



**DUNGENESS A SITE AND B POWER STATION
SITE STAKEHOLDER GROUP MEETING
THURSDAY 9 MARCH 2023
AT 1000 HRS, REFRESHMENTS AVAILABLE FROM 0930 HRS
VENUE: WELLNESS CENTRE (VISITOR CENTRE) DUNGENESS B POWER
STATION,
ROMNEY MARSH, TN29 9PX**

AGENDA

- I INTRODUCTION
- II APOLOGIES FOR ABSENCE
- III TO APPROVE THE MINUTES
- IV MATTERS ARISING
- V CORRESPONDENCE
- VI CHAIRMANS REPORT
- VII DUNGENESS A's CLOSURE DIRECTOR'S REPORT – IAN CUTHBERT, SITE DIRECTOR
- VIII DUNGENESS B's STATION DIRECTOR'S REPORT – GAVIN LANCASTER, STATION DIRECTOR
- IX ONR REPORT FOR DUNGENESS A – JOHN ROGERS, ONR INSPECTOR
- X ONR REPORT FOR DUNGENESS B – JASON CROOK, ONR INSPECTOR
- XI ENVIRONMENTAL UPDATE FOR DUNGENESS A AND DUNGENESS B – PHIL FAHEY, EA INSPECTOR, DUN A, EDDIE OSONDU, EA INSPECTOR, DUN B
- XII NDA UPDATE – SIMON NAPPER, NDA
- XIII MAGNOX UPDATE – BILL HAMILTON, DIRECTOR OF EXTERNAL AFFAIRS
- XIV ANY OTHER BUSINESS
- XV DATE AND TIME OF NEXT MEETING – THURSDAY, 22 JUNE 2023

**DUNGENESS A SITE AND B POWER STATION
DUNGENESS SITE STAKEHOLDER GROUP MEETING
VENUE: LYDD GOLF COURSE, ROMNEY ROAD, ROMNEY MARSH TN29 9LS
THURSDAY 17TH NOVEMBER 2022**

Attendance:

Ms M Allardice	-	Environment Agency
Cllr M Burgess	-	Ashford Borough Council
Ms R Cavanagh	-	Communications, Dungeness B
Cllr P Coe	-	New Romney Town Council
Mr J Crook	-	ONR Inspector, Dungeness B
Mr P Fahey	-	EA Inspector, Dungeness A
Mr G Finn	-	Chair
Ms T Finn	-	SSG Secretariat (Outgoing)
Cllr D Godfrey	-	Deputy Chair
Mr B Hamilton	-	Magnox Director of External Affairs
Cllr T Hills	-	Kent County Council
Mr G Lancaster	-	Station Director, Dungeness B
Mr R Lavender	-	Kent Invicta Chamber of Commerce
Ms H Lingham	-	East Kent Hospitals NHS Trust
Mr C Milne	-	Magnox Site Integrator Manager
Mr S Napper	-	NDA
Mr K Obbard	-	Natural England
Mr M Pardo	-	EDF Communications
Ms C Prichard	-	SSG Secretariat (Incoming)
Mr J Rogers	-	ONR Inspector, Dungeness A
Mr P Wilkins	-	Natural England
Ms S Bowie-Wooler	-	Minute Taker

Apologies

Ms A Bamping	-	Natural England
Ms L Barton	-	Lydd Airport Action Group
Mr S Bashford	-	Staff Rep, Dungeness B
Ms C Bruce	-	Dungeness Resident
Mr B Botley	-	Kent Against a Radioactive Environment
Mr I Cuthbert	-	Site Director, Dungeness A
Ms L Marsh	-	Romney Marsh Partnership
Mr E Osondu	-	EA Inspector, Dungeness B
Ms K Ramsden	-	Regional Lead, Magnox Communications
Ms M Stuart	-	Kent Against a Radioactive Environment

I INTRODUCTION

3891 Chairman opened the meeting and welcomed the SSG to today's meeting. Chair ran through the housekeeping for the site.

Chair thanked Cllr George Smythe for the work he did as part of the SSG for the number of years he sat as Chairman.

Chair gave a brief history of experience and connection to the area, and why he has stood as Chairman for the SSG.

Chair introduced new members to the SSG, including Gavin Lancaster as the new Dungeness B Site Director replacing John Benn. Cath Prichard will be taking over from Tracey Finn as the Dungeness Secretariat.

New members to the group include Ken Obbard from Natural England, P Wilkins from Natural England and Ms H Lingham from East Kent Hospitals NHS Foundation Trust.

Chair thanked Tracey Finn for her service as Secretariat to the SSG and wished her a happy retirement.

