



Site Stakeholder Group

HUNTERSTON SITE STAKEHOLDER GROUP

The Seventy First Meeting of the Hunterston Site Stakeholder Group will take place
on Thursday 7 March 2024 at 1330 Hrs

Venue – The Waterside, Ardrossan Road, West Kilbride,
KA23 9NG Light Refreshments will be served from 1245 prior
to the meeting.

AGENDA

13.30 Chairman's Opening Remarks and Declarations of Interest

13.35 Chair and Vice Chair Updates and Correspondence

13.45 Actions and approval of previous Minutes

13.55 AGR Transfer Programme Update - Sohail Ashraf

14.05 Hunterston B Site Reports

Hunterston B Report – Joe Struthers

ONR – Stephen Saunders

SEPA Report – Keith Hammond

Members Question and Answer Session Public Forum

14.30 Hunterston A Site Reports

Hunterston A Site Report – Mark Blackley

ONR – Peter Hughes

SEPA Report – Melanie Hayes

Members Question and Answer Session Public Forum

15.00 Update from NDA

David Wallace

Update from Magnox

Bill Hamilton

Update from Scottish Government

Diane Hamilton

Members Question and Answer Session Public Forum

15.30 Any Other Business

Next Meeting Thursday 13 June 2024

**HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
SUMMARY OF KEY POINTS FROM THE SEVENTIETH MEETING
HELD ON THURSDAY 7 DECEMBER 2023**

AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG

Chair's Opening Remarks

The Chair reported on various meetings, including monthly updates with both Station Directors and an annual meeting of NDA chairs and vice-chairs. The Chair highlighted reports in *the Guardian* regarding toxic work cultures at Sellafield. An ONR consultation on EDF's decommissioning plans for HNB, closing 28 March, would be circulated.

Actions and Approval of Previous Minutes

The minutes of the 14 September meeting were approved. There were no actions outstanding.

Hunterston B Report – Mr Joe Struthers

Mr Struthers highlighted that industrial safety remained strong. The individual radiological dose had been increased slightly, associated with an emergent defect repair carried out in period. The first AGR in the UK had been defueled on 18 September with all fuel removed from reactor 3 on plan, on budget, and safely.

ONR Report – Mr Steve Saunders

Mr Saunders reported that the ONR had been satisfied that legal requirements had been met in removal of fuel from reactor 3. Meetings had taken place on emergency response, relating recognition of the reduced level of risk on site.

SEPA Report – Mr Keith Hammond

Mr Hammond reported that SEPA had been focused on the refurbishment of the new decommissioning waste processing facility and installation of alternative active effluent discharge line, on which an application would be made to SEPA shortly. SEPA had been monitoring a non-radioactive oil leak from transformer 3. The radioactive dose around Hunterston was 0.005 mSvs, down from 0.006 mSvs in 2021, against a legal limit of 1 mSv.

Hunterston A Report – Mr Mark Blackley

Mr Blackley reported there had been one conventional safety accident resulting in a hairline fracture to the left ankle. A constructive meeting had taken place with SEPA and the ONR regarding characterisation of the bunker waste, which had agreed to produce a report examining all of the options for package measurement and inventories. 306 boxes from bunker 1 had gone to the store, equating 183 tonnes. 16 new roles were at various stages of the resourcing process, with seven new starts between September and November. Two graduate apprentices were to be recruited in 2024.

ONR Report – Mr Peter Hughes

Mr Hughes reported that inspections had focused on the reactor buildings and roof work, where adequate arrangements existed. A security inspection had also been adequate. A high radiation dose had been found in the cooling ponds, which was being dealt with appropriately.

SEPA Report – Ms Melanie Hayes and Mr Paul Dale

Ms Hayes reported that future gaseous discharge returns were being submitted compliantly, until a permanent process could be put into place. An inspection of the work instructions for the new visual inspections of the site discharge ventilation systems and stacks had found a very high standard of work.

Ayrshire Civil Contingencies Team Update – Ms Lesley Jeffery

Ms Jeffery reported the plan around movement from the site to the railway had been issued to partners. The offsite plan had been reviewed and modified to be more user friendly. Work had been slow due to staffing shortages.

Update from the NDA – Mr David Wallace

Mr Wallace reported that the NDA had an annual ministerial briefing on 26 October, including updates on the AGR and the potential move of the MOD Vulcan site to Dounreay. A member of the Scottish Government had moved into the future missions team.

Update from Scottish Government – Ms Diane Hamilton

Ms Hamilton reported that the Environmental Authorisations (Scotland) Regulations 2018 had been amended to bring together SEPA's four main regulatory regimes. The consultation would be available soon.

There were many questions asked by members after each presentation, the detail of which can be read in the full Minute of the meeting, available from the Secretariat.

Next Meeting – Thursday 7 March 2023



**MINUTES OF THE MEETING OF THE
HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
HELD AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG
THURSDAY 7 DECEMBER 2023**

Attendance/Apologies list

Present:

Community Council Representatives

Rita Holmes - Fairlie CC HSSG Chair)

John Lamb - West Kilbride CC

Jamie Woodburn - Largs CC

North Ayrshire Council

Eleanor Collier - Councillor

Stewart McKenzie - Environmental Protective Services

Leslie Jeffrey - Ayrshire Civil Contingencies Team (ACCT)

Nuclear Restoration Services

Mark Blackley - Station Director Hunterston A

Richard Gibson - Engineering and Infrastructure Manager

Colin Hargreaves - Independent Site Inspector

Alistair Walker - AGR Programme Development Manager

Claire Aitken – Communication/Secretariat

EDFe (Hunterston B)

Joe Struthers - Station Director Hunterston B

Stuart McGhie - TUC (HSSG Vice Chair)

