

**TRAWSFYNYDD DECOMMISSIONING SITE, WALES
(MAGNOX LIMITED)**

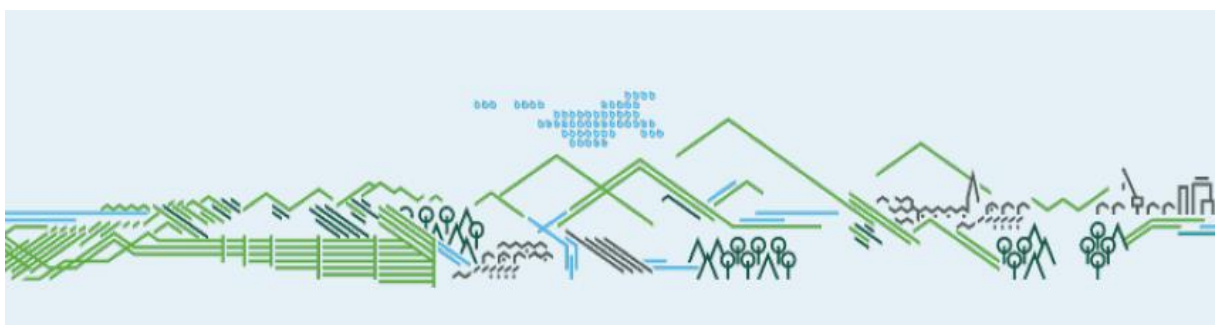
**REPORT TO THE SITE STAKEHOLDER GROUP
JUNE 2021**

FOREWORD

This report is issued to the Site Stakeholder Group (SSG) to provide a brief summary of the regulatory activities of Natural Resources Wales (NRW) relating to the Trawsfynydd Decommissioning nuclear site.

NRW is accountable to the Welsh Government for the environmental regulation of nuclear sites in Wales. NRW has a contractual arrangement in place which enables them to draw on the experience and resources of the Environment Agency's specialist Nuclear Regulation Group, to assist in the delivery of on-site inspection work and associated assessments.

We regulate the disposal of radioactive waste, discharges to water and conventional waste. Please see Annex 1 for further information on our role.



Introduction

This report covers the period since December 2020.

Routine Regulatory Matters

We carried out a remote intervention in January 2021 to review the effectiveness of the Magnox Ltd arrangements for ensuring ongoing permit compliance during the continuing coronavirus pandemic. We sought information on a number of areas of interest – (1) Radioactive Waste Advisers & Suitably Qualified and Experienced Personnel; (2) examination, maintenance, inspection & testing of environmental equipment; (3) discharge monitoring & reporting; (4) environmental monitoring; (5) waste consignments. We were satisfied that the arrangements were appropriate to maintain permit compliance and provide a high level of environmental protection.

We reviewed the best available techniques (BAT) assessment and supporting Grout Cell Standby Fan Justification Report produced for the proposed Fuel Element Debris (FED) Encapsulation Plant (FEP) emergency vent system. This system is designed to prevent a build-up of hydrogen gas in the event of a failure of the main ventilation system. We did not have any issues with the findings of the BAT assessment but did highlight that it should have been produced earlier as part of the optioneering process.

We carried out a remote inspection in April 2021 focussing on the arrangements for consignment of low-level radioactive waste. We also followed up on a number of actions and recommendations arising from a high active waste audit in March 2019. We did not identify any areas of concern and were satisfied that the consignment arrangements were suitable.

We continue to have routine weekly/bi-weekly catch-up's with Magnox to discuss regulatory issues.

We will be carrying out a site inspection on 16 June. This will focus on gaseous radioactive waste discharge monitoring and also verification of some of the low-level waste consignment procedures.

Guidance on Requirements for Release from Regulation (GRR)

In conjunction with ONR, NDA, planning representatives for Snowdonia National Park and Gwynedd Council we continue to work with Trawsfynydd site on the requirements of GRR. We have attended two routine meetings of the Trawsfynydd End State Group (TESG) in January 2021 and April 2021. Close working with these stakeholders and the local community will be important in the developing plans for decommissioning the site.

We have participated in meetings to discuss and provide regulatory advice in relation to waste characterisation and groundwater requirements.

We will continue to assess the progress of Magnox Ltd in updating the lifetime plan baseline for the site and their integration of the "Rolling Programme of Decommissioning within existing site plans, in order to ensure efficient and optimised decommissioning.

Permitting

We have updated the Compliance with Environment Agencies Requirements, Approvals & Specification (CEAR) document made under the Radioactive Substances Activity Environmental Permit. This was to (1) include some additional details for the witnessed sampling requirements and (2) to amend the date by which the waste management plan and site wide environmental safety case need to be submitted.