II APOLOGIES FOR ABSENCE

3892 Apologies to be sent with the approved minutes

III TO APPROVE THE MINUTES

3893 Minutes of meeting May 2022 accepted as a true reflection

IV MATTERS ARISING

3894 The minutes from a previous meeting on the Dungeness A Boiler project gave some points that did not seem to be fully closed out. The Chairman informed the SSG that these should be made clearer in today's A station presentation.

V CORRESPONDENCE

3895 List of correspondence included in meeting packs; can be made available by emailing the SSG Secretariat.

VI CHAIRMAN'S REPORT

3996 Chair highlighted the following points as part of his report:

- Meetings attended:
 - 4th and 5th July, met with the NDA Executive and discussed the strategy moving forward and the NDA four pillars. During this meeting under the NDA Socioeconomics report, the success, and the investment against value of the New Romney Business Hub was highlighted as being very positive.

- Video conference Economic Impact Assessment for Magnox sites, all SSGs chairs were invited, and this document has now been issued. Further information can be found via [Economic impact assessment of Magnox sites, May 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/108442/Economic_impact_assessment_of_Magnox_sites_May_2022.pdf). This report looked at the history of the socioeconomic impact of areas around all Magnox sites. Looking forward the future is within the hands of the SSG and there is plenty of funding available to support the community and a process to be followed to obtain this funding.
- ONR Annual report, Hard Copies available and electronic version can be found via [ONR annual reports](https://www.onr.gov.uk/publications/annual-reports/). Positive statement - Dungeness B Site had been in previous special measures, these have now ended.
- Chair attended Dungeness A and B site tour and discussed the future challenges and planned works.

VII COMMENTS OR QUESTIONS REGARDING DUNGENESS A Site DIRECTOR'S REPORT – CHRIS MILNE, SITE INTEGRATION MANAGER DUNGENESS A SITE

Chris delivered his report verbally and highlighted the following:

3897 Safety and Compliance

Hand injury occurred on site. In response to this:

- Investigation was launched, two-day safety stand-down to talk and listen to our workforce and using feedback from the team, a list of priority safety targets has been developed.
- Continued commitment on a focus on safety and improvement.
- Emergency Services Day was recently held where representatives from all services attended site.

3898 Storm Damage update

- Work has taken place to make the reactor building safe and secure following the winter storm damage earlier this year.

3899 Dungeness Sustainability Group

- DNA is leading a company-wide initiative to install electric vehicle charging stations at site, and low carbon emission technology is being introduced such as Solar Powered Street Lighting and Hybrid Generators.

3900 Business Planning

- All Magnox Sites are currently preparing Business Plans for the next couple of years that will address funding constraints. The Dungeness Business Plan will be presented to the Magnox Executive team in December, this may involve a slower rate of progress for some projects, but it is not expected to have a significant impact to the current /planned programme of work.

3901 Recap on current key projects

- Site has met a milestone to safely transfer circa 5m³ of contaminated sludge.
- Non active commissioning of the Wet Waste Transfer facility is in progress.
- Concrete pour for the new ILW processing facilities is planned for February 2023, up to eight lorries per day is expected over a 2-week period.

3902 Boiler down project – next steps

- Filling of tunnels and culverts – enabling works which, once complete, will provide space for contractors to mobilise plant and equipment for demolition and boiler removal
- Next activity:
 - Culvert infill – up to three lorries per day on weekdays from end of November 2022 to mid-January 2023. No lorry movements over the two-week Christmas and New Year period
 - Filling of the turbine hall basement – spring 2023 to early 2024
 - Steam and cable tunnels infill – work planned for summer 2023

3903 **Asset Management**

- Asset management projects are ongoing with £2.5 million in the budget for this year, Projects will carry on as normal for the next financial year, there will be the same amount of people working on site.

3904 **Socio-economic**

- There has been 10 years of Magnox Socio-economic funding support since 2012 to 2022, £9,165,583 has been given out to several projects across all 12 Magnox sites. Dungeness has been awarded £1,178,646, and eighty-eight applications have been supported.
- Dungeness A applications 2022-23 - Total funding as of 10th November 2022: £31,3600.
 - Turn the Tide Festival (Dymchurch) – Resources for Environmental Workshop £1,000.
 - Light Up New Romney – Lantern making materials £600
 - Folkestone and Hythe District Council (on behalf of Romney Marsh Partnership Group) - £30,000 towards the cost of employing a senior Specialist for the Romney Marsh Partnership.
- There is also the Good Neighbour scheme, applications up to £2,000 can be discussed via Kirsty Ramsden and over £2,000 via Haf Morris.

10-year Magnox Anniversary Story The full report, summary infographic and simplified guidance documents are available via:

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

Thanks were given to Tracey Finn, for her service to Magnox since 1979.

3905 Chris invited questions from the SSG

Tony Hills: What concerned me, was the volume of lorry movements to create the platform for the crane to sit on. My concern is based on the funding for highway repairs is decreasing, and I am worried that the roads will not be able to take that volume of traffic. I would like to be stayed connected by this, as I am an advocate of bringing this in by sea. We have brought in 30,000 cubes in by Sea for Lydd ranges.