Fiona McCall - External Communications

Nuclear Decommissioning Authority (NDA)

David Wallace - Stakeholder Lead Scotland

Scottish Government (SG)

Diane Hamilton - (Radwaste Team)

National Farmers Union (NFU)

William Jack - NFU Scotland

Hunterston Estate

Angus Cochran Patrick

Office of Nuclear Regulation

Peter Hughes - HNA Inspector

Steve Saunders - HNB Inspector

Scottish Environmental Protection Agency (SEPA)

Melanie Hayes - HNA Inspector

Keith Hammond - HNB Inspector

Paul Dale - SEPA Director

Civil Nuclear Constabulary (CNC)

Inspector Paul Gilmartin

Minute Taker

Matthew Dent

MOP

Alan Holden

Apologies

Tom Marshall - NA Councillor

Patricia Gibson MP

Bill Hamilton - NRS

1. CHAIRMAN'S OPENING REMARKS AND DECLARATIONS OF INTEREST

Ms Holmes, Chair, welcomed everyone to the seventieth meeting of the Hunterston Site Stakeholder Group in the Waterside Hotel, West Kilbride. Introductions were made around the table.

Claire Aitken read the apologies as listed above. There were no declarations of interest.

2. Chair and Vice Chair Updates and Correspondence

The Chair provided her report to the SSG:

Since the September meeting Stuart and I have had monthly updates from A station online and had ready access to B station management when necessary.

We attended the NDA Chairs and Vice chairs annual meeting in Manchester, in October to speak with the NDA Board and site updates. We met with Magnox (now called Nuclear Restoration Services) Chairs and Vice chairs at its annual meeting, also in Manchester last month. Bill will probably say more about that.

Jill Callander received a gift as thanks from all the sites for the kind, competent way she delivered secretariat services to us over many years. It was lovely to spend time with her before the business meeting next day. Thank you Bill for making that possible. Sheila who diligently took the minutes of our meetings has left and we have a replacement service today.

I want to mention three things:

The first relates mainly to Sellafield, the second to ONR's Consultation on EDF's proposed decommissioning plans and Environmental Impact Assessment for Hunterston B decommissioning and the third to Near Surface Disposal and better Characterisation of Bunker Waste.

1. Sellafield, has been described as a "bottomless pit of hell, money and despair" at Europe's most toxic nuclear site. That is what NDA is charged with cleaning up and making safe. That is what ONR has to stringently regulate. Sellafield is what the Guardian has been recently reporting on. ONR has warned that toxic work cultures have been factors in all major nuclear accidents and the Civil Nuclear Chief Constable Simon Chesterman has voiced his disappointment at the press article saying it has evidence of officers being involved in a group sending unacceptable and offensive messages of racist, homophobic nature as well as joking about paedophilia. The CNC, NDA and Regulators have much to consider, particularly regarding the Sellafield site which has multiple legacy waste problems to rectify, and of course the 120 tons of plutonium. The public expects better of a workforce, a management and a constabulary which are supposed to be keeping a potentially catastrophic site safe and secure. Sellafield is not just of relevance to the people of West Cumbria, who ONR has stated are living with an intolerable risk. It is relevant globally. We are all living with that intolerable risk from Sellafield. On a positive note, I am regularly told by ONR that Hunterston B is one of the best sites and has one of the best workforces. We suspected that already, but it is always good to hear.
2. The second item is ONR's Public Consultation on EDF's decommissioning plans for HNB. HNB has already consulted locally and we had a chance to make preliminary comments then. Thank you for that. I assume that as the plans are now more specific, then we should as an SSG make time to meet together and discuss these in early 2024 and well before

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the 28th March, the closing date for responses. It would be helpful if we could also be made aware of any changes NRS may have in mind to the EDFe decommissioning plan, as we are aware that A and B have been liaising.

3. Near Surface Disposal and better characterisation of bunker waste are also on our minds today so it is good to have Paul Dale of SEPA here today for an update on these.

On 12 December, the NDA group would be running a virtual stakeholder summit called 'Creating Meaningful Conversations'. David Wallace confirmed that around 140 people were registered to attend at the moment, and it was open to all stakeholders.

Stuart McGhie stated it had been noted that the councillors had not attended many of the recent meetings and suggested that the SSG write to them to say that their attendance would be advantageous.

Steve Saunders provided a response regarding Sellafield on behalf of the ONR:

"The ONR undertook several hundred inspections each year and were satisfied that Sellafield was meeting the high standards of safety and security required by law. If shortfalls were identified, they would and had taken timely and proportional regulatory action to bring about required improvements. The ONR's regulatory strategy for Sellafield encouraged the safe and timely reduction of hazards and risks whilst ensuring the site continued to meet its legal obligations. Significant progress had been made in decommissioning projects in recent years, and the ONR would continue to work to ensure this momentum was maintained. With respect to *The Guardian* article, *The Guardian* had not consulted with regulators before publication. There were a number of factual inaccuracies in the report, in particular regarding the cyber issue. The ONR had placed a rebuttal statement on its website that there was no evidence that Sellafield systems had been hacked by state actors. More information could be obtained from the ONR press office."

Jamie Black noted he had expected to hear a bit more about the plans for Hunterston B, with which he agreed. The Chair noted that the plans would formally go to the ONR, who were seeking comments from the public. Steve Saunders noted the closure date for the consultation was 28 March 2024, and was prominent on the ONR website. The Chair said the SSG secretary could circulate the link.

ACTION: The secretary to circulate the link to the ONR consultation on the plans for Hunterston B.

3. ACTIONS AND APPROVAL OF PREVIOUS MINUTES

There were no actions from the previous meeting.

John Lamb proposed that the minutes of the previous meeting be approved. William Jack seconded the motion. The minutes of the previous meeting were approved as a true and accurate representation of the meeting.

