

Hunterston Site Stakeholder Group

SEPA Update on Hunterston B

4th June 2020 by teleconference

Regulation

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

SEPA staff have not inspected the station in relation to its EASR permit since the last SSG meeting in March 2020 due to the Covid-19 lockdown measures. However, in order to monitor the situation and keep abreast of any environmental developments the following teleconferences were set up and are continuing at the time of writing:

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

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

- Meeting with EDF and EA on 22 April to discuss EDF's progress in developing a Site Wide Environmental Safety Case (SWESC) and associated Waste Management Plan as set out in Management of Radioactive Waste from Decommissioning of Nuclear Sites: Guidance on Requirements for Release from Radioactive Substances Regulation (GRR);
- Level 2 meeting with EDF, EA and ONR on 29 April to discuss strategic regulatory issues across the EDF fleet;
- AGR Operations Plan (AGROP) meeting on 18 May to discuss issues associated with AGR fuel.

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.

Controlled Activities Regulations (CAR)

Other than the hypochlorite event described below, 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

On 16 April 2020 the station informed SEPA that it had experienced a failure in its hypochlorite dosing equipment that resulted in non-radioactive hypochlorite being spilled on to the beach next to the jetty on the Clyde. The beach is largely inaccessible except by EDF staff and, during the lockdown measures in place at that time, even fewer people were in the vicinity. The spilt hypochlorite was remediated and the equipment repaired. There was no significant environmental impact from this event.

SEPA continues to investigate the event involving the unauthorised receipt of radioactive waste in the form of debris in the incoming fuel flasks, which was reported to the last SSG meeting, although the investigation has been slowed by the Covid-19 lockdown measures. Because the event is still under investigation, SEPA cannot give any further indication of what, if any, enforcement action SEPA may take. There is no environmental impact from this practice, which appears to have occurred since the station began accepting fuel flasks. SEPA expects EDF to make application to vary the station's permit to allow the debris to be lawfully received.

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.

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 24) covering 2018 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 broadly similar to previous years, and is about 0.5% of the annual dose limit (1 millisievert). The decrease in total dose and change in the representative person from 2017 was mostly due to a lower estimate of direct radiation from the site in 2018.

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 2017, including that from Hunterston B, have been published and are available on SEPA's website: www.sepa.org.uk under "*Environment/Environmental data/SPRI*".

Keith Hammond
Specialist 1- Radioactive Substances Unit
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