

Station Director
EDF Energy NG Ltd
Hunterston B Power Station
West Kilbride
Ayrshire
KA23 9QJ

Our Ref: FWL/2022-9019

If emailing, mark FAO:
Keith Hammond

FAO Mr Joe Struthers

22 June 2022

Dear Sir,

**FINAL WARNING LETTER (REF FWL/2022-9019)
ENVIRONMENTAL AUTHORISATIONS (SCOTLAND) REGULATIONS 2018
LOSS OF CONTROL OF GAS CIRCULATOR LUBRICATION OIL
EAS/P/1173596: HUNTERSTON B POWER STATION, WEST KILBRIDE**

I refer to the loss of approximately 1300 litres of tritiated oil from the Reactor 3 gas circulator lubrication oil (R3 GCLO) settling tank on 18 February 2022.

I must advise you that this letter constitutes a final warning. Any further/continued contravention of the above legislation is likely to result in enforcement action being taken against you by SEPA. Such enforcement action could include the submission of a report to the Procurator Fiscal recommending prosecution, and such a report may include the incident(s) referred to in this letter.

SEPA is of the opinion that the circumstances leading to the loss of control occurring have contravened the Standard Conditions attached to the station's permit, EAS/P/1173596 as listed below. The contravention of a condition of a permit is an offence under Regulation 69(1)(e) of the above Regulations.

- *A.2.1 You must have and maintain a management system to ensure compliance with your authorisation.* The risk of a leak from the buried pipework servicing R3 GCLO settling tank were recognised in September 2015; however, the required changes to prevent a recurrence were not implemented until after the third leak occurred in February 2022. This indicates there is a deficiency in the station's arrangements that failed to recognise the risk to compliance from this situation and incorporate any necessary works into the station's work management system to ensure they were captured and tracked appropriately.
- *A.5.1 You must ensure that anyone carrying out duties that may be affect compliance with your authorisation is suitably trained and experienced.* The individuals involved in authoring and verifying the engineering change (EC369811) to block the drains to prevent further loss of control were both under mentorship at that time, and the station civil engineer does not

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appear to have been involved. This has contributed to the quality gaps in the document which, when implemented, allowed a route for oil to escape to remain open.

- *A.6.2 You must have and comply with appropriate arrangements for acceptance into service of all facilities and equipment that are necessary to ensure compliance with your authorisation.* Following completion of the work under EC369811, there was no verification (e.g., dye testing) that all routes had been blocked. SEPA does not believe that appropriate arrangements for acceptance into service were followed in this instance.
- *A.6.3.a You must ensure that all facilities and equipment necessary to ensure compliance with your authorisation are maintained in good repair.* The buried pipework associated with R3 GCLO settling tank experienced leaks on three occasions since 2015 due to corrosion; however, according to the relevant EMIT, the buried pipework was not required to be inspected. The delay in moving these pipes above ground impeded the station's ability to maintain them in good repair which in turn contributed to the corrosion not being identified and ultimately to the loss of control of the oil.
- *A.6.3.c You must ensure that all facilities and equipment necessary to ensure compliance with your authorisation are checked to ensure they are serviceable and effective.* The affected pipework could not be inspected easily due to being buried; however, the relevant maintenance schedule (EMIT) for the R3 GCLO settling tank does not include inspection of this pipework at all. The station is not able to demonstrate that these pipes were serviceable and effective.
- *A.9.2.d Where you have informed SEPA that your authorisation has been contravened, you must ensure that any corrective measures are carried out as soon as reasonably practicable.* SEPA was informed of the second leak in April 2020 and the corrective actions recommended by the internal investigation (ACIN 1202147) in October 2020. SEPA is of the opinion that the timescale of events indicate that these corrective actions have not been carried out as soon as reasonably practicable and have only been prompted by the third leak in February 2022.
- *B.2.1 You must use the best practicable means to ensure that no unnecessary radioactive waste is generated.* SEPA considers it BPM to maintain equipment in a timely fashion in order to minimise events which will generate unnecessary waste. It is understood that the event generated approximately 10 IBCs of oil/water mixture as well as contaminated pig matting/booms that will require disposal via the AETP or off-site transfer to an authorised facility for incineration. In addition, the two oil skimmers in the lagoons have been contaminated and will need to be managed appropriately. Although arguably the oil itself would have become waste at some point in the future, the other items constitute unnecessary radioactive waste generation that, in SEPA's opinion, could have been avoided.

However, in mitigation of the above contraventions, SEPA is satisfied that the station has responded promptly and appropriately when the leak occurred in February 2022 and has notified SEPA without delay of its occurrence. It is noted that your actions, and in particular the actions of your contractor, appear to have prevented any escape of the oil into the environment. We are reassured that the station has been fully cooperative in assisting us with our investigation. You have conducted your own robust investigation and provided SEPA the findings in a timely fashion.

The root cause of the event, as set out in your investigation report, that indicates that the environmental safety and compliance risks are not always fully understood, is disappointing.

Consequently, SEPA will be closely following progress on the corrective actions identified and looking for demonstration that the actions have been completed.

In the meantime, should you have any questions on this letter, please do not hesitate to contact me at keith.hammond@sepa.org.uk.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'K Hammond', written in a cursive style.

Mr Keith Hammond
Specialist 1- Radioactive Substances