



**DUNGENESS A SITE AND B POWER STATION
SITE STAKEHOLDER GROUP ANNUAL GENERAL MEETING
WEDNESDAY 18 MAY AT 0930 HRS
VENUE: LYDD GOLF COURSE, ROMNEY ROAD,
ROMNEY MARSH, TN29 9LS**

AGENDA

- I INTRODUCTION
- II APOLOGIES FOR ABSENCE
- III TO APPROVE THE MINUTES
- IV CORRESPONDENCE
- V MATTERS ARISING– GEORGE SMYTHE, SSG CHAIRMAN
- VI COMMENTS OR QUESTIONS REGARDING DUNGENESS B's STATION
DIRECTOR'S REPORT – JOHN BENN, STATION DIRECTOR
- VII COMMENTS OR QUESTIONS REGARDING DUNGENESS A's CLOSURE
DIRECTOR'S REPORT – IAN CUTHBERT, SITE DIRECTOR
- VIII COMMENTS OR QUESTIONS ON ONR REPORT FOR DUNGENESS A – JOHN
ROGERS, ONR INSPECTOR
- IX COMMENTS OR QUESTIONS ON ONR REPORT FOR DUNGENESS B –
JASON CROOK, ONR INSPECTOR
- X COMMENTS OR QUESTIONS ON ENVIRONMENTAL UPDATE FOR
DUNGENESS A AND DUNGENESS B – PHIL FAHEY, EA INSPECTOR, DUN
A, EDDIE OSONDU, EA INSPECTOR, DUN B
- XI NDA UPDATE – SIMON NAPPER, NDA
- XII NULEAF AND SMR UP-DATE – DAVID GODFREY
- XIII SOCIO-ECONOMIC UPDATE – GEORGE SMYTHE, SSG CHAIRMAN
- XIV CHAIRS UPDATE – GEORGE SMYTHE, SSG CHAIRMAN
- XV ELECTION OF CHAIR AND DEPUTY CHAIR
- XVI ANY OTHER BUSINESS
- XVII DATE AND TIME OF NEXT MEETING – TBA



Site Stakeholder Group

**DUNGENESS A SITE AND B POWER STATION
DUNGENESS SITE STAKEHOLDER GROUP MEETING
VIA ZOOM
WEDNESDAY 24 NOVEMBER 2021**

Attendance:

Mr J Benn	-	Station Director, Dungeness B
Cllr M Burgess	-	Ashford Borough Council
Cllr P Coe	-	New Romney Town Council
Mr I Cuthbert	-	Magnox Site Director, Dungeness A
Ms R De Dios Fisher	-	Magnox, Dungeness A
Mr P Fahey	-	EA Inspector, Dungeness A
Mrs T Finn	-	SSG Secretariat
Mr C Frears	-	Office for Nuclear Regulation (ONR)
Cllr D Godfrey	-	Deputy SSG Chairman
Mr J Goodsell	-	SJC Dungeness A
Cllr C Hoggart	-	Rother District Council
Cllr J Jones	-	Lydd Town Council
Mr S Kirsopp	-	ONR Inspector
Mr R Lavender	-	Kent Invicta Chamber of Commerce
Mrs E Vaughan Lewis	-	Magnox Communications
Ms K Masters	-	For DNA Site Director
Mr J McNamara	-	Nuclear Decommissioning Authority
Mr E Osondu	-	Environment Agency
Mr M Pardo	-	Communications, EDF
Mrs A Prentice	-	EDF, Dungeness B
Ms K Ramsden	-	Magnox Communications
Mr J Rogers	-	ONR Inspector, Dungeness A
Mr J Royal-Simpson	-	Affinity Water
Col G Smythe	-	Independent Chairman
Mr C Wells	-	Magnox
Mrs S Bowie-Wooler	-	Minute Taker

I INTRODUCTION

- 3834 Chairman opened the meeting and highlighted the recent announcements and changes that have taken place since the last meeting. Chairman has explained that a considerable amount of work has taken place to the constitution of the Dungeness SSG, and the distribution of comms and attendance at the meeting. The chairs of all SSGs are meeting on 5 December to finalise changes to the constitution across all sites.

II APOLOGIES FOR ABSENCE

- 3835 Apologies have been received from Cllr T Hill and Cllr C Goddard

III TO APPROVE THE MINUTES

- 3836 Minutes of meeting 29 June 2021 accepted as a true reflection
Minutes of extraordinary meeting 28 September 2021 accepted as a true reflection

IV CORRESPONDENCE

- 3837 There has been a large amount of correspondence produced since the last meeting. Col. Smythe explained that all the correspondence had been sent to members via email. Col Smythe has asked if they needed to be resent, requests to be made to Tracey Finn.

29 July, a brief was sent by the Environmental Agency asking for views on Fusion. Chairman spoke to the coordinator at Folkestone and Hythe Council and the views were as a Fusion Plant cannot be placed at Dungeness, the council did not feel as if they are in the position to comment on this. . The brief on fusion in June 2021 was given by UKAEA the UK atomic energy authority not the EA – (Environment Agency) so they couldn't give feedback.

V MATTERS ARISING – GEORGE SMYTHE

- 3838 None

VI COMMENTS OR QUESTIONS REGARDING DUNGENESS A'S CLOSURE DIRECTOR'S REPORT – KELLY MASTERS, ENVIRONMENT, HEALTH & SAFETY, SECURITY AND QUALITY MANAGER, DUNGENESS A

- 3839 Kelly Masters attended in place of Ian Cuthbert (Dungeness A, Site Director), delivered the presentation, and highlighted the following points.

Safety and Compliance

- Site now has exceeded 2,016 days since a last time accident occurred (as of 17/11/2021)
- There has been raised site awareness of the new approach road speed camera installed.
- Covid Guidance has been reiterated to all teams, and the expectation that all on-site staff are to test at least once a week.
- Recent site-safety/well-being campaigns have focused on transport, winter safety and mental health.

Future Focus

- A and B sites are co-operating following the government's announcement on arrangements for decommissioning EDF Energy's Advanced Gas-cooled Reactors

fleet. Site Directors have already begun initial meetings regarding collaborative working.

- Dungeness A is in discussion with Environment Agency about reducing the site environmental programme – this is to rationalise the number and location of samples, taking into account the current discharges from the site. Continued monitoring of discharges will continue to assess environmental impact and to look for trends.

Dungeness Sustainability Group

- Established to support Magnox sustainability strategy, the group are currently in their engage and prepare phase.
- The Group is looking to engage the local community and develop local suppliers and locally sourced workforce. Developing a sustainable approach for the long-term work programme.
- Achievements include:
 - Waste projects included sustainability requirements in contract specifications for waste facilities.
 - Incorporating sustainability requirements into boilers and ancillary plant removal project
 - Campaign to minimise printing at site and using digital documents where possible.
 - Lower power usage lights have been installed in Channel View.

Plant & Structures / Asset care update

- Asset care projects have allocated funding to progress 23 planned projects.
- Five more projects (including upgrades to site buildings and car parks) have been identified.
- Initial 23 have been highest priority works to maintain condition of the site. This includes upgrading site assets, provision of additional welfare facilities/improvements to existing facilities.
- Completed work to electrical system – enabling boilers removal project
- Installation of temporary roofs in boiler annexes. This will prevent further degradation to the annexes and prevent ingress of rainwater to site.
- Town's water main upgrades – around 3,000 dead ends and legs have been disconnected.
- The Channel View building has been refurbished and now in use, showcasing a smarter working approach.

