

Office for Nuclear Regulation (ONR)

Site Report for Dungeness A

Report for period 1 July - 30 September 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 to members for the Dungeness Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Dungeness Site Stakeholder Group meetings where these reports are presented and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.



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1 Inspections

Dates of inspection

The ONR site inspector made inspections on the following dates during the report period 1 July – 30 September 2021:

Licence Condition 7 and Licence Conditions 19 – 22 on 14 September.

Additionally, two ONR Radiation Protection specialist inspectors carried out an inspection under the Ionising Radiation Regulations 2017 on 24 August.

2 Routine Matters

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) (as amended)
- 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 the 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, routine inspections of Dungeness A covered the following:

Licence Condition (LC) 7 – Incidents on the site. In addition to inspecting the site's arrangements and the implementation thereof for LC7 the ONR site inspector inspected the site's implementation of Operational Experience Feedback (OEF). OEF is recognised as good practise and is a requirement of the Management of Health and Safety at Work Regulations 1999. International conventions and nuclear safety standards go beyond the requirements of LC7 in the use of OEF. The purpose of the additional requirements is to identify corrective actions, prevent recurrences, learn lessons from incidents and disseminate lessons learned to others who may benefit. The site's arrangements for OEF appear to be adequate in meeting the requirements of LC7 and the additional requirements, however I identified shortfalls in the

implementation of these arrangements and improvements in these areas are being sought.

LCs 19 – 22 are concerned plant construction, commissioning and modification to plant, equipment and safety cases. This inspection was rated as adequate.

During the reporting period, ONR judged the arrangements made and implemented by the site in response to safety requirements to be satisfactory in the areas inspected. Where improvements have been identified, the licensee has made a commitment to address those issues, and ONR inspectors will closely monitor progress during future site inspections. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales. Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records on our website www.onr.org.uk Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

We held a meeting with Magnox Ltd during the report period to gain further information on the pond skips issue reported in the previous SSG report. This was a useful meeting, Magnox Ltd undertook to arrange a further meeting with the regulators to present their proposals in due course.

Other work

The site inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

3 Non-Routine Matters

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

Matters and events of particular note during the period were:

The site reported a minor non-compliance with the Transport Regulations involving the incorrect completion of package labels. The site also reported that on two occasions it had failed to maintain a minimum number of staff which had a minor effect on the response to site emergencies. This was quickly rectified in both cases, and a recruitment campaign is underway to help prevent a recurrence.

4 Regulatory Activity

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, 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 take a range of enforcement actions, to include issuing an Enforcement Notice.

- No LIs, Enforcement Notices or Enforcement letters were issued during this period.

5 News from ONR

Enforcement action

- In July, we served an improvement notice on Devonport Royal Dockyard Ltd (DRDL) for shortfalls in its health and safety arrangements. The notice was served after DRDL failed to demonstrate consistent and effective arrangements to control and monitor the risks associated with working at height at its Devonport site. DRDL must comply with the requirements of the improvement notice by 31 March 2022.
- In August, we announced that Morgan Sindall Infrastructure Ltd had complied with an improvement notice served in January 2021 after workers came close to striking a live high voltage electric cable during excavation work at the Sellafield site. Since this incident occurred, Morgan Sindall has put in place measures to prevent similar occurrences, and we are satisfied that they have complied with the requirements of the improvement notice.

COVID-19: ONR Position

- We are continuing to obtain assurance that nuclear site licensees and other dutyholders are adequately resourced to continue to safely and securely carry out their activities. We remain satisfied with industry's response at this time; there has been no significant change to dutyholders' safety and security resilience.
- We have measures in place to try and prevent asymptomatic ONR staff unwittingly conveying the virus onto a regulated site. We require all staff to take a circular 1 health (C1H) antigen test in advance of them visiting a site. In addition to the C1H test, we also require them to take a lateral flow test on the morning of their planned site visit. We are keeping our COVID-19 testing

guidance under regular review, in-line with the changing national context and any further developments in industry approaches to testing arrangements.

Other

- In July, our project to become the UK's domestic safeguards regulator was named the public sector's [Project of the Year at the National Project Awards](#).
- In September we invited stakeholders to submit comments on our updated reference papers for Coastal Flood Hazards and Meteorological Hazards for Nuclear Sites. Although supplementary to our normal governance process, we are doing this due to stakeholder interest in these topics and our commitment to being an open and transparent regulator.

The reference papers provide additional detail on the analysis of the external hazards for nuclear sites and have been produced by our [Expert Panel on Natural Hazards](#), a group of academic and industry technical specialists working under contract to provide us with independent expert advice. You can find out more about how to get involved and comment on these papers on our [website](#).

For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

6 Contacts

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