Chris Milne: They have looked at several options, and they have concluded that this would not work for us. The explanation and justification for this will be part of the planning application.

Chair: At the previous meeting, it was stated that Ian would follow up – how can we do this? Can someone please spend some time with Tony to discuss this further.

Chris Milne: I will discuss with Tony and ensure that the information is provided.

Action: Chris to send Tony the planning application.

VIII COMMENTS OR QUESTIONS REGARDING DUNGENESS B's STATION DIRECTORS' REPORTS – GAVIN LANCASTER, STATION DIRECTOR

3906 Gavin Lancaster delivered his update verbally and highlighted the following points.

- Safety performance: disappointingly one of our contract partners whilst working on the main cooling waters, trapped his foot which resulted in an injury. We have completed the EDF investigation, and this is being reviewed in conjunction with the ONR to learn lessons from the event.
- Environmental events: warning letter was received from the Environment Agency in October, following commissioning tests of a small generator and boiler. The station had been granted 48-hours to run these tests, but there was a requirement for additional time to complete the test. There was no environmental impact from these tests, the station is working with the EA to prevent further occurrences.
- Defueling: Working on safety cases regarding preparedness for defueling, contract end date with the NDA is set for 30th June 2023. On track to achieve this, permission is required from the ONR to defuel the reactors, nuclear safety justification has been submitted and is with the ONR for review.
- Defueling timeline: Due to the ongoing works, site has been able to move the predicted defueling dates closer to the end of 2027, with significant nuclear materials leaving the site by end of 2028. Briefings are ongoing with staff. Pause to apprenticeship programme, need to look at ensuring that they have the right pipeline for staffing to ensure that works can continue to a high standard. As well as succession planning for Sizewell C, currently looking at development training for contract partners to ensure skills are not lost as site moves to defuel.
- Outage update: In February we embarked on our pre-defueling outage. This piece of work was created to get us plant ready for defueling. Since this programme started, work as commence on gas circulators, boilers, and the fuelling machine – with most of the major works now complete. In total the team has completed more than 15,000 separate tasks and the plant is looking good.
- As the Chairman mentioned in his report, it is fantastic that the site has been removed from special measures – we are not complacent, there has been a significant culture change within the site, and work is continuing to on this. Integral to maintaining the regulatory confidence.

3907 Gavin invited questions from the SSG

Cllr Tony Hills: Regarding your staffing numbers, do you know how many are required?
Gavin Lancaster: We have the nominal staffing numbers for the defueling campaign, for the next 3-4 years we would need around 300-400 members plus 200 contracting partners. That remains unchanged, we are currently reviewing workforce plans as we move forward. We will need to look at reductions in staffing but working with our sister stations to ensure knowledge transfer and resilience. We do not want a mass exodus, so we are engaging with staff to ensure they can see their place in the business.

IX ONR REPORT FOR DUNGENESS A – JOHN ROGERS, ONR INSPECTOR

3908 John Rogers delivered his presentation verbally and highlighted the following points:

- Changes to the way to how the ONR monitor Magnox sites, further updates will be available at the next SSG meeting. Looking to move away from the historic focus on nuclear safety and focus more on industrial safety. Current hazard and risk are regarding safety culture and industrial works, as the site has been fuel-free for the past 10-years now. There is a large scope of industrial and demolition work ongoing, and this will ramp up as we move into 2023 with the Boilers Project
- Discussion took place at the last SSG regarding the deteriorating safety culture, this has been placed back with Magnox. Magnox do recognise that this is an issue, and plans are in place to address this. Team inspection to look at Safety Culture is being planned, and this will take place in April. Hopeful that this will be cancelled, because of the work that Magnox will carry out.
- Boilers are the focus at Dungeness, and this is an important task to tackle. This is the top of everyone's priorities now, ONR are confident that this project will go ahead.
- Last meeting, discussion took place regarding Pond Skips, last update is positive, and dialogue is starting to develop between Sellafield, NWS, and Magnox. Preparations are ongoing regarding the GDF, this is early days but remain positive.

3909 John invited questions from the SSG
No questions raised

X ONR REPORT FOR DUNGENESS B – JASON CROOK, ONR INSPECTOR

3910 Jason delivered his report verbally and highlighted the following points:

- Intense period of inspections since last SSG, significant specialist inspections have taken place including mechanical, C&I and electrical to look at the pre-defueling activities to make sure that Dungeness are performing appropriate maintenance, and this is being done effectively. The purpose of these inspections is to inform the assessors as part of the defueling safety case, to ensure that a safe decision is reached.
- The exit from enhanced inspection, moves the site back into normal inspection, there is still work to be done to ensure that the site is in optimum position to achieve the regulatory licence agreements. Looking at forward planning for training, and this will be a continued focus area for the ONR.
- There was a serious crush injury that occurred to a worker which took place in June 2022, ONR has commenced a formal investigation into the incident to establish the facts, this is still ongoing and hopeful that an update will be able to provide an update at the next SSG.
- Annual emergency exercise took place shortly after the last SSG, this was a good performance, and the site was able to demonstrate that they were able to react to an emergency event.
- Annual safety review to take place next year, senior inspectors will review the safety performance over the last 12 months.