There have been no other changes made to any of the environmental permits during this reporting period

Events and enforcement

We regularly review summaries of all events reported and discuss those relevant to environmental compliance with Magnox Ltd as part of our routine regulation.

There have been no significant environmental events at Trawsfynydd during this reporting period. We have not taken any enforcement action in the period since the last report.

We have reviewed two investigation reports submitted during this reporting period in response to two minor events. The first event related to the sampling equipment for the active waste vault moducon being inadvertently switched off. The second event was a small leak (ca14m³) from the discharge pipeline transferring treated effluent to Llyn Trawsfynydd. We were satisfied that both events were appropriately investigated and that appropriate actions are being implemented to prevent/reduce a recurrence. We have not identified any breaches of the environmental permits.

Contact details

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Annex 1: The role of Natural Resources Wales and the Environment Agency at nuclear sites

Operating and cleaning up nuclear sites generates radioactive and non-radioactive wastes. Our role as the environmental regulator is to ensure that the impact of those wastes on people and the environment, now and in the future, is as small as it can be. We also aim to prevent pollution, enhance the environment, and contribute to the sustainable development of the UK.

We inspect nuclear sites and assess proposals from operators, to provide assurance that the operator is complying with the limits and conditions of the permits we issue under the Environmental Permitting Regulations 2016 (as amended) and other relevant legislation and policy.

We supplement direct regulation with a partnership approach, working with the operators, the Nuclear Decommissioning Authority (NDA) and the Office for Nuclear Regulation (ONR) to solve problems jointly.

We expect operators to comply fully with all relevant legislative requirements and permits. If this does not happen, we will not hesitate to use our enforcement powers to ensure that action is taken to protect the environment or to secure compliance.

In summary our objectives are to:

- Ensure that environmental permits are up to date, flexible and fit for purpose and that they drive environmental improvement
- Assess compliance with the limits and conditions of the permits
- Reduce risks to the environment and avoid creating further legacies
- Ensure that integrated waste strategies continue to improve
- Ensure that solid waste is packaged in a form suitable for disposal
- Ensure that infrastructure and assets are maintained to minimise environmental impact
- Develop guidance on Best Available Techniques (BAT)
- Influence NDA so that they provide appropriate direction to operators to minimise waste and improve environmental outcomes
- Encourage integrated management of fuel and nuclear materials so as to prevent or minimise the potential environmental impacts
- Ensure land and groundwater contaminated by radioactivity or other pollutants is managed appropriately and protect land and groundwater from further contamination
- Monitor and assess organisational change to ensure that environmental performance is maintained

Natural Resources Wales and the Environment Agency have produced joint guidance on our requirements for decommissioning of nuclear sites, which can be found here: <https://www.gov.uk/government/publications/the-decommissioning-of-nuclear-facilities>



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SAFLE DATGOMISIYNU TRAWSFYNYDD, CYMRU (MAGNOX LIMITED)

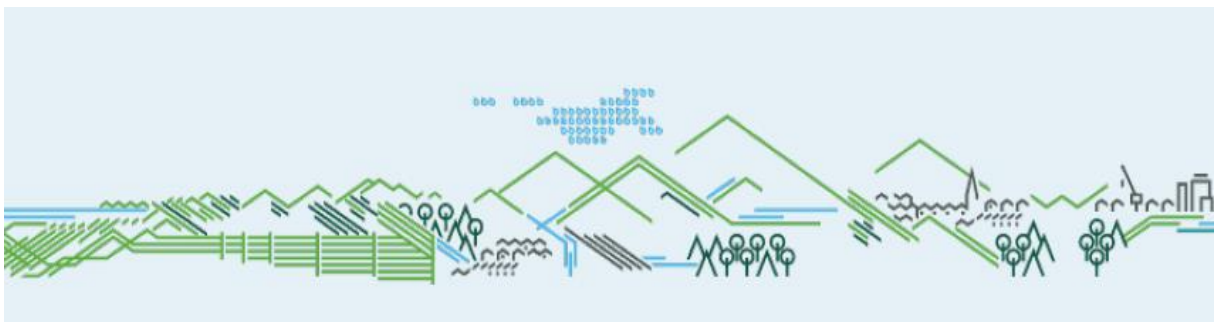
ADRODDIAD AR GYFER GRŴP RHANDDEILIAID Y SAFEL MEHEFIN 2021

RHAGAIR

Cyflwynir yr adroddiad hwn i Grŵp Rhanddeiliaid y Safle i ddarparu crynodeb byr o weithgareddau rheoleiddio Cyfoeth Naturiol Cymru (CNC) mewn perthynas â safle niwclear Trawsfynydd.

