



HUNTERSTON A

SITE STAKEHOLDER GROUP REPORT

SITE DIRECTOR – MARK BLACKLEY

MARCH 2024

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SITE DIRECTOR'S REPORT TO THE SITE STAKEHOLDER GROUP
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Hunterston A continues to address the nuclear liabilities at Hunterston A in a safe, secure manner with care for the environment.

1 SITE DIRECTOR OVERVIEW

There were no significant new Nuclear, Radiological, Environmental or Security issues over the reporting period.

A site operative received an injury whilst lowering a security camera mast on site. The operative received grazes to wrist, shin and a hairline fracture to his left ankle. This type of injury is identified under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) as a specified injury. The operative is recovering at home and should return to work in December. This event is currently being investigated via a Root Cause Investigation (RCI) being undertaken by Head of Safety from Magnox centre. All work relating to the lowering of camera masts have been stopped and a review of the safe systems of work has been undertaken.

The site Accident, Emergency and Security Contingency Arrangements are tested frequently and remain suitable and sufficient. This was recently demonstrated during Exercise "Neptune" where the site along with the support of Police Scotland (Counter-Terrorism and Uniformed Officers) and Explosive Ordnance Disposal (EOD) Search Regiment successfully demonstrated our Security Contingency Arrangements.

On 31 October 2023, Magnox rebranded to Nuclear Restoration Services (NRS). The new brand strategy represents the joining together of Magnox and Dounreay and prepares us to welcome the seven advanced gas-cooled reactors sites for decommissioning and other future missions.

NRS (formerly Magnox) has submitted a Permit Variation Request to SEPA to enable the grouting of waste packages in SILWE. NRS had a constructive meeting with SEPA and ONR regarding the appropriateness of the characterisation of the bunker wastes. SEPA re-iterated that they do not consider that NRS has demonstrated that it has used BPM to characterise the bunker waste, or the individual packages of waste, as required by the EASR Standard Conditions for radioactive substances activities and are unable to sign a Permit Variation for Bunkers 2 - 5 based on the information provided to them so far. It was agreed at the meeting that NRS will prepare a report, with supporting evidence, which examines all options for final package measurement, and options to refine the package inventories.

We continue to retrieve waste from SAWB Number 1. To date, the SAWBR team have safely exported a cumulative total of 306 3M³ boxes from Bunker 1 to the ILW Store

equating to 183.3 Tonnes of Bunker 1 waste. **1200** 3M³ boxes have been exported from SAWBR (all 5 bunkers).

Activities associated with Inactive Commissioning of the Acid stream in WILWREP have progressed well over the past few months. The physical activities on the plant are now complete. We aim to permission a move into Active Commissioning in December / January

Good progress continues to be made with the Dumper Bot (a small remote control vehicle used to corral the material to a single area). The Operations team have cleared the contents from SRT3, and the Dumper Bot has now moved to SRT2 where residual sludge recoveries and waste sorting is progressing towards completion.

The SILWE Project continue with preparations for the commencement of Phase 2 Commissioning. Issues continue with the Kuka robots.

The Reactor roof repairs works are drawing to a close on the SRU roofs. Handrails are 100% complete across both reactors and 2,800m of Sarna bar repairs have been carried out from the total of 5,000m.

In terms of people, we currently have 16 roles at various stages of the resourcing process. In the period from September to November we have had 7 new starters join the site. We have recently agreed that we will recruit 2 graduate apprentices in Engineering within the 2024 apprenticeship intake. We are working with Hunterston B to develop a joint programme which will provide shared experience across both sites.

More details on some of these highlights are within the appropriate sections of this report.

2 SAFETY OVERVIEW

2.1 Safety Review Performance

The Site Total Recordable Incident Rate (TRIR) is 0.96 and the Days Away Case Rate (DACR) is 0.48. 4 months have past since the last Lost Time Accident (LTA).