3911 Jason invited questions from the SSG
No questions raised

XI ENVIRONMENTAL UPDATE FOR DUNGENESS A AND DUNGENESS B – PHIL FAHEY, EA INSPECTOR, DUNGENESS A,

3912 Phil Fahey delivered his report for both Dungeness Site A and B, as Eddie has sent his apologies. Phil highlighted the following:

- Industrial Environmental Safety: There has been an increase in environmental events on site, these have been raised with the site and the EA will continue to monitor for improvements. Chris Milne and Ian Cuthbert have implemented plans, and meetings are due to take place to discuss further. We are working closely with the site to offer advice and guidance.
- Aqueous waste: Awaiting BAT (best available techniques) assessment, as site has proposed that off-site disposal is now one of the preferred option. Discussions are ongoing.
- Site Activity: The site is remarkably busy now, there is a lot of demolition work planned so the EA are working alongside site and the ONR to ensure that environmental impact is minimised. Regular discussions are maintained to ensure multi-agency working.
- Enforcement action. We issued advice and guidance as our enforcement response following a minor event at site regarding statutory gaseous radioactive discharge returns to the Environment Agency. We found that the Operator was in breach of 2 conditions of their radioactive substance's regulation permit. Phil went on to explain to the SSG the Environment Agency's enforcement policy for non-compliances to environmental permits.

3913 Phil invited questions from the SSG

Cllr Tony Hills: Regarding the Turbine Hall infill project, there will be a considerable environmental impact with the lorry movement across the roads in the Marsh.

Phil Fahey: Although, lorry movements do not fall directly into our scope of inspection. We want to ensure that the hole is infilled, to prevent ground water rising. We have weighed up the environmental risk, and the sustainability has been reviewed. This has been considered, as part of the plan. I will take the comment back and discuss with my colleagues.

XII NDA UPDATE – SIMON NAPPER, NDA

3914 Simon delivered his update verbally and highlighted the following points:

- New ministers: Following the change in government, Grant Shapps has been appointed as Secretary of State at BEIS, which is the NDA sponsoring department. Graham Stuart has been appointed as Minister for Climate and Nuclear. Meetings due to take place soon.
- NDA working: NDA continue to work on a hybrid model, with a mix of home-working and office-based work. Currently, the NDA team are working on average 2-3 days a week in the office. The NDA will continue to meet stakeholders in the ways that work for them, some sites continue to have virtual meetings whereas others have opted for return to face to face.
- Annual Reports and Accounts 2021-2022: The ARAC notes some of the highlights of the past year's activity Completion of the process of moving all operating companies from the Parent Body Organisation (PBO) model to direct subsidiaries and the adoption of a new Group Operating Framework of four pillars. Major skylines change at Sellafield with removal of diffuser on top of the 125 Windscale Pile Chimneys. Confirmation that Dounreay will join Magnox in 2023
- NDA Business Plan: Annual consultation is due to be launched in December 2022 and is likely to last 8 weeks.
- Economic Impact Assessments: Update of the economic impact of activities has taken place, reports have been published and are available via the following link [Nuclear Decommissioning Authority - GOV.UK \(www.gov.uk\)](https://www.gov.uk/nuclear-decommissioning-authority). Between 2012 and 2021, Magnox and the NDA committed over £14m to socio-economic projects to local communities. There has been a considerable impact to employment within the local areas, and we are aware of the need for stability for employment.

- AGR Transfer: Hunterston B stopped generating on 7 January and defueling has now commenced. This will take several years. Once the station is certified fuel-free, ownership will transfer to NDA and Magnox will begin the process of decommissioning. Hinkley Point B stopped generating on 1 August and will shortly begin defueling. The cost of defueling and decommissioning the seven AGR reactors is due to be met from the Nuclear Liabilities Fund.
- Cwmni Eginio: The Nuclear Decommissioning Authority (NDA) and Cwmni Eginio announced in May that they would work together on proposals for the siting of a new nuclear development at Trawsfynydd in north Wales. This has been formalised in a Memorandum of Understanding which summarises how they will work together.
- GDF Siting Process: There are now four Community Partnerships, three in West Cumbria and one in Lincolnshire. Community Partnerships are a further step in an exploratory, fact-finding and discussion process with the local community about hosting a GDF. Geophysical surveys have been completed off the Cumbrian coast. This exercise is to map the geology under the sea in the inshore coastal zone.
- NDA – “Keeping the conversation going”: Held in central Edinburgh on 7th & 8th September, around 170 people participated across the UK. This was the first in-person NDA event in three years and acted as a great opportunity to provide an update on the new group structure and organisational plans.

