

Environment Agency Report to the AWE Local Liaison Committee

July 2019

Radioactive Substances

We regulate radioactive waste disposals to the environment. We do this through permits that contain limits and conditions aimed at minimising wastes and protecting the environment. We check for compliance with the permits by making regular inspections of AWE facilities.

During the year we inspect facilities to ensure that the company complies with the conditions of the Environmental Permits issued to AWE for disposing of radioactive wastes and using some radioactive sources. Our inspections and regulatory engagement with AWE follows a programme developed for the year. Our programme covers areas where we have specific regulatory interest, including operational and decommissioning facilities, as well as new facilities currently being developed at Aldermaston and Burghfield.

We produce reports for our compliance assessment work regulating radioactive substances (Radioactive Substances Compliance Assessment Reports or RASCARs), including checking radioactive waste discharge and environmental monitoring reports. These reports are available on our Public Register.

We work together with the nuclear safety regulators - Office for Nuclear Regulation (ONR) and Defence Nuclear Safety Regulator (DNSR) - whenever possible and particularly on areas of joint regulatory interest, such as the management and disposal of radioactive waste; decommissioning; and new build projects. We share information with other regulators to facilitate efficient regulation.

We attend a range of regulatory interaction meetings with AWE, ONR and DNSR covering

current operations, development projects, waste management and decommissioning activities.

Higher Activity Waste

We continue to attend meetings on the management of higher activity waste at AWE and review progress with AWE's forward action plan. We are working jointly with ONR on this area of work.

Compliance assessment

We have completed a number of inspections since the last Local Liaison Committee meeting:

Plutonium Technology Centre - We undertook a compliance inspection focussing on Plutonium Technology Centre (PTC) facilities at Aldermaston Site. We noted a minor (CCS4) non-compliance on the date of the inspection, in relation to the registering of solid radioactive waste assay equipment on the company's asset management system.

Hydrodynamics and Radiation Technology Centre Facilities - We inspected key facilities in the Hydrodynamics and Radiation Technology Centres at Aldermaston Site to assess compliance with the radioactive substances disposal permit. We recorded non non-compliances on the date of the inspection and provided verbal feedback to AWE. We are currently producing our compliance assessment report.

Delay in reporting environmental monitoring sample exceeding the activity threshold - AWE notified us that it had failed to report that a routine sample from a surface water outfall, taken as part of its environmental monitoring programme, had exceeded an agreed notification level. AWE undertook an investigation and provided a copy of its investigation report to us. The investigation concluded that the event did not involve or result from any release of material to the environment. The exceeded level was attributed to the mixing-up of a check sample with the regulatory sample.

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

We recorded three minor (CCS4) non-compliances with the permit.

HEPA filters

We continue to work jointly with Office for Nuclear Regulation in our engagement with AWE on assessing the adequacy of and progress on its commitments to address previously identified shortfalls in the organisation's management of ageing High Efficiency Particulate Arrestor (HEPA) filters. We reviewed a report from AWE covering its internal review of its current procedures and processes for the management of HEPA filters and nuclear ventilation against relevant good practice. We and ONR have reviewed the report separately and have provided interim feedback to AWE. We intend to provide final feedback to AWE during July 2019. We have also asked AWE to provide us with an integrated project plan covering the implementation of identified improvement actions, which includes the replacement of a significant number of HEPA filters.

Structured Improvement Plan (SIP)

AWE has developed a Structured Improvement Plan (SIP) designed to facilitate its withdrawal from enhanced regulatory attention by ONR. SIP improvements impact AWE management arrangements, including those that affect environmental compliance. We are party to the various work streams supporting the SIP, as well as being involved in supporting meetings and workshops, and continue to support the SIP process.

Environmental performance workshop

We participated in an AWE workshop with representatives of its Environment function on the development of appropriate measures to improve environmental (compliance) performance. This gave us a further opportunity to provide advice to AWE on our regulatory expectations.

Other Permits/Regimes we regulate

We permit and regulate other operations at AWE to protect the environment, including activities for generating power and steam, work using non-ferrous metals, work using carbon, Control of Major Accident Hazards (CoMAH) and the quality of surface water

discharged from Aldermaston and Burghfield.

Control of Major Accident Hazards (COMAH)

AWE is currently undertaking an assessment of the likelihood that materials and chemicals stored on the site could lead to a major accident to the environment (MATTE). This assessment is required under the Control of Major Accident Hazards (COMAH) Regulations. We continue to engage with AWE to monitor progress on completion of this assessment.

Non-ferrous metals activities

We completed a compliance inspection of the facilities authorised to undertake non-ferrous metals activities at Aldermaston Site. We noted no non-compliances during the inspection but recorded regulatory advice in the form of observations and recommendations.

Carbon activities

We completed an inspection of the facilities authorised to undertake carbon activities at Aldermaston Site. We noted no non-compliances on the date of the inspection and are in the process of producing our compliance assessment report.

Other EA News

GRR

The environmental regulators have produced new guidance for operators of all nuclear sites, describing what they need to do when planning and carrying out their work to decommissioning and clean-up their sites.

The guidance applies to all sites, whether or not they have already begun decommissioning and clean-up. Operators also need to take the guidance into consideration when designing or building new sites.

The full guidance document 'Management of radioactive waste from the decommissioning of nuclear sites: guidance on the requirements for release from radioactive substances regulation' (also known as GRR) is available from the Scottish Environmental Protection Agency's (SEPA) website under the section 'Joint guidance'.

We have made a number of changes to the Aldermaston and Burghfield Sites' radioactive waste disposal permits to incorporate the requirements of GRR.

These changes principally require AWE to produce and maintain a Waste Management Plan (WMP) and Site Wide Environmental Safety Case (SWESC). We have shared the draft permits with AWE for review and comment and aim to issue the varied permits by the end of July 2019.

For more information contact:

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