Since the (LTA) that occurred on Site during October 2023,(Rigger received injuries from falling camera mast) the injured operative has returned to normal duties. There has been 1 further event that resulted in an injury that required first aid. During the Covid pandemic, the site had installed partitions/screens within offices to ensure social distancing was maintained. One of these partitions toppled over when supporting furniture was moved causing the partition/screen to topple slowly over onto an office worker. The injury received was minor in nature and after first aid (reassurance) the person resumed normal duties. The partitions within this office have been removed and a site wide check was undertaken to ensure all remaining screens were secured from toppling over.

The Root Cause Investigation (RCI) into the LTA event has been completed and is due to be presented at the Event Review Team (ERT) meeting. The committee will review the report, findings, and recommendations to ensure that all learning is captured, and the corrective actions/recommendations are appropriate and will reduce the likelihood of recurrence.

The ERT meets weekly, though sometimes it is necessary for a special ERT meeting to be held so that suitable time is allocated to review RCI's or similar investigation reports.

Interim findings from the RCI has indicated that there are weaknesses with the quality of Safe Systems of Work (SSoW), which includes Work Instructions and Risk Assessments, provided for NRS work activities. To address this improvement area the Site is providing additional training to all persons on Site that undertake Risk Assessments. A series of Risk Assessment workshops are planned for end of February and into March. These workshops are designed to improve the quality of oW provided and raise the Standards and Expectations placed on those who produce Risk Assessments.

Target zero remains proactive in raising awareness of specific topics relevant to the day-to-day activities and outputs from the safe decommissioning of Hunterston A Site. Topics were, December – Be a 'STAR' (Stop Think Act Review); January -Return to Work; and February is Fire Safety.

During February Psychological Safety training has been rolled out to NRS staff.

Psychological safety is about creating an environment where everyone has a voice. It's an environment where diversity is welcomed, everyone feels included, safe to ask questions, safe to report, safe to contribute and safe to challenge. By creating an

environment that reflects a learning organisation, we can all contribute to safe outcomes.

Reporting of events remains healthy in relation to numbers and variances in types of events being reported. The events (Q Pulses) are discussed at the daily safety and compliance meeting and where required actions placed proportionate to the event.

The safety representatives (Magna & Contractor) continue to meet fortnightly and have recently attended the site HESAC meeting. The safety representatives have planned a Pedestrian Safety campaign to be held in the Safety and Learning Drop-in Centre and will be available to all person on site to attend.

2.2 Emergency Arrangements

The site Accident, Emergency and Security Contingency Arrangements are tested frequently and remain suitable and sufficient. This year, planning is well underway to deliver a comprehensive and challenging site wide Emergency Training and Exercise Programme. The site Exercise Plan is designed to fully test our Emergency Arrangements and verify robust procedures are in place to effectively respond to and safely manage the consequences of both existing and emerging business risks that have a potential to impact the site.

In the last 3 months the site has successfully delivered 4 live emergency exercises involving both site staff and contractors, a further 28 exercises involving live play, tabletop and group discussion are planned throughout 2024. After discussion with the Company Internal Assurance Team (CIAT) and Local Category 1 Responders this year's annual demonstration exercise (Exercise North Laine) will take place on Wednesday 15th May 2024 which will fully test the sites emergency capability and interoperability with responding emergency services.

The site continues to maintain effective working relationships with our Emergency Preparedness partners and neighbouring facilities by actively participating in joint Emergency Planning Consultative Committee (EPCC) meetings with EDF Energy and the Emergency Services. During the last Emergency Planning meeting with Scottish Ambulance Service, Scottish Fire and Rescue Service and Police Scotland the site's offer to facilitate site familiarisation visits was well received by all and future dates for site visits are in the planning.

In support of our Emergency Arrangements the site has recently invested in new Rescue from Height and First Aid equipment to ensure our contingency team have the best tools available to safely and swiftly retrieve a casualty from height. Furthermore, as from the 1st of January 2024 the site has welcomed 7 new fully trained team members to the Site Contingency Team to improve flexibility and resilience within the team. The

addition of new emergency staff and equipment further demonstrates the site's commitment to improvement and development of our Emergency Arrangements.