Simon invited questions from the SSG

3915 Cllr Tony Hills: Nuclear activity has been part of the local life for over 60 years, as a community we are very nuclear friendly, and we are hoping to have small modular reactors on the Dungeness site. I hope the NDA will support us in pushing this.

Simon Napper: I am aware of this, and the aim is that the site is returned to the community for future use. What this will be is not for the NDA to decide, and there is a drive within government for new energy creation. Announcement to be made by Great British Nuclear, this has been delayed and hoping this will be made shortly.

XIII MAGNOX UPDATE – BILL HAMILTON, DIRECTOR OF EXTERNAL AFFAIRS

3916 Bill delivered his update verbally and highlighted the following points:

- Magnox branding: In 2023, Magnox will relaunch with a new company name and logo. The mission of the new organisation aims to:
 - Extol virtues and values of the organisation we want to be, be a blueprint for all interactions and be known and trusted in the field.
 - Development is ongoing for the purpose statement and organisational values.
- Regeneration: Programme to position ‘Magnox’ to be ‘match fit’ to achieve current and future missions, programme of simplification will include introducing an efficient and standardised approach as well as investing in technology to support the simplification.
- Future missions: Working with Dounreay and on track to merge in April 2023, current employees will become Magnox employees, via TUPE. Scopes of work are continuing to be built prior to the first AGR transfers, confirmation that Hunterston will be the first to transfer following defueling and this anticipated to take place in 2026. EDF, NDA and Magnox are aligning the decommissioning strategy and plans.
- External Communications: New SSG website is to be presented to all SSG chairs for approval, prior to go-live. Two successful webinars have been delivered to increase engagement with the supply chain and encouragement for small and medium sized enterprises to bid for Magnox contracts. Full audit has taken place on all digital channels and plan has been implemented for engagement with social media audiences. Further information can be found via Magnox social media channels Social networks such as

LinkedIn ([Magnox Ltd: Overview | LinkedIn](#)), Twitter ([Magnox Limited \(@magnoxsites\) / Twitter](#)) and YouTube ([MagnoxSites - YouTube](#))

- Apprentice recruitment campaign due to start in January 2023.
- Employee Engagement: Survey amongst current team has been carried out, and an action plan will be developed to act on feedback received. There have been an additional 32 apprentices join the Magnox team, bringing the current total to 73 apprentices.
- Community engagement: Celebrating 10 years of the Magnox socioeconomic fund, as mentioned in the earlier update a total of £9.2m in funding has been awarded to local communities.

Chair clarified ownership of land, and size of land available for the potential of new build for small modular reactors. Noting land around Dungeness A is owned by the NDA and land around Dungeness B is still owned by EDF.

XIV NDA SUMMIT AND MAGNOX CHAIRS MEETING UPDATE – DAVID GODFREY

- 3917 Cllr David Godfrey provided a verbal update on the meetings attended, the NDA summit highlighted the graduate apprenticeship programmes, and David would like to bring that to the local community to enhance the offering to young people on the Romney Marsh.

XV ANY OTHER BUSINESS

None raised

XVI DATE AND TIME OF NEXT MEETING

- 3918 Thursday 22 June 2023 at 10am – Venue TBC



March 2023

Dungeness Site Stakeholder Group – EDF report

Station Director's Message – March 2023



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

edfenergy.com

EDF Energy Nuclear Generation Limited
Registered in England and Wales
Registered No. 03076445
Registered office: EDF Energy, Barnett Way,
Barnwood, Gloucester, GL4 3RS

2023 will be a year of dramatic change here at Dungeness B. Since we declared the end of generation in summer 2021 we have been preparing the station, and our people, for defueling. We have held conversations with our teams to make sure we have the right people in the right places. We have spent a huge amount of time getting the plant ready for our new defueling mission. And we have worked hard with the ONR, and EDF technical colleagues, to secure permissions to start defueling. This year there will be other changes as we deal with parts of our site in need of attention and get into a new operational routine.

Updates

Safety case

- In mid-December EDF was granted a Licence Instrument for the Initial Defueling Safety Case by the ONR.
- This permission allows defueling of the first 200 channels of reactor 21. While this work is underway we will continue efforts to secure further permissions for defueling.
- Securing this permission is a testament to all those at station and the company's technical HQ in Gloucestershire. Preparation of a defueling safety case of this magnitude usually takes several years of effort.
- We remain on track to begin removing fuel from the reactors this summer.

