

## Hunterston Site Stakeholder Group

### SEPA Update- Hunterston B

1 September 2022

#### **Chief Executive's Post**

SEPA announced the appointment of Nicole Paterson as its next Chief Executive on 7 July 2022.

Nicole, who joins 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**

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.

Throughout our response and recovery activities, we published a weekly service status, detailing progress on our affected systems and services. We'll 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**

We have continued telephone communication with the station throughout the period, including formal weekly call-downs with the station's Environmental Safety Group and corporate

Generation Environment Management as well as monthly updates from the EDF internal regulator on site. We have also attended routine meetings with corporate EDF, Magnox, ONR and EA on strategic issues, including defueling and decommissioning.

#### Site Inspection

We have visited the station once since the last SSG meeting. On 28 June 2022, SEPA staff carried out an inspection to follow up on progress with both the radioactive and non-radioactive oil loss events as well as a number of on-going projects. No new contraventions were identified.

We intend to carry out an inspection on 23 August 2022 to focus on corrective actions taken by the station in response to the radioactive oil loss event in February 2022 and station-based deconstruction activities. A verbal report of the outcome will be provided at the meeting.

#### Applications

The station applied in July 2020 to regularise the receipt of radioactive waste in the form of debris in the incoming fuel transport flasks. SEPA has determined the application and we have granted the application subject to conditions. The Notice of Variation was issued on 29 July 2022.

#### **Pollution Prevention and Control (PPC)**

We have been investigating and assessing the leak from an oil-filled cable onsite- see below. Otherwise, there have been no issues relating to the station's PPC permit for its non-radioactive emissions from the emergency diesel generators, auxiliary boilers and waste oil burner since the last scheduled SSG meeting.

#### **Control of Major Accidents and Hazards (COMAH)**

There have been no issues related to COMAH since the last scheduled SSG meeting.

#### **Controlled Activities Regulations (CAR)**

There have been no other issues relating to the stations' non-radioactive liquid discharges to the water environment since the last scheduled SSG meeting.

#### **UK Emissions Trading Scheme (ETS)**

There have been no issues relating to the ETS since the last scheduled SSG meeting.

#### **Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations (EIADR)**

SEPA is a statutory consultee for the above regulations. We have received the Scoping Report in relation to the decommissioning of Hunterston B from the Office for Nuclear Regulation and will return our comments for the deadline of 5 September 2022.

## **Environmental Events**

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

We previously reported two environmental events on site, both of which involve the loss of control of oil:

1. In February, the station lost control of approximately 1300 litres of radioactively contaminated oil from a gas circulator settling tank. The oil is lightly contaminated with tritium. The oil appears to have been captured at the lagoons at the 39-inch outfall and did not enter the environment. The recovered waste oil/water mixture has been allowed to separate, with the water fraction being disposed of through the AETP and the oil being transferred to an authorised incinerator. We have concluded our investigation and have issued the station with a Final Warning Letter on 22 June 2022.
2. EDF have made SEPA aware of a small, ongoing non-radioactive oil leak from an oil-filled transformer cable. The leak constitutes about 50 litres per quarter of fully biodegradable oil which has a half-life of around 15 days in soil. There is no reason at present to assume a significant environmental impact. The station has undertaken monitoring of the cable using tracers. We are in discussions with the station regarding locating the oil leak and putting plans in place to implement a fix.

## **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 EASR18.

## **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. We intend 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*".

Mr Keith Hammond

Radioactive Substances Specialist

*Speisealach Stuthan Reidio-beo*

17 August 2022