

Closure Director's Report Dungeness A Site

November 2020





Round-up from the Closure Director

I am pleased to report that Dungeness A has now exceeded 1,624 days (over 4 years) since we last had a Lost Time Accident.

In line with the company values to deliver a 'Target Zero' approach to safety, the site continues to promote monthly themed company-wide campaigns. Recent topics include 'Returning to work safely following the operational pause (Covid-19)', 'Electrical Safety', and 'Fire Safety'.

Since the last SSG events have transpired that we wouldn't have thought possible at the time with the arrival of the Covid-19 Pandemic and the impact it's had globally. Like the majority of companies we too had to stop work and go into a period of operational pause during the initial lockdown period. Our main priority, as always, was the safety of our staff and maintaining the safe operation of essential plant and systems on site. This was carried out across the Magnox fleet in agreement with our board of directors and locally with our own management team at Dungeness A with agreement from our Regulators.

We also reviewed what we had in our stores that could be used by the NHS, emergency services and on the ground organisations; one of our contract partners Erith, also did the same. I'm glad to report that we were able to distribute a large quantity of Personal Protective Equipment (PPE) to the William Harvey Hospital, The New Romney Hub and Air Ambulance Kent Surrey Sussex where they were immediately put to good use.

Magnox also made available £25,000 for the communities around the sites through the district councils and Dungeness A was no exception.

We appreciate that a lot of community organisations have been impacted during this period. We are looking to work with them to enable their work to continue in the future. There's more information later in this report.

Magnox took a very cautious and phased approach in returning staff to work on site during June to ensure that there were processes and procedures in place for staff to be able to carry out their work as safely as possible. This included physical changes to ensure social distances were maintained, the introduction of one way systems, increased cleaning regime and the provision of adequate sanitising supplies to maintain hygiene. These measures are constantly reviewed in line with Government updates and regional variations. We have also encouraged those who can work from home to continue to do so.

Since this initial return to site of staff and contractors, work to decommission the site has gradually resumed and I am pleased to report the progress.

Waste management is a key area of work for the site where we are seeing innovative solutions being developed to progress the work. The design and installation of the Wet Waste Transfer Facility (WWTF) was one of these projects and is now complete. Equipment testing is underway and expected to be complete by December 2020. Another project for the management of waste was the Borderline Wet Waste (BWW) Project; this has progressed well with the detailed design phase now complete. Procurement and manufacturing of the retrieval equipment is in progress and the contractor is expected to mobilise on site in April 2021 with retrievals now expected to start in September 2021.

The Ponds Programme Team has, since the completion of the “Drained and Stabilised” milestone in November 2019, been preparing the ponds for the back-out activities which will enable the project to progress into the second phase of its de-planting activities. The Thermal Insulation Removal Project for the boiler houses has been fully staffed since the middle of September and work is now progressing well in a number of areas.

Our Asset Management Programme has the responsibility to ensuring that Magnox assets are maintained in a safe and compliant state until decommissioning and demolition or entry into Care and Maintenance is achieved. The programme recently received certification that the systems used are in line with ISO55001 (Asset Management – Management systems) standard. Gaining this certification is an outstanding achievement for all involved and a testament to our commitment.

To ensure that we maintain the Covid-secure working environment at all our sites we keep our arrangements under constant review. As well as the latest Government advice, we also consider a range of other factors that will help to keep our sites and offices safe and healthy places to work.

The UK government announced a new ‘lock-down’ across England, starting on Thursday 05 November. The arrangements for sites are different to the lock-down in March, in that all our sites will remain open as we have put arrangements in place to ensure they are Covid-secure.

The key feature remains that if our staff can work from home effectively they should. We have re-introduced the ‘essential travel only’ requirement for travel between sites, and introduced one additional precaution, that it will become mandatory to wear a face covering in indoor communal areas on all sites.

We have explained our working arrangements to our contractors and are in regular contact with them to ensure that everyone on our sites, employee, ASW or contractor, understands the rules and is properly protected.



