

Oldbury Site Stakeholder Group Report

This report covers our regulation of Magnox Ltd. at Oldbury Site and related issues - including the Coronavirus pandemic - over the period January 2020 to October 2020

Coronavirus: Nuclear site regulation operational update

The Environment Agency's priority remains to protect people and the environment. We have set out how we are doing this across the many areas we regulate, advise or interact with the public, for example, flood defence, flood warning, environmental sampling, permitting, angling and fisheries, waterways management and billing. In brief:

- We are fully operational, with the majority of our staff working from home.
- Our frontline staff have returned to near normal regulatory work including physical inspections.
- We have published a series of temporary regulatory position statements (RPSs). RPSs are national arrangements that allow for limited relaxations of regulatory requirements provided certain circumstances and conditions are met. They clearly set out the standards that must be adhered to. The RPSs issued at the beginning of the pandemic have and will continue to be reviewed, and extended or withdrawn as necessary.

Please see our published statement for further information at

<https://www.gov.uk/government/news/coronavirus-environment-agency-update>.

Coronavirus: Operational Pause

As a result of the Coronavirus (Covid-19) pandemic, Magnox made the decision to pause operations at Oldbury on 17th March 2020. In preparation for the pause, Magnox carried out a number of activities to bring the site to a passively safe state, and to reduce any potential environmental risks. This included the shutting down of all gaseous ventilation systems, and the discharge of liquid wastes. We maintained regular contact with Magnox throughout this period, and were able to review plans and supporting assessments to ensure Best Available Technique (BAT) was employed.

Following publication of the RPSs, Magnox informed us of their intention to use two of the RPSs, relating to monitoring emissions (RPS C7) and the reporting of data, returns and other records (RPS C10) on 30th April 2020. RPS C7 required justification and agreement of use with us, whereas RPS C10 required notification of intended use. Details of Magnox's use of these RPSs are included in the environmental discharges and monitoring section below.

These RPSs expired on 30th September 2020, by which point Magnox had returned to compliance with the relevant conditions of its permit covered by the RPS. We have since published replacement RPSs, which operators will either need notify us or seek our agreement to use, should they be again unable to comply with relevant parts of their permit as a result of the Coronavirus pandemic. Details of the RPSs are available at <https://www.gov.uk/government/collections/covid-19-regulatory-position-statements>.

Coronavirus: Return to Work

Following the operational pause, Magnox began the process of returning to work and restarting operations at site. This included offsite preparations before accessing operational areas and enabling works to return to compliance and normal operations. As part of the offsite preparations, Magnox developed quality plans, including one capturing environmental considerations, to ensure all relevant aspects were considered. As with the operational pause, we maintained regular contact with Magnox throughout the return to work phase. We were able to review these quality plans, as well as supporting documents and assessments, to ensure environmental risks were appropriately considered and BAT was employed.

Site Regulation

Following the return to work, we have re-established our regular engagements including remote meetings and the routine tripartite (Magnox, EA and ONR) updates. We will continue to check compliance with the permit by undertaking inspections, where possible remotely, but if necessary and in line with government guidelines, at the site.

In February, prior to the operational pause, we carried out an inspection looking at waste characterisation arrangements at Magnox both corporately and at Oldbury site. Characterisation is essential to understand waste and facilitate its appropriate management and optimised disposal. We found corporate and site characterisation arrangements to be in line with BAT and to meet the requirements of the permit. We also looked at the site strategy and methods for the upcoming sampling and characterisation campaigns of radioactive sludge and resins, and operational Low Level Waste (LLW) fingerprints. We found arrangements to be appropriate to manage and control the upcoming activities. We will continue to monitor progress and the associated records of these project to ensure compliance with the permit.

Our assessments and any non-compliances identified are detailed through Radioactive Substances Compliance Assessment Reports (RASCARs). These reports are placed on our public register. In addition to our own inspection activities we have also reviewed Magnox documents and reports of operational events and incidents that have occurred on site. We will follow-up on these where appropriate, but there have been no events or incidents of significant concern or interest to us in the period.

