



**Cyfoeth
Naturiol
Cymru**
**Natural
Resources
Wales**

SAFLE DATGOMISIYNU TRAWSFYNYDD, CYMRU (MAGNOX LIMITED)

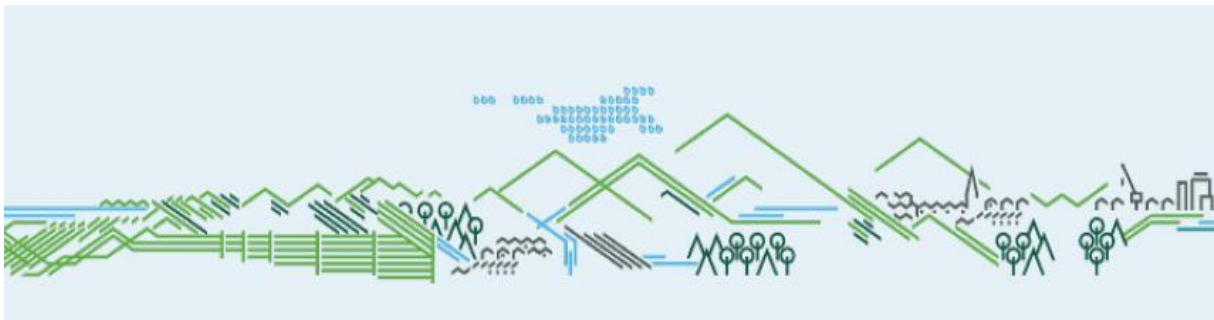
ADRODDIAD AR GYFER GRŴP RHANDEILIAID Y SAFEL RHAGFYR 2022

RHAGAIR

Cyflwynir yr adroddiad hwn i Grŵp Rhanddeiliaid y Safle i ddarparu crynodeb byr o weithgareddau rheoleiddio Cyfoeth Naturiol Cymru (CNC) mewn perthynas â safle niwclear Trawsfynydd.

Mae Cyfoeth Naturiol Cymru yn atebol i Lywodraeth Cymru am y gwaith o reoleiddio safleoedd niwclear yng Nghymru. Mae trefn gytundebol ar waith sy'n galluogi Cyfoeth Naturiol Cymru i ddefnyddio profiad ac adnoddau Grŵp Rheoleiddio Niwclear arbenigol Asiantaeth yr Amgylchedd i gynorthwyo wrth gyflawni gwaith arolygu ar y safle ac asesiadau cysylltiedig.

Rydym yn rheoleiddio'r trefniadau ar gyfer cael gwared ar wastraff ymbelydrol, gweithrediad y gwaith hylosgi, gollyngiadau i ddŵr, a gwastraff confensiynol. Gweler Atodiad 1 am ragor o wybodaeth am ein swyddogaeth.



Cyflwyniad

Mae'r adroddiad hwn yn cwmpasu'r cyfnod ers Mehefin 2022.

Arolygiadau

Gwnaethom gynnal archwiliad ar y cyd am ddiwrnod a hanner gyda'r Swyddfa Rheoleiddio Niwclear yn canolbwyntio ar reoli gwastraff solet (gwastraff ymbelydrol a gwastraff nad ydynt yn ymbelydrol) a digwyddiadau gwastraff. Mae gwastraff lefel isel yn cael ei reoli'n dda ac mae'r safle'n gwneud cynnydd da gyda adalw a phecynnu gwastraff lefel ganolradd. Gwelsom fod y trefniadau ar gyfer adnabod, adrodd a dysgu o ddigwyddiadau ar y safle yn briodol. Nid oeddem yn nodi unrhyw ddiffyg cydymffurfio â'r sylwedd ymbelydrol trwydded amgylcheddol neu faterion gyda deddfwriaeth gwastraff nad ydynt yn ymbelydrol Fe godon ni argymhelliad mewn perthynas ag olrhain y defnydd o wastraff nad ydynt yn ymbelydrol ar y safle sy'n cael eu cynnwys gan eithriad gwastraff U1 i'r Rheoliadau Trwyddedu Amgylcheddol.