Paul Wilkinson
Closure Director

1. SAFETY

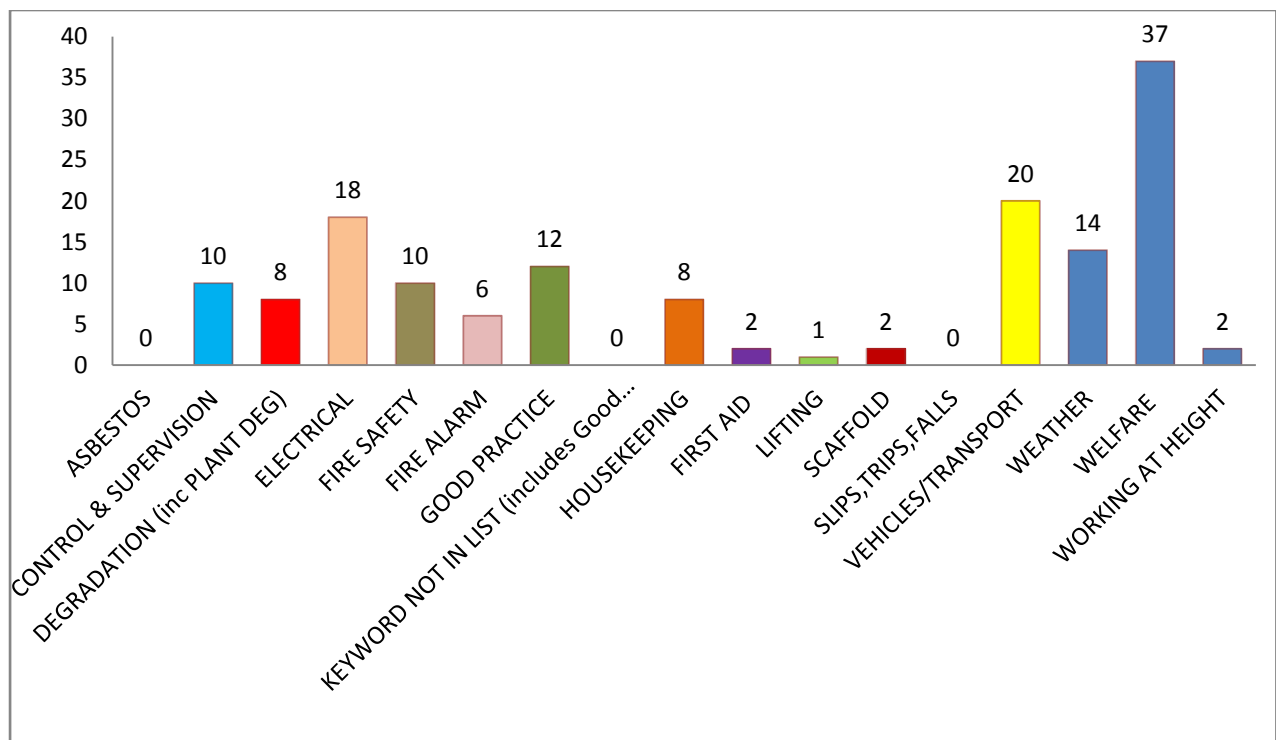
CONVENTIONAL SAFETY

In line with the company values to deliver a 'Target Zero' approach to safety, Dungeness A continues to promote monthly themed campaigns. Recent topics include 'Returning to work safely following the operational pause (Covid-19)', 'Electrical Safety', and 'Fire Safety'. The site has now exceeded 1,624 days (over 4 years) since its last Lost Time Accident.

Additional challenges to safety and welfare from the Covid-19 pandemic are evident but are being managed well with regular interactions between management and safety representatives to ensure the safety and wellbeing of our workers.