Ponds programme update:

- Significant milestones for the ponds programme have been reached:
 - Remaining sludge in reactor one ponds have been transferred
 - Clean down of reactor one flasks loading bay has progressed, removal and cutting up of equipment used for sludge/water transfers has been completed.
- The programme is now moving into phase 2, which will include deplant, size reduction and waste processing of internal pipework and pumps etc.

Magnox Socio-economics – Update

- Romney Marsh Business Hub development official opening will be 7 December 2021
- The Good Neighbourhood fund 2021/2022
 - One good cause already supported
 - Two more applications are in process

The good neighbourhood fund will fund up to £1,000, and funding is available for larger scale projects. Further information can be found via

3840 Kelly invited questions from the SSG:

Chairman confirmed boiler removal will be covered in the presentation later on in the meeting.

Chairman asked if the meeting between the Site Directors was around the technical aspects of decommissioning, or the longer-term plan?

John Benn answered: John confirmed that this is due to Magnox being the preferred supplier for decommissioning and they are looking at the ways they can work together. Meeting to take place in Quarter 1 of next year. This is a positive step forward, and the SSG will be informed when the plan has been decided.

Phil Fahey: We would like to see the sites begin to work together at an early stage, Dungeness B can learn from Dungeness A and we welcome the involvement of all stakeholders. The Environment Agency would agree any changes in the programme as appropriate.

VII COMMENTS OR QUESTIONS REGARDING DUNGENESS B STATION DIRECTOR'S REPORTS – JOHN BENN, STATION DIRECTOR

3841 John Benn thanked the SSG for facilitating the move of the meeting. John Benn delivered his report verbally and highlighted the following points:

- No significant radiological or industrial safety events, only event this year was the slip reported in Feb 2021. This is a testament to the safety performance of the site, and Dungeness are leading in the fleet for safety on a number of metrics.
- Issues controlling the boiler feedwater, through further analysis of the results from tests carried in May 2021. The boiler water purity is extremely important, we fell short at the standards. EDF are working with the regulator to rectify this, there was no risk to the public. Robust action plan has been agreed and will be submitted to ONR and remedial works will be made.
- Good progress is being made towards defueling the site, good progress has been made with the safety case and commitment has been made to government that the site will be defueled by June 2023.
- A number of high-level visits have been made to the site, these have included NLF trustees, Exec and the BBC. It has been a great opportunity to showcase the work that has taken place since June 2021.
- There will be a large, planned outage at Dungeness, there is a circa of £35m of funding, this will lead the site into defueling. All new fuel has been packaged and sent off to the designated sites.
- EDF are looking at their asset management, and a new office has been opened at Eureka Park as it was deemed more cost effect to lease the site for 7 years.
- A new season of beach feeding will commence for 19 weeks, EDF are in contact with local stakeholders to ensure that we are maintaining our sea defences.

John showed slides showing updates of the works that have been discussed in previous meetings include safe transit ways across the sites, upgrading of the Additional Feed Systems and Boiler Lifetime works (new building and controls).

Staff consultation is taking place around the Dungeness B Visitor Centre, this may not reopen, and all options are being considered.

3842 John invited questions from the SSG
No questions raised.

VII COMMENTS OR QUESTIONS ON ONR REPORT FOR DUNGENESS A – JOHN ROGERS, ONR INSPECTOR

3843 John Rogers delivered his presentation verbally and highlighted the following points:

Two inspections have been carried out, one on licence condition 7 (investigation and reporting of incidents on site). Dungeness A has always had a good history of reporting and investigating industries. The recent investigation was given an amber rating and formal improvements have been requested, the site was aware, and Kelly had put together an OUF improvement plan. LC 19 to 22, inspection to look at modifications including the boiler removal project and no issues were found and a green rating was issued.

- Pond skips, a number of sites including Dungeness A were to transport their skips to Hinkley for long term storage. This has not happened, and the planning permission for storage was refused. Magnox have been looking for a way forward, and sampling needs to take place to gain a better understanding of the radiological characterisation. There was a request for a large number of samples, Magnox raised the concern around the high-level risk associated with this. The ONR are working with Magnox to ensure that sampling takes place and there is an internal investigation taking place on how this situation has come about. There is a large amount of high dose waste at Dungeness and the ONR will keep the SSG up to date on the progress on this project.
- General tidiness of site, there has been a dramatic improvement of general tidiness of site. Improvement works are being made to the welfare facilities such as office, and the work Ian and his team have put in is beginning to bear fruit.

3844 John invited questions from the SSG
No questions raised

IX COMMENTS OR QUESTIONS ON ONR REPORT FOR DUNGENESS B – STEPHEN KIRSOPP, ONR INSPECTOR

3845 Stephen delivered his report verbally and highlighted the following:

- Apologised to the SSG for reports not been received, and these will be forwarded onto the SSG Secretariat.
- Q2 Highlights:
 - Compliance inspections took place – LC11, LC9 and LC10 during this period, the Deputy Chief Inspector attended. The inspections were all rated green, and this evidenced a positive demonstration of the site's responsiveness against these licence conditions.
- Q3 Highlights:
 - LC 6 and LC 23 – archiving and documentation, rated green
 - Health and Safety inspection, carried out by a specialist inspector. Looked at Working at Height and Control of Substances Hazardous to Health (COSHH) – rated green
 - As John mentioned earlier in the meeting, the loss of water chemistry controls was formally reported to the ONR. As a consequence, we undertook preliminary enquiries to gain a better understanding of what occurred and we became aware that there was a significant shortfall in licence conditions LC17, LC 23, LC24 and LC28. The ONR management model was implemented, a direction was issued to the station under LC15 which required the station to review the management of this and the report is due on 1st December. The station has responded well and have been proactive in accepting the ONR findings.

3846 Stephen invited questions from the SSG

X COMMENTS OR QUESTIONS ON ENVIRONMENTAL UPDATES – PHIL FAHEY, EA INSPECTOR, DUNGENESS A AND EDDIE OSONDU EA INSPECTOR, DUNGENESS B

3847 Phil Fahey delivered a presentation and highlighted the following points:

- There have been a number of interactions between the EA and Dungeness A in recent months, including various aspects of aqueous waste, gaseous waste plant and the ILW skips in conjunction with the ONR. The EA are looking at how the site is making environmental improvements as well as compliance with the permits. The EA are happy with the implementation of the Sustainability in projects at site. We are awaiting for reports from the Operator as outlined in our report. Various Inspections have taken place over the last few months, also outlined in the report. The Operator is due to complete their waste management plan and site wide environmental safety case in line with the GRR (Management of radioactive waste from decommissioning of nuclear sites: Guidance on Requirements for Release from Radioactive Substances Regulation) by end of 2023.

3848 Phil invited questions from the SSG

- Chairman asked, confusion around the skips and we were under the impression these would go to Hinkley. Will these be stored on site and will this affect Dungeness B. Phil: The skips stored on site need to have further work on their characterisation as outlined in our report. The skips will be stored appropriately until this characterisation is complete. Kelly Masters: We will pick the optimum disposal route following the characterisation.