Mae Cyfoeth Naturiol Cymru yn atebol i Lywodraeth Cymru am y gwaith o reoleiddio safleoedd niwclear yng Nghymru. Mae trefn gytundebol ar waith sy'n galluogi Cyfoeth Naturiol Cymru i ddefnyddio profiad ac adnoddau Grŵp Rheoleiddio Niwclear arbenigol Asiantaeth yr Amgylchedd i gynorthwyo wrth gyflawni gwaith arolygu ar y safle ac asesiadau cysylltiedig.

Rydym yn rheoleiddio'r trefniadau ar gyfer cael gwared ar wastraff ymbelydrol, gweithrediad y gwaith hylogi, gollyngiadau i ddŵr, a gwastraff confensiynol. Gweler Atodiad 1 am ragor o wybodaeth am ein swyddogaeth.



Cyflwyniad

Mae'r adroddiad hwn yn cwmpansu'r cyfnod ers Rhagfyr 2020.

Materion Rheoleiddio Arferol

Gwnaethom ymyriad o bell ym mis Ionawr 2021 i adolygu effeithiolrwydd trefniadau Magnox Cyf. ar gyfer sicrhau cydymffurfiaeth barhaus â thrwyddedau yn ystod pandemig parhaus y coronafeirws. Gofynnwyd am wybodaeth am nifer o feysydd o ddi-ddordeb – (1) Cynghorwyr Gwastraff Ymbelydrol a Phersonél â Chymwysterau a Phrofiad Addas; (2) archwilio, cynnal a chadw, arolygu a phrofi offer amgylcheddol; (3) monitro arllwysyadau ac adrodd yn ol; (4) monitro amgylcheddol; (5) llwythi gwastraff. Roeddem yn fodlon bod y trefniadau'n briodol i gynnal cydymffurfiaeth â thrwyddedau a darparu lefel uchel o ddiogelwch amgylcheddol.

Gwnaethom adolygu'r asesiad technegau gorau sydd ar gael (BAT) a chefnogi Adroddiad Cyfiawnhau Grout Cell Standby Fan a gynhyrchwyd ar gyfer system gwyl argyfwng arfaethedig Yr Elfen Tanwydd (FED). Mae'r system hon wedi'i chynllunio i atal nwy hydrogen rhag cronni os bydd y brif system awyru'n methu. Nid oedd gennym unrhyw broblemau gyda chanfyddiadau'r asesiad BAT ond gwnaethom dynnu sylw at y ffaith y dylai fod wedi'i gynhyrchu'n gynharach fel rhan o'r broses o ddewis.

Cynhaliwyd arolygiad o bell gennym ym mis Ebrill 2021 gan ganolbwyntio ar y trefniadau ar gyfer cludo gwastraff ymbelydrol lefel isel. Gwnaethom hefyd ddilyn nifer o gamau gweithredu ac argymhellion yn deillio o archwiliad gwastraff gweithredol uchel ym mis Mawrth 2019. Ni wnaethom nodi unrhyw feysydd a oedd yn peri pryder ac roeddem yn fodlon bod y trefniadau cludo yn addas.

Rydym yn parhau i gael cyfarfodydd "dal i fyny" bob pythefnos gyda Magnox i drafod materion rheoleiddio.

Byddwn yn cynnal archwiliad safle ar 16 Mehefin. Bydd hyn yn canolbwyntio ar fonitro rhyddhau gwastraff ymbelydrol nwyol a hefyd gwirio rhai o'r gweithdrefnau cludo gwastraff lefel isel.

Canllawiau ar Ofynion i'w Rhyddhau o Reoliad (CRhR)

Ar y cyd gyda'r Swyddfa Rheoleiddio Niwclear (SRhN), yr Awdurdod datgomisiynu Niwclear (ADN), Y Parc Cenedlaethol Eryri a Cyngor Gwynedd rydym yn parhau i weithio gyda safle Trawsfynydd ar ofynion CRhR. Rydym wedi mynychu dau gyfarfod arferol o Grŵp Talaith Diwedd Trawsfynydd (TESG). Bydd gweithio'n agos gyda'r rhanddeiliaid hyn a'r gymuned leol yn bwysig wrth ddatblygu cynlluniau ar gyfer datgomisiynu'r safle. Byddwn yn parhau i asesu sut mae Magnox Ltd yn symud ymlaen gyda diweddarau ei Cynllun Oes a sut mae'r rhaglen "Datgymalu Adweithyddion Parhaus" (DAP) â chynlluniau safle presennol i sicrhau datgomisiynu effeithlon.

Trwyddedu

Rydym wedi diweddarau'r ddogfen Cydymffurfio â Gofynion Asiantaethau'r Amgylchedd, Cymeradwyo a Manyleb (CEAR) a wnaed o dan y Drwydded Amgylcheddol Gweithgaredd Sylweddau Ymbelydrol. Roedd hyn i (1) yn cynnwys rhai manylion ychwanegol ar gyfer y gofynion samplu a welwyd a (2) i ddiwigio'r dyddiad pryd bydd

angen cyflwyno y cynllun rheoli gwastraff a'r achos diogelwch amgylcheddol ar draws y safle.