3 DECOMMISSIONING PROGRESS

3.1 Solid Active Waste Bunker Retrieval (SAWBR) Project

The SAWBR facility was constructed to recover solid HAW (Higher Activity Waste) from within the site's five HAW bunkers. This is achieved by using remotely operated vehicles (ROV's) to fill hoppers that are then tipped into RWM (Radioactive Waste Management Ltd) approved 3M³ stainless steel boxes. The initial breakthrough into Bunker 5 was achieved in March 2014 and Bunkers 5, 4, 3 and 2 have been sequentially emptied to date.

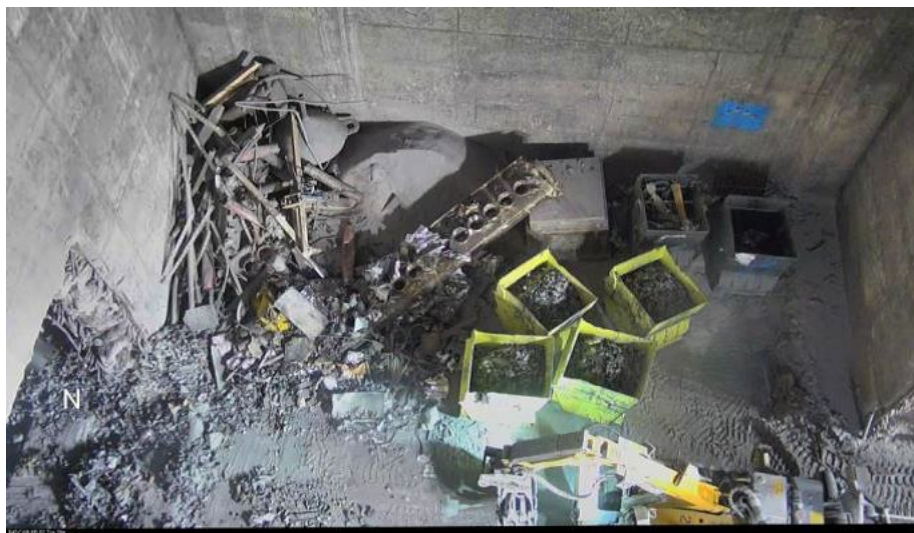
To date, the SAWBR team have safely exported a cumulative total of **316** 3M³ boxes from Bunker 1 to the ILW Store equating to **187.2** Tonnes of Bunker 1 waste.

1208 3M³ boxes have been exported from SAWBR (all 5 bunkers) and it is forecast that the bulk retrieval of waste from Bunker 1 will be completed in February/early March 2024, waste recovery from the SAWB bunkers began in 2014 so this will be a significant milestone for Hunterston and NRS.

The SAWBR team are developing a 'Back out plan' for the SAWB Bunkers that will include a detailed strategy for the processing of the identified orphan wastes, the Fuel debris items and the retrieval of the fines dusts. Back out works will commence once bulk clearance has been declared.

The plant had a routine maintenance outage in February which is now complete and the facilities have returned back into service.

Picture below of Bunker Waste Recovery Operations showing fuel assy/skip guide and part of the De-splitter machine.



3.2 Wet Intermediate Level Waste Retrieval & Encapsulation Plant (WILWREP)

The WILWREP facility was designed and constructed to recover and encapsulate Intermediate Level Waste (ILW) sludges, resins and acids stored in site tanks. Having completed the first stage of bulk sludge recoveries the plant was being reconfigured to retrieve and encapsulate radioactive Nitric acid before being paused in Summer 2022 due to other site priorities.

WILWREP Acid Reconfiguration

Commencement of Active Commissioning of the WILWREP Acid waste stream is on track to start at the end of February 2024 following completion of a successful DAR 5.2 engineering review. This waste campaign will passivate the largest existing Hazard at the Hunterston A site by recovering, neutralising, and encapsulating the acidic waste in a cement matrix within around 80 stainless steel 3m³ drums.

