

# Environment Agency report to the Hinkley Point Site Stakeholder Group.

## October 2021: Interim Report

### Introduction

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

### Coronavirus: Nuclear site regulation operational update

We have continued to maintain regulatory activities at Hinkley Point A & B including in-person site visits as well as using remote working arrangements where practicable and effective. The sites continue to operate a hybrid system for their workforces of operational presence and homeworking.

### 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 <sup>(1)</sup>.

We maintain regular contact with the sites between visits to the sites.

### Hinkley Point A

We hold routine meetings with the site, with the Head of Radiological Protection and Environment and with the new Site Director, respectively, on a weekly and fortnightly basis. This allows us to remain informed of any relevant activities and events at the site of regulatory interest and to ensure the site responds appropriately to any environmental or regulatory concerns that might arise.

In addition, we also have monthly meetings with waste management project staff to provide advice and guidance to support environmental performance and compliance, including on the application of Best Available Techniques (BAT) for key decommissioning projects planned at site. This currently includes more detailed consideration of results from the re-characterisation of Fuel Element Debris (FED) sampled during 2020 and implications for conditioning and packaging these wastes. We will use this to inform our review of a recently received BAT case covering the management of the FED retrievals.

Hinkley point A has advised us that they intend to apply for planning permission for a further concrete batching plant for the pre conditioning facility which will fill concrete boxes during the packaging of intermediate level waste. We will provide comments on the planning application to the local authority, noting this facility supports the BAT for the packaging of waste into concrete boxes and storage into the intermediate storage facility. The batching plant for this process is likely to require a permit as a part B (Environmental process from the local authority. However the permit for this process will be issued by the local authority.

We have undertaken an inspection on environmental awareness of Hinkley Point A project and operational staff. We found that there was a good level of awareness of the permit and environmental aspects of individual roles however we have raised a recommendation to ensure that the management arrangements consider the adequacy of their SQEP resource and are sufficient to respond to their programme requirements.

## **Hinkley Point B**

The Hinkley Point B reactors returned to service in February 2021. Since the return to service, Reactor 4 developed a re-heater leak on quadrant 4, resulting in leakage of reactor gas to the secondary circuit causing slightly elevated discharges of radionuclides through minor discharge routes listed in the permit. EDF carried out a Best Available Techniques (BAT) assessment to consider the best course of action to minimise any impact to the environment.

The BAT option selected is not completely without drawbacks and there continues to be a minor leakage of the reactor gas and condensed steam which could challenge the minor discharge limits in the environmental permit. Hinkley Point B are proposing continuing operating with this minor leak until the cessation of production in July 2022.

We have advised the site that any change to the minor discharge limits in the permit would require a minor permit variation, as discharges are limited by the permit. This would require the operator to apply for a minor permit variation with a justification for the increase in minor discharge limits. It was noted that there would be no requirement to increase the annual permit limits. Whilst the increase in the minor discharge limit would remain below the annual limits, it would result in a slightly higher proportion of the annual limit being attributed to minor discharges.

Currently the station is monitoring the leak to see if they would need an increase to the current minor discharge limits. An action level of 70% of the minor discharge limit level was agreed with Hinkley Point B on the 1st of July. The station agreed to request an increase in the minor discharge limits if this action level was triggered.

## Events and enforcement

### Hinkley point A

Hinkley Point A have provided us with their investigation report into leaking drums from the Non Combustible Active Waste store (NCAW). We are not satisfied that the conclusions of this report are satisfactorily demonstrated. We are satisfied that the initial actions taken are required, however we have requested further information to look more broadly at the root causes and contributory factors and actions needed to prevent reoccurrence. When we have received the further information from Hinkley Point A we will require the corrective actions to be taken and we will monitor progress against these actions.

We will be reviewing the investigation report and we will report back to the SSG on our conclusions. We are considering whether further enforcement action will be taken, in accordance with our enforcement policy.

Magnox has advised us that they are responding to our concerns regarding management of the external laboratory, in conjunction with our corporate regulator. Hinkley Point A has also provided us with an investigation report for the events in the laboratory for which they were responsible and are keeping us up to date with actions that have been put in place to prevent such events from reoccurring. We are considering what enforcement action will be taken, in accordance with our enforcement policy.

### Hinkley Point B

In September Hinkley Point B advised us that there had been a fire in a transformer which had discharged oil and fire water to the beach. We and our area team have attended site on several occasions to investigate the cause and monitor the subsequent environmental clean-up, including requesting additional analysis of the discharge. We are reviewing the information and considering whether any enforcement action will be taken, in accordance with our enforcement policy.

## 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

The liquid and gaseous discharges from Hinkley Point A were below any notification levels and within permitted limits. We have received the results of the quarterly environmental

monitoring programme. These will be assessed in line with new internal Environment Agency guidance 'Assessing the significance of environmental radiological monitoring'.

## **Hinkley Point B**

The liquid and gaseous discharges from Hinkley Point B were below any notification levels and within permitted limits.

## **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.

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://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/431212/rife-report-2019.pdf) and the 2020 report is in preparation.

## **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 <sup>(3)</sup> 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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<sup>1</sup> <https://www.gov.uk/access-the-public-register-for-environmental-information>

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

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