3849 Eddie Osondu delivered his presentation for Dungeness B

Eddie delivered his presentation verbally and highlighted the following points:

- During the period under review, we conducted 2 inspections and attended the Annual Review of Safety (ARoS). In July 2021 we inspected the Environmental Monitoring Programme (EMP). Dungeness B undertakes the monitoring, sampling and some analyses for both sites. Objectives were to investigate factors behind Dungeness B not reporting Q1 2021 herbage sample results from the Dengemarsh sampling location, discuss potential changes to the EMP following the 2019 Habits Survey and to review the station's monitoring/sampling/analyses approach. We did not identify any permit non-compliances during the inspection.
- We recommended that Environmental Safety Group update the station's EMP taking into consideration changes identified in the latest Habits Survey Report. This will be submitted to the EA for review by 31 March 2022.
- In October 2021, we conducted an Asset Management inspection focusing on the Active Effluent Water Treatment Plant (AEWTP), Gaseous Sampling Cubicles and the Heating & Ventilation (H&V) Plant.. Aim of this inspection was to check that adequate arrangements are in place to maintain the above plants in good repair before, during and after the defueling period. We did not identify any permit breaches. We found that significant ongoing investment was being made to ensure plant and equipment remain in good repair.
- In the latest RIFE (Radioactivity in Food and the Environment) Report for 2020 the total radiation dose to the public within the vicinity of Dungeness A and B as a result of discharges and radiation shine was very low at 0.012 mSv. This is approximately 1% Government dose limit of 1mSv per year. Further information can be found in the EA report and in the RIFE report (link below)

3850 Eddie invited questions from the SSG
No questions asked

XI NDA UPDATE – JOHN MCNAMARA, NDA

John delivered his presentation and highlighted the following points:

3851 Covid-19 Update

- NDA staff are still working at home, there is a progressive managed return to the office taking place. The NDA will continue to adopt a hybrid mix of home and office working. The stakeholder groups are still being consulted on how we continue to respond to the Covid-19 situation and how we engage with external stakeholders.

NDA Sustainability report

- The first NDA Sustainability report was published on 8th March 2020 and was aimed at:
 - Investing in people, communities & protecting the environment for the longer term.
 - Identifying key opportunities and projects to improve sustainability across the NDA group.
 - NDA Group supported participation at the recent COP26 meetings (<https://ukcop26.org/>) and are working to achieve the net zero target.
- <https://www.gov.uk/government/publications/nda-sustainability-report-financial-year-april-2020-to-march-2021>

Mission Progress Report

- Published on 4 November
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/814660/Mission_Progress_Report_July_2019.pdf
- The report demonstrates how much progress has been made in our mission since 2005, and how much further is left to go over the next 120+ years.
- Progress and goals have been aligned with those in strategy 4, published in March 2021. <https://www.gov.uk/government/publications/nuclear-decommissioning-authority-strategy-effective-from-march-2021>

Nuclear Waste Services

- NDA's waste division on target to launch 31st January 2022, bringing together LLWR and RWM under a common executive team. It will be known as the Nuclear Waste Services (logo and identity still in development)
- Day-to-day work for majority of employees will remain unchanged and the departments and functions will be integrated following the launch. The new executive team do not take up positions until 31st January 2022.

NDA to decommission Advanced Gas Reactors

- The NDA have been directed by government to take on future ownership of seven EDF AGR sites for decommissioning.
- Magnox Ltd will be responsible for decommissioning the seven sites following the defueling of the seven sites including Dungeness B.
- This is a testament to the skills, knowledge and experience in the NDA group – and government confidence in NDA's capability to deliver the expectations set by government.

Theddlethorpe Working Group / Mid Copeland Community Partnership

- RWM welcomes the formation of the Theddlethorpe Working Group, providing the platform for starting local discussions on the possible siting of a geological disposal facility (GDF)
- Marks the starting point in an exploratory, fact-finding and discussion process.
- The Mid-Copeland Community partnership has been formed and brings in the opportunity for further discussions within the local community.

Personnel changes

- Jamie Reed joined the NDA this week to become director for Social Impact
- Dr Sam Harris has joined the NDA as Head of Government Affairs
- Jonathan Jenkins will join BEIS, Simon Napper from RWM will be his replacement moving forward.
- Gillian Elliot joins the Stakeholder team from her current role at Cumbria County Council.

NDA Supply Chain Event

- New date 3 February at The International Centre, Telford. This was originally planned for June 2020 and was postponed due to the Covid-19 Pandemic. This will be the largest supply chain event in Europe with 1,700 visitors and over 300 suppliers.

NDA – “Keeping the conversation going”

- NDA Stakeholder event took place on 26 November, this was an invite only event and all SSG members were welcome. Virtual conference where stakeholders can ask live questions and hear panels on a live streaming platform.

3852 John invited questions from the SSG

David Godfrey asked if the Mid-Copeland Community Partnership are accessing the funds that are available now that they are in the next stage of the process?

John McNamara: They are, now that they have moved into the Community Partnership stage the local authority is now involved. The Community Partnership will now work with the RWM to identify suitability. There should be a second set up before Christmas and a third set up after. Further updates will be provided, the RWM are receiving further interest from other areas.

XII TURBINE HALL INFILL PROJECT UPDATE – ROSANNA DE DIOS FISHER, SAFETY AND ENVIRONMENT ENGINEER

3853 Rosanna delivered her presentation and highlighted the following points:

- Project goals are:
 - To meet an environmentally suitable end state which is in compliance with the site’s environmental statement.
 - To provide a stable and level lay down area for future decommissioning works.
- Recap of Project
 - The site is partially infilled with demolition material in 2015
 - Magnox carried out a number of assessments to identify the best solution and to demonstrate the suitability of leaving the demolition material in situ. Magnox presented this proposal at the SSG in February 2021.
- Project Progress
 - A groundwater monitoring regime has been agreed with the EA and is under development.
 - Potential sources of infill material have been identified and Environmental Impact Assessment is ongoing. Magnox have engaged with the Local Authority in preparation for beginning a planning application.
- Project Review – Importing material by sea
 - A decision was made not to import material by sea due to:
 - Disruption of the SSSI
 - Disruption of public access to Dungeness beach and right of way

- High potential for increase dust levels
- Water management issues
- High cost of infrastructure for a relatively small project
- Difficult to check material meets acceptance criteria
- Significant and not straightforward permissioning.
- Next Steps
 - Submit preliminary planning enquiry and EIA Screening to Folkestone and Hythe District Council
 - Engage contractor for design and fill phases
 - Implement groundwater monitoring regime and groundwater contingency arrangements
 - Aiming to begin on site preparation works in August 2022 and importing materials by September 2022. Project completion planned for February 2022.

3854 Rosanna asked for questions from the SSG

The chairman asked if there was a possibility for this to be brought in by rail to prevent further traffic in the surrounding community.

Rosanna: We did investigate this, as Dungeness B would also be using this rail line. We are continuing to consider further options on this, as it may limit where we can get the materials from.

3855 John Benn: I would consider the infrastructure required to modify the rail head, would be too great to be effective to move. It would need a fairly significant investment and could affect the Dungeness B defueling programme.

3856 Phil Fahey: I wanted to provide a background, and this matter is detailed in my report. As Rosanna has described the Operator will leave this in situ and further materials put on top to support the crane. Magnox has proven to the EA's satisfaction that this is the best option moving forward. The EA will formulate a regulatory position statement. Although we are not 100% happy we feel that this is the best option moving forward. We are considering consulting with Natural England to produce the position statement. Since the meeting we contacted NE for their view.

