

Hunterston Site Stakeholder Group

SEPA Update- Hunterston A

1 June 2022

Chief Executive's Resignation

Following conduct allegations, SEPA's CEO, Terry A'Hearn, has stepped down and left his position. SEPA has a clear Code of Conduct and takes conduct allegations very seriously indeed. To protect anonymity, SEPA is unable to comment further. The recruitment process for a new Chief Executive has commenced and in the interim, Jo Green will continue as Acting Chief Executive, supported by SEPA's Agency Management Team.

Cyber-Attack

On 24 December 2020, we were subject to a serious and complex cyber-attack, displaying significant stealth and malicious sophistication, which significantly impacted our organisation, our staff, our public and private partners, and the communities who rely on our services.

Since the attack, we have worked with Scottish Government, Police Scotland, the National Cyber Security Centre (NCSC) and the Scottish Business Resilience Centre (SBRC), to a clear recovery strategy.

We've published [Our response and recovery from a major cyber-attack](#), and a range of voluntary independent audit reports on our response and recovery from Police Scotland, the Scottish Business Resilience Centre and Azets. You can view these reports at sepa.org.uk/cyber-attack.

We will continue to publish the weekly service status until all our services have resumed, continuing to support our organisation, our staff, our public and private partners, and the communities who rely on our services, as we continue our recovery.

Regulation

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

In addition to the cyber-attack, SEPA has also had to continue to manage the COVID-19 pandemic and its associated restrictions.

Telephone communication with the site continued throughout the period since the last SSG in March, 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 to be planned in order to ensure compliance with the site permit.

An inspection was undertaken just before the last SSG. On 1st March 2022 SEPA carried out an inspection to look at the maintenance schedules of any safety/ environment equipment and how the site ensures that the equipment is fit for use when they have not been used for a prolonged period due to the nature and frequency of potential discharges from the site. This was a joint inspection with ONR. In addition, SEPA had a meeting during the day to discuss BPM documentation relating to a number of projects. There were no permit non compliances found during the inspection.

SEPA Investigation 8th June

SEPA will attend 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 Bunkers Retrieval Facility gaseous discharge stack. (see environmental events section below).

SAWBR Optioneering

In December 2020, Hunterston A wrote to SEPA advising of the Magnox decision to withdraw an extant application to vary the site permit until such a time as the variation could be further underpinned. This allowed further work to be undertaken to support optimisation, characterisation and the treatment of the SAWB waste.

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, with particular regard to demonstrating optimisation of the long-term management of the waste and consistency with the Scottish Government's HAW policy for storage and disposal.

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.

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 an updated version with any date changes.

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 on 31st March 2022 that contractors carrying out an inspection of the site gaseous discharge stacks on 23rd March 2022 discovered a hole in a gaseous ventilation stack on the site. The hole was after the abatement but before the inlet into the stack sampler. The hole was repaired by the contractors when it was discovered. The site undertook an investigation into the discovery and identified a number of actions. SEPA will undertake an investigation into the potential for non-compliances with the Hunterston A site permit.

There were no other 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 B. 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 26) covering 2020 has been published and can be obtained from SEPA's website along with previous year's reports. RIFE 26 reports that the total dose for the representative person (most exposed) around the Hunterston site, which includes both Hunterston A and Hunterston B, for 2020 was 0.005 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 2019, including that from Hunterston A and B, have been published and are available on SEPA's website under "*Environment/Environmental data/SPRI*".

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