4. HUNTERSTON B STATION REPORTS

Hunterston B Site Report – Mr Joe Struthers

Joe Struthers presented his report. He highlighted that industrial safety had remained strong. In regard to radiological protection, the maximum individual dose had been slightly raised, which was associated with an emergent defect repair carried out in that period.

Revised emergency arrangements, which remain proportional to the hazards during defueling, are being implemented. A Proof of Concept exercise has been completed and the Station are

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endeavouring to implement the changes in January 2024 subject to a Licence Instrument being granted.

On defueling, a milestone had been achieved with the first AGR in the UK being defueled on 18 September, with all fuel being removed from reactor 3 on plan, on budget, and done safely. There had since been an outage period overhauling fuel route equipment, prior to commencing reactor 4 defueling. The fuel removed from reactor 3 had been shipped offsite.

ONR Report – Mr Steve Saunders

Steve Saunders presented his report, which covered the period from 1 July to 30 November.

The ONR's focus remained on continued safety of defuelling operations and the move to decommissioning and transfer. Fuel had been removed from reactor 3, and in all cases the ONR had been satisfied that legal requirements had been met.

The ONR had had a number of meetings on emergency response and the proof of concept exercise, relating to proposed changes to recognise the reduction of risk on site. Once additional work had been completed on site, there was no reason why approval for the revised arrangements should not be able to be granted.

SEPA Report – Mr Keith Hammond

Keith Hammond presented his report.

SEPA had been onsite a few times since the last SSG meeting, mostly focused on transition and deconstruction, the refurbishment of the new decommissioning waste processing facility, and the installation of the alternative active effluent discharge line. An application on this would be coming to SEPA shortly.

SEPA had been monitoring the non-radioactive oil leak from transformer 3, which was being managed. It had been discovered that the entire fleet had been using zinc bromide in windows of the irradiated fuel dismantling cell, which being dealt with on a fleet basis. The Radioactivity In food in the Environment (RIFE) report covering 2022 had been published in early November, and the dose around Hunterston was 0.005 mSvs, down from 0.006 mSvs 2021, and against the legal limit of 1 mSv.

Questions and Answer Session

John Lamb asked how much was still outstanding in terms of fuel from reactor 4 which needed to go offsite. Joe Struthers explained that defueling had just started on reactor 4, and everything removed from reactor 3 had been shipped to Sellafield. All of the containers were moved by rail.

The Chair queried whether the earlier flooding of reactor 4 had made any difference to the state of the reactor. Joe Struthers confirmed it had made no difference to refuelling operationally. No additional issues specific to reactor 4 were anticipated. The Chair asked whether when both sites came under the NDA in a few years, whether the existing welfare provisions would be upgraded. Joe Struthers said Hunterston B facilities were upgraded every year. Mark Blackley added that there had been a lot of work to upgrade the welfare facilities over recent years, and as the sites were joined opportunities would be sought to operate safely and more efficiently.

Jamie Woodburn queried the strategy for Hunterston B. There had been nothing in the NDA business plan around a plan for Hunterston B. Joe Struthers explained that EDF had well-developed plans for decommissioning and were working closely with NRS on a seamless combined plan. Public consultations had taken place in 2022 and 2023. A lot of joint working was taking place. Steve Saunders added that LC35 required the station to have a decommissioning strategy. Inspectors were working to ensure a seamless transfer, and if they were not comfortable around this a licence was unlikely to be granted to NRS. Jamie Woodburn asked when the decommissioning plan would be published. Steve Saunders explained that the plan was being worked on and the required detail was not yet present.

5. HUNTERSTON A SITE REPORTS

Hunterston A Site Report – Mr Mark Blackley

Mark Blackley presented his report.

There had not been any new significant nuclear, radiological, environmental or security issues since the last SSG meeting. There had been one conventional safety accident whereby a security camera had been lowered in uncontrolled manner causing a hairline fracture to the worker's left ankle. An investigation was being carried out. Since the last SSG meeting there had been a successful demonstration of the accident, emergency and security contingency arrangements.

In relation to the variation request which had been submitted, a constructive meeting had taken place with SEPA and the ONR regarding characterisation of the bunker waste. It had been agreed to produce a report examining all of the options for package measurement and refinement of package inventories.

Waste was being recovered from the bunkers, with 306 boxes from bunker 1 having gone to the store, equating to 183 tonnes.

Preparations for active commissioning of WILWREP acid retrievals were continuing. It is expected that active commissioning will start in January.

Recruitment was continuing, with 16 roles at various stages of the resourcing process. There had been seven new starts between September and November. Two graduate apprentices in engineering were to be recruited in 2024, jointly with Hunterston B

ONR Report – Mr Peter Hughes

Peter Hughes presented his report, which covered from 1 July to 30 September.

Inspections had focused on the reactor buildings and roof work which had taken place. It had been determined that adequate arrangements existed. A security inspection had also been held, the results of which had been adequate.

A high radiation dose had been found in the cooling ponds. This was being dealt with appropriately.

SEPA Report – Ms Melanie Hayes

Melanie Hayes presented her report, which covered from the last SSG meeting to mid-November.

Melanie Hayes had been on site on 31 October to undertake an inspection of the temporary process put in place to submit monthly gaseous discharge returns. The inspection had found that measures put in place were likely to ensure the future discharge returns were being submitted compliantly, until a permanent process could be put into place.

An inspection had taken place of the work instructions for the new visual inspections of the site discharge ventilation systems and stacks. A very high standard of work had gone into this. An information notice had been sent requesting provision of information to assess compliance of the ventilation systems. Almost all of this had been submitted. Melanie Hayes would be back on site in February to discuss whether the site had returned to compliance.