5857 Chris Frears: Is the Environmental Impact assessment a statutory requirement?

Rosanna De Dios Fisher: We have not completed the screening, so we are not able to answer that question now. We are using the EIA, regardless of the screening for our assurance. The first step on our route to planning is to submit a pre planning letter to F&HDC. We are carrying out a number of works to ensure this is assessed to ensure this is mitigated correctly.

Rosanna will return to a future meeting to answer any concerns and queries that may not be answered following on from her presentation in today's meeting.

XIII SMALL MODULAR REACTORS – CLLR DAVID GODFREY

3858 The Chairman gave background to the need for this report, due to recent information provided to by the Folkestone and Hythe MP Damian Collins. The Chairman asked David to prepare an update on how the Small Modular Reactors could benefit Dungeness.

David delivered his report verbally and highlighted the following points:

- Damian and Vice Chair met with Rolls Royce a number of years ago, net zero has put SMRs firmly in agenda for moving forward. The government has commissioned Rolls Royce to investigate potential sites.
- It is very early days, and F&HDC support Damian's wish to have these and Vice Chair will bring further information when this is available.

- 3859 John McNamara offered his comments. BEIS would instruct the NDA to sell land to private developers if this in line with the government's plans. The NDA would work with local communities to identify the suitability of the land and will be guided by BEIS.
- 3860 Richard Lavender offered his comments. This subject has been raised by the business community as part of the Kent Invicta Chamber of Commerce. Recently provided a briefing to the CEO on what SMRs are and how these could be beneficial for the area. Majority of MPs are in support of this project and so are local businesses.
- 3861 John Benn informed the SSG that there a number of interviews online which detail further information on site selection and where SMRs could be deployed. There is no mention of specific sites and Dungeness has not been selected as of this moment.

XIV SOCIO-ECONOMIC UPDATE – GEORGE SMYTHE, SSG CHAIRMAN

- 3862 This was covered in the Dungeness A report. A sub-group committee meeting took place in the middle of the week to progress projects.

The good neighbourhood fund will fund up to £1,000, and funding is available for larger scale projects. Further information can be found via

<https://www.gov.uk/government/collections/magnox-working-with-our-communities>

XV CHAIRS UPDATE – GEORGE SMYTHE, SSG CHAIRMAN

- 3863** The Chairman has announced his intention to stand down as of the next AGM meeting. The Chairman has asked for SSG members to inform him if they would like to nominate themselves for the position.

The SSG thanked the Chairman for his service over the years.

Chairman thanked the SSG for their attendance.

XVI ANY OTHER BUSINESS

- 3864 None raised

XVII DATE AND TIME OF NEXT MEETING – Tuesday 29 March – Special SSG meeting and Wednesday 18 May Annual General Meeting of the Dungeness SSG



**DUNGENESS A SITE AND B POWER STATION
EXTRA ORDINARY DUNGENESS SITE STAKEHOLDER GROUP MEETING
TUESDAY 29 MARCH 2022**

ATTENDANCE:

George Smythe	Chairman
David Godfrey	Deputy Chair
Shannon Bowie-Wooler	Minute taker
Ian Cuthbert	Magnox Dungeness A Site Director
Kirsty Ramsden	Magnox Regional Comms Lead
John Rogers	Office for Nuclear Regulation
Phil Fahey	Environment Agency
Robert Jones	Lydd Town Council
Kim Rye	Lydd Town Council
Jon Plaine	Local Resident
Elaine Plaine	Local Resident
Linda Marsh	Folkestone & Hythe District Council / Romney Marsh Partnership
Mick Burgess	Ashford Borough Council
Peter Coe	New Romney Town Council
Nicola James	Local Resident
Richard Lavendar	KICC
John Benn	EDF Dungeness B Site Director
Matthew Pardo	EDF Dungeness B Site Communications

I INTRODUCTION

- 3796 Ian Cuthbert, Site Director for Dungeness A, welcomed the SSG to today's extraordinary meeting, and explained that the meeting will detail the upcoming changes to the skyline and site of Dungeness A.

Agenda for today's meeting will include

- Share a video of the work ahead
- Outline what may be seen and heard during the next year
- Talk about commitment to the local community
- Provide an opportunity for the SSG members to ask questions

Ian confirmed the housekeeping for the site including visitor safety; Covid-19 precautions and appropriate PPE.

II PRESENTATION

Ian delivered his presentation and highlighted the following points:

Recent Storm Damage (February 2022)

- The site was damaged during the storms, including damage to the cladding on the reactor 2 building.
- The site is working through the recovery phase ensuring that safety is the number one priority.
- Ian gave personal thanks to the wider community and the Magnox workforce.

Dungeness A Overview

- The site reliably and safely generated energy from 1965 to 2006, decommissioning commenced in 2007. Defueling completed by 2012.
- Demolition works for the turbine hall were completed in 2015, ponds draining programme completed in 2019.
- Removal of intermediate level waste resin and bulk asbestos completed in 2020 and 2021 respectively.

Plans for 2022

Ian presented the SSG with a detailed video capturing the plan. Ian confirmed that this is an indicative idea on how the boilers will be removed. This will be presented to the NDA and Executive teams to secure funding to carry out the works.

Physical works required to progress with decommissioning include

- Erection of buildings to support decommissioning
- Infill of turbine hall to be carried out
- Improvements to car park and welfare facilities

Boilers and ancillary plant removal – project benefits

- Fully addresses the plant degradation issues

- Removes 145,500m³ of buildings, representing 33% of the total building structures at Dungeness
- Removes > 7,170 tonnes of steel, 131km of cable and 17,865 tonnes of reinforced concrete
- Delivers the scope required to achieve the LC 35 milestone, remove annexes, boilers and re-instate the weather envelope
- Creates sustainable socio-economic benefits for local community
- Develops large-scale demolition and boiler removal techniques applicable to other Magnox sites and growth of UK nuclear decommissioning supply chain capability

Waste projects – waste enablers

- Ductile cast iron container (DCIC) paint shop relocation:
 - Crane installed and commissioned. This will be the UK's largest crane and will attract both local and national interest
 - Handover to waste operations team to take place this month

New intermediate level waste facility buildings:

- Contract placed for design and build of three buildings
- Design authority review is expected July/August 2022
- Construction expected to be completed June/July 2023
- This project is a pre-requisite to boiler removal project so facilities currently in demolition zone can be vacated by June 2023

Magnox approach – sustainability

- Programme will be delivered in line with Magnox's sustainability goals.
 - Including supporting communities to be sustainable through working with local supply chain and providing employment

Our decommissioning journey

- Safety of Magnox staff and contractors, and the local community is a priority
- This programme of work is an essential part of the decommissioning journey
- Magnox is responsible for the spending of public money and will spend this with safety, sustainability and efficiently at the forefront.
- Work will take place to support the local community through employment, supporting existing supply chain and developing new, local partnerships.

III QUESTIONS

Ian invited questions from the SSG

Chairman: Will the store be a temporary or permanent feature?

Ian Cuthbert: This will initially be a temporary store, built for the day-to-day storage of waste. This will be shared between both Dungeness A and Dungeness B, until fuel free status has been reached for Dungeness B. This will start the process of sharing facilities until both sites are merged for decommissioning.

David Godfrey: When can we expect the lorries to start delivering the materials?

Ian Cuthbert: The concrete delivery can be expected this week, and the majority will be here by April / May, rest to arrive by November.

David Godfrey: Has any consideration been made for the additional pressure on Hammonds corner?

