

# Environment Agency Report to the AWE Local Liaison Committee

March 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 the forward action plan. We are working jointly with the ONR on this area of work.

We have been working with the Defence Nuclear Safety Regulator (DNSR) and Office for Nuclear Regulation regarding the transfer of title and liability for some 5000 drums of materials that will be moved for off-site processing and storage, as part of AWE's delivery of its Higher Activity Waste plan.

We wrote to AWE with our comments on Radioactive Waste Management Limited's review of AWE's conceptual packaging proposals for its High Inventory Drums.

## Inspections

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

*Assembly Technology Centre* - We undertook a compliance inspection focussing on the main Assembly Facility at Burghfield Site. We noted no non-compliances on the date of the inspection and have shared our draft inspection report with AWE, for comment, and will issue the final report in due course

*Uranium Technology Centre* - We inspected the main facility operated by the Uranium Technology Centre at Aldermaston Site. The inspection focused on assessing the adequacy of radioactive solid waste management in the facility, as well as the arrangements for internal assurance, including independent environmental (compliance) assurance. We noted no non-compliances but provided regulatory advice in the form of a recommendations and observations. We shared

our draft inspection report with AWE, for comment, and will issue the final version in due course.

### **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 were generally satisfied with the technical and project planning information submitted to us by AWE in response to the joint EA-ONR enforcement letter (covered in previous LLC reports). As part of our engagement on the HEPA filter management issue, we observed – jointly with ONR - an Options Appraisal workshop undertaken by AWE in relation to one of its decommissioning facilities. We were content with the demonstration and provided advice and guidance to AWE. Following commitments made by AWE in response to the joint enforcement letter, we expect to receive, on or before 11 March 2019, a number of reports 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 will review these reports once we have received them.

### **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.

## **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.

### **Water discharge activities**

We undertook a joint visit with Environment Agency Water Quality specialists to Aldermaston Site to review current surface water drainage infrastructure and (non-radioactive) water discharge permits sampling arrangements. Regulatory advice was provided to AWE.

## **Other EA News**

### **GRR**

The environmental regulators have produced new guidance for operators of all nuclear sites, describing what operators need to do when they are planning and carrying out their work to decommission 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 written to AWE to inform it that we intend undertake variations of its radioactive substances disposal permits at its Aldermaston and Burghfield sites in order to formally incorporate our regulatory requirements under GRR.

## EU Exit

The Environment Agency is playing a major role at both national and local level in helping the country prepare for EU Exit. We have been working with Defra, other parts of government, businesses, local authorities, Non-Governmental Organisations and many others to seek to ensure that Britain's exit from the EU is as smooth as it can be, that we manage the risks, and that we seize the opportunities to deliver even better outcomes once we leave. Our work has included preparations for a potential 'no deal BREXIT'.

We recognise that if this situation is allowed to occur there may be significant disruption to the free movement of goods, services and people that applies to members of the European Union. We have written to all nuclear site operators in England to clarify our expectations for contingency planning to mitigate, as far as possible, the effects of a potential no deal BREXIT. The purpose of this is to assure ourselves that these contingency plans have addressed future compliance with requirements of nuclear operators' environmental permits. AWE has provided a response to our letter.

## Site Environment Review (SER)

We drafted our Site Environment Review (SER) for AWE sites and shared the draft document with AWE in January, for review. The SER covers our assessment of AWE's regulatory performance over 2018-19 and specifies our regulatory actions and priorities over the 2019-20 financial year.

The key purpose of this document is to draw together the evidence and information to support our strategic regulatory outcomes and to identify actions to help us carry out and demonstrate risk-based regulation.

In addition, the SER allows us to:

- identify and summarise information on site operations and our regulatory priorities to facilitate the future planning and prioritisation of our on-site resources;
- provide a means of communicating environmental issues and priorities to the site and to the Office for Nuclear Regulation;
- inform our National Environment Report of national priorities which are collated into our Nuclear Delivery Plan

- link specific operational, planning and strategic issues with national initiatives, for example: Nuclear Decommissioning Authority (NDA) Strategy, National Integrated Waste Strategies (IWS), MoD Nuclear Liabilities Strategy.

### For more information contact:

Rob Green, Lead Nuclear Regulator

E-mail: [robert.green1@environment-agency.gov.uk](mailto:robert.green1@environment-agency.gov.uk)