Onsite works

- Since the start of the year we have undertaken a number of tests, warming up and cooling down the reactors. Because of the way Dungeness B was designed we intend to deliver defueling with the reactor at pressure and warmed up. To be sure that the reactor and associated equipment will function as we need it to, we have been completing detailed tests of cooling systems and addressing issues as they arise.
- Our pre-defueling outage identified a number of issues which we have had to focus on before we could start on the job at hand.
- This included the replacement of the fuelling machine skirt. This 'skirt' sits at the base of our fuelling machine and is designed to accommodate any undulations on the top of the reactor to protect our teams from exposure to radiation during the machine's operation. When teams looked at the skirt they found that over the years the material had degraded, which increased the risk of foreign material interfering with our defueling operations. A decision was taken to replace the skirt, and because the original skirt was made using lead for shielding, a change in both material and design was required for the replacement project. Special tiles were commissioned from a contractor in America and then fitted to the machine.
- A review of our onsite buildings has identified more than a dozen pre-fabricated buildings which are no longer meeting the needs of the teams who have used them.

Our site infrastructure team has a full scope of work for 2023 and this year will be removing 15 pre-fabricated buildings from the site. They are working with local planning authorities on these changes.

- Our preparations for defueling received a further boost in February when the ONR completed a defueling readiness inspection and confirmed we were on the right track.

Staff update

- Since the start of 2023 I've been meeting teams to ensure everyone is firmly aligned with the station's priorities. There have been conversations with every member of our workforce about our new mission.
- We have also started to talk to teams about transfer and deconstruction work. The transfer date is several years away but it is vital that our teams fully appreciate how things will change onsite over the coming years and the timetable for those changes.
- After looking at our apprentice programmes and future requirements we have decided to recruit. We expect to have four new apprentices on company training programmes by the autumn.

Environmental events

- There have been no top tier environmental safety events since the last meeting.

Safety

- There have been no significant safety events since the last meeting.

Community contributions

- Our teams remain as generous as ever. Over the festive period a number of fund-raising events were held onsite. We staged raffles and ran an always-popular Christmas jumper day. Collectively these events raised more than £2,500 for our charity partner Prostate Cancer UK.

Gavin Lancaster

Station Director

March 2023



Office for Nuclear Regulation (ONR)

Site Report for Dungeness A

Report for period 1 October – 31 December 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/lrc/>).

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 October – 31 December 2022:

22 November

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 etc 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 site covered the following:-

- Incidents on the site

This inspection, which was rated “Green” under the ONR Inspection Rating Guide, was a follow up to a previous inspection carried out just over a year ago which found shortfalls with the licensee's arrangements for reporting and investigating incidents on the site. Since the previous inspection the licensee has implemented an improvement plan, and the ONR site inspector was satisfied that the evidence presented demonstrated that adequate improvement had been made.

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.

2.2. Other Work

During the period the ONR site inspector visited the site once to discuss progress with the boiler removal project and safety improvement programmes and attended the SSG meeting on the 17 November.

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.

During the period ONR received the licensee's investigation report for the RIDDOR reportable injury reported in the previous period. However, it was determined that the report had not adequately found the root cause(s), therefore the licensee is to reopen the investigation.

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

Dungeness B

ONR Site Report

Dungeness B

Report for period: 01 October – 31 December 2022

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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. Date(s) of Inspection

The ONR site inspector made inspections on the following dates during the report period 01 October – 31 December 2022:

04 October

11 – 12 October

08 – 09 November

15 – 16 November

08 December

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 etc 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 B covered the following:

- examination, maintenance, inspection and testing;
- management of operations including control and supervision;
- staff training, qualifications and experience;
- conventional (non-nuclear) health and safety;
- safeguards

During the period ONR held an Emergency Arrangements Review meeting with Dungeness B to review the site's emergency arrangements performance and effectiveness including forward plans for enhancements. ONR was satisfied that Dungeness B is maintaining appropriate and effective emergency arrangements with exercise focus evolving to reflect the anticipated commencement of defuelling.

Senior ONR inspectors attended the Dungeness B annual review of safety along with the site inspector, ONR security inspectors and the Environment Agency. This provided an opportunity for senior level engagement with the site and for ONR to communicate its view of the performance of the site and explain its regulatory priorities.

ONR highlighted that Dungeness B will need to ensure that sufficient focus is placed on not only making sure that the plant is ready for defuelling, but also ensuring that the site personnel are fully ready. Dungeness B explained that it fully recognised the importance of this aspect and had plans in place to ensure that this aspect will be delivered prior to defuelling.

ONR has now agreed to Dungeness B implementing its safety case to commence initial defuelling, so will carry out a number of readiness inspections to ensure appropriate regulatory oversight before this activity commences.