Ian Cuthbert: We will need to await the tender process, as we understand this will be an issue.

Linda Marsh: Regarding the 30 vacancies, the RMP are organising a local skills event in July.

Ian Cuthbert: I will pass that information over, as we are keen to work with local people.

IV ANY OTHER BUSINESS

The Chairman took the opportunity to discuss his plan to step down as SSG Chairman. An email will go out asking for volunteers to step into this role.

This will be discussed at the next main SSG meeting on 18 May 2022.

Meeting closed

V DATE AND TIME OF NEXT MEETING – Annual General Meeting 18 May 2022



May 2022

Dungeness Site Stakeholder Group – EDF report



EDF Energy Nuclear Generation Ltd
EDF Energy, Barnett Way,
Barnwood, Gloucester, GL4 3RS

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Station Director's Message – May 2022

It is now almost a year since EDF announced Dungeness B would enter its defueling phase with immediate effect. A huge amount has happened in that time as our teams onsite have risen to the enormous challenge of steering the station towards the next step of its life, defueling.

Perhaps the most significant matter for us as a team, was the ONR lifting the enhanced regulation status. The regulator put Dungeness B into enhanced regulatory attention in 2018 due to identified shortfalls in the management of plant condition in relation to requirements of the safety case, and underlying shortfalls from expectations of leadership and culture at an operating nuclear power plant.

Since then the team at Dungeness has worked hard to turn things around. In 2019 we launched a performance improvement programme designed to transform the station's business, operational performance and safety culture. Twelve months later we launched Professional To The Core, our fleet leading behavioural improvement programme. And in February this year, ONR issued a letter confirming that Dungeness B could exit enhanced regulatory attention and return to a routine level of attention for safety.

This turn around was no easy feat and the fact it was achieved so quickly is a tribute to the dedication and hard work of TeamDungeness.

Storm Eunice

In February Storm Eunice hit Dungeness hard. However extensive preparatory work, including securing multiple parts of the station, meant that damage was limited.

Defueling

Work continues to prepare Dungeness B's safety case for defueling. As I'm sure you're aware because Dungeness B had planned to operate for several further years, work on development of the station's defueling safety case was not as advanced as some of EDF's other sites.

Usually it takes several years to prepare a station like ours for defueling. Thanks to the determination of those onsite, and the support of our technical colleagues at Barnwood, we remain on course to deliver those preparations and start defueling inside two years. We know it will take the ONR considerable time to assess our safety case but at this point we intend to submit it to the regulator by the autumn.

In February our long planned £37m full pre-defueling outage got underway. Part of this work includes significant work on the fuelling machine. This piece of equipment is what will enable the station to take the nuclear fuel out of the reactors so it is critical that it is in the best possible condition before our defueling works begin.

To prepare for this outage, every member of Team Dungeness was required to complete specific training so we were all as ready as we could be. Work on the fuelling machine started in earnest in April, when we had completed preparatory works and started to embark on the significant technical aspects of the outage. The work continues. Alongside this vital work the teams have also delivered a station wide outage which has seen them undertake major projects on our boilers, on the gas circulators and complete more than 7,000 tasks across the station.

Coronavirus

Over the past months we have continued to be vigilant to the risks of coronavirus. When appropriate we encouraged social distancing and mask wearing, on occasions where distancing could not be maintained, and our careful approach meant we avoided any significant impacts on day-to-day operations.

As restrictions started to be eased earlier in the year we have followed suit. Although our teams are now working largely restriction free we continue to closely monitor the local situation and to take advice from company medical professionals, and colleagues at other stations, to minimise risks where we can.

Beach feeding

Every year the station contracts a company to replenish the bund in front of the station which is shifted by the natural movement of the tides and storms through the year. The 2021/22 season saw the contractors move 19,000m³ of shingle inside 5 months. Planning is underway for the 2022/23 season.

Environmental events

Since the last report to the SSG in October 2021 there have been no environmental events to report.

Safety

We measure our safety performance against industry top tier indicators, including nuclear reportable events, environmental events and staff and contract-partner recordable injuries. There have been no lost time events recorded at Dungeness B since our report in November.

Dungeness B staff meet the Prime Minister



Three Dungeness B staff were called up to fly the flag for our industry at a special meeting with the Prime Minister.

In March Boris Johnson gathered representatives of the UK nuclear industry at Downing Street to discuss the UK's energy future and to understand more about the benefits a career in working in nuclear power can bring. The Prime Minister also asked to meet a number of apprentices from EDF sites.

Rebecca Godden, a fourth year Electrical Maintenance Apprentice from Lydd, Conor Raine, also an Electrical Maintenance Apprentice and from Lydd, and Apprentice Co-ordinator and Maintenance Team Leader Stuart Gallagher all travelled to central London for the event.

The trio did the station, company and industry proud and I'm delighted they had the opportunity represent us at the heart of Government in such a special event.



John Benn
Station Director
May 2022

Environment Agency Report to the Dungeness Site Stakeholder Group

May 2022

Introduction

This report covers our regulation of Dungeness A and B Sites and related environmental matters for the period November 2021 to April 2022.

The Environment Agency's priority remains to protect people and the environment. We have set out how we are doing this across the many areas we regulate, and on which we provide advice and guidance. For example, flood defence, flood warning, environmental sampling, permitting, angling and fisheries, waterways management and billing. Please see our page on GOV.UK (www.gov.uk/government/organisations/environment-agency).

Radioactive Substances Regulation

We regulate radioactive waste disposals through environmental permits that contain limits and conditions aimed at minimising wastes and protecting the environment. We check compliance with the permit by undertaking regular inspections. These are recorded on Compliance Assessment Reports which detail our inspections and any non-compliance(s) found.

On 9th and 10th February 2022, we carried out an inspection at Dungeness A on the radioactive characterisation of the boilers which will feed into the "boilers down" project. We also looked at the characterisation of one of the pond tanks where wet ILW is being retrieved for drying and placing in containers for interim storage at Bradwell.

On March 30th, 2022, we conducted an inspection at Dungeness A jointly with the ONR (Office for Nuclear Regulation) on the damage caused by storm Eunice. We took the opportunity to discuss various other topics whilst at site.

On 22nd-23rd February 2022, we conducted an inspection of the Spent Fuel Storage Ponds at Dungeness B. In addition, we inspected solid radioactive waste management at Dungeness B on 29th March 2022.

We also maintain regular contact with the sites by remote means in addition to formal correspondence and site visits.

Site Regulation

Dungeness A

We are in regular contact, several times during the month with Senior Managers at Dungeness A to ensure that we are kept in touch with progress on decommissioning, progress on actions and recommendations and any emerging issues at the site.

Inspections:

Following our February inspection, we made some recommendations for the boiler characterisation strategy which the Operator will consider. We also saw the progress made with commissioning of the modular active effluent treatment plant. We were due to

see the environmental performance criteria for this plant in practice (see below) but due to delays in commissioning we could not achieve this.

During our visit to site on 30/3/22, we were given a presentation of how the site is looking at sustainability in general using the Magnox framework and in the boilers down project in particular. We judged what the Operator was doing to be good practice.

Storm Eunice.