Significant supporting effort from sites EHS&Q, Engineering and Work Control functions as well as central waste functions have helped the Waste Operations/Programme team to get to this point, the effort by the wider group has been greatly appreciated and is a great example of cross department/team working.

All inactive commissioning activities are successfully complete with the team recently pumping liquid from the acid buffer tank to the drum and then decanting it back to source successfully. To demonstrate compliance with our Environmental permit we are required to understand what we are releasing to atmosphere and the first stages of our active regime will be to form a discharge baseline to the WILWREP stack prior to introducing acidic wastes with a radioactive inventory. This is planned week commencing 26th February. It is expected that acidic waste will follow shortly after a

successful baseline is achieved and presented to the established Testing & Commissioning Panel (T&CP).

3.3 Solid Intermediate Level Waste Encapsulation (SILWE) Project

The SILWE facility exists purely to encapsulate the 3M³ packages containing the solid waste retrieved/recovered from SAWBR with a grout mix. Once encapsulated, the packages will be in their disposable state.

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The new Deed of Variation (DoV) has now been accepted by both the Principal Contractor and NRS. The supporting L4 schedule is being amended to include outstanding defects. This is a great opportunity for the project team to direct work through the Principal Contractor and manage the progress of packages of work to completion.

The resolution to robot related issues and associated commissioning activities continues with Kuka. In parallel with this, the project continues to investigate the feasibility of processing ILW packages manually without the robots. These manual operations have been simulated on-site, with associated dose and ALARP/shielding assessments produced in support.



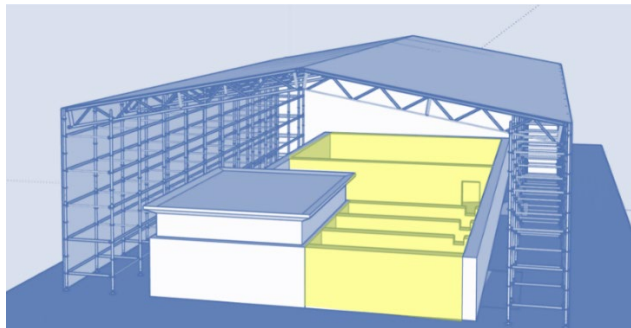
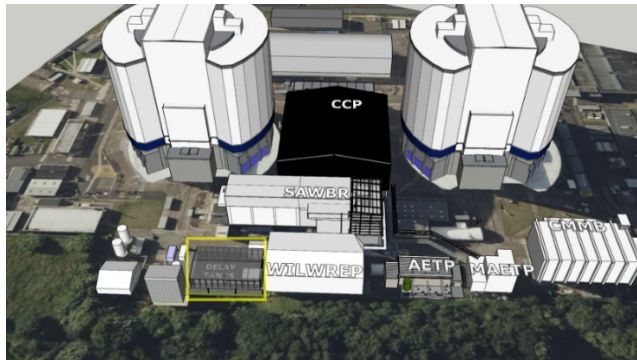
3.4 Ponds Programme

CCP Delay Tanks

The CCP and Miscellaneous Delay Tanks are planned for decontamination before financial yearend. The project team have made significant progress towards achieving this milestone as follows:

- Radiological surveys conducted to confirm levels of contamination and inform optioneering/BPM
- F224 & F-226 Options Assessment reports prepared and approved.
- DPAF at final stages of approval cycle
- DAR 1-3 approved.
- WAR 3 approved.
- Temporary ventilation design approved and procured components now arriving on-site.
- Design for stack support scaffold complete
- Site and radiological documentation being prepared.

The team are now focused on finalising the commissioning steps for the ventilation system and will by in the Delay Tanks by March performing decontamination works before moving onto the deplanting of redundant structures and equipment within.