The reporting culture remains strong with 690 Learning Capture Forms submitted over the last 12 months. Evaluation and trending of these events has identified areas for improvement and a six month Site Safety Improvement Plan has been developed to focus attention in the areas identified. These include maintaining a safe place of work due to increased plant degradation, improved fire safety including renewing aging fire systems and replacing fire doors and exits where required, upgrading water systems to reduce the risk of Legionella, coaching leaders on safety legislation relevant to the site, improving signage, improving the site risk assessment process and increased assurance of asbestos works.

The chart below shows the keyword areas in which 'Learning Capture' Forms have been raised this financial year at Dungeness A:



There have been three events of conventional safety significance in the last quarter:

- Minor electrical shock sustained from light switch.
- Person found working outside scaffold handrail.
- Portakabin offices fire system power loss.

The Welfare Working Group is currently working through a number of improvements including cleaning regimes, provision of safe welfare facilities and robust Covid-19 controls. The Workplace Transport Working Group is rolling out many improvements to vehicle/personnel segregation, improved signage, lighting, road surfaces and line markings.

There were two minor first aid injuries in the last quarter. The Days Away Case Rate (DACR) remains at zero and the Total Recordable Incidents Rate (TRIR) is 0.49.

RADIOLOGICAL PROTECTION AND ENVIRONMENT

Radiation doses remain as low as reasonably practical and below dose limits. Due to the COVID-19 operational pause, the dose accrued on site is showing some divergence below the estimate; however work is being completed to review the estimate considering the revised schedule.

Following a successful selection process, two Radiological Protection Technician Apprentices have started work at Dungeness A.

The site has received a revised Conventional Effluent Discharge Permit which that now includes the new Modular Active Effluent Treatment Plant in the authorised discharge route. Following a program of sampling and engagement with the Environment Agency, the site has submitted an additional variation application for this permit to suitably capture other ongoing discharges from the site.

An Environmental Awareness Campaign has also been initiated to develop a better site-wide understanding of environmental issues and mitigations associated with the work being undertaken to ensure everyone on site understands their role in successful environmental management.

EMERGENCY SCHEME

Since June Dungeness A has held the following exercises:

22/06/2020 – Exercise Wyoming – Site-wide fire drill
09/07/2020 – Exercise Kentucky – Covid-19 response exercise
02/08/2020 – Exercise Utah – Covid-19 return to pause exercise
22/09/2020 – Exercise Texas – Site-wide fire drill
07/10/2020 – Exercise Dakota – Security exercise

Training and emergency preparedness will continue with a security demonstration exercise scheduled for March 2021.

2. SITE AND PROJECT NEWS

PONDS PROGRAMME

Since completion of the drained and stabilised milestone delivered in November 2019, the team has been preparing the ponds for the back- out activities that enables the project to progress into



the Phase 2 De-plant Activities. With the national Covid-19 lockdown in March, the team re-classified both pond facilities back to Contamination Controlled Area C2 (surface contamination) and sealed the areas. On return to site in July, C3 (risk of airborne contamination) conditions were re-established and a programme of surveys and inspections carried out to ensure clear understanding of any change in physical plant or radiological conditions prior to progressing work.

The deconstruction and waste processing of the legacy splitter flask- a five ton steel shielding structure which was used to transfer fuel element lugs from the lug vault to the Magnox dissolution plant for processing has since been completed.

Work is also underway to place a contract to have the flask crane bale arms and ropes removed. These parts of the crane were wetted in operation as they were used to lift the fuel flasks in and out of the ponds. Removal and waste processing of these items will remove any future risk of potential airborne contamination being generated. The remaining flask crane travelling structures will be left in situ until the pond buildings are demolished.

Mobile Active Effluent Treatment Plant (MAETP)

To enable full decommissioning of the original Active Effluent Water Treatment Plant, an alternative contaminated water treatment facility has been installed with inactive commissioning completed in December 2019. A new discharge line has been installed and connection into the site's existing discharge line has also been finished. To allow progress to active commissioning requires a new discharge permit; this has now been approved and issued by the EA as mentioned previously. The project is currently in the process of solving a technical issue with the original pipework design which should now see active commissioning taking place in April 2021.