Following storm Eunice on 18th February 2022 we liaised extensively with the site to understand any environmental impacts from the damage caused. We were happy with the Operator's response. It was reported to us that no contamination areas were affected, and all environmental routines required to ensure compliance were continued. It was also reported to us that ventilation stacks for gaseous radioactive waste were unaffected. Any material blown off site was collected and has since been found to be non-radioactive. We inspected the damage on 30/3/22 with the ONR. There is a Root Cause Investigation (RCI) ongoing by the Operator. We spoke to the RCI team to understand their terms of reference which we were content with. We await their report which we will assess.

Environmental Monitoring Programme (EMP).

We have agreed with the Operator the extent of the EMP following their proposals to reduce the amount of monitoring after the pond drain was completed and the subsequent reduction in aqueous waste discharges. The Operator has agreed with our view that the programme should not be reduced as much as originally proposed (in July 2021).

Aqueous waste discharges and the MAETP.

Dungeness A is preparing to use a new Modular Active Effluent Treatment Plant (MAETP) to meet its ongoing aqueous waste disposal needs and facilitate decommissioning of the existing Active Effluent Pond Water Treatment Plant.

In December 2021 we assessed a proposal by the Operator to define waste acceptance and environmental performance criteria for the MAETP. We think these are generally acceptable and made some further recommendations for the Operator to consider. We will pick up the points we raised in an on-site inspection and will ensure that the arrangements are being complied with.

The Operator had made an application for a permit variation (water discharge permit) to allow water from the turbine hall voids to be discharged to sea and for the aqueous waste originating from the reactor voids to enter a discharge route direct to the surface water drains. Our national permitting service (NPS) issued this variation in December 2021 (see below). We assessed a document regarding the environmental performance criteria for the reactor void water. We wish to ensure there is adequate monitoring in place to prevent any impact to the environment from the use of this route. We discussed the project with the Operator during our meeting at site on 30/3/22. We have some queries on the proposed way forward and we will carry on our discussions with the Operator.

Engagement with the Operator regarding the turbine hall void.

Following our last SSG report we have issued a local enforcement position to allow the pumping of the turbine hall void to stop. At present the voids are pumped by the Operator (as above) to prevent high pH leachate from entering groundwater. This has been the case since the Operator placed rubble into the void following the turbine hall demolition in 2015. The Operator wishes to stop the pumping so the void can be infilled, and a crane be placed in the area to support the "boilers down" project. The Operator has been able to

demonstrate that stopping pumping will have a low environmental impact when all factors are considered.

Our enforcement position will be on the understanding that the environmental impact of stopping the pumping is no more than already anticipated and that there is adequate surveillance and contingency in place. We are also in discussion to ensure that whatever material is used to fill the void does not in itself cause any environmental impact.

Further to this the Operator will need to infill culverts in the turbine hall void which run under the material previously emplaced. The Operator has determined that there is some 3000m³ of water in these culverts that will need pumping out. The Operator has applied for a further variation to the water discharge permit to enable this water to be removed and disposed of (see below). Due to the time for a permit variation to be determined and to allow the project to continue we have issued a further local enforcement position to allow the water in the culverts to be pumped and discharged to sea. We are satisfied that the environmental impact of such a discharge is low.

Joint EA/ONR meetings with the Operator.

We have remote regulatory meetings with the Operator and ONR on a monthly basis. We discuss COVID issues, significant events and learning over the previous month, a brief update on projects/programmes and upcoming Regulator inspections.

Quarterly we have larger strategic meetings (last 9th March 2022) where we discuss future strategies/lifetime plans for the site, waste projects and various decommissioning topics. These meetings ensure the regulators can discuss issues at site together with the Operator.

Other issues.

We continue to liaise with the Operator regarding other projects at site

We were in discussion regarding monitoring of gaseous waste in the low-level active waste (LLAW) plant. We had been informed that the gaseous sampling nozzle in the low-level active waste ventilation plant may not be of the correct dimensions to ensure isokinetic sampling. The probe was upgraded and in March 2022 we assessed an environmental advice note from the Operator which indicated that the upgrade had not made any difference to the measurement of gaseous waste from the LLAW plant, and that sampling had been representative.

We are still in dialogue with the Operator on further characterisation disposability of pond skips in on-site storage (as reported at the last SSG). Magnox are still considering their sampling strategy. We discussed the skips with the Operator at our visit in February 2022. We reviewed a report where Magnox determined that no ILW skips were sent to the low-level waste repository due to any error in characterisation. Our contractors have been looking at this project and in one of their reports to us, they confirmed this.

During our visit in February 2022, we were informed that in January 2022 the Operator performed a comparison of the contents of the nuclear, statutory, and radiological environmental maintenance schedules (REMs) and routines identified as being on the maintenance Schedule in Passport (the maintenance scheduling software). This identified several discrepancies with some entries in Passport not being reflected in the relevant maintenance schedule and some entries in the maintenance schedules not having entries in Passport.

We reviewed an Actual Cause Investigation (ACI) of the reasons behind these discrepancies. The ACI recommended various actions to prevent a recurrence and there were no actual environmental consequences on this occasion. We were satisfied with the conclusions of the ACI and we will check to ensure the Operator implements recommendations outlined in the ACI.

As part of the “boilers down” project we are discussing with the Operator a proposal to leave the drains around the boilers in place whilst the demolition programme goes ahead. We want to be assured that the Operator will revisit the disposal of these drains at a later date and that there will be no unacceptable environmental consequences from leaving the drains for several years. We are in discussion with the Operator about how they wish to proceed under the GRR (Management of radioactive waste from decommissioning of nuclear sites: Guidance on Requirements for Release from Radioactive Substances Regulation, <https://www.sepa.org.uk/media/365893/2018-07-17-grr-publication-v1-0.pdf>).

Dungeness B

Radioactive Substances Regulation

Site Inspections

On the 22nd – 23rd February 2022, we conducted an inspection of the Dungeness B (DNB) Spent Fuel Storage Ponds. This was (in part) a joint inspection with ONR. The aim of the inspection was to assess DNB’s preparedness for the first Defueling Phase with respect to application of Best Available Techniques (BAT) to minimise:

- i. the activity of aqueous radioactive waste discharged into the environment
- ii. volume of radioactive waste disposed of by transfer to other premises

We did not identify any permit non-compliances during the inspection. One of the recommendations we made was for DNB to:

- i. conduct a review of pond water activity concentrations and liquid radioactive waste discharges arising from Defueling activities. The review should also consider the current BAT arrangements to determine whether they will remain applicable during Defueling.

The output from the recommendation above will help us to assess the adequacy of current BAT arrangements and whether it is necessary to vary DNB’s environmental permit in advance of defueling operations. The station has until 12th May 2022 to confirm acceptance of all recommendations outlined in the Ponds inspection report.

On 29th March 2022, we conducted a solid radioactive waste inspection at DNB. The aim of the inspection was to assess the station’s use of BAT to:

- i. minimise the volume of radioactive waste disposed of by transfer to other premises
- ii. characterise, sort and segregate solid radioactive waste to facilitate optimised disposals

We identified a record keeping gap due to a lack of reports describing findings of waste containment inspections completed by DNB during 2021. These inspections are a requirement specified in the station’s solid waste management procedures. However, we could not determine (during our inspection) whether the procedures require DNB to retain the reports of completed waste containment inspections.

We are expecting further information from the station on 12/05/2022. Once received, we will assess whether DNB has breached one or more of its permit conditions. Following this, we will draft the inspection report, and specify actions and/or recommendations for improvement. We will provide an update on our final conclusions at the next SSG meeting.

Events and Enforcement

Dungeness A.