Environmental Discharges & Monitoring

The site's environmental permit requires Magnox to use BAT to manage their operations, and ensure their impacts on the public and wider environment are minimised. Disposal of wastes – as solids, liquid or gases can only be made via permitted routes or by transfer to permitted sites. Magnox must also carry out a programme of environmental monitoring. A report of the liquid and gaseous discharges to the environment, and the results of the environmental monitoring programme must be submitted to us on a periodic basis. We examine these reports and report on their performance through a RASCAR.

For the operational pause period, Magnox informed us of their intention to use the RPS relating to monitoring emissions (RPS C7) and the reporting of data, returns and other records (RPS C10). Under RPS C10, Magnox delayed sending the monthly discharge returns for Oldbury for the period March – June until the return to work phase, and these

were subsequently received on 21st July 2020. Under RPS C7, Magnox proposed revised techniques for the monitoring of discharges and their routine environmental monitoring programme. We agreed these changes as appropriate and acceptable under the circumstances, but reiterated our expectation that Magnox should return to full compliance as soon as is achievable, and prior to normal operations resuming.

Gaseous discharges for the period were minimal as all vents had been shut down. For the single liquid discharge made during the period, Magnox was able to comply with all normal monitoring requirements, and activity was very low as expected. Both liquid and gaseous discharges from Oldbury continue to be at levels well within permitted limits. Discharges of all measured gaseous radionuclides remained below 1% of their relevant annual limits, and less than 4% for liquid discharges, for Q1 and Q2 (Jan-Jun) 2020.

The results of Magnox's environmental monitoring programme continue to be consistent with our independent programme, and do not indicate any results of concern or significant change from previous years. The results of our independent programme, in association with the Food Standards Agency, are published in our annual Radioactivity in Food and the Environment (RIFE) report, and can be found at <https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports>. For Berkeley and Oldbury, total dose for the representative person for 2018 was <0.005mSv, less than 1% of the government derived limit to protect members of the public. Levels of radioactivity found in the environment remain low and close to background levels. The webpage also includes a summary report for 2004-2016, giving an overview of recent trends in data.

Enforcement

We have not taken any enforcement actions at Oldbury in the period since the previous SSG meeting.

Environmental Permitting

There have been no changes to Magnox's Oldbury permits in the period since the previous SSG meeting, and no changes are planned for the immediate period.

Change to Environment Agency Regulator

The EA's Nuclear Regulation Group (NRG) has a policy that site nuclear regulators are regularly rotated. The responsibilities for the regulation of Oldbury site will therefore be passed from Alex Lord to Rebecca Cleverley. After a period of acclimatisation, the formal handover of responsibilities will take place on 01 November 2020.

Rebecca Cleverley comes into the role as an experienced nuclear regulator, and will be introduced to the SSG at the next available opportunity. Her details are as follows:

Correspondence Address Environment Agency, Nuclear Regulation Group, Red Kite House, Howbery Park, Wallingford, Oxfordshire, OX10 8BD
NRG(S) Telephone +44 208 474 8298
Regulator Email rebecca.cleverley@environment-agency.gov.uk

NRG(S) is responsible for the environmental regulation of radioactive waste disposals on or from nuclear licensed sites in southern England (and in south Wales, on behalf of Natural Resources Wales). We also work closely with the local Environment Agency teams in Wessex Area in relation to other Environment Agency roles and responsibilities.

A public register service is available on the GOV.UK website at:

<https://environment.data.gov.uk/public-register/view/index>

Alternatively you can request access to public documents directly by contacting the Customers and Engagement Team in the Wallingford office. Please email:

WTenquiries@environment-agency.gov.uk

Further information on our role in regulating the use of radioactive substances and related activities on nuclear licensed sites can be found on the Environment Agency pages of the Gov.UK website at:

<https://www.gov.uk/government/publications/nuclear-regulation-in-the-environment-agency>

Our enforcement and sanctions policy is publically available on the GOV.UK website at:

<https://www.gov.uk/government/publications/environment-agency-enforcement-and-sanctions-policy/environment-agency-enforcement-and-sanctions-policy>

Public Health England has placed guidance on ionising radiation dose comparisons on the GOV.UK at:

<https://www.gov.uk/government/publications/ionising-radiation-dose-comparisons>