Gwnaethom gynnal arolygiad diwrnod a hanner yn canolbwyntio ar gallu ac adnoddau amgylcheddol, monitro clirio a defnyddio'r sbectrometreg gama cydraniad uchel (HRGS) ar gyfer asesu gwastraff. Roeddem yn fodlon bod digon o adnoddau a gallu'r amgylchedd ar gyfer y gweithrediadau presennol sy'n cael eu cynnal ond byddwn yn parhau i fonitro gofynion adnoddau. Roeddem yn fodlon bod proses wedi'i dogfennu'n addas ar gyfer monitro clirio ar waith gyda digon o bersonél monitro hyfforddedig a bod yr HRGS yn cael ei ddefnyddio a'i gynnal yn briodol. Nid oeddem yn nodi unrhyw ddiffyg cydymffurfio â'r drwydded amgylcheddol gweithgarwch sylweddau ymbelydrol.

Rydym yn parhau i gael cyfarfodydd rheolaidd, pob pythefnos, gyda Magnox i drafod materion rheoleiddio.

Rhyddhau

Mae gollyngiadau ymbelydrol i'r aer a ddŵr o safle Trawsfynydd yn dal llawer is na'r terfynau a ganiateir dros y cyfnod adrodd hwn. Roedd gollyngiadau nad ydynt yn ymbelydrol i ddŵr hefyd o fewn terfynau a ganiateir.

Monitro Amgylcheddol

Cawsom ganlyniadau'r rhaglen fonitro amgylcheddol yn ôl y galw gan y drwydded amgylcheddol gweithgarwch sylweddau ymbelydrol. Cafodd cwpl o samplau mwsog eu cymryd yn ystod cyfnod Q2-2022 lle'r oedd y canlyniadau'n uwch na'r cymedr ynghyd â 4 gwyriad safonol o'r 12 mis blaenorol. Ymchwiliwyd i'r rhain a chredir eu bod oherwydd cynnydd yn lefel silt y sampl yn hytrach nag o unrhyw weithgareddau gweithredol ar y safle (nodwyd bod unigolyn newydd wedi cyflawni'r sampl yn dilyn ymddeoliad y person blaenorol). Mae Magnox Ltd wedi cadarnhau bod canlyniadau sampl mwsogl Q3-2022 o'r un lleoliadau wedi dychwelyd i'r lefelau arferol.

Roedd pob canlyniad arall yn unol â'r rhai o gyfnodau blaenorol ac nid yw'n dangos unrhyw achos o bryder.

Canllawiau ar Ofynion i'w Rhyddhau o Reoliad (CRhR)

Ar y cyd ag ONR, NDA, cynrychiolwyr o adran Cynllunio Parc Cenedlaethol Eryri a Chyngor Gwynedd rydym yn parhau i weithio gyda safle Trawsfynydd ar ofynion GRR. Aethom i gyfarfod chwarterol arferol y Grŵp Statws Diwedd Trawsfynydd (TESG) ym Mehefin 2022 a Medi 2022, gyda'r cyfarfod nesaf wedi'i drefnu ar gyfer y 1 Rhagfyr 2022.

Rydym yn parhau i ymgysylltu â Magnox Ltd i drafod a darparu cyngor rheoleiddio mewn perthynas â'r prosiect Dymchwel a Gwaredu Pyllau Cymhleth a gwaredu gwastraff ymbelydrol ar y safle. Rydym ni wedi darparu adborth rheoliadol ar becyn gwaith penodol yn nodi dull strategol Magnox Ltd o nodweddu. Aethom i'r safle ym mis Medi 2022 i alluogi Aseswr Gwastraff Niwclear Asiantaeth yr Amgylchedd i gael gwell dealltwriaeth o ffurfweddiad yr adeilad pyllau a'r gwaith dad-blannu sy'n cael ei wneud ar hyn o bryd. Rydym hefyd wedi mynychu tri gweithdy technegol gyda Magnox Ltd a'u Hymgynghorwyr i drafod nifer o wahanol feysydd pwnc (e.e. dŵr daear; asesiadau perfformiad; rhestr eiddo) y bydd angen mynd i'r afael â hynny fel rhan o gais trwydded ar gyfer gwaredu gwastraff ymbelydrol ar y safle.