WASTE OPERATIONS PROGRAMME

The Waste Operations programme halted all processing and disposal of waste when the site went into operational pause until the gradual return to work. As part of that return, the Waste Operations Team had to ensure that all waste facilities were COVID-19 secure in line with the new company S-192 (Health Protection Guidance During the COVID-19 Pandemic), before any work commenced.

Low Level Active Waste (LLAW) Operations

Between the beginning of January 2020 until the pause, the Waste Operations Programme monitored, processed and disposed of the following waste:

- Two contaminated metals shipment processed and dispatched to Cycliffe for treatment and recycling (10.5te).
- One contaminated combustible waste shipment has been processed and dispatched to Veolia (33.7m³).
- 50m³ of contaminated very low level asbestos waste was consigned to Augean for disposal.
- A further 155te of non-radiological waste was disposed of, comprising mainly asbestos and metal/general and hazardous waste.



The transfer of waste drums to the Bradwell Intermediate Storage Facility is expected to re-commence in November.

Since the return from pause to October the 15, the Waste Operations Programme has monitored, processed and disposed of the following waste:

- Two contaminated metals shipment processed and dispatched to Cycliffe for treatment and recycling (7.6te).
- A further 232te of non-radiological waste was disposed of, comprising mainly metal/general and hazardous waste

High Activity Waste (HAW) Operations

Bulk retrieval and conditioning of Intermediate Level Waste (ILW) resin from settling tanks ST3 and ST4 has been completed and a further 13 MOSAIK[®]s filled and conditioned between 1 of

January and the middle of March. To date, a total of 112 MOSAIK[®]s have been filled and conditioned since the process began.

Any residual resin remaining in ST3 and ST4 will be retrieved using specifically designed equipment; this will take place over the next six months.

Three rail shipments of nine MOSAIK[®]s per shipment have been dispatched to Bradwell to the Interim Storage Facility. In total, 11 rail shipments containing 96 MOSAIK[®]s have safely been undertaken.



Camera inspection and Health Physics survey also completed on Miscellaneous Active Components (MAC) in the Magnox Dissolution Plant (MXD)

The future scope of work up to the end of March 2021 is as follows:

- Retrieval of residual ILW resin from ST3 to ST4
- Bulk retrieval and conditioning of three MOSAIK[®]s with ILW resin from Sludge Tank 4
- Transport of two rail shipments to Bradwell containing 18 MOSAIK[®]s
- Complete processing of Bradwell waste drums
- De-plant of Oil Incinerator from the LLAW Plant
- Retrieval and repackaging of MAC from the MXD splitter vault
- Processing and disposal of 107m³ of LLW/VLLW
- Continue monitoring and processing of non-radiological waste

WASTE PROJECTS PROGRAMME

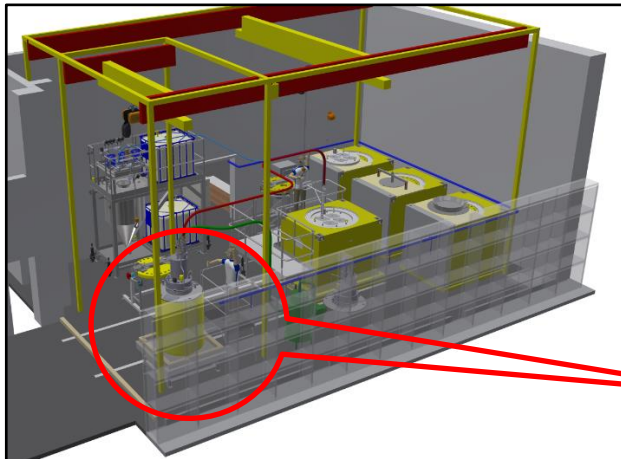
Resin Pathfinders

The strategy for this project has changed over the last year. In addition to its original design intent, this project will now provide a more generic facility to transfer a number of different wet ILW wastes in to DCIC disposal packages from a range of different containers. This facility is known as the Wet Waste Transfer Facility (WWTF).