Nothing to report.

Dungeness B

We recorded three CCS4 (Compliance Classification Scheme category 4) permit non-compliances against DNB in March 2022. A CCS4 breach is one that could result in an incident having no or negligible impact on people and the environment.

We identified these permit breaches during our review of DNB's 2021 Q2 Environmental Monitoring Programme (EMP) Returns. The permit conditions breached, with brief descriptions of the non-compliances are as follows:

- i. **4.2.2 (b)**, as specified in the CEAR (Compilation of Environment Agency Requirements) requirement 4.2.2 - Part 2:
 - a) Failure to provide prompt notification of a genuine sediment sample 4-sigma result.
 - b) Reporting of an inaccurate water sample 4-sigma result.
- ii. **1.1.1 (a)**:
 - a) Failure to implement procedures to enable prompt notification of a genuine sediment sample 4-sigma result.
 - b) Failure to implement procedures for prompt and thorough investigation of abnormal results to enable identification of the inaccurate water sample 4-sigma result and to prevent its reporting.
- iii. **2.3.6 (a)**: - Failure to implement adequate arrangements after routine maintenance of the Liquid Scintillation Counter to assure its normal performance for sample analyses necessary to determine compliance with permit conditions.

The station has completed the actions we specified to return to compliance and prevent a recurrence of the above permit breaches.

Annual Review of Safety and Environment

We attended the annual regional review of safety, security and environment held on 10th May 2022. The review was at Sizewell A and covered all 3 sites in the Magnox southeast area (Sizewell A, Bradwell and Dungeness A).

Environmental Permitting

Dungeness A

Radioactive Substances Regulation

Water discharge permit

Our National Permitting Service (NPS) determined an application to add the discharge from the turbine hall void water to the permit and issued a variation to this permit in

December 2021. We previously had determined that this water which is discharged to sea needs to be included. This application also considered the proposal to discharge waste from the reactor voids to the surface water drains (see above).

The Operator has also applied for a further variation to discharge water from the turbine hall culverts to sea (see above).

Dungeness B

Nothing to report

Discharge Reports

Both sites are required to report to us liquid and gaseous discharges to the environment on a monthly basis. Liquid and gaseous discharges from both Dungeness sites remain within the limits set by the Environmental Permits.

Dungeness A

Dungeness A has submitted the gaseous and liquid waste discharge returns required to be reported to us. We have reviewed the discharge returns covering the period of this report and did not identify any unusual or unexplained trends. We continue to monitor all discharge reports.

Dungeness B

Dungeness B has submitted gaseous and liquid waste discharge returns in line with requirements of the environmental permit. We are in the process of reviewing the discharge returns and will update the SSG if we identified any unusual trends.

Environmental Monitoring

The Operators carry out monitoring of various environmental samples at periodic intervals and report the information to us. Dungeness B staff carry out the work on behalf of both sites. The programmes for the two sites are slightly different to reflect the radionuclides that are being discharged, the historical discharges and the operational activities taking place at each site.

Dungeness A

Dungeness A has submitted the Environmental Monitoring returns required to us. We reviewed the environmental monitoring returns for the quarters covered by this report and did not identify any unusual trends.

Dungeness B

Dungeness B has submitted Environmental Monitoring returns in line with requirements of the environmental permit. We are in the process of reviewing the environmental monitoring returns and will update the SSG if we identified any unusual trends.

Further information

Further information on our role in regulating the use of radioactive substances and related activities on nuclear licensed sites can be found on the Environment Agency section of the GOV.UK website (www.gov.uk/topic/environmental-management/nuclear-regulation)

The Environment Agency's Lead Regulator for the Dungeness A site is Phil Fahey. The Environment Agency's Lead Regulator for the Dungeness B site is Eddie Osondu.

Eddie and Phil are Nuclear Regulators and part of the Nuclear Regulation Group South (NRG South) based at the Environment Agency's Wallingford office in Oxfordshire.

NRG South Nuclear Regulators undertake environmental regulation of radioactive substances on nuclear licensed sites in southern England. They work closely with the local Environment Agency teams in those areas as well as external bodies such as the Office for Nuclear Regulation.

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Office for Nuclear Regulation (ONR)

Site Report for Dungeness A

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 Dungeness Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Dungeness Site 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 – 31 March 2022:

Licence Conditions 14 and 15 on 23 February.

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 Dungeness A covered the following:

Licence Condition (LC) 14 – Safety documentation. This planned inspection examined the implementation of the site's arrangements for the production and assessment of safety cases. From the evidence seen the site inspector was satisfied that the arrangements are adequately implemented by suitably qualified and experienced persons. The inspection was rated as Green under the ONR inspection rating guide.

Licence condition (LC) 15 – Periodic review. This planned inspection briefly examined the site's arrangements for the periodic and systematic review and reassessment of safety cases. It was acknowledged that Magnox Ltd have proposed changes to the Company arrangements for LC 15, and until these changes have been formally implemented there was no benefit in inspecting any further. However, as the closure

of all outstanding actions from the previous LC 15 periodic review has been achieved, the site inspector rated the inspection as Green under the ONR inspection rating guide.

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.

The site inspector accompanied an ONR civil engineering specialist inspector with specialist demolition experience to the site on a fact finding visit for the boiler removal project. Feedback was given to the Site Director at the end of the visit.

The site inspector also attended a special SSG meeting and meetings on site covering safety culture, vacancies and recruitment, boiler removal project, and the Magnox Ltd investigation into the recent storm damage of the reactor buildings.

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.

There were no such matters or events of significance during the period.

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.

- No LIs, Enforcement Notices or Enforcement letters were issued during this period.

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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Office for Nuclear Regulation (ONR)

Site Report for Dungeness B

Report for period 1 October to 31 December 2021

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 Dungeness B and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Dungeness B 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 undertook inspections on the following dates during this reporting period of 1 October to 31 December 2021:

- 18 – 21 October 2021
- 2 - 4 November 2021
- 8 - 11 November 2021

Visits made by specialist inspectors

- 18 – 21 October 2021
- 2 - 4 November 2021

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 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.

Compliance Inspections

In this period, routine inspections at Dungeness B covered the following topics:

- Licence Condition (LC) 4- Restrictions on nuclear matter on the site,
- LC 5 - Consignment of nuclear matter
- LC 25 - Operational records.
- LC 32 - Accumulation of Radioactive Waste Compliance Inspection
- LC 7 – Incidents on the site compliance inspection

Compliance inspections

LC 7 – Incidents on the site - (18-21 October 2021)

The purpose of LC 7 is to ensure that the licensee implements adequate arrangements for the proper application of resources, identify immediate corrective actions, identify any operability / reportability concerns to ONR, and identify potential adverse trends and/or repeat occurrences reporting of incidents at station and undertaking adequate investigations to determine root causes.

This inspection was undertaken by the nominated site inspector and observed by a French (ASN) regulator as part of their secondment activities. The inspection targeted the station's LC 7 arrangements relevant to reported incidents, the inspection sampled the following areas

- Apparent Cause Investigation
- Human Evaluation Tool (HUET) investigations
- Effectives reviews (ER)
- Observing a CAP sentencing meeting

In conclusion, the station effectively demonstrated its compliance arrangements against LC 7. Some minor observations were made during the inspection which the site inspector is confident the station will address. The site inspector rated this compliance inspection as GREEN, no further regulatory follow-up required.