Trwyddedu

Does dim newidiadau wedi eu gwneud i unrhyw un o'r trwyddedau amgylcheddol yn ystod y cyfnod adrodd hwn.

Digwyddiadau a Gorfodi

Rydym wedi adolygu'r adroddiad i ymchwiliad achos ymddangosiadol i ddigwyddiad ym mis Tachwedd 2021 lle gadawodd ysgubwr ffordd safle heb ddilyn gweithdrefnau monitro clirio gwastraff radiolegol y safle priodol. Rydym yn fodlon bod ymchwiliad priodol i'r digwyddiad ac y dylai'r argymhellion a nodwyd atal digwydd eto os yw'n cael ei weithredu'n briodol. Rydym wedi nodi diffyg cydymffurfio â'r drwydded amgylcheddol gweithgarwch sylweddau ymbelydrol am fethu â gweithredu a rheoli'r gweithgareddau gyda digon o bersonau ac adnoddau cymwys. Er bod proses reoli wedi'i dogfennu yn ei lle ar gyfer monitro clirio ni chafodd ei ddilyn oherwydd diffyg dealltwriaeth/ ymwybyddiaeth gan yr unigolion oedd ynghlwm â'r digwyddiad hwn. Yn unol â'n system dosbarthiad cydymffurfio mae hyn wedi'i nodi fel toriad categori 3 (mân effaith amgylcheddol posibl). Rydym yn adolygu crynodebau o'r holl ddigwyddiadau a adroddwyd yn rheolaidd ac yn trafod y rhai sy'n berthnasol i gydymffurfio amgylcheddol â Magnox Ltd fel rhan o'n rheoliad arferol. Ni nodwyd unrhyw faterion arwyddocaol eraill.

Manylion cyswllt

Os oes gennych unrhyw ymholiad, cysylltwch a'r canlynol.

Cyfoeth Naturiol Cymru

David Wilby

Teitl swydd / Arbenigydd Arweiniol – Lead Specialist

Cyfoeth Naturiol Cymru,

Maes y Ffynnon,

Bangor. LL57 2DW

Ffôn / Tel: 0300 065 3000

E-bost: david.wilby@cyfoethnaturiolcymru.gov.uk

Email: david.wilby@naturalresourceswales.gov.uk

Asiantaeth yr Amgylchedd

Mike Baggs

Nuclear Regulator

Nuclear Regulation Group (North), Environment Agency, Ghyll Mount, Gillan Way, Penrith, Cumbria CA11 9BP

Tel: 0203 025 5806

Email: mike.baggs@environment-agency.gov.uk

ATODIAD 1: Swyddogaeth Cyfoeth Naturiol Cymru ac Asiantaeth yr Amgylchedd ar safleoedd niwclear.

Mae gweithredu a glanhau safleoedd niwclear yn cynhyrchu gwastraff ymbelydrol ac anymbelydrol. Ein swyddogaeth fel y rheoleiddiwr amgylcheddol yw sicrhau bod effaith y gwastraffau hynny ar bobl a'r amgylchedd, yn awr ac yn y dyfodol, cyn lleied ag y gall fod. Rydym hefyd yn anelu at atal llygredd, gwella'r amgylchedd, a chyfrannu at ddatblygiad cynaliadwy'r DU.

