

Office for Nuclear Regulation (ONR)

Site Report for Dounreay

Report for period 1 January – 31 March 2022

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed to members for the Dounreay Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR usually attend Dounreay Stakeholder Group meetings where these reports are presented and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

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1. Inspections

1.1. Dates of Inspection

The ONR site inspector made inspections on the following dates during the report period 1 January to 31 March 2022:

- 22 to 24 February 2022.
- 22 to 24 March 2022

2. Routine Matters

2.1. Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the Energy Act 2013.
- the Health and Safety at Work Act 1974 (HSWA74); and
- regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The inspections entail monitoring the licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of Dounreay covered the following:

- Management of operations including control and supervision.
- Emergency preparedness.
- Radiological protection.
- Organisational capability

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records on our website www.onr.org.uk. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

In addition, ONR observed a partial redemonstration of the site's emergency arrangements focusing on the management and recovery of multiple radiologically contaminated casualties from a radiologically contaminated environment. This redemonstration was a follow up to the site's annual Level 1 Safety Demonstration conducted in September where this topic was identified by DSRL as an area for improvement. ONR is satisfied that the revised arrangements that DSRL have implemented with regards the management and recovery of contaminated casualties aligns with the relevant good practice provided within ONR's guidance documentation.

ONR has continued to undertake assessment activities necessary to support the release of regulatory hold-points placed on a number of the projects on site.

2.2. Other Work

ONR provided feedback to the site on the Safety and Security Culture Review conducted 30 Nov to 2 Dec 21. This feedback was provided to the executive team and representatives from the operations staff. ONR is satisfied that the key messages were received positively by the executive team with a clear acknowledgement of those areas identified for improvement and a commitment to ensure that these were considered as part of DSRL's overarching cultural change programme.

The site inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety, and welfare at work.

3. Non-Routine Matters

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

Matters and events of particular note during the period were:

- INF-1709: On 17 Feb 22, DSRL reported a breach of a criticality operating rule following the processing of contaminated material within one of the gloveboxes within the Fuel Cycle Area. Follow up activities have been undertaken and ONR remains satisfied that the circumstances of the breach are such that there was no degradation in the criticality safety margins nor any failure of lines of defence. ONR will now await the completion of the formal site investigation. ONR will also conduct further follow up inspection activities during the ONR Cross-Sites Criticality Safety Themed Inspection scheduled for April.
- INF-1725: On 1 Mar 22, DSRL were carrying out lifting operations in D3100 when the calibrated load cell indicated that the weight of pump and the lifting equipment exceeded the Safety Working Load of the lifting davit. All work was stopped and a site investigation initiated. ONR has discussed this incident with the site and are currently awaiting the completion of the site investigation report before considering any further regulatory action.
- INF-1746: On 1 Mar 22, During Nitrogen Dewar Filling Operations a member of staff, whilst unloading nitrogen dewars from a trailer, stepped back and twisted their ankle. The individual subsequently attended the site Occupational Health Department and Caithness General Hospital. ONR has discussed this incident with the site and are currently awaiting the investigation report before considering any further regulatory action.

4. Regulatory Activity

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'Licence Instruments' (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

- The following LIs, Enforcement Notices and Enforcement letters have been issued during the period:

Table 1: Licence Instruments and Enforcement Notices Issued by ONR during this period

Date	Type	Ref. No.	Description
20/02/22	Enforcement Letter	ONR-EL-21-043	To Grahams Construction Limited to address issues identified against the requirements of the Construction (Design & Management) Regulations 2015 and the Lifting Operations and Lifting Equipment Regulations 1998.
20/02/22	Enforcement Letter	ONR-EL-21-044	To DSRL to address issues identified against the requirements of the Construction (Design & Management) Regulations 2015 and Nuclear Site Licence Condition 7 regarding the reporting, investigation and learning from incidents on site

5. News from ONR

For the latest news and information from the Office for Nuclear Regulation, please read and subscribe to our regular email newsletter 'ONR News' at www.onr.org.uk/onrnews

6. Contacts

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