3D Model showing location and configuration of delay tanks
(highlighted yellow)



Internal views of Delay tanks

New Effluent Treatment Plant (NEffTP)

New Effluent Treatment Plant (NEffTP) at HNA is planned for Active Commissioning before financial yearend with the project team having already made good progress in the following areas:

- Design, manufacture and onsite installation within the Low-Level Waste Transfer Facility is complete.
- Inactive commissioning complete.
- Operator familiarisation training delivered.
- Design approved to DAR 5.1 (Manufacture, Installation and Setting to Work)
- Effluent characterisation (Rad & non-rad) complete and system BPM justifications at an advanced stage.
- All Plant Operating and Work Instructions are written, approved and validated.

The team are now focused on preparing for DAR 5.2 in late February which permissions the start of Active Commissioning of the plant.



New Effluent Treatment plant within the Low-Level Waste Transfer Facility.

4. PEOPLE

4.1 Site HR

We continue to have a variety of vacancies at various stages of recruitment with 15 currently in process. Posts include Site Security Manager, Security Guard, Maintenance Technicians, System/Project Engineers, Project Manager, Environmental Co-ordinator, Administrator. It is proving challenging to fill all our Maintenance Technician posts, due to market conditions, and our supply chain partners are currently supporting these vacancies as we continue advertising.

We have a variety of Employee benefits which have been enhanced. 'My Lifestyle' employee portal has a range of benefits available with offers and discounts with major retailers, cycle to work scheme, dental insurance etc. Following feedback from employees, Early Flexible Retirement has recently also been introduced which allows members of the Electricity Supply Pension Scheme the ability to access their pension early and continue to work. We are encouraging employees who are interested to attend one of our **pre-retirement courses** to make sure they have understood the options before making any decisions. This option may result in applications for flexible working through reduced hours which are considered on a case-by-case basis subject to business/operational needs.

4.2 Occupational Health

Sickness levels continue to remain high comparative to the company target, however continued support from Line Management, Occupational Health and HR with long term sickness cases and pro-active management of cases is having a positive impact with a downward trend in the overall sickness levels over the period.

In support of overall wellbeing, we continue to promote webinars and wellbeing messages such as highlighting the free and confidential employee wellbeing support available over the festive period as we recognise it is not a time of celebration for everyone and it can be difficult for lots of people for different reasons and 'Time To Talk' Day which is about encouraging everyone to talk more about mental health and remove stigma. Our Wellbeing Group and Mental Health First Aiders also are part of our support initiatives and continue to highlight these topics and we are looking to relaunch our Wellbeing Group and encourage new group members to get involved in the forthcoming weeks

5 ASSET MANAGEMENT

To enable safe operation, we proactively review our systems, processes and facilities via our Systems Engineering Department. This enables us to look at future investment requirements to maintain a safe operational status.

Following the difficulties experienced last year with a previous sub-contractor to supply safety information with relation to planned improvements to line markings, a new sub-contractor was engaged and phase 1 of this work was completed with external car parks line markings being renovated. Due to circumstances outwith Site's control a new Contractor was required to be sought to complete Phase 2. This has now been resolved and Phase 2 works including areas within the RCA and general site are planned to be completed during March.

Initial specifications for the replacement RCA shower facility have been produced in conjunction with Engineering and are now progressing through the procurement process. Similarly, the specification for the removal of the fire damaged facility which is beyond economical repair is progressing through the initial procurement process.

Previous difficulties in agreeing a suitable technical solution to repair the Cartridge Cooling Pond roof through our incumbent Access Solutions Contractor led to this route being discounted. The Site is now going direct to market for a suitable solution. This work is currently being progressed through the Plant & Structures Programme.

Further Welfare upgrades across the site are planned again for the next financial year.

Progress of this year's work packs is ongoing and a portfolio of work packs for 2024/25 and 2025/26 are being developed.

6 RADIOLOGICAL SAFETY

Explanatory note: The maximum permissible dose to a radiation worker in the UK is 20mSv (milliSieverts) in a calendar year. The average annual radiation dose to the UK population from all sources is 2.6mSv. Collective dose is usually measured in man.milliSieverts. For example, if ten people were each to receive 0.1milliSieverts during a particular task, then the collective dose for the task would be 10 people x 0.1mSv each = 1 man.milliSievert.