Rydym yn archwilio safleoedd niwclear ac yn asesu cynigion gan weithredwyr er mwyn darparu sicrwydd fod y gweithredwr yn cydymffurfio â chyfyngiadau ac amodau'r trwyddedau rydym yn eu rhoi o dan Reoliadau Trwyddedu Amgylcheddol 2016 (fel y'u diwygiwyd) a deddfwriaethau a pholisïau perthnasol eraill.

Rydym yn ychwanegu at reoleiddio uniongyrchol drwy ddull partneriaeth, gan weithio gyda'r gweithredwyr, yr Awdurdod Datgomisiynu Niwclear a'r Swyddfa dros Reoli Niwclear er mwyn datrys problemau ar y cyd.

Rydym yn disgwyl i weithredwyr gydymffurfio'n llwyr â holl ofynion deddfwriaethol perthnasol ac unrhyw drwyddedau. Os na fydd hyn yn digwydd, ni fyddwn yn oedi cyn defnyddio ein pwerau gorfodi er mwyn sicrhau bod camau gweithredu'n cael eu cymryd er mwyn gwarchod yr amgylchedd neu er mwyn sicrhau cydymffurfiaeth. I grynhoi, ein hamcanion yw:

- Sicrhau bod trwyddedau amgylcheddol yn gyfredol, yn hyblyg ac yn addas i'r diben a'u bod yn sbarduno gwellhad amgylcheddol
- Asesu cydymffurfiaeth â chyfyngiadau ac amodau'r trwyddedau
- Lleihau'r risgiau i'r amgylchedd ac osgoi creu etifeddiaethau pellach
- Sicrhau bod strategaethau gwastraff integredig yn parhau i wella
- Sicrhau bod gwastraff soled yn cael ei becynnu mewn ffurf briodol ar gyfer ei waredu
- Sicrhau bod y seilwaith a'r asedau yn cael eu cynnal a'u cadw i leihau'r effaith ar yr amgylchedd
- Datblygu canllawiau ynglŷn â'r Technegau Gorau sydd ar Gael
- Dylanwadu ar yr Awdurdod Datgomisiynu Niwclear fel ei fod yn darparu cyfeiriad priodol ar gyfer gweithredwyr ynghylch sut i leihau gwastraff a gwella canlyniadau amgylcheddol
- Annog dulliau integredig o reoli tanwydd a deunyddiau niwclear er mwyn atal neu leihau'r effeithiau amgylcheddol posibl
- Sicrhau bod tir a dŵr daear sydd wedi cael eu halogi gan ymbelydredd neu lygryddion eraill yn cael eu rheoli'n briodol a sicrhau bod tir a dŵr daear yn cael eu gwarchod oddi wrth halogi pellach
- Monitro ac asesu newid sefydliadol er mwyn sicrhau bod perfformiad amgylcheddol yn cael ei gynnal

Mae Cyfoeth Naturiol Cymru ac Asiantaeth yr Amgylchedd wedi cynhyrchu canllawiau ar y cyd ar ein gofynion ar gyfer datgomisiynu safleoedd niwclear, y gellir eu gweld yma:

<https://www.gov.uk/government/publications/the-decommissioning-of-nuclear-facilities>



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**TRAWSFYNYDD DECOMMISSIONING SITE, WALES
(MAGNOX LIMITED)**

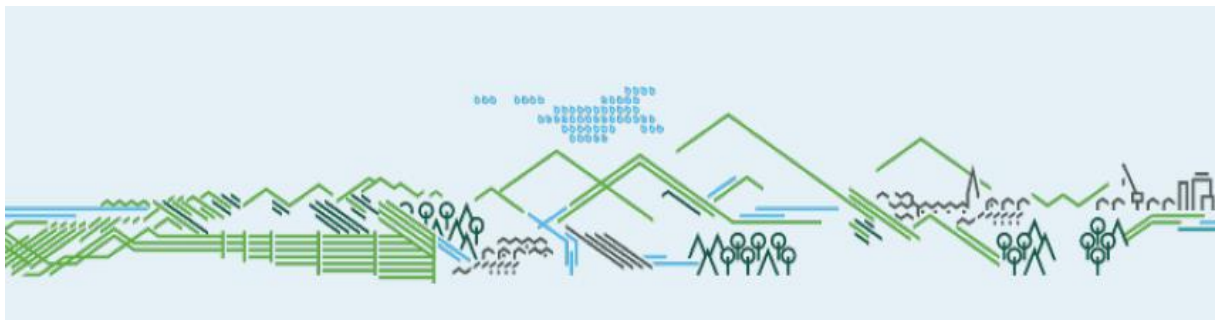
**REPORT TO THE SITE STAKEHOLDER GROUP
DECEMBER 2022**

