. The results of this survey will assist SEPA to determine if our environmental monitoring programme around nuclear sites needs to be amended to take account of changing habits. Around 1000 surveys will be sent to randomly selected address in the Caithness area with 7000 surveys being gathered in total from across Scotland. Should you not be randomly selected, but still wish to provide information an electronic survey will also be available and a link can be requested via RSEnquiries@sepa.org.uk.

SEPA Consultations

There are several consultations that SEPA is carrying out that may be of interest as they impinge on aspects of how we regulate the nuclear industry. These consultations are:

Name of Consultation	Closing Date
Proposed revision of radioactive substances activities Standard Condition C.4.1 (Transfer of radioactive waste outside of the United Kingdom)	22 December 2020
Radioactive substances activities charges consultation	15 December 2020
Revised guidance on the use of enforcement action- variable monetary penalties	15 December 2020

Radioactivity in Food & the Environment (RIFE)

SEPA works together with the Environment Agency, Natural Resources Wales, Northern Ireland Environment Agency, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and the environment, and in publishing the results. The reports aim to provide an in-depth assessment of radioactivity in food and the environment in the UK and the public's exposure to radiation. The reports focus on key information that demonstrates both that food remains safe and that the public's exposure to ionising radiation is within legal limits.

The latest edition (RIFE 25) covering 2019 has been published and electronic copies can be obtained from SEPA's website: www.sepa.org.uk under "*Environment/Radioactive Substances/Environmental monitoring and assessment/Reports*". The total dose for the critical group around Hunterston for the year was 0.005 millisieverts, which is unchanged from 2018, and is about 0.5% of the annual dose limit (1 millisievert).

Scottish Pollutant Release Inventory (SPRI)

The Scottish Pollutant Release Inventory (SPRI) is a publicly accessible electronic database of releases of pollutants to all environmental media and transfers of non-radioactive waste. SEPA intends that, as far as practicable, SPRI be the principle means by which information on Scottish pollutant releases and non-radioactive waste transfers is collected and made public. Wherever possible, such information will be collected and presented by this one system.

The data for 2019, including that from Hunterston B, have been published and are available on SEPA's website: www.sepa.org.uk under "*Environment/Environmental data/SPRI*".

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