Doses for the calendar year 2024, to the end of January, are as follows:

- Approximately 149 employees and visitors received a total collective dose of 0.466 man.mSv between them.
- Approximately 110 contractors received a total collective dose of 0.509 man.mSv between them.
- The highest individual dose received by an employee was 0.045 mSv.
- The highest individual dose received by a contractor was 0.096 mSv.

The majority of dose accrued in 2024 has been from a combination of the pond decommissioning project and other site projects. All doses in these projects have been prior assessed, planned and are tracked throughout the project duration to ensure that no limits are exceeded and that doses are kept as low as reasonably practicable.

7 ENVIRONMENT

7.1 Radioactive Discharges (Jan 2023-Dec 2023)

Solid

Low Level Waste (LLW) disposals to the Low Level Waste Repository (LLWR) continue. 33.73 m³ of LLW and VLLW with a total activity of 0.13 GBq was disposed of during the twelve-month period from January 2023 - December 2023. There is no limit on the volume or radioactivity content of LLW and VLLW being disposed of under the site EA(S)R Permit. The main contribution to these waste consignments was decommissioned plant, equipment, and materials generated during decommissioning operations.

Liquid

The main sources of liquid radioactive discharges during the period January 2023 - December 2023 were liquors generated through wet waste recovery and encapsulation processes and routine waste water arisings from the site active drain system.

Radionuclide or Group of Radionuclides	Annual Limit	Activity discharged (Jan 2023 - Dec 2023)
Tritium	30 GBq	0.006 GBq
Caesium-137	160 GBq	0.043 GBq
Plutonium-241	2 GBq	0.000 GBq
All alpha emitting radionuclides not specifically listed taken together	2 GBq	0.001 GBq
All non-alpha emitting radionuclides not specifically listed taken together	60 GBq	0.038 GBq

Gaseous

The main contributions to gaseous radioactive discharges were ventilation systems operating in contamination controlled areas and reactor vessel 'breathing'.

Authorised Outlet, Group of Outlets or other discharge route	Radionuclide or Group of Radionuclides	Annual Limit	Activity discharged (October 2022-Sept 2023)
All authorised outlets taken together.	Tritium	100 MBq	0.3 MBq
	All other radionuclides (excluding tritium)	3 MBq	0.239 MBq
Discharges made as a consequence of reactor breathing	Tritium	3000 MBq	376.74 MBq
	Carbon-14	200 MBq	57.69 MBq

7.2 Non-radiological Environmental update (Jan 2023-Dec 2023)

Treated sewage effluent from the plant is currently being independently assessed by SEPA on a quarterly basis. Results from an independent off-site laboratory analysis verify that the sewage treatment works reed beds continue to work efficiently to maintain good quality effluent in compliance with the sites CAR discharge licence.

Monitoring and trending of data for resources such as water, electricity and fuel continues to determine where use can be minimised, in line with the site Environmental Management System. Over the period Jan 2023-Dec 2023, the site used 13.14 Terra Joules (Tj) of energy; 12.30 Tj attributed to electricity consumption and 0.84 Tj attributed to fuel use in site vehicles, equipment, and generators. In the same 12-month period the site water consumption was 5,467m³. The site continues to report carbon equivalent emissions data as per the new company process.

Waste disposal and recycling is recorded in the company unified dashboard. Over the period Jan 2023-Dec 2023, a total of 51.6 tonnes of waste was collected for consignment from site (48.5 tonnes for re-use, recycling, recovery, or composting, 0 tonnes sewage waste and 3.1 tonnes for disposal to landfill). This gives a recycling rate of approximately 94%.

7.3 Environmental Events

There were no significant events over the reporting period.

8 SOCIO-ECONOMIC / STAKEHOLDER UPDATE

No update since the last meeting to report.