Paul Dale explained that SEPA had been asking for appropriate characterisation of bunker waste for four years. This had not come forward, and various information had come forward from the site in support of the EA(S)R variation. An external consultant had reported back that the information was not sufficient to underpin a variation, and SEPA had met with Magnox jointly with the ONR to make this clear. It had been agreed that bunker 1 waste would be treated separately to bunkers 2 to 5, and Magnox would undertake the report examining all of the options.

Questions and Answer Session

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The Chair asked whether the National Nuclear Laboratory report was what SEPA had relied on to claim that characterisation had not been completed. Paul Dale explained that it had been an independent review, which had confirmed SEPA's views. The Chair asked why ONR appeared less stringent. Paul Dale explained that management and disposal of waste was a SEPA responsibility, whilst safety was an ONR responsibility. The driver for bunker 1 was safety.

The Chair asked how soon local people could expect details about options proposed for dealing with waste. Paul Dale explained SEPA had asked Magnox to consider what was possible. Mark Blackley stated a scope had been written, but a timescale had not yet been arrived at. The Chair asked whether the NNL report was open to the public. Paul Dale anticipated it would form part of the SEPA response to the consultation.

John Lamb queried whether the source of the high dose item in the cooling pond had been identified. Mark Blackley said it had been the pump. Additional options for bunker 1 were being worked through.

The Chair asked whether the KUKA robot was ever going to work properly. Mark Blackley noted there were functioning KUKA robots used on site but they were having particular difficulties with the robots in SILWE.

The Chair noted the aging facility at Hunterston A, and queried whether the steam raising units were inspected closely. Peter Hughes noted that arrangements had been looked at and it had been concluded they were adequately managed at present.

The Chair asked whether there had been any movement on height reduction of the reactor building. Mark Blackley reported that the rolling plan for decommissioning was being looked at.

6. UPDATE FROM AYRSHIRE CIVIL CONTINGENCIES TEAM – MS LESLEY JEFFREY

Lesley Jeffery presented her update.

The plan which the SSG had requested had been issued to partners, dealing with movement from the site to the railway. The offsite plan had been reviewed and modified to be more user friendly. This was with the group for comment, before being issued. The team had been slow in getting this work done due to staffing shortages.

Questions and Answer Session

Steve Saunders noted the next offsite test was to be by 2025. At the present rate, the second reactor would be defueling. He suggested requesting from the ONR whether they would still hold the team to an offsite plan. Lesley Jeffery reported that these discussions were already happening. It might be a tabletop exercise. A meeting would take place in June 2024.

Richard Gibson noted that B station would go through an exercise considering worst case scenarios and external hazards, the biggest of which being aircraft impact. Steve Saunders noted that the law did not require the worst case per se, but the reasonably foreseeable worst case. In terms of nuclear, the worst case foreseeable scenario would be a local release on site. Jamie Woodburn noted that the pandemic had been unpredicted, as had other events. Steve Saunders stated that the local authority had a range of contingency plans, with nuclear being only one of them. The likelihood of a nuclear incident was very low from the start, due to the safety measures already in place.

7. UPDATE FROM NDA – MR DAVID WALLACE

David Wallace presented his report.

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The NDA had had an annual ministerial briefing on 26 October. The NDA had a statutory obligation to brief Scottish ministers on mission progress in Scotland. This had included updates on the AGR and the potential move of the MOD Vulcan site to Dounreay. This had been well received. Mairi McAllan MSP, the Scottish Government Cabinet Secretary for Just Transition and Net Zero, had asked the NDA to make contact with the innovation department at the Scottish government regarding closer working, which was an ongoing conversation.

There had been a Scottish supply chain event on 8 November at Dunblane, with a UK event taking place on 27 June in Telford. The socio-economic refresh was currently out for consultation until the end of January.

There had been a second secondment to the Scottish government, as well as a member of the Scottish Government from Diane Hamilton's team having moved into the future missions team.

Questions and Answer Session

Angus Cochran-Patrick noted that the NDA had sold six hectares of land in Scotland, and queried whether this had been at Chapelcross. David Wallace confirmed that it had been.

8. UPDATE FROM SCOTTISH GOVERNMENT – MS DIANE HAMILTON

Diane Hamilton presented her report.

Regarding the radioactive waste concept project, it had been decided that one online session would be held for all SSGs. The logistics and date for this were being decided. Survey questions were being developed for a public survey on attitudes to radioactive waste disposal, to be released in the next few weeks.

The Environmental Authorisations (Scotland) Regulations 2018 had been amended to bring together SEPA's four main regulatory regimes. The consultation for this would be available soon, including minor amendments to the radioactive substances framework for clarification.

Questions and Answer Session

The Chair queried SEPA's view on the EA(S)R amendments. Paul Dale said the intention was for a single permit across different regimes. SEPA had been very much in favour.

Jamie Woodburn asked about the attitudes survey for radioactive waste. Diane Hamilton explained it had been a commitment in the 2016 strategy. Jamie Woodburn asked what this would drive. Diane Hamilton said the questions would be very general and not site specific. She was not sure what would be done with the results once complete and would find out and come back on this. The Chair said Claire Aitken would send the link out to the SSG members.

ACTION: Diane Hamilton to come back to the SSG in regard to what the attitudes survey would be used for.

9. ANY OTHER BUSINESS

The Chair thanked those present for attending and closed the meeting.

Next Meeting date: Thursday 7 March 2024.

