

Hunterston Site Stakeholder Group

SEPA Update- Hunterston A

1st December 2022

Chief Executive Appointment

Recruitment for a new Chief Executive has been concluded and Nicole Paterson has taken over the role of CEO.

Nicole, who joined the agency in October, is an award-winning local government Chief Officer, with nearly thirty-years' experience across five local authorities, consultancy, and environmental non-executive roles; leading operational, regulatory and strategic environmental services.

With more than twenty-five-years' experience in local government specifically, Ms. Paterson joins from North Lanarkshire Council, Scotland's fourth largest local authority, where her role as Head of Environmental Assets saw her drive a strategic vision of community focused, inclusive growth and prosperity. She led systemic change on climate change adaption, biodiversity, flood risk management, transport policy, planning and green spaces.

The appointment followed an open recruitment process which attracted a broad and diverse range of applications from across Scotland, the UK and Europe.

Cyber-Attack

SEPA continue to update our service status on a weekly basis so that we're clear on what those we work with can expect and how we'll prioritise progress.

Regulation

Environmental Authorisations (Scotland) Regulations 2018 (EASR)- radioactive substances

Telephone communication with the site continued throughout the period since the last SSG in September, including formal monthly staying in touch telephone calls. Routine teleconferences with Hunterston A and the corporate Magnox Ltd team on strategic issues have also continued as before.

Site visits continue in order to ensure compliance with the site permit.

SEPA Site Inspection 24th – 26th October

Earlier this year a hole was identified within a gaseous discharge stack on the site at the Solid Active Waste Building (SAWB). Due to this the site was issued with a Warning Letter relating to a number of non-compliances specifically related to the hole within the SAWB stack. (See SEPA Investigation 8th June below).

Due to the contraventions, SEPA arranged a visit at the Hunterston A site in October to undertake an Inspection of the site's arrangements for Maintenance and Inspection of Facilities and Equipment. The inspection concentrated on gaseous and liquid discharge systems. We were specifically inspecting against Standard Conditions A.2.1 (management arrangements), A.3.1 (written procedures), A.4.1 (record keeping), and A.6.3 (maintain in good repair) of EASR 2018.

SEPA are considering the findings of its inspection, however the site was informed while SEPA were on site that SEPA had concerns over the condition of one of the gaseous ventilation systems (see environmental events below) and recommended that the site undertake routine visual inspections of gaseous and liquid containment systems going forward.

SEPA Investigation 8th June

SEPA attended site on 8th June to undertake the initial fact finding stage of an investigation into potential non compliances with the site permit relating to a hole which was discovered in the Solid Active Waste Building (SAWB) gaseous discharge stack. (see environmental events section below).

Magnox Hunterston A were sent a Warning Letter on the 17th August 2022 detailing SEPA's findings regarding whether there have been any contraventions, or failures to comply with, any of the limitations and conditions of the Certificate of Authorisation number EAS/P/1173609 which outlined breaches of a number of conditions. Magnox was found to have contravened EASR authorisation conditions relating to: management system arrangements; implementation of written procedures; ensuring facilities and equipment are in a good state of repair; implementation of arrangements for acceptance into service of facilities and equipment; ensuring gaseous waste is discharged out of the authorised discharge point; notification of SEPA of a potential contravention of the authorisation without delay.

SAWB Optioneering

SEPA received an optioneering report from Magnox on 28th March 2022 entitled “Review of Options for Managing Waste from The Hunterston A Solid Active Waste Bunkers Given its Status at May 2021 WD/REP/0032/21”.

Having initially reviewed the information sent, SEPA considers it needs to undertake a review of the underpinning characterisation work and whether this is sufficient to underpin the optioneering decisions.

SEPA has taken the decision to procure a specialist contractor to review the model and associated work undertaken by Magnox with regards to the characterisation of the SAWB waste. A contractor has been identified and work will commence in the near term.

Other

Magnox provided SEPA with a programme for the coming year for the HNA site with regards to potential variations to the site permit and associated environmental documentation.

SEPA has requested that Magnox provide a list of extant/ current BPM documentation for the HNA site.

Non-Rad Regulation

There have been no issues relating to non-rad regulation since the last scheduled SSG meeting.

Environmental Events

The site notified SEPA whilst SEPA were on site undertaking an inspection (24th – 26th October) that holes were discovered within the ventilation ductwork in the Low Level Waste Processing Facility on the site. There were two areas where there were issues found – one hole within the facility in a filtered room, pre abatement where the duct is under negative pressure. The second hole was after the abatement, and after the fan within an unfiltered room where the duct was under positive pressure prior to entering the stack. The site undertook an investigation into the discovery and identified a number of potential non compliances and actions. Upon finding the issues with the LLWPF vent ductwork along with SEPA recommendations at the site inspection Magnox have begun a scope of work to undertake visual inspections of the gaseous containment systems. It is understood the liquid containment systems will also be looked at. SEPA has begun an investigation into the potential non compliances and potential for wider issues with containment systems, and visited site as part

of this investigation into the potential for non-compliances with the Hunterston A site permit on 21st – 23rd November.

Controlled Activities Regulations (CAR)

There were no reportable incidents, complaints or non-compliance events affecting SEPA's interests at Hunterston A known to have occurred since the last meeting of the SSG at the time of writing this report.

Radioactivity in Food & the Environment (RIFE)

RIFE is a collaborative report on work carried out by SEPA, the other UK environment agencies, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and the environment. The RIFE reports aim to provide an in-depth assessment of radioactivity in food and the environment in the UK and the public's exposure to radiation, including in the vicinity of Hunterston A. The RIFE report incorporates the results from the analysis of a wide range of samples and key information on local habits to demonstrate both that food remains safe and that the public's exposure to ionising radiation is within legal limits.

The latest edition (RIFE 27) covering 2021 has been published and can be obtained from SEPA's website along with previous year's reports. RIFE 27 reports that the total dose for the representative person (most exposed) around the Hunterston site, which includes both Hunterston A and Hunterston B, for 2021 was 0.006 millisieverts, which is well below the legal annual dose limit of 1 millisievert as set out in paragraph 26, Schedule 8 of EASR19.

Scottish Pollutant Release Inventory (SPRI)

The Scottish Pollutant Release Inventory (SPRI) is a publicly accessible electronic database of releases of pollutants to all environmental media and transfers of non-radioactive waste. SEPA intends that, as far as practicable, SPRI be the principle means by which information on Scottish pollutant releases and non-radioactive waste transfers is collected and made public. Wherever possible, such information will be collected and presented by this one system. The data for 2020, including that from Hunterston A and B, have been published and are available on SEPA's website under "*Environment/Environmental data/SPRI*".

Melanie Hayes
Radioactive Substances Specialist
November 2022