Ni wnaed unrhyw newidiadau eraill i unrhyw un o'r trwyddedau amgylcheddol yn ystod y cyfnod adrodd hwn

Digwyddiadau a Gorfodi

Rydym yn adolygu fel rhan on rheoliad arferol crynodeb or digwyddiadau sydd wedi ei adrodd gan Magnox Cyf. I gysidro oes unrhyw agweddau amgylcheddol o bwys

Ni fu unrhyw ddigwyddiadau amgylcheddol arwyddocaol yn Trawsfynydd yn ystod y cyfnod adrodd hwn. Nid ydym wedi cymryd unrhyw gamau gorfodi yn y cyfnod ers yr adroddiad diwethaf.

Manylion cyswllt

Os oes gennych unrhyw ymholiad, cysylltwch a'r canlynol.

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ATODIAD 1: Swyddogaeth Cyfoeth Naturiol Cymru ac Asiantaeth yr Amgylchedd ar safleoedd niwclear.

Mae gweithredu a glanhau safleoedd niwclear yn cynhyrchu gwastraff ymbelydrol ac anymbelydrol. Ein swyddogaeth fel y rheoleiddiwr amgylcheddol yw sicrhau bod effaith y gwastraffau hynny ar bobl a'r amgylchedd, yn awr ac yn y dyfodol, cyn lleied ag y gall fod. Rydym hefyd yn anelu at atal llygredd, gwella'r amgylchedd, a chyfrannu at ddatblygiad cynaliadwy'r DU.

Rydym yn archwilio safleoedd niwclear ac yn asesu cynigion gan weithredwyr er mwyn darparu sicrwydd fod y gweithredwr yn cydymffurfio â chyfyngiadau ac amodau'r trwyddedau rydym yn eu rhoi o dan Reoliadau Trwyddedu Amgylcheddol 2016 (fel y'u diwygiwyd) a deddfwriaethau a pholisïau perthnasol eraill.

Rydym yn ychwanegu at reoleiddio uniongyrchol drwy ddull partneriaeth, gan weithio gyda'r gweithredwyr, yr Awdurdod Datgomisiynu Niwclear a'r Swyddfa dros Reoli Niwclear er mwyn datrys problemau ar y cyd.

Rydym yn disgwyl i weithredwyr gydymffurfio'n llwyr â holl ofynion deddfwriaethol perthnasol ac unrhyw drwyddedau. Os na fydd hyn yn digwydd, ni fyddwn yn oedi cyn defnyddio ein pwerau gorfodi er mwyn sicrhau bod camau gweithredu'n cael eu cymryd er mwyn gwarchod yr amgylchedd neu er mwyn sicrhau cydymffurfiaeth. I grynhoi, ein hamcanion yw:

- Sicrhau bod trwyddedau amgylcheddol yn gyfredol, yn hyblyg ac yn addas i'r diben a'u bod yn sbarduno gwellhad amgylcheddol
- Asesu cydymffurfiaeth â chyfyngiadau ac amodau'r trwyddedau
- Lleihau'r risgiau i'r amgylchedd ac osgoi creu etifeddiaethau pellach
- Sicrhau bod strategaethau gwastraff integredig yn parhau i wella
- Sicrhau bod gwastraff soled yn cael ei becynnu mewn ffurf briodol ar gyfer ei waredu
- Sicrhau bod y seilwaith a'r asedau yn cael eu cynnal a'u cadw i leihau'r effaith ar yr amgylchedd
- Datblygu canllawiau ynglŷn â'r Technegau Gorau sydd ar Gael
- Dylanwadu ar yr Awdurdod Datgomisiynu Niwclear fel ei fod yn darparu cyfeiriad priodol ar gyfer gweithredwyr ynghylch sut i leihau gwastraff a gwella canlyniadau amgylcheddol
- Annog dulliau integredig o reoli tanwydd a deunyddiau niwclear er mwyn atal neu leihau'r effeithiau amgylcheddol posibl
- Sicrhau bod tir a dŵr daear sydd wedi cael eu halogi gan ymbelydredd neu lygryddion eraill yn cael eu rheoli'n briodol a sicrhau bod tir a dŵr daear yn cael eu gwarchod oddi wrth halogi pellach
- Monitro ac asesu newid sefydliadol er mwyn sicrhau bod perfformiad amgylcheddol yn cael ei gynnal

Mae Cyfoeth Naturiol Cymru ac Asiantaeth yr Amgylchedd wedi cynhyrchu canllawiau ar y cyd ar ein gofynion ar gyfer datgomisiynu safleoedd niwclear, y gellir eu gweld yma:

<https://www.gov.uk/government/publications/the-decommissioning-of-nuclear-facilities>