The design and installation of the WWTF is now complete. Equipment testing is underway and expected to be complete by December 2020.

There has been a recent change in strategy that requires the priority for this facility to be focussed on Pathfinder DCIC repackaging. These are the three Yellow Boxes shown at the back of the facility in the 3D representation below.

This facility is expected to be ready to receive resin for packaging in MOSAIK[®] transport and disposal DCIC's by December 2021.



3D view of the wet waste transfer facility

Photo of a MOSAIK[®] DCIC in its filling station



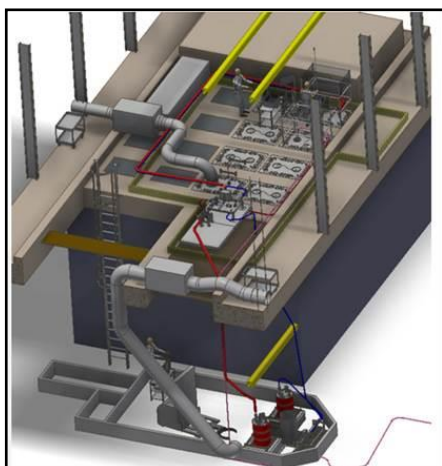
Borderline Wet Waste

The Borderline Wet Waste (BWW) Project scope is to retrieve a number of wet ILW wastes that have been identified as suitable for encapsulation in cement and disposed to the Low Level Waste Repository (LLWR). The LLWR will be the final repository for these packages.

The strategy is to retrieve the waste into drums, transport them to Tradebe/Inutec's (TI) premises in Dorset where they will be encapsulated and packaged for disposal. Wood Group is in partnership with Tradebe/Inutec (TI) to deliver this work. Wood Group has designed the retrieval equipment and TI has developed the encapsulation recipes and managed the disposal strategy with the LLWR.

The Borderline Wet Waste (BWW) Project has progressed well and the detailed design phase is now complete. Procurement and manufacturing are in progress and the contractor is expected to mobilise on site in April 2021.

It is expected that retrievals will commence in September 2021.



The MXD Sludge retrieval equipment layout

Sludge and Sand

Site installation works are complete. The Fill House building is fitted out with the retrieval and packaging equipment and preparations are underway to start inactive commissioning.

All the retrieval and packaging equipment had been assembled and tested, last year, at NSG's works in Preston, Lancs.

The Sludge and Sand Project is now expected to be ready for active commissioning in June 2021.

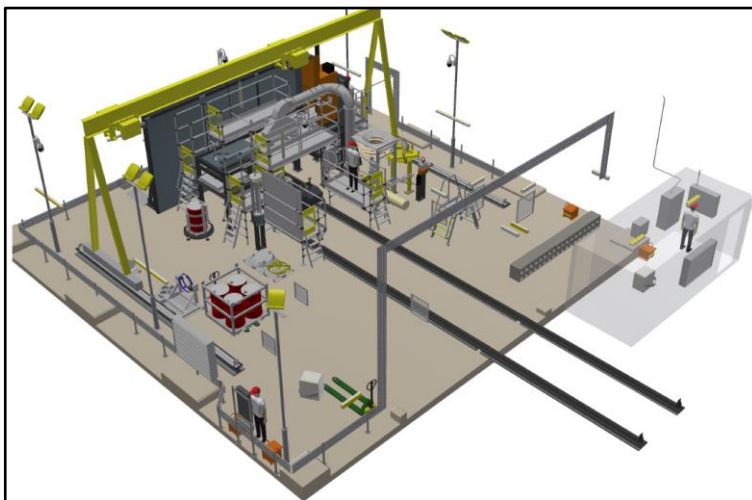


The Fill House building being equipped with retrieval and DCIC filling equipment

Miscellaneous Contaminated Items (MCI)

The detailed design for the Waste Transfer Area is complete. This is where MCI and MAC will be taken for size reduction and packaging into DCIC's prior to conditioning.

