

Environment Agency Report

Oldbury Site Stakeholder Group

October 2021

This report covers our regulation of Magnox Ltd. at Oldbury Site and related issues, including the Coronavirus pandemic, over the period August to October 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)).

- 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.

We have maintained regulatory activities at Oldbury, throughout including in-person site visits as well as using remote working arrangements where practicable and effective to do so.

Please see our published statement for further information at

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

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. We remain satisfied that environmental performance is not being adversely affected by current Covid-related absences or broader impacts.

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 the site's arrangements for managing its environmental monitoring programme and undertaking of sampling and analysis. This was a joint inspection with the Berkeley site regulator, as the environmental monitoring programme covers both sites. The inspection combined an assessment of relevant documents and procedures, an initial discussion with relevant staff members over Teams, and an in-person visit to relevant facilities.

We were supplied with a well-organised set of documents which was appropriate for our needs. During the review with staff we were clearly able to see the connection between Environment Agency guidance and the Magnox standard which then fed into more local site instructions. The staff we spoke both on the Teams meeting and at the site appeared knowledgeable and committed to permit compliance. At the site we observed procedures for changing passive shades, designed to capture any airborne contamination, and also sampling of grass. We inspected the District Survey Laboratory. Management of sampling was well organised, and we noted good housekeeping at the facility. We also inspected training records for staff who carry out the sampling procedures. We made a recommendation regarding the content of local operational instructions. We found no non-compliances with the environmental permit.

In addition to our own inspection activities we also review, on a weekly basis, Magnox 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. Magnox is currently in the process of reviewing its programme. We have made comments on its proposals and are awaiting clarification of a number of points. We will update the SSG on the results of this at the next meeting.

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 all sources including natural sources of radiation (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 allow for consolidated treatment or storage and provide a more effective programme of wastes management across the Magnox fleet.

Enforcement

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

Business planning

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. We now have started our structured business planning process for next year..

Environment Bill

The delayed Environment Bill returned to Parliament on 13 October for a third reading in the House of Lords. The passage of the Environment Bill will not fundamentally affect the Environment Agency's regulation of nuclear sites. It will, however, 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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