

# Environment Agency Report

## Oldbury Site Stakeholder Group

January 2022

This report covers our regulation of Magnox Ltd. at Oldbury Site and related issues, including the Coronavirus pandemic, from October 2021 to January 2022.

### **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 asset management. The inspection combined an assessment of relevant documents and an interview with relevant staff members over Teams.

We were supplied with a well-organised set of documents which was appropriate for our needs. The remote inspection began with a clear presentation of asset management arrangements which helped to set the documentation in context. We spoke to Oldbury site staff who were able to describe the way asset management arrangements are used at a practical site level. We also spoke to staff from the Magnox central asset management team who described their role and responsibilities and the way they interact with sites. The staff appeared knowledgeable and committed to permit compliance. It was clear that much progress has been made in the area of asset management since our themed inspection of 2018.

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 (EMP) continue to be consistent with our independent programme, and do not indicate any results of concern or significant change from previous years. Magnox sets a 5-year review period for its EMPs. Since Oldbury's EMP was reviewed in 2015, the ponds have been drained. As mentioned in our October SSG report, following its review, we received a proposal from Magnox to make some changes to its EMP. We have concluded that the proposals are proportionate and reasonable for a site in an advanced stage of decommissioning. We will continue to monitor the results and the techniques used to ensure this continues to be the case. No non-compliances with the permit were identified by this report.

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 2020" (RIFE 26), is published on the GOV.UK website.

<https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports>

The report for 2020 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. Anthropogenic radioactivity in the environment, from the nuclear industry and from past testing of nuclear weapons, accounted for less than 0.2% of the exposure to the UK population. Berkeley and Oldbury sites are considered together for the purposes of RIFE because the effects from both sites contribute to the same area.

The RIFE report presents an assessment of annual 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 2020, 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 and 2019. This is less than 0.5% of the UK National dose limit of 1000 microsieverts and less than 0.2% of the average annual radiation dose 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. 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.

### **Sustainable development**

We are supporting Magnox with the development of its sustainability strategy. We have provided technical advice and shared our learning from our own experience of implementing sustainable development goals into our business, which includes flood and coastal risk management capital works. Over the coming months, we will support Oldbury in developing its thinking in this area and broader opportunities for improving environmental performance and outcomes throughout the decommissioning process at Oldbury.

## Business planning

We plan to undertake 1 further inspection at the Oldbury site in the 2021/22 regulatory year (April - March) looking at environmental leadership. We now have started our structured business planning process for the 2022/23.

## 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](mailto: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.

**Address:** Environment Agency, Red Kite House, Howbery Park, Wallingford, Oxfordshire, OX10 8BD

**Email:** [nrg.south@environment-agency.gov.uk](mailto:nrg.south@environment-agency.gov.uk)

**Telephone:** 020 3025 7462