ONR identified that improvements were required to Dungeness B's management of some specific aspects of its maintenance arrangements in relation to the governance and oversight of maintenance schedule suspensions and a specific category of defects. We have raised a level 3 regulatory issue to ensure appropriate oversight as part of normal regulatory business.

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.

2.2. Other Work

The site inspector attended the Dungeness site stakeholder group in November, to give an overview of ONR's regulatory activities and provide an opportunity for members of the public to ask questions related to ONR's work.

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

The site inspector met regularly with the site-based Independent Nuclear Assurance (INA) team to ensure the internal regulator function remains effective and verifying information provided by the station.

During this reporting period the site inspector undertook a number of intelligence gathering activities and plant visits including engagement with members of the site's senior leadership team.

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.

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

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

Date	Type	Ref. No.	Description
09/12/22	Licence Instrument	568	Agreement under arrangements made under condition 22(1) to the implementation of np/sc 7813 rev 000 – initial defueling safety case, ec369274 rev 000 version no:03.
23/11/22	Enforcement Letter - Fleet	EI-22-021	Required improvements related to the Electricity at Work Regulations 1989

Reports detailing the above regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

LI 568 allows Dungeness B under licence condition 22(1) to implement the safety case and plant changes which will allow it to commence removal of the fuel from the shutdown reactors. ONR will maintain regulatory oversight of Dungeness B's preparations to commence defuelling as the station moves towards this milestone. This initial case allows 200 fuel channels to be defuelled and Dungeness B will be required to produce a further safety case to allow defuelling past this limit.

On the 23 November 2022 ONR issued an enforcement letter to EDF Energy NGL related to the Electricity at Work Regulations 1989 which identified that improvements are required to the management of a number of lighting and small power circuits in relation to conventional health and safety matters. ONR identified that there were deficiencies in the implementation of electrical testing on lighting and small power circuits and a lack of documented test records. Whilst this enforcement letter was issued at a fleet level, improvements are also required in this area at Dungeness B

5. News from ONR

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

6. Contacts

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Environment Agency Report to the Dungeness Site Stakeholder Group

February 2023

Introduction

This report covers our regulation of Dungeness A and B Sites and related environmental matters for the period November 2022 to February 2023.

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 15th and 16th November 2022, we visited Dungeness A to review various decommissioning projects including aqueous waste management, and to investigate recent environmental incidents that occurred on site. On 11th January 2023, we visited the site to take part in the DAR (Design Authority Review) meeting for the 'boilers down' project.

On 29th November 2022, we carried out an inspection of the Dungeness B Asset Management arrangements.

We attended the Dungeness B Annual Review of Safety (ARoS) on the 6th and 7th of December 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 up to date with progress on decommissioning projects, implementation of actions/recommendations and any emerging issues at the site.

Inspections:

During our visit to site in November 2022 we conducted an extensive review of arrangements for aqueous waste disposal and subsequently wrote to the Operator (on 12/12/22) setting out how we expect the station to adopt an integrated approach to aqueous waste management and disposal. We have asked the Operator to fully justify their proposals for aqueous waste disposal and prove to us that future disposals will use optimised routes. We have asked the Operator to consider whether the MAETP (Modular Active Effluent Treatment Plant) should be part of this plan and whether discharging reactor void water to surface water drains meets the requirements of the site environmental permits (due to particulate and oil being found in reactor void aqueous waste previously). The aqueous waste disposal programme will also need to consider aqueous waste generated from the boilers 'down project' and how this may affect the water in the reactor void. We have asked for feedback by 01/03/23 but this may be extended depending on progress by the Operator.

During the visit in November 2022, we reviewed 2 environmental incidents:

- a change to the bag monitors' software caused an error in the alarm thresholds for some types of material with the potential to produce incorrect activity assessments in the clearance and recycling centre (CRC). This could have meant radioactive waste entering a non-radioactive waste stream. No waste left site classified incorrectly. However, after receiving the apparent cause investigation into the event (on 6/12/22) and following our conversations at site we decided that the Operator was in breach of 2 conditions of their radioactive substances activity permit.
- uncontrolled flow of liquid effluent from a blockage through the Magnox dissolution plant and into the surface water drains, releasing a small amount of very low activity effluent into surface water drains. We will assess the root cause investigation when we receive the report and determine whether any permit breach(es) has occurred.

On 11/1/23 we attended an all-day event organised by the Boilers Down Programme Team to receive updates on the recent DAR 3 meeting which included the project's WAR (Waste Authority Review). The DAR and WAR are part of the Operator's design & safety justification process, the 3rd stage being the 'scheme design'. We (jointly with Office for Nuclear Regulation (ONR)) discussed the boilers down project, overview of the DAR3 process and reviews of relevant technical studies.

