

Environment Agency Report

Oldbury Site Stakeholder Group

July 2021

This report covers our regulation of Magnox Ltd. at Oldbury Site and related issues, including the Coronavirus pandemic, over the period June to July 2021.

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 (see [GOV.UK](https://www.gov.uk)).

Our existing HR policies and positions will not change initially as a result of Covid-19 restrictions being lifted, however they will remain under review. In brief, currently:

- we are fully operational, with the majority of our staff working from home in accordance with government guidelines
- our frontline staff have returned to near normal regulatory work including physical inspections.

Please see our published statement for further information at

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

The Environment Agency continues to offer the option of using temporary [regulatory position statements \(RPSs\)](#) for non-nuclear operators, however, those relating to nuclear licensed sites have expired.

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 check compliance with the permits by making regular site inspections.

We also regulate and control other activities through our environmental permits, including surface water discharges to surrounding water bodies and emissions to air.

Radioactive Substances Compliance Assessment Reports (RASCARs) summarising our inspections, and any non-compliances found, are made available to the public on request.

Permitting

Magnox holds a radioactive substances activity permit under the Environmental Permitting Regulations (EPR) at the Oldbury site (EPR/GB3435DG). No changes have been made to the permit since the last SSG meeting.

Compliance activities

We are in regular contact with the Head of Radiological Protection and Environment to ensure we are aware of progress on decommissioning, progress on actions and recommendations and any emerging issues at the site. These discussions also include updates on Covid-related issues such as number of Oldbury staff infected or isolating. At

the time of writing, environmental performance is not being adversely affected by Covid-related absences.

We continue to have regular engagement with the site, including remote meetings and the routine tripartite (Magnox, EA and ONR) updates. We will continue to check compliance with the permit by undertaking inspections. Under the current circumstances, we will, where possible, undertake a part of these inspections remotely. If necessary, we will then arrange shorter 'in-person' follow-up visits to the site, in line with government guidelines.

Since the last SSG we have undertaken an inspection of lower activity waste arrangements and practices at Oldbury. The inspection was a combination of document assessment in advance of the inspection, a discussion with relevant staff members over Teams, and an in-person visit to relevant facilities.

As in previous inspections, the staff we spoke to appeared knowledgeable and committed to permit compliance. At the site we observed good housekeeping of waste facilities. We found no non-compliances with the environmental permit.

In addition to our own inspection activities we also review, on a weekly basis, 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 to us in the period since the last SSG.

Environmental impact

The site environmental permit requires the operator to monitor and assess the impact of discharges on the environment.

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 Environment Agencies and Food Standards Agency carry out independent environmental monitoring around nuclear sites. These monitoring programmes support our regulatory function and provide reassurance that public radiation exposures are low and within legal limits. The results of this work are published annually and the latest report, "Radioactivity in Food and the Environment 2019" (RIFE 25), is published on the GOV.UK website.

<https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports>

The report for 2019 continues to show that total doses to the public, from permitted discharges and direct radiation around nuclear sites, remained below the legal limit. Radioactivity from natural background, rather than nuclear sites, continues to be the more significant source of exposure to communities in all areas of the UK.

The RIFE report presents a yearly assessment of radiological dose to individuals in the local population who are most exposed to radiation from each nuclear licensed site (known as the 'representative person'). In 2019, the total dose to the representative person from all pathways and sources of radiation from the Oldbury and Berkeley sites combined was less than 5 microsieverts, unchanged from 2018. This is less than 0.5% of the UK National dose limit of 1000 microsieverts and less than 0.2% of the average annual amount of radiation we all receive from natural sources (2700 microsieverts/year).

Discharges from site

The site's environmental permit requires Magnox to use best available techniques (BAT) to manage its 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. 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.

Both liquid and gaseous discharges from Oldbury continue to be at levels well within permitted limits. We have received discharge returns up to and including June 2021. Discharges of all measured gaseous and liquid radionuclides remained below 1% of their relevant annual limits.

Higher activity waste management

We are working jointly with Office for Nuclear Regulation to consider the management of Intermediate Level Wastes (ILW) as part of the decommissioning and reactor dismantling process. This may include consideration of wastes transferred between Magnox sites to provide a more effective programme of wastes management across the Magnox fleet.

Management of conventional non radiological (Directive) wastes

The Oldbury site has produced a Waste Recovery Plan to support its proposal to use (non-radioactive) waste material instead of non-waste material to fill voids on site created during the decommissioning process (for example, the demolition of the Turbine Hall). Magnox have submitted the plan to the Environment Agency's National Permitting Service (NPS) for advice on whether this is acceptable as a waste recovery activity. NPS has now formally replied to Magnox with its advice agreeing, with caveats, that the scheme is a recovery activity. This means that Oldbury can now proceed with a permit application for the activity.

Update to SSG on flood defences

A Senior Specialist Coastal Engineer has confirmed that the responsibility for maintenance of the flood defences immediately in front of the Oldbury and Berkeley Power Stations lies with the stations/Nuclear Decommissioning Authority. My colleague has had engagement with the Severn Valley Flood Defence Group and is happy to answer further questions.

Enforcement

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

Business planning

We have completed our structured business planning process for the year. We plan to undertake 4 inspections at the Oldbury site in the 2021/22 regulatory year (April - March) looking at: low level waste management; environmental monitoring; asset management; and environmental leadership.

Environment Bill

The delayed Environment Bill returned to Parliament on 26 May for a final commons debate. Whilst this will not fundamentally affect the Environment Agency's regulation of

nuclear sites, the passage of the Environment Bill will provide enabling measures that may offer opportunities to simplify and enhance the regulatory framework for UK regulated industry. We will report on the implications of this Bill in subsequent SSGs.

Further information

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>

The Environment Agency's lead nuclear regulator for the Oldbury site is Rebecca Cleverley. Rebecca is part of the national Nuclear Regulation Group (South) (NRG (South)) which is based at the Environment Agency's Wallingford office in Oxfordshire.

NRG (South) undertakes environmental regulation of radioactive substances on nuclear licensed sites in southern England. . It works closely with the local Environment Agency teams in those areas as well as external bodies such as the Office for Nuclear Regulation.

Members of the local Wessex Environment Agency team cover the site for general (non-radioactive substances) environment protection matters such as regulation of groundwater, contaminated land, waste management and water abstraction.

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