



Office for Nuclear Regulation (ONR) Quarterly Site Report for Chapelcross

1 July – 30 September 2020

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 Chapelcross Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend the 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 made visits to the Chapelcross (CHX) site on the following dates: -

- 17 – 19 August 2020
- 16 – 18 September 2020

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);
- The Energy Act 2013;
- The Health and Safety at Work Act 1974 (HSWA74); 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 CHX:

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

- LC9 Instructions to persons on the site
- LC10 Training
- LC12 Duly authorised and other suitably qualified and experienced persons
- LC17 Management Systems
- LC22 Modification or Experiment on existing plant
- LC26 Control and supervision of operations
- LC28 Examination, Inspection, Maintenance, and Testing
- LC36 Organisational Capability

ONR also carried out a regulatory inspection of COVID-19 risk control measures during the period.

For the LC Compliance and COVID-19 inspections, ONR judged that the arrangements made and implemented by the site in response to safety requirements were adequate.

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.

3. NON-ROUTINE MATTERS

Licensees are required to have arrangements to respond to non-routine matters and events. 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 CHX during this period.

COVID-19

During lockdown, the Chapelcross licensed site was put into a quiescent safe-state. All decommissioning and radioactive waste handling activities ceased. This pause in operations allowed the number of personnel on site to be reduced to a level that some monitoring and surveillance of plant could be undertaken and that security could be sustained. In this quarter, the site has undertaken a controlled return to service with a number of staff working from home and at site as appropriate and has progressed a significant way through their plans. The ML Internal Oversight team has checked independently that the pandemic and restart arrangements have been properly implemented.

Emergency preparedness is being maintained through a duty cover team at each site in accordance with ONR approved emergency arrangements. These arrangements include the provision to call in additional personnel and the emergency services onto site to assist ML staff. These plans have been regularly rehearsed and observed by ONR inspectors during emergency exercises in the past.

Overall ONR is content with the actions taken by ML to make safe the CHX site under these exceptional circumstances. The site inspector is in touch regularly with CHX personnel to discuss any changes to the arrangements and any potential emerging safety or regulatory issues.

4. REGULATORY ACTIVITY

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site Licence Conditions (LC) 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' (LIs) but can take other forms. In addition, inspectors may issue Enforcement Notices to secure improvements to safety.

No LIs or Enforcement Notices were issued to CHX within the reporting period.

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

5. NEWS FROM ONR

COVID-19 (Coronavirus) (ONR position)

ONR is continuing to obtain assurance that nuclear site licensees and other duty-holders are adequately resourced to continue to safely and securely carry out their activities. We remain satisfied with industry's response at this time and there has been no significant change to duty-holders' safety and security resilience.

As COVID-19 restrictions change, our focus is on the preparedness for the weeks and months ahead and maintaining safe and secure operations in the face of any further escalation in COVID-19 transmission.

ONR staff continue to work at home, primarily. We are increasing our on-site regulatory work in accordance with public health advice. We'll also continue to inspect, assess and permission remotely where necessary to protect staff, workers on site, and the public around sites.

Enforcement Action

In July we publicised the serving of an Improvement Notice on Rolls-Royce Submarines Ltd (RRSL) for procedural safety breaches at its Derby site. The notice was served after shortfalls were identified against the safety case requirements at a nuclear fuel production facility on the site.

In September we announced that an Improvement Notice had been served on EDF Energy Nuclear Generation Ltd (EDF NGL) for shortfalls in safety procedures at its Heysham 2 Power Station in Lancashire. The notice was served after some of the equipment which is used to measure reactor power was incorrectly configured during the reactor's restart process following a planned outage in April 2020. In September we announced that an Improvement Notice had also been served on Devonport Royal Dockyard Ltd for shortfalls in maintenance procedures at its Plymouth site. The notice was served after Devonport Royal Dockyard failed to carry out scheduled maintenance tests on an effluent extraction system which is used to support maintenance and repair activities within the licensed site.

In September we publicised our intention to prosecute AWE plc under Section 3 of the Health and Safety at Work etc. Act (1974). The charge relates to an incident on 20 June 2019, at the AWE Aldermaston site which resulted in a contractor narrowly avoiding injury when a flash over of electricity occurred from a 415V electrical source. The incident was a conventional health and safety matter and took place in a 'non-nuclear' building, so there was no radiological risk to workers or the public.

Regulatory updates

In July the Government published its response to the International Atomic Energy Agency's final report on the Integrated Regulatory Review Service (IRRS) mission to the UK. The IRRS mission took place between 14 – 25 October 2019 was hosted by ONR and saw a team of 18 independent experts from across the globe scrutinising the regulation of nuclear and radiological safety.

In August we provided EDF NGL with permission for Reactor 3 at its Hunterston B site to return to service for a limited period of operation (16.425 Terawatt days, approximately six months' operation). In September we also gave permission for Reactor 4 at the same site to return to service for a limited period of operation (16.25 terawatt days, which is approximately six months operation). The decision to permission the restart of these reactors was given after extensive and detailed assessments of the respective safety cases by specialist ONR inspectors.

Corporate updates

In July we published our new 2020-25 Strategy, which sets out our direction and priorities for the next five years. It builds on our strengths and continues to focus on protecting society, and addressing the changing demands we will face as the UK's nuclear regulator.

In late September we published our Annual Report and Accounts highlighting our performance and key achievements for 2019/20.

The report notes that we continued to deliver our mission of protecting society by securing safe nuclear operations and that the majority of dutyholders have continued to meet the high standards of safety and security required. Where dutyholders have fallen short of such standards, we are satisfied that their facilities remain safe and that our regulatory focus has had a positive impact on their performance.

During the year, we completed more than 800 compliance inspections across 36 licensed sites during 2019/20, granting permission for 30 nuclear-related activities, serving three improvement notices and instigating one prosecution.

ONR Chair Mark McAllister said: “I am pleased to report that we have again delivered our mission and achieved our 2020 vision. As we look ahead, I have every confidence in our senior leadership team to see through the strategic improvement projects already underway that will enhance the organisation’s information and knowledge management system, and successfully deliver the aspirations of our new strategy.”

In September we announced that Jean Llewellyn OBE had been appointed to the ONR Board as the new Security Non-Executive member. Jean will take up her appointment on 1 October 2020 for a three-year term and will Chair ONR’s Security Committee.

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

6. CONTACTS

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