

Environment Agency report to the Hinkley Point Site Stakeholder Group.

June 2021

Introduction

This report covers the Environment Agency's regulation of the Hinkley Point A & B nuclear sites and related issues for the period March 2021 to June 2021.

Coronavirus: Nuclear site regulation operational update

During the pandemic we issued Regulatory Position Statements (RPS) to support site operators in maintaining compliance, these will be withdrawn on 30th June 2021. The sites have been fully operational for over 6 months.

Radioactive substances regulation

We regulate radioactive waste disposals to the environment. We do this through environmental permits that contain limits and conditions aimed at minimising wastes and protecting the environment. We also check compliance with these permits by making regular inspections at Hinkley Point A & B.

Radioactive Substances Compliance Assessment Reports (RASCAR) detailing our inspections and any non-compliances found, are available on the Public Register ⁽¹⁾.

We maintain regular contact with the sites by telephone and e-mail in addition to our formal correspondence and visits to the sites.

Hinkley Point A

We are continuing to hold valuable weekly meetings with the Head of Radiological Protection and Environment. These meetings allow us to remain informed of activities and events at the site.

We are also continuing with monthly waste management project meetings to provide advice and guidance remotely on the application of Best Available Techniques (BAT) for some of key decommissioning projects planned at site. We have now received two Options assessments for the management and disposal of sludges and for the potential to discontinue sorting of fuel element debris in the wet vaults (this is already the case in dry vaults). We are reviewing these and will provide comment in due course. The site is also undertaking a number waste characterisation projects to confirm the radiological and non radiological characteristics of legacy wastes prior to assessing the disposal routes for these wastes.

Hinkley point A has applied for planning permission to construct a new Low Level Waste (LLW) store so that the existing store can be otherwise utilised. We have reviewed the application and attended site to observe and discuss this. We have not raised an objection to the application. We have advised HPA to consider if they need to apply for a variation to their permit to accommodate this.

We have carried out two inspections this quarter. The first inspection comprised a Higher Activity Waste Inspection with the ONR. We identified a number of areas for improvement and are making recommendations through the issuing of a RASCAR. Whilst no non compliances were identified we are considering how this and the previous inspection findings in 2020 link to an event comprising leaking drums, which you were informed of in our previous site stakeholder group report. This will be subject to a further RASCAR.

We also carried out an assessment of environmental awareness and leadership in May. We were pleased and encouraged to see the positive level of environmental knowledge in the current leadership team and the staff in the labs and waste teams.

Hinkley Point B

Our planned Control of Major Accident Hazards (COMAH) inspection on the 24th of February in conjunction with the ONR went ahead as planned. Due to the Covid-19 infection rates at the time; the inspection consisted of a 3 hour outdoor tour inspecting the COMAH plant. To minimise indoor interactions, the management arrangements were covered by a video conference on the 9th of March.

Overall from our inspection we found that the station had good arrangements in place for the management of the COMAH regime. We made a number of recommendations to help improve arrangements further in the future. These included practising a chemical spill exercise as part of routine emergency arrangements and reviewing arrangements of the COMAH regime at the end of generation (July 2022) to ensure the planned removal of any COMAH chemicals to reduce the hazard at site.

We attended the Annual Review of Environment (ARoE) at Hinkley Point B on the 26th April. This included the site inspector, the power production team leader from the Nuclear Regulation Group (NRG) and the Regulated Industry Manager from the Wessex Area. The review included a site tour of key areas and a meeting reviewing the stations environmental performance over the past year. We were pleased that with the appropriate risk assessments the ARoE was able to take place in person. The ARoE was a constructive meeting looking at the past performance of the station, acknowledging the previous warning letters over the last year and looked forward to ensure that compliance is maintained through the period of end of generation in July 2022 and beyond to de-fuelling and decommissioning.

We received the HPB submission for the Site Wide Environmental Safety Case (SWESC) and Waste Management Plan (WMP) under the Guidance on Requirements for Release of Nuclear Sites from Radioactive Substances Regulation (GRR). These documents set out how radioactive waste will be managed through the sites life cycle and also the end state of the site which will enable release from the environmental permitting regime in the future.

We provided feedback to EDF, confirming that overall the SWESC was a well written comprehensive document that meet the Improvement Condition (IC4) in their current permit to produce a SWESC and WMP. We also provided some minor comments and recommendations for consideration. Now it has been confirmed that IC4 has been completed, the management of GRR arrangements will be managed and maintained through the station's current environmental permit.

Events and enforcement

Hinkley point A

Prior to pausing activities at Hinkley Point A, Magnox advised us of the following events;

One event relates to the leakage of two low level waste storage drums. These drums were moved to the waste store and placed on bunds to manage and contain the leak. The drums were then checked weekly during the period of reduced operations on site. Magnox has subsequently made arrangements to over-pack these drums and carry out their disposal via the Low Level Waste Repository framework.