Actions from Hunterston SSG Meetings

ACTIONS FOLLOWING SSG MEETING 07.12.23

ACTION	DETAIL	RESPONSE	STATUS	DATE
A meeting of the SSG consultation sub-group to be arranged	A meeting to be arranged to formulate an SSG response to the draft NDA Social and Economic Impact Strategy.	Meeting held: 19.02.24 SSG Response sent to NDA 20.02.24	Complete	19.02.24
NDA Virtual Stakeholder Summit invite to be circulated	The NDA are hosting a Virtual Stakeholder Summit on 12 December. Invitation to be circulated to all SSG voting members	Invitation circulated.	Complete	12.12.23
Chair to write to Cllrs to attend SSG meetings	The Chair is going to write to the Cllrs who site on the SSG to provide them with the dates for the rest of the year and to ask that they attend.	Email circulated	Complete	27.02.2024
Jamie Woodburn to forward a copy of his email	Jamie Woodburn to forward a copy of the email that he sent to the NDA to Chair and Vice Chair and to David Wallace.		Ongoing	
Diane Hamilton to provide detail on the attitudes survey	Diane Hamilton to come back to the SSG in regard to what the attitudes survey would be used for	The need for the Scottish Government to conduct research and development (R&D) is set out in the 2016 Implementation Strategy for our 2011 Higher Activity Radioactive Waste (HAW) Policy. This identifies the relevance of societal attitudes to implementing waste management solutions and identifies research to understand societal attitudes as a focus area, amongst others, for R&D. This wider public engagement work complements specific engagement undertaken by the Scottish Government with stakeholders in the sector, including the	Complete	22.02.24

		communities around Scotland's nuclear sites and will inform implementation of the SG HAW Policy and any future review.		
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Site Stakeholder Group

Hunterston B Station Director's Report

Period: November 2023 to January 2024

1. Defueling

Following the successful completion of R3 defueling, the station carried out a five week fuel route outage. During this time staff briefs were held to reset standards and expectations and to highlight some key process changes before Reactor 4 started defueling on 1st November 2023.

The team faced an early challenge when they experienced difficulties in removing a component called a “tie bar end fitting” from one of the fuel assemblies. Following some excellent cross-function working a mechanical removal solution was developed and the component was successfully removed. This caused an early delay in defueling of Reactor 4 but work is underway to recover the flasking schedule which was affected by the issue.

The issue with the seized component has reoccurred once however, due to the excellent work carried out by the initial event recovery team, the mechanical removal method was re-deployed and in this instance the delay was less than a week.

A review of events has produced a robust action plan that will improve the station’s resilience to any future similar events and also to seek to understand a technical cause that will be used as learning for other stations as they head toward defueling.

The station has defueled 35 channels from Reactor 4 and the flask schedule is beginning to recover. Defueling on Reactor 4 will pause for around a month from mid-February whilst essential statutory compliance work is completed on the charge machine.

2. Transfer and Deconstruction

Site Transition

Upon completion of defueling, we will seek to adjust our site arrangements to support deconstruction. This will mean a new safety case, emergency arrangements, security arrangements and organisational structure. The scoping phase of the transition plan has now been completed and we are now moving into the design and development phase. No implementation work will take place until the site is fuel free.

In the quarter we have completed a draft management of change paper which describes the organisational design for the site following Fuel Free Verification (FFV) ready for regulator engagement. We have also further developed our understanding of the security requirements for the site following FFV and shared this with the ONR.

During the period we wrote to the Civil Nuclear Constabulary (CNC) to give them notice of cessation of service once defueling is complete. The CNC has provided valuable support to Hunterston B power station for nearly 20 years but the additional protection they provide will no longer be required once all the nuclear fuel has been removed from site. There will still be a security team based at the site which will put the level of protection in line with other nuclear sites once defueling has been completed.

Giving CNC notification at this time allows the force to start consultation with their officers.

Asset Transfer

EDF and NRS are working together to deliver the safest, most cost-effective solution for decommissioning the UK's Advanced Gas-cooled Reactor (AGR) fleet. This involves a seamless transfer of the site to NRS after the completion of defueling by EDF. A work break down structure and joint plan has been agreed and outlines the scope of work required to enable transfer by April 2026. Both NRS and EDF remain fully committed to working together to deliver seamless transfer of the site licence to NRS.

Deconstruction Delivery

Work continues to prepare for deconstruction, which will start following the completion of defueling. Key focus areas are waste strategy, consents and permission (public consultation) and deplanting and demolition strategy. The overall decommissioning strategy remains 'Early Safestore'.

A number of synergy groups have been setup at a working level between key EDF and NRS subject matter experts ensuring alignment in deconstruction approach.

Some highlights for the quarter have been the EIADR submission to the ONR which, on approval, will allow the site to move into the delivery phase of Deconstruction (post FFV) whilst in another area work has progressed to secure a new incoming electrical supply for the site designed to last for the full decommissioning lifecycle of the site. Work is due to complete on this in Q1 of 2024. In addition, we have been running Deconstruction briefing sessions for all personnel on site to provide a high level summary of the work contained in the plans and the broad timescales in which it will be delivered. The sessions have been well received and engagement with them has been excellent (over 450 personnel briefed).

3. Safety and Environment

Station Industrial Safety Performance

Safety performance during the reporting period has been strong and our Total Recordable Injury Rate (TRIR) was zero for 2023. This means that no one on site required medical attention due to an accident in the workplace.

In January 2024 we held our 'Safe Start' campaign. Over the week we carried out various forms of engagement with staff and contract partners across the station. Walk down of work sites were carried out by station leaders, as well as attendance at start of shift briefs and setting to work meetings. Spending time in the field was extremely valuable and allowed for some good conversations around our work site standards and expectations. 'Safe Start' was supported by a week of daily safety messages from multiple departments and over the week we had a presence at the turnstiles from: Fire Safety, Occupational Health, Industrial Safety, Human Performance and our mental health team.