FOREWORD

This report is issued to the Site Stakeholder Group (SSG) to provide a brief summary of the regulatory activities of Natural Resources Wales (NRW) relating to the Trawsfynydd Decommissioning nuclear site.

NRW is accountable to the Welsh Government for the environmental regulation of nuclear sites in Wales. NRW has a contractual arrangement in place which enables them to draw on the experience and resources of the Environment Agency's specialist Nuclear Regulation Group, to assist in the delivery of on-site inspection work and associated assessments.

We regulate the disposal of radioactive waste, discharges to water and conventional waste. Please see Annex 1 for further information on our role.



Introduction

This report covers the period since June 2022.

Inspections

We carried out a 1½ day joint inspection with the Office for Nuclear Regulation focussing on solid waste management (both radioactive waste and non-radioactive waste) and waste events. Low level waste is well managed and the site is making good progress with the retrievals and packaging of intermediate level waste. We found that the arrangements for identifying, reporting, and learning from events on site were appropriate. We did not identify any non-compliances with the radioactive substance's activity environmental permit or issues with non-radioactive waste legislation. We raised a recommendation in relation to tracking the use of non-radioactive waste arisings on site which are covered by a U1 waste exemption to the Environmental Permitting Regulations.

We carried out a 1½ inspection focussing on environmental resource & capability, clearance monitoring and the use of the high-resolution gamma spectrometry (HRGS) for waste assessment. We were satisfied that there was adequate environment resource and capability for the current operations being conducted but will continue to monitor resource requirements. We were satisfied that there is a suitable documented process for clearance monitoring in place with sufficient trained monitoring personnel and that the HRGS was being used and maintained appropriately. We did not identify any non-compliances with the radioactive substance's activity environmental permit.

We continue to have routine, every two weeks, catch-ups with Magnox to discuss regulatory issues.

Discharges

Radioactive discharges to air and water from Trawsfynydd remained well below permitted limits in this reporting period.

Non-radioactive discharges to water were also within permitted limits.

Environmental monitoring

We received the environmental monitoring programme results as required by the radioactive substances activity environmental permit. There were a couple of moss samples taken during the Q2-2022 where the results were above the mean plus 4 standard deviations of the previous 12 months. These have been investigated and are believed to be due to increase in the silt level of the sample rather than from any operational activities on site (it was noted that a new individual carried out the sampling following retirement of the previous person). Magnox Ltd have confirmed that the Q3-2022 moss sample results from the same locations have returned to the normal levels.

All other results were in line with those from previous periods and show no cause for concern.

Guidance on Requirements for Release from Regulation (GRR)

In conjunction with ONR, NDA, planning representatives for Snowdonia National Park and Gwynedd Council we continue to work with Trawsfynydd site on the requirements of GRR. We attended the routine quarterly meeting of the Trawsfynydd End State

Group (TESG) in June 2022 and September 2022, with the next meeting scheduled on 1 December 2022.

We continue to engage with Magnox Ltd to discuss and provide regulatory advice in relation to the Ponds Complex Demolition and Disposal project and the onsite disposal of radioactive waste. We have provided regulatory feedback on a specific work package setting out Magnox Ltd's strategic approach to characterisation. We attended site in September 2022 to enable the Environment Agency Nuclear Waste Assessor to gain better understanding of the configuration of the Ponds Complex and the de-planting work that is currently being undertaken. We have also attended three technical workshops with Magnox Ltd and their Consultants to discuss a number of different topic areas (e.g., groundwater; performance assessments; inventory) that will need to be addressed as part of a permit application for onsite disposals of radioactive waste.

