



Office for Nuclear Regulation (ONR) Quarterly Site Report for Hunterston A

1 January – 31 March 2021

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

Site inspectors from ONR usually attend Hunterston 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 Hunterston A (HNA) site on the following dates: -

- 15 - 16 March 2021

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 HNA:

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

- LC19 Construction or installation of new plant
- LC20 Modification to design of plant under construction
- LC21 Commissioning
- LC22 Modification or experiment on existing plant
- LC26 Control & supervision of operations

For the LC Compliance inspections, ONR judged that no formal action was required by the site in regard to the arrangements made and implemented by the site in response to safety requirements.

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 incidents. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

Solid Active Waste Bunker 1 fuel element

During remote waste retrievals from Bunker 1 an item resembling a Magnox Fuel casing was uncovered from within the bulk of Fuel Element Debris (FED) waste. Subsequent weighing and dose rate measurements confirmed that the Magnox casing did contain an intact spent fuel element that had been irradiated in the reactor many years ago.

Magnox fuel from the HNA reactors would have been routinely sent to Sellafield for re-processing. Processing of fuel from the reactors had the potential for fuel to end up in the bunkers. This was especially the case in the early operational days.

The Solid Active Waste Bunker Retrievals (SAWBR) facility was designed to be able to handle any elements that were uncovered during waste retrieval operations. The risk assessment anticipated that fuel fragments or fuel elements may be uncovered. The operation to retrieve waste from Bunker 1 was designed and operated on the basis that fuel either intact or in fragments is expected. Part of the safety case for emptying Bunker 1 allows for handling up to 50 kg of fuel elements / fragments and then packaging to go the site Intermediate Level Waste (ILW) Store.

It is judged that the fuel element can be safely stored in the ILW store on site. The ONR site inspector will be actively engaging with the site on their plans to ensure this is done safely and securely and will be happy to update on progress made at future Site Stakeholder Group (SSG) meetings.

Covid-19

In response to the Covid-19 pandemic all 12 of Magnox Ltd.'s licensed sites have put arrangements in place to ensure their workplaces are COVID-19-secure sites. The sites have returned to a new "normal" with many staff combining working from home and at site as appropriate, with project work restarted to ensure the safe and timely decommissioning of these sites.

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.

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.

Table 1

Licence Instruments and Enforcement Notices Issued by ONR during this period

| Date | Type | Ref No | Description |
|----------|--------------------|--------|--|
| 31/03/21 | Licence Instrument | LI 532 | Approval of Amendment to the Hunterston A Site Accident and Emergency Arrangements |

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

5. NEWS FROM ONR

Below are summaries of key activities over the last three months. Further detail is available on our website.

COVID-19 (coronavirus)

- We are 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. Our latest position can be found on our [website](#).

Enforcement Action

- In January, we agreed to extend two Improvement Notices served on the Atomic Weapons Establishment (AWE), recognising the good progress made so far. The Notices, which were served in June 2019, relate to the way the company controls changes to organisational structure and resources which may affect safety.
- In January, we served an Improvement Notice on Sellafield Ltd following a number of electrical safety incidents across the site. While we are satisfied that Sellafield Ltd is currently meeting the high standards expected with regards to nuclear safety, as a regulator we require sustained improvements in the area of electrical safety.
- In February, we served an Improvement Notice on Morgan Sindall Construction and Infrastructure Ltd after workers came close to striking a live high voltage electric cable during excavation work at the Sellafield site. Nobody was harmed in the incident on 7 October 2020, and there was no impact on the public or the environment. However, the incident posed a serious risk to workers who were operating within one metre of the 11kV cable.

Regulatory Updates

- In March, we published a response on our website to a BBC report relating to Sellafield. We were naturally concerned to hear the claims, particularly any suggestion that staff have been subjected to racist abuse of any kind. As a regulator, if we had any concerns or evidence that bullying and harassment was impacting safety at the site, we would take robust action to ensure this is addressed as a matter of urgency.
- In March, we [published an article](#) about how we responded to the serious nuclear accident at the Fukushima Daiichi nuclear power plant in 2011 to mark the 10th anniversary.
- In March, we gave EDF permission for Reactors 3 and 4 at Hinkley Point B power station to return to service for a limited period of operation. Permission for Reactor 3 will allow it to operate to a core utilisation of 17.55 terawatt days, while permission for Reactor 4 is to operate to a core utilisation of 17.3 terawatt days, which equates to two periods of approximately six months operation for each reactor.

Stakeholder Engagement

- In February, we encouraged interested parties to take part in a Nuclear Energy Agency (NEA) survey about building and maintaining trust between nuclear safety regulators and the stakeholders they engage with.
- In February, we provided an update about the leadership structural changes we initially announced in December 2020. Under existing contractual arrangements, current Chief Executive Adrienne Kelbie CBE was always expected to step down as her extended term of office comes to an end in January 2022. Mark Foy will step into the new combined role on 1 June 2021, when the new leadership structure will come into full effect.
- In February, we announced that we had appointed Donald Urquhart to the newly-created role of Executive Director of Operations, which will form part of our new leadership structure. As Executive Director of Operations, Donald will be responsible for leading our regulatory work.
- In March, we announced that as part of our new leadership arrangements, we had appointed three new deputy chief nuclear inspectors (DCIs) to our regulatory and senior leadership teams: Jane Bowie, Paul Dicks and Steve Vinton, currently all senior superintending inspectors at ONR. All three new DCIs have a strong track record of delivering regulation across the organisation and will help us maintain a focus on our Strategy 2020-25.

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

6. CONTACTS

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