Site works are not expected to commence until April 2022.



3D view of the MCI Waste Transfer Area

PLANT AND STRUCTURES

Boiler House Asbestos Removal

The thermal insulation removal project has been fully staffed from the middle of September with the return to site of Magnox staff and the project's contract partners, after the site pause. Work is progressing well in a number of areas. These are:

- **1B Drum House** – bulk insulation removed. Fine cleaning of the metalwork to remove all traces of thermal insulation underway.
- **Blower 7** – all insulation removed and enclosure dismantled final inspection ongoing for the fourth stage clearance and the handover of the area back to site.
- **2A Foundation Block** - all insulation removed and enclosure dismantled final inspection ongoing for the fourth stage clearance and the handover of the area back to site.
- **2A Control Face Blowdown Area** - all insulation removed and first enclosure being dismantled to enable the second enclosure to be constructed.

Some statistics:

- The total number of asbestos enclosures (tents) that will be constructed for the project is estimated at 163
- Asbestos enclosures constructed to date 154
- Enclosures in progress four
- Enclosure to be constructed five
- To date the project has removed some 304 tonnes of asbestos waste.

We now have only two areas where spring cutting needs to be progressed, these are at the base of Boiler Cells 3 and 4. The intention is to commence this work in November.

ASSET MANAGEMENT PROGRAMME

The Asset Management Programme is responsible for ensuring that Magnox assets are maintained in a safe compliant state until decommissioning and demolition or entry into Care & Maintenance is realised.

Recently the Magnox Asset Management Programme received certification that its systems are in line with the standard ISO55001 (Asset Management – Management systems). This is an outstanding outcome and in gaining certification to ISO55001, Magnox has demonstrated its ability in managing assets to meet the needs of company strategies against the challenging age and condition risks many of them present and to an internationally recognised standard.

DUNGENESS A ASSET CARE PROJECTS

In this financial year (2020/21) there are 26 work packs being worked on with a forecast value of approximately £1.5M.

After the 'Covid-Pause' physical work re-started on site in July. Already five work packs have been completed:

- Replacement of the Effluent Treatment Plant building ventilation plant room roof.
- Town's Main Water improvements to reduce and rationalise the system in accordance with modern standards. Further phases also planned.
- Drain gully repairs across the site.
- Installation of new air conditioning units in Channel View building.
- Layout and welfare improvements to the Security Reception building.

3. STAFFING

As at the end of September 2020, there were 124.42 full time equivalent (FTE) members of staff at Dungeness A Site. There are also an additional 37 FTE who have a central role but are based at Dungeness A.

- There are 47.93 agency supplied workers and 28 individuals employed through framework agreements or as contract supplied workers.
- The number of contractors fluctuates according to the work being undertaken.
- Since the last report to 31 December 2019, there have been seven leavers (including retirements and transfers to other sites).

4. COMMUNITY RELATIONS

2019/20

Magnox receives funding from the Nuclear Decommissioning Authority to support socio-economic schemes across the 12 Magnox sites it manages. Last year (2019/20), Magnox awarded £1,012,536 to a variety of projects across the estate.

At Dungeness seven applications received a total of £5,669 of Good Neighbour level funding.

