

**Scottish Environment Protection Agency
Report to the Chapelcross Stakeholders' Group
January 2020.**

Environmental Authorisations (Scotland) Regulations 2018 (EASR 2018).

Inspections

SEPA has undertaken two regulatory inspections since the last meeting on 23 August 2019.

The first of these was undertaken on 19th September 2019. The focus was the site's review and maintenance of their environmental monitoring programme (EMP). The site is required to establish and operate a suitable environmental monitoring programme to demonstrate that their radioactive discharges (liquid and gaseous) have been optimised and the associated radiological effects minimised.

The inspection found that Magnox Ltd has procedures in place to ensure that the site's monitoring programme is reviewed with a periodicity of 3-5 years or when a significant change has been identified. Suitably qualified and experienced staff were used to review and maintain the site's monitoring programme. Further, in developing and maintaining their programme, the site had used SEPA's Radiological Monitoring Technical Guidance Note 2. This provides guidance on planning and implementing routine environmental radiological monitoring programmes.

No issues were identified during the inspection. The site's EMP currently remains fit for purpose with respect to ongoing activities at the Chapelcross site.

On the 21 November 2019, SEPA inspected the site's procedures and facilities for the reassurance monitoring of solid wastes that have been assessed as radiologically clean or out of scope of radioactive substances regulation prior to their disposal from the Chapelcross site. The inspection found that the site had procedures in place and facilities that were adequate to undertake the reassurance monitoring required. In particular, the site had a dedicated facilities to monitor radiologically clean waste and appropriate procedures in place to manage the monitoring and disposal of the waste. These procedures include a robust system of labelling and segregation of the waste to ensure managed and disposed of compliantly. No issues were identified during the inspection.

SEPA attended the Chapelcross site on the 12 December 2019 to discuss Magnox Ltd's response to the Notice Requiring Information appended to the Final Warning Letter issued to Magnox Ltd on 7 August 2019.

The Final Warning Letter and associated Notice Requiring Information related to ingress of rainwater into bulk items of solid low level radioactive waste (LLW) stored on the Chapelcross site. This had resulted in the generation of a small volume of radiologically contaminated water and the breach of a number of standard conditions in the site's EASR permit. The contaminated water was managed on the site and there was no radiological risk to the public or the environment.

SEPA's investigation into this event and the associated Magnox Ltd investigation identified a significant back log of 'legacy' LLW stored on the Chapelcross site. In addition a number of failures in the management of stored LLW and the application of best practicable means (BPM) were identified.

The Notice Requiring Information required Magnox Ltd to provide comprehensive details of the solid low level radioactive waste held on the site as well as a programme and timescale for its disposal. In addition they were required to detail the corrective work to ensure the site's LLW Operations and Storage Safety Case is adequate to ensure regulatory compliance and the application of BPM to the storage of LLW.

In response, the Chapelcross site provided SEPA with details of the LLW stored on site and a programme and associated timescale for its disposal. In addition Magnox Ltd has secured significant new funding over the period 2020-2023 for additional resources to manage and dispose of the legacy LLW held on the site. A schedule of disposal over this timescale was also provided to SEPA.

Magnox Ltd had also reviewed the site's LLW Operations and Storage Safety Case and prepared a number of BPM studies relating to the storage and disposal of LLW. As of 12 December 2019 these were undergoing review by Magnox Ltd. These have not yet been reviewed by SEPA.

SEPA welcomes Magnox Ltd's response to the Notice Requiring Information. The management and disposal of the legacy solid LLW held on site will remain an area of regulatory interest to SEPA as the site's programme of disposals is implemented over the timescale for which the additional funding is available.

SEPA will keep the SSG updated on progress to dispose of the legacy waste from the Chapelcross site.

David Stone.