Following notification of the event we requested that all of the drums in the waste store were inspected. This action was delayed due to the site pause. Since returning to site a more detailed inspection of the drums in the waste store has been carried out and 2 further leaking drums have been identified. These have also been moved to the bunded area in the waste store. Magnox is undertaking a root cause investigation to determine why the drums leaked and why they were not identified earlier. Whilst there is no impact to the environment from the leaking drums the permit requires Magnox to check, at an appropriate frequency, the effectiveness and maintenance of systems, equipment and procedures to ensure that the Best Available Techniques (BAT) are in place to minimise the volume and activity of waste. We are waiting for Magnox to conclude their investigation and provide their findings, including actions that they have taken. We have now advised Magnox that we are considering what enforcement action will be taken, in accordance with our enforcement policy.

Magnox has also advised us of a number of events relating to the analysis of environmental samples. Magnox has investigated these and following a request for us they have undertaken an audit of the external lab. We await the outcome of the audit. We have now advised Magnox that we are considering what enforcement action will be taken, in accordance with our enforcement policy.

Hinkley Point B

Customer service line **03708 506 506**

Floodline **03459 88 11 88**

Incident hotline **0800 80 70 60**

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Since we issued the warning letter in December 2020 for the desiccant mis-consignment event; there have been no non-compliance events at HPB.

Discharge reports

The operators at Hinkley Point A and B are required to report liquid and gaseous discharges to the environment to us on a regular basis. We assess these to check compliance with the site permits. The site discharge reports and our assessments are placed on the public register.

Hinkley Point A

Analysis results for liquid and gaseous discharges from Hinkley Point A, collected during the pause, have been received and have been reviewed. They continue to be within the permitted limits and notification levels identified on the permit. However we note that the results presented have been affected by ongoing analysis problems which you have been advised of in previous site stakeholder reports. As such advice has been sought from Environment Agency subject matter experts to provide assurance that the levels provided are within the statistical variance expected for the discharges.

Hinkley Point B

The liquid and gaseous discharges from Hinkley Point B were below any notification levels and within permitted limits. We have also had recent confirmation that HPB has passed its MCERTs re-certification. This is a 5 year audit on the flow rate monitoring of effluent discharges to ensure they are accurately measured and recorded.

Environmental impact

Nuclear sites are required to carry out a rigorous environmental monitoring programme (EMP) that requires the operator to monitor and assess the impact of their discharges on the environment.

During the Covid-19 Pandemic operators have been able to use Regulatory Position Statements (RPS's) 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. Further details on the current RPSs can be found here <https://www.gov.uk/government/collections/covid-19-regulatory-position-statements>

Magnox currently has a corporate arrangement to use Regulatory Position Statement C21 (reporting of sample results). However Hinkley Point A has advised us that they are able to collect analyse and report discharges in accordance with their permit at this time. We continue to review this position on a weekly basis.

EDF has taken the majority of samples required by its environmental monitoring programme this year for quarter 2 (April- June) and we have received the returns for quarter 1. The station applied to use Regulatory Position Statement 20 (RPS20) in case there was an issue with their MCERTs Re-certification (discussed earlier in the report). It has now been confirmed that HPB passed their MCERTs re-certification audit within the regulatory timeframe, so the RPS was not used.

Additionally, the Environment Agencies and Food Standards Agency carry out independent environmental monitoring around nuclear sites. The results of this work are published in our annual Radioactivity in Food and the Environment (RIFE) report ⁽²⁾. We suspended our contracted sampling programme at the beginning of March 2020 due to the pandemic, though all quarter 1 samples had been taken. Work restarted on the Environment Agencies monitoring programme in June, with the majority of Q2& Q3 samples being collected. We will continue to follow Government guidelines with Safe Systems of Work in place, with the aim of minimising any gaps in our monitoring. The 2019 Rife report has now been published here: [Radioactivity in Food and the Environment, 2019 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Further information

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 section ⁽³⁾ of the GOV.UK website.

The Environment Agency's Lead Regulator for the Hinkley Point A site is Tracy Braithwaite. The Environment Agency's Lead Regulator for the Hinkley Point B site is Victoria Thomas.

Tracy and Victoria are Senior Nuclear Regulators and part of the national Nuclear Regulation Group (South) which is based at the Environment Agency's Wallingford office in Oxfordshire.

The EA's Nuclear Regulators undertake environmental regulation of radioactive substances on nuclear licensed sites in southern England. They work closely with the local Environment Agency teams in those areas as well as external bodies such as the Office for Nuclear Regulation.

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¹ <https://www.gov.uk/access-the-public-register-for-environmental-information>

² <https://www.gov.uk/monitoring-radioactivity>

³ <https://www.gov.uk/government/publications/nuclear-regulation-in-the-environment-agency>