Team monthly safety meetings continue to be a success and recent topics included winter driving and safety rules. These meetings generate good discussion amongst teams and contract partners, helping to keep safety as the key focus on site.

Our building and fabric condition continues to be a key focus for the station. We are investing in upgrades to our buildings and this has continued over the winter months despite the obvious challenges with weather.

In February 2024 we will have an in-depth review of our Key Risk Tool. This tool is used to monitor our compliance with Health and Safety legislation and drives improvements in industrial safety over 39 different topics.

Although safety performance was very good in 2023, the station is committed to driving improvements to ensure our Zero Harm ambitions are realised.

Radiological Protection

The radiation dose of each worker is assessed individually by an electronic personal dose meter. A computer database keeps records for each worker. Exposure is continuously monitored and ultimately compared with the levels specified in the Ionising Radiations Regulations (2017) which are the UK Health and Safety legislation that applies to work with radiation.

During the reporting period the Collective Radiation Exposure (CRE) was above plan (see table below). Collective doses are pre-planned for each year based on scheduled maintenance, outages and routine operations. A breakdown of dose received is shown below (along with a comparison of relevant dose statistics).

All work is fully reviewed and justified in order to ensure all doses received were ALARP (As Low As Reasonably Practicable). This involves justifying and optimising the dose, as well as remaining within those dose limits.

Differences between the actual and planned dose can be down to a range of factors including changes to the work programme, development of new techniques for carrying out work that will result in a lower dose and the deployment of new equipment. In this case, emergent faults in the Irradiated Fuel Dismantling (IFD) Cell resulted in the actual dose being higher than predicted.

There were no reportable radiological protection events during this reporting period.

Radiation Dose to workers (November 2023 - January 2024)		
Planned collective dose	13.1man.mSv	
Actual collective dose	14.3man.mSv	
	Employee	Contract Partner
Total Dose	12.02man.mSv	2.31man.mSv
Average individual dose	0.04mSv	0.01mSv
Highest individual dose	1.79mSv	0.71mSv
Individuals	333	208

Chest X-ray	Transatlantic Flight	CT scan	Average UK annual dose to public	EDF Energy Dose Restriction Level	UK legal dose limit for radiation workers
0.014mSv	0.08mSv	2.0mSv	2.6mSv	10mSv	20mSv

Explanatory notes:

- mSv: milliSieverts (SI unit of dose received by an individual)
- man.mSv: The collective dose for a group of workers (i.e. the total of the doses received by each member of a group).

Environmental Safety

There have been no significant environmental events in the period November 2023 to January 2024.

Work continues to record the leak rate of biodegradable insulation fluid from one of the station Transformer cables. If the rate increases to a point where a tracer can be detected, further investigation will be carried out. So far the leak rate has been too low to use a tracer. SEPA has been kept fully informed.

Radioactive gaseous and aqueous discharges arising from normal plant operations in defueling remain at levels well below those authorised by SEPA.

The programme of off-site environmental monitoring and radiation surveys in the district has continued throughout the period and demonstrates that the radiological discharges from the station have a negligible impact on the local environment. Reports are provided monthly and quarterly to SEPA, detailing the samples and results of analysis performed.

Work to process and package solid low level wastes has continued in the period as part of normal operations and consignments have been made to our regular partners.

During the generating and defueling phases of the power station, Hunterston B uses a significant volume of sea water as a tertiary cooling system. The radioactive discharge permits currently in place specify a large volume flowrate of water to make radioactive discharges to sea, which can only be achieved by the main Cooling Water (CW) system.

Following the removal of all nuclear fuel from the site, there will be no justification for the continued use of the main CW system, which requires significant electrical power and maintenance resource. An application has been made to SEPA to change the discharge permit to remove the condition requiring the CW flowrate for effluent discharges.

The application has been made following a full option elimination process which included dispersal modelling using real-world observations and modelling which showed that, given the deep water the discharge is released into, the flow rate and tidal windows have very little influence on dilution and dispersion in the Firth of Clyde at the permitted discharge point.

The application does not request a change to the permit limits and environmental monitoring will continue throughout the deconstruction phase.

Emergency Arrangements

There have been no issues with the emergency arrangements during this reporting period. Hunterston B continues to work closely with fleet Emergency Preparedness Group as the lead defueling site.

As a company we continue to look to optimise our emergency arrangements in line with the risk profile of the station. Following the end of generation at Hunterston B in January 2022, the station risk profile has changed. On Monday 22nd January 2024 at 12:00, we

implemented optimised defueling emergency arrangements and an update to Hunterston B's emergency plan went live.

Hunterston B Power Station's Emergency Plan - HPS/EP (Revision 025) has been issued, alongside a number of updates to the emergency handbooks and associated documentation. The new emergency arrangements remain proportional to the hazards during defueling, so that resources, equipment and facilities are optimised to support our emergency response capability. The changes to the emergency scheme arrangements can be summarised as resource changes and involve a change to, or removal of, some roles. We will continue to review the emergency arrangements.

During the reporting period we have also commenced our first exercise season of 2024, which will allow our existing role holders and trainees to exercise their roles in defueling and conventional hazard based scenarios. The 2024 exercise plan also contains a number of demonstration exercises this year, as well as a second exercise season in the autumn. This will help to facilitate our ongoing role succession plan and will further increase the opportunity for training and authorisations later in the year.

4. People

As part of the Leadership Development Plan, the Leaders forums have continued which give leaders the opportunity to come together, ask questions, and discuss topics. At the start of November the topic was on 'Keeping Your Team Motivated'. There were a number of sessions available for leaders and trade union representatives to attend. In January the session was on 'Diversity and Inclusion - what's it all about' and was another well-attended session which gave the opportunity for leaders to be able to share experiences and have open discussions. Both these sessions have received positive feedback and there will be further sessions delivered throughout 2024 to support our leaders and trade union representatives.