9 SUSTAINABILITY

9.1 Sustainability Strategy

Magnox's sustainability strategy centres around five goals: governance, environment, supply chain, employees, and communities. Goal 5 recognises Magnox's responsibility to deliver value to its communities and this goal aims to strengthen local engagement, invest in local community assets and share our expertise.



9.2 Volunteering Portal

A key target under Goal 5 is the introduction of a trial of the 'Neighbourly portal' at Hunterston, Trawsfynydd and Berkeley. It formalises the process of identifying, promoting, monitoring & reporting volunteering opportunities for employees. Key benefits include:

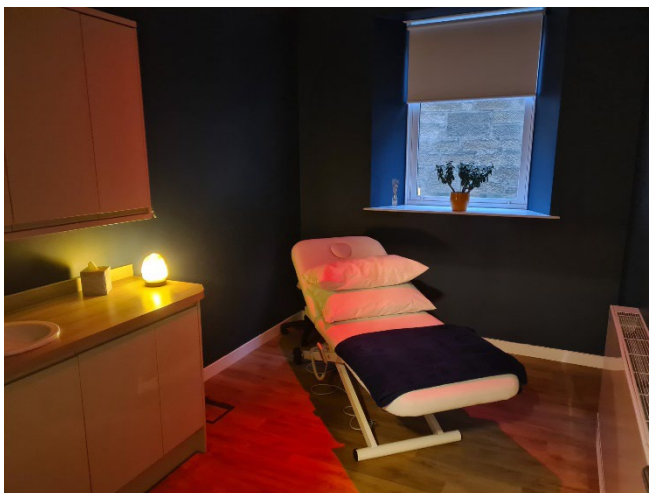
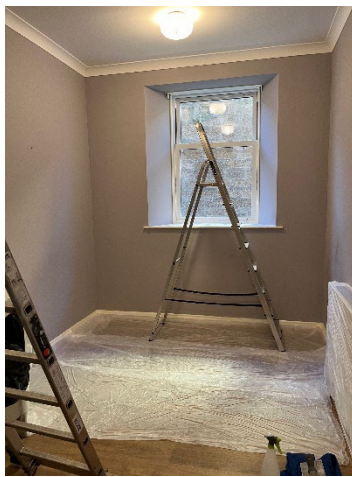
- Targeting activities to organisations that share our values and bring **benefits to our communities**.
- Improving employee **skills and wellbeing**
- Supporting **equality and diversity** by providing skilled support to groups from marginalised communities
- Building stakeholder confidence

Ayrshire Cancer Centre, Kilmarnock

Earlier this year, some of our staff volunteered at Ayrshire Cancer Support Centre in Kilmarnock as to assist in decorating a room within the centre. The centre is run by both staff and volunteers who provide services to both cancer patients and their families. These services are free so any volunteering is much appreciated.

Our staff worked to transform the treatment room from a dull grey to a modern, calming and welcoming space. They worked hard during the day to prepare, replaster, paint and upgrade the facilities in the room.

The staff at the Cancer Centre were delighted with the finished look and were very grateful for the help from our staff, thanking them for their work.



10 SITE VISITS AND KEY DATES

Hunterston A Site continues to attract the right kind of interest through our good safety and business performance. Below is a selection of visitors / key dates during the period.

DATE	EVENT/VISIT
6th December	Business Plan Review
12/13 December	ONR Inspection
8 th January	Return to Work Stand Downs to all personnel on site
18 th January	Cross Site meeting with HNB
1 st February	Programme Delivery Director - Ross McAllister
13/14/15 February	Psychological Training (6 sessions)
19 th February	John Grierson - Nuclear Operations Director
20 th February	ONR Intervention
21 st February	Fire Safety Management Review
28 th February	CS&IA Workshop
5 th March	Sohail Ashraf - AGR Transition Director Pam Duerden - EHSS&Q Director Andy Munro - Future Missions Director
6 th /7 th March	AGR Level 2