LC 32- Accumulation of radioactive waste – (2-4 November 2021)

This inspection focused on the status of radioactive waste management at Dungeness B following the successful closure of a Regulatory Issue in November 2019. ONR sampled the implementation of the station's arrangements for minimising accumulations of radioactive waste generated on the site and for recording the waste so accumulated. Overall, ONR found that the radioactive waste is being managed in accordance with regulatory expectations and the station is delivering against its radioactive waste management plan. The station recognised the importance of maintaining its current performance and the environmental safety group is planning to reinvigorate engagement with operational teams to reinforce good radioactive waste management behaviours and practice.

There remain areas where the arrangements could be strengthened to support and cultivate a waste led culture, which will help to maintain compliance with LC 32. This is particularly important now that the station has stopped generating.

From the evidence sampled, ONR concluded that implementation of the duty holder's arrangements for minimising the accumulation of radioactive waste on the station, and for recording the waste so accumulated, to be adequate, the inspection was therefore rated GREEN.

Joint inspection with ONR Safeguards LC4- Restrictions on nuclear matter on the site, LC5 - Consignment of nuclear matter and LC25 - Operational records. (8-11 November 2021)

The inspection was led by the Dungeness B nominated site inspector and supported by the site improvement inspector. The purpose of the LC 4, 5 and 25 compliance inspections were to ensure that the licensee implements adequate arrangements with respect to the life cycle for a fuel element.

This inspection was also a joint inspection with ONR's Safeguards team as there were several areas which both inspection teams shared a common interest. The Safeguards inspection focused on the station's compliance arrangements against Nuclear Safeguards (EU Exit) Regulations (NSR19).

The compliance inspection targeted the station's LC4, 5 and 25 arrangements relevant for the management of nuclear fuel at site, the inspection sampled the life cycle of a single fuel element considering the following areas:

- Initial arrival at the station,
- Plant visit to the fuel storage facility
- Fuel element reactor core location
- Removal of fuel element
- Returned to Sellafield for disposal/storage
- All associated documentation to the sampled fuel element
- Records Management and inspection of station archive centre
- Staff Training records of responsible persons

For the LC4, 5 and 25 compliance inspections, ONR examined the arrangements for management of nuclear fuel and organisational responsibilities. There was a clear link from the Licensee's arrangements to the station's departmental instructions. The site inspector was satisfied that the licensee's arrangements and their implementation in compliance with LC4, 5 and 25 were suitable and sufficient. No formal actions were considered necessary, the compliance inspection was rated green for each licence condition examined.

System Based Inspections

In addition to our compliance inspections based on the conditions attached to the nuclear site licence, ONR also inspects operating reactors against safety-related systems. Each site has a safety case that demonstrates how it operates safely. For Advanced Gas-cooled Reactors, each of the key systems will be inspected against the claims made upon them by the safety case. The aim is to systematically inspect all the significant safety related systems within a five-year cycle. ONR considers that this will provide additional assurance that operations on the Dungeness site are safe. Each of these system inspections considers the relevant licence conditions below:

- LC 10: Training
- LC 23: Operating rules
- LC 24: Operating instructions
- LC 27: Safety mechanisms
- LC 28: Examination, inspection, maintenance and testing
- LC 34: Leakage and escape of radioactive material and radioactive waste

For this reporting period only one SBI was undertaken.

System Based Inspection (SBI) covering Data Processing & Control System (DPCS) and a Joint Nuclear Safety & Nuclear Security SBI - 18-21 October 2021

This inspection was led by two control and instrumentation (C&I) specialist inspectors and supported by a fault studies specialist inspector. In addition to this SBI, two cyber security and information assurance inspectors undertook a Systems based inspection of the site data processing and control system (DPCS)

The function of DPCS is to provide prompts for operator action (i.e. protection) in conjunction with separate hard wired alarms and indications; and to ensure that in normal operation the plant remains within the operating envelope of the reactor. Through examination of the system, a compliance inspection was performed against the following Licence Conditions (LCs) which are applicable provisions of the Energy Act 2013. Note: LC 34 (Leakage and escape of radioactive material and radioactive waste) which is usually considered during a SBI was not considered applicable to this intervention)

The security aspect of this intervention was conducted under the requirements of the Nuclear Industries Security Regulations (NISR) 2003 and considered if the requirements of the Security Case and Security Operating Procedures had been met, to confirm the application of physical, administrative, procedural and technical security controls specific to the Data Processing and Control System.

With respect to the SBI, ONR judged that overall, the safety provisions applicable to the DPCS met the requirements of the safety case in relation to LCs 10, 23, 24, 27, and 28. However, ONR did not consider that the DPCS met the requirements of the security case. ONR judged that compliance with NISR 2003 and EDF's arrangements in the Nuclear Site Security Plan was not demonstrated in relation to the DPCS. A regulatory issue has been placed upon the duty holder for it to address the shortfalls identified.

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.

Other Work

Annual Review of Safety (ARoS) – (2-4 November 2021)

A team of ONR inspectors attended the Dungeness B Annual Review of Safety for the period April 2020 to March 2021. The review summarised the site's strengths and identified opportunities for improvement. The ARoS was conducted over two half days. The first half day consisted of a plant walk down of the station, followed by a review meeting:

External plant

- Backup Boiler feed water Pump House
- Essential Cooling water System
- Chemical Dosing plant

Internal Plant

- Reactor basement (Pressure Vessel cooling system)
- Plug Unit Maintenance Facility (PUMF)
- Gas Circulator Hall
- Pond's area (C2)

ONR provided feedback to the station regarding the areas visited. The ONR team observed good housekeeping in many areas although there were some areas where there had been some drift in standards. Overall, the plant visit was very informative and demonstrated the station's continual drive to improving standards, behaviours, and expectations.

Safety Representatives Meeting

The site inspector held routine meetings with station safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work. During this reporting period no significant safety issues were raised. The safety representatives provided examples of several positive observations regarding the Operational Focus meeting improvements, Take-5, COVID-19 management and significant progress with the Station's HESAC. However, there are some concerns regarding the deterioration of some buildings, welfare facility issues concerning water supplies and the loss of skills and knowledge management through people leaving.

Intelligence gathering

During this reporting period the site inspector undertook plant visits with several senior leadership team managers. The aim of this was to understand those areas which the station managers had personal interest in or that were a key focus at the time of the site inspector's visit. The site inspector also observed the weekly site excellence tours which are routine station tours undertaken by a mixture of EDF and contract partner personnel which target specific areas of the station to maintain or improve standards at the station. Attending the site excellence tour also enables the site inspector to meet and discuss topical issues with a greater variety of station staff and gain further insights into the station. The site inspector also undertook routine engagement meetings with the station's internal regulator to share intelligence and discuss areas of mutual interest and future inspection planning.

Post generation

ONR continues to engage with the licensee and central technical organisation to understand the work scope for the post generation phase and to develop the regulatory strategy for maintaining adequate oversight of the defuelling preparations and for permissioning the defuelling safety cases.

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.

There were no such matters or events of significance during the period.

Dungeness B is a site in ONR enhanced attention, and we have written before of extensive work with the station over the past two years to encourage and help efforts to improve performance. From the outset, we agreed a set of success criteria including leadership and culture, condition of plant and safety case. We now regard many of these success criteria to have been met, and are planning a safety culture intervention in February 2022 to gather evidence on the rest.

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.

- No LIs, Enforcement Notices or Enforcement letters were issued during this period.

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

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