A topic that employees had requested more information on was TUPE. Helen Whiteman, Policy Manager and Helen Hamilton, Employee Relations Manager delivered TUPE awareness sessions. These were available for all employees to attend and gave the opportunity to gain a better understanding of how TUPE is applied and to ask any questions. It was communicated that while these sessions provided an overview, more detailed information about what TUPE will mean for Hunterston employees will be made available ahead of formal consultations happening. These sessions were positively received and a TUPE fact sheet was made available for everyone to view on the People Hub.

In December, which can be a challenging time of year for some, the Mental Health First Aiders were chatting to people on their way in. They were giving out tea and biscuits and letting everyone know it is OK to take a time out, stop, have a cuppa, a biscuit and a chat. There was also a communication to 'meet the team' who showed who all the Hunterston Mental Health First Aiders are along with why they think being a Mental Health First Aider is important, a bit about themselves, as well as a fun fact and contact details.



Conscious Inclusion Champions have been introduced as part of Hunterston creating an environment where everyone is welcome, can be themselves and do their best work. The Conscious Inclusion Champions will help to further build a sense of belonging and inclusion through empowering colleagues to role model conscious inclusion, break down silos and inform inclusion related change. This is part of EDF's Conscious Inclusion Programme and Hunterston B's five Conscious Inclusion Champions are part of the fifty-seven who have been introduced across Nuclear Operations and Nuclear Services.



5. Company Update

Investment boost to maintain UK nuclear output at current levels until at least 2026

EDF manages the UK's eight nuclear power station sites, five that are generating (Sizewell B, Torness, Heysham 2, Heysham 1, Hartlepool) and three that are defueling (Hunterston B, Hinkley Point B and Dungeness B) and is issuing its annual fleet update on 10 January 2024.

- EDF plans to invest a further £1.3billion in the UK's five generating nuclear power stations over 2024-26, taking the total invested in the fleet to nearly £9billion since 2009.
- UK nuclear output in 2023 was 37.3TWh, 15% lower than 2022 due to station closures and statutory outages but nearly four times the forecast when EDF acquired the fleet in 2009.
- EDF plans to maintain output around this level until at least 2026. This improved outlook has been driven by life extensions announced for Heysham 1 and Hartlepool in March 2023.
- The ambition is to further extend the lives of the four generating AGR stations, subject to inspections and regulatory approvals; a decision will be taken by the end of 2024.
- Through its nuclear operations business, EDF will pay around £600million in taxes for 2023, including £200million through the new Electricity Generator Levy.

EDF's plans to invest a further £1.3billion in the UK's five generating nuclear power stations over the 2024-26 period will help sustain output at current levels, boost energy security and cut carbon emissions. The more positive fleet outlook, and major new build programme, means EDF plans to hire over 1,000 people in 2024 across its various UK nuclear businesses.

The future investment plan for the operating fleet comes 15 years after EDF's acquisition of British Energy PLC, a period in which £7.5billion (equivalent to £270 per household) has already been invested in the UK's eight nuclear power stations, alongside major investment

into the Hinkley Point C and Sizewell C projects. Three of those eight stations are now in the defueling phase, the first stage of decommissioning.

Without EDF's investment and expertise, Sizewell B power station would be the only operational nuclear power station in the UK today and nuclear would provide just 3% of the UK's power consumption rather than the 13% it does account for. This would have meant even more reliance on gas, higher energy prices for customers and more carbon in the atmosphere.

Dr Mark Hartley, Managing Director of EDF's Nuclear Operations business, said "EDF has built a strong track record of safely operating the UK's existing nuclear fleet, delivering over 35% more clean power than initially forecast. Looking ahead, our aim is to maintain output from the four AGR stations for as long as possible and extend Sizewell B by a further 20 years, out to 2055. Maximising output also helps preserve the critical nuclear skills and capabilities that will be valuable for future nuclear projects."

EDF's 15-year investment in the UK nuclear fleet has delivered the following benefits:

- The stations have generated over 35% more electricity than initially forecast at the time of acquisition, through successful life extensions and improved operational performance
- This extra output (212TWh) is enough to power all UK homes continuously for 2 years and has saved an additional 74million tonnes of carbon dioxide from entering the atmosphere, compared to gas-fired power
- Sustained employment for over 4,000 critical operational and technical skills, while the UK's new nuclear programme begins to take shape, as well as thousands of jobs in the supply chain. Over 500 people have transferred from operations to Hinkley Point C in the last decade.
- Additional tax payments to Government under the new Electricity Generators Levy (EGL) are estimated to be over £600million over the 2023-2025 period; for 2023 they will be around £200million, with EDF's average realised price at £90 per MWh.

Following the scheduled end of generation at three stations across 2021-22, nuclear power generation in 2023 totalled 37.3 TWh and the objective is to keep it around this level until at least 2026. This medium-term forecast is 40% higher than estimated last year and is driven by the decision in March 2023 to extend generating lifetimes at Hartlepool and Heysham 1 power stations (combined 2.2GW capacity) by a further two years, to a current forecast of March 2026. Heysham 2 and Torness power stations (2.4GW) are currently due to generate until March 2028. These AGR lifetimes will be reviewed again by the end of 2024 and the ambition is to generate beyond these current forecasts, subject to plant inspections and regulatory approvals.

Sizewell B power station in Suffolk has so far generated over 250TWh in its 29 years of operation and has the potential to generate for at least a further 20 years beyond its current end of generation date of 2035. EDF is investing in the station to allow a final investment decision to be taken on this during 2025; securing a sustainable commercial model is necessary to enable such a decision.