Organisation	Funding awarded	Description/outcome
Romney Marsh Responders	£828	Purchase of new CPR Manikins
Turn the Tide Festival	£1,000	Arts based workshops and performances as well as sporting events in Dymchurch.
South Kent MIND	£699	Mobile IT equipment for Wellbeing Activity Coordinator to enable support for people on the Marsh
Romney Marsh Community Church	£891	Pulse Youth Club – traditional games and electronic gaming to create competitions
Light Up New Romney Community Lantern Parade	£300	Lantern making materials for workshops
Hamstreet School Association	£952	Purchase of outdoor learning and play equipment
New Romney Town Council	£999	Purchase and installation of bespoke anti-vandal town bench featuring heritage crest.
Total	£5,669	

During the Covid-19 pandemic, Magnox made available £300,000 in total to the 12 local authorities where a Magnox site is located. The £25,000 allocated per site was to support the many community groups that are carrying out positive work with the most vulnerable in their areas and to help organisations deal with the pandemic wherever possible. The funding was distributed through the local authority to the Romney Marsh Community Hub in New Romney which supports the Romney Marsh area. £13,500 of support has been released so far to buy food for local Foodbanks and PPE for volunteers amongst other things. There is still £11,500 of support available to Folkestone and Hythe District Council to apply for.

Magnox also released as much PPE as was possible to help the local communities (over 130,000 items); Dungeness was no exception with PPE and other equipment being distributed to the William Harvey Hospital, the Romney Marsh Community Hub and Air Ambulance Kent Surrey Sussex.



PPE and other goods ready for despatch from Dungeness A

Back in 2016, Magnox contributed £40,000 towards a feasibility study of Mountfield Road Industrial Estate, New Romney to look at its development potential. The initial study, led by Folkestone and Hythe District Council (F&HDC), considered a 5-10 year timeframe and created a masterplan. Following consultation, a way forward was agreed and successful bids and applications made to F&HDC and East Kent Spatial Development Company to contribute £735,000 each towards the £2.2m project to build a business centre. Following this commitment, a successful application was made to the NDA who provided the remaining £705,238 to meet the funding target. The work has been out to tender and a contractor appointed to start construction on-site in December. The ambitious scheme will see construction of a business centre to help diversify the local employment offer.

Based on this commitment, F&HDC have successfully applied for £3.5 million from the Government's Getting Building Fund towards the £5m required to service five hectares of employment land for business expansion and consolidation. This funding focuses on encouraging construction projects that support economic recovery and lead to improvements in skills, jobs or infrastructure in parts of the country facing major economic challenges.

Overall, this £7.2m project, to be delivered by March 2022 will see the construction of a new business centre and unlock six hectares of employment land in New Romney to benefit the Romney Marsh as envisaged in the site masterplan supported originally.

Soc-ec Support 2020/21

Since the 1 April, Jam on the Marsh has received £2,000 towards their virtual festival this year; the funding went to support a local individual apply his training and qualifications in filming and editing to support the programme of virtual events. The impact of the pandemic made his involvement and contribution even more important and the quality of his work was visible in the concerts that were aired on social media.

There are a few other applications in the pipeline but yet to be finalised.

In May, Magnox issued its annual infographic round up of funding support for 2019/20:

<https://www.gov.uk/government/publications/summary-of-socio-economic-funding-201920>.

In July, the NDA published the latest version of its local social and economic impact strategy for 2020. The strategy outlines the current approach to socio-economics and includes a consolidated view of improvements and amendments made over the last few years with the launch of the new grant funding scheme – which is similar in principle to the previous Magnox criteria for good Neighbour level applications (up to £1,000) with the Small applications including those up to £10,000. The next level (Medium) is £10,000 to £200,000 where the application form has additional requirements and any potential applications over £200,000 need to be discussed first with Haf Morris: haf.e.morris@magnoxsites.com or tel: 01712799820 (currently working from home). This information along with the NDA Strategy and Guidelines is available at: <https://www.gov.uk/government/collections/magnox-working-with-our-communities>

More recently we issued the Magnox Socio-economic Plan 2016-20(Interim) which takes a look back at Socio-economic support provided over several years broad plans for the coming 12 months or so. To view please go to: <https://www.gov.uk/government/publications/magnox-socio-economic-plan-2016-21-interim>

For further information or to discuss a potential application please contact Haf Morris.