We confirmed our agreement with the project's strategy, highlighting the need for a holistic approach, in the context of lifecycle considerations, sustainability and learning from experience (LfE). We also highlighted the need to ensure that:

- adequate resource is available for the 'boilers down' programme and other projects
- project risks are fully considered
- non-radioactive aspects of compliance related to waste are appropriately considered
- a stakeholder engagement strategy is developed and implemented

We will keep this project under review and assess the integrated waste strategy as the work progresses.

Engagement with the Operator regarding the turbine hall void.

We are still liaising with the Operator regarding the material that is to be used to infill the turbine hall void. We held further discussions on this issue during the DAR 3 meeting and will discuss (in due course) relevant aspects of the regulation of this material with the Operator and our Local Area colleagues.

Joint EA/ONR meetings with the Operator.

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

On a quarterly basis we have larger strategic meetings (last 18/1/23) where we discuss future strategies/lifetime plans for the site, waste projects and decommissioning projects.

Other issues.

We continue to provide advice and guidance to the Operator on further characterisation to support disposability of pond skips stored on site (as previously reported to the SSG). Magnox are still developing their strategy, taking learning from Sizewell A.

We continue to provide advice and guidance to Magnox on their plans for using 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>). The Operator has until the end of 2023 to complete their waste management plan and site wide environmental safety case. The Magnox Corporate team are making good progress. We are keen for site personnel to understand their responsibilities under the GRR and will follow this up in future meetings.

We have commented on a Folkestone and Hythe District council planning application to replace ageing pumps and pipework to ensure continued operation of the surface water discharge system. As this relates to a minor route for aqueous radioactive waste discharges, we have asked the Operator to submit a BAT (Best Available Techniques) assessment for the proposed plant and works.

During our visit in November 2022, we discussed the planned end state for the ponds which have now been drained of water. The Operator is assessing whether all or some of the ponds' surfaces should to be sealed. We asked the Operator to conduct a BAT assessment of the gaseous and solid waste that may be generated in the future from the ponds and to consider other environmental issues e.g., the asset management of the ponds complex.

Dungeness B

Site Inspections

On 29th November 2022, we carried out an Asset Management inspection at Dungeness B. The inspection focused on the following environmentally critical plants:

- Active Effluent Water Treatment Plant (AEWTP)
- Gaseous Sampling Cubicles
- Heating & Ventilation Plant

We reviewed the station Lifecycle Asset Management Plans (LAMPs) for these plant systems.

We did not identify any breach of the environmental permit during the inspection. We welcomed the learning on asset management received from Dungeness A via station level collaboration, the retention and expansion of scope of the existing corrosion management programme. Dungeness B is undertaking systematic rationalisation of planned maintenance activities to optimise delivery. We welcome this approach noting this should remain subject to periodic review to ensure that emergence of, or change in the rate of, degradation mechanisms are addressed. The Dungeness environment is particularly harsh and asset care is an ongoing concern. We remain concerned about the ingress of groundwater through construction joints into the AEWTP.

We took part in the Annual Review of Safety (ARoS) on the 6th and 7th December 2022. The ARoS provides an opportunity for us and ONR to review performance of the station over the past year and discuss developments and plans.

Events and Enforcement

Dungeness A.

Following the RADOS event (see above) we determined the Operator was in breach of 2 conditions of permit number EPR/ZP3293SR.

- Condition 2.3.6(a) - The operator shall have and comply with appropriate criteria for the acceptance into service of adequate systems, equipment, and procedures for:
 - (a) carrying out any monitoring and measurements necessary to determine compliance with conditions of this permit.
- Condition 1.1.1 - The operator shall manage and operate the activities:
 - (b) using sufficient competent persons and resources.

Due to mitigating factors (no waste left site classified incorrectly, the effect of Covid 19 on the process and that the Operator has other arrangements that may have picked up radioactive waste in the CRC), we gave advice and guidance as our enforcement response on this occasion.

Dungeness B

In August 2022, we granted written authorisation for DNB to conduct commissioning tests on a new CO₂ boiler to demonstrate a nuclear safety function in advance of formal application to vary its combustion permit. At the last SSG Meeting we reported on a non-compliance with our authorisation.

The site has since applied for a variation to its Combustion permit to address the new CO₂ boiler. Our National Permitting Service currently has a back-log of applications to process. To facilitate Commissioning and routine testing of the new CO₂ boiler we have put in place a Local Enforcement Position specifying the Management and Operating Techniques under which the CO₂ boiler may be used.

Environmental Permitting

Dungeness A

Nothing to report.

Dungeness B

Nothing to report.

Discharge Reports

Both sites are required to report to us liquid and gaseous discharges to the environment monthly. 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. Where specified samples have been difficult or impossible to obtain, we have been kept informed.

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 and Dungeness B

Both sites submitted the Environmental Monitoring returns required to us in line with requirements of the environmental permits. We reviewed the environmental monitoring returns for the quarters covered by this report and did not identify 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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