As well as the positive impact on energy security and carbon emissions, the revised output forecast is good news for nuclear skills as it helps to sustain many of the fleet's 5,000 jobs for longer, especially in Lancashire and on Teesside which are also two of the Government's eight designated sites for new nuclear development.

EDF is also responsible for defueling the AGR power stations, three of which have entered this phase since mid-2021. Hunterston B is already more than halfway through defueling and Hinkley Point B is over a quarter of the way through; both these stations are due to transfer

to Nuclear Restoration Services (formerly Magnox) in 2026 for long term decommissioning. Dungeness B power station started defueling operations in May 2023. Under the 2021 decommissioning agreement with the Government, EDF will defuel the stations and NRS will manage the long-term programme. Funding for this is provided through the Nuclear Liabilities Fund (NLF), which had a fund size of £20.4billion at 31 March 2023.

6. Contacts

For more information about anything in this report or other station issues, contact:

Fiona McCall, Senior External Affairs Manager

Tel: 07813 232 347

E-mail: fiona.mccall@edf-energy.com

Nikki Thomson, Communications Coordinator

Tel: 01294 826157

E-mail: nikki.thomson@edf-energy.com

Hunterston Site Stakeholder Group

SEPA Update- Hunterston B

7 March 2024

SEPA Board Changes

SEPA has welcomed the appointment of Lisa Tennant as Chair of the agency, with effect from January 2024. Ms. Tennant was appointed by The Cabinet Secretary for Transport, Net Zero and Just Transition, Màiri McAllan MSP and replaces outgoing Chair, Bob Downes. Ms. Tennant is a Chair and Non-Executive Director with wide ranging experience across the private, public, and charitable sectors. Her previous Board roles include Forestry & Land Scotland and the Scottish Land Fund, where she championed environmental interests.

In addition, Dr Carol Evans, David Hunter, Lindsay MacDonald, Lorraine McMillan, Dr Sue Paterson MBE and Keith Rosser have all joined SEPA's Board following appointments made by Scottish Ministers and regulated by the Ethical Standards Commissioner. The new Members all join from diverse backgrounds in public, private, and third sector and complete our refreshed Board.

Regulation

Environmental Authorisations (Scotland) Regulations 2018 (EASR)- radioactive substances

We have continued telephone communication with the station throughout the period, including formal weekly call-downs with the station's Environmental Safety Group and corporate Generation Environment Management as well as monthly updates from the EDF internal regulator on site. We have also attended routine meetings with corporate EDF, Nuclear Restoration Services (formerly Magnox), ONR and EA on strategic issues, including defueling, transfer and decommissioning.

Site Inspection

We have visited the station twice since the last SSG meeting. On 15 December 2023, SEPA attended the site to close-out outstanding issues from the past year and agree the way forward on those remaining. No new contraventions were identified.

The station was visited again on 14 February 2024 to follow up on two minor errors found in recent data returns to SEPA. The station's investigation report into the event was reviewed and the proposed corrective actions discussed. The corrective actions will be monitored in future SEPA inspections to ensure they are completed and no further errors occur. The inspection was also used to discuss a number of decommissioning projects with station Transition & Deconstruction staff.

EASR Permit Variation

The station applied to SEPA on 31 January 2024 to vary its EASR permit. The application seeks to remove the minimum aqueous discharge flow rate (7m³/s) and tidal window

requirements (one hour after high tide to one hour before low tide) whilst keeping the same discharge point. This application has been made in anticipation of turning off the main cooling pumps which will no longer be required after the station is defueled. No changes to the station's gaseous or aqueous discharge limits are proposed.

Pollution Prevention and Control (PPC)

SEPA are continuing to work with EDF to include additional sample locations and increase the scope of the analysis suite to ensure the biodegradable oil is having no significant environmental impact. The analysis results will be reviewed to determine if further amendments to the monitoring regime are required. Otherwise, there have been no issues relating to the station's PPC permit for its non-radioactive emissions from the emergency diesel generators, auxiliary boilers and waste oil burner since the last scheduled SSG meeting.

Control of Major Accidents and Hazards (COMAH)

It has been identified that the EDF AGR fleet has not accounted for the presence of zinc bromide, used in the windows of Irradiated Fuel Dismantling Cells, in their COMAH inventories for the stations, including Hunterston B. EDF will be submitting a single Major Accident to the Environment (MATTE) assessment report for Zinc Bromide use at all their sites in the fleet. EDF may also need to submit an application to the local authority to vary their Hazardous Substances Consent to reflect the Zinc Bromide inventory. SEPA & ONR are statutory consultees on applications for hazardous substances consents.

Controlled Activities Regulations (CAR)

There have been no other issues relating to the station's non-radioactive liquid discharges to the water environment since the last scheduled SSG meeting.

Fluorinated Greenhouse Gas Emissions (F-Gas)

There have been no other issues relating to the stations' F-Gas usage since the last scheduled SSG meeting.

UK Emissions Trading Scheme (ETS)

There have been no issues relating to the ETS since the last scheduled SSG meeting.

Environmental Events

There were no reportable incidents, complaints or non-compliance events affecting SEPA's interests at either site known to have occurred since the last meeting of the SSG at the time of drafting this report.

Radioactivity in Food & the Environment (RIFE)

RIFE is a collaborative report on work carried out by SEPA, the other UK environment agencies, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and the environment. The RIFE reports aim to provide an in-depth assessment of radioactivity in food and the environment in the UK and the public's exposure to radiation, including in the vicinity of Hunterston B. The RIFE report incorporates the results from the analysis of a wide range of samples and key information on local habits to demonstrate both that food remains safe and that the public's exposure to ionising radiation is within legal limits.

The latest edition (RIFE 28) covering 2022 has been published and can be obtained from SEPA's website along with previous year's reports. RIFE 28 reports that the total dose for the representative person