Permitting

There have been no changes made to any of the environmental permits during this reporting period.

Events and enforcement

We have reviewed the apparent cause investigation report into an event in November 2021 whereby a road sweeper left site without following the appropriate site radiological waste clearance monitoring procedures. We are satisfied that the event has been properly investigated and that the recommendations identified should prevent a recurrence if implemented appropriately. We have identified a non-compliance with the radioactive substances activity environmental permit for failing to operate and manage the activities with sufficient competent persons and resources. Although there was a documented management process in place for clearance monitoring it was not followed due to lack of understanding/ awareness by the individuals involved in this event. In accordance with our compliance classification system this has been identified as a category 3 (potential minor environmental impact) breach.

We regularly review summaries of all events reported and discuss those relevant to environmental compliance with Magnox Ltd as part of our routine regulation. No other significant issues were identified.

Contact details

If you have any queries please contact the following:

Natural Resources Wales

David Wilby

Teitl swydd / Arbenigydd Arweiniol – Lead Specialist

Cyfoeth Naturiol Cymru,

Maes y Ffynnon,

Bangor. LL57 2DW

Ffôn / Tel: 0300 065 3000

E-bost: david.wilby@cyfoethnaturiolcymru.gov.uk

Email: david.wilby@naturalresourceswales.gov.uk

Environment Agency

Mike Baggs

Nuclear Regulator

Nuclear Regulation Group (North), Environment Agency, Ghyll Mount, Gillan Way, Penrith,
Cumbria CA11 9BP
Tel: 020 3025 5806
Email: mike.baggs@environment-agency.gov.uk

Annex 1: The role of Natural Resources Wales and the Environment Agency at nuclear sites

Operating and cleaning up nuclear sites generates radioactive and non-radioactive wastes. Our role as the environmental regulator is to ensure that the impact of those wastes on people and the environment, now and in the future, is as small as it can be. We also aim to prevent pollution, enhance the environment, and contribute to the sustainable development of the UK.

We inspect nuclear sites and assess proposals from operators, to provide assurance that the operator is complying with the limits and conditions of the permits we issue under the Environmental Permitting Regulations 2016 (as amended) and other relevant legislation and policy.

We supplement direct regulation with a partnership approach, working with the operators, the Nuclear Decommissioning Authority (NDA) and the Office for Nuclear Regulation (ONR) to solve problems jointly.

We expect operators to comply fully with all relevant legislative requirements and permits. If this does not happen, we will not hesitate to use our enforcement powers to ensure that action is taken to protect the environment or to secure compliance.

In summary our objectives are to:

- Ensure that environmental permits are up to date, flexible and fit for purpose and that they drive environmental improvement
- Assess compliance with the limits and conditions of the permits
- Reduce risks to the environment and avoid creating further legacies
- Ensure that integrated waste strategies continue to improve
- Ensure that solid waste is packaged in a form suitable for disposal
- Ensure that infrastructure and assets are maintained to minimise environmental impact
- Develop guidance on Best Available Techniques (BAT)
- Influence NDA so that they provide appropriate direction to operators to minimise waste and improve environmental outcomes
- Encourage integrated management of fuel and nuclear materials so as to prevent or minimise the potential environmental impacts
- Ensure land and groundwater contaminated by radioactivity or other pollutants is managed appropriately and protect land and groundwater from further contamination
- Monitor and assess organisational change to ensure that environmental performance is maintained

Natural Resources Wales and the Environment Agency have produced joint guidance on our requirements for decommissioning of nuclear sites, which can be found here:

<https://www.gov.uk/government/publications/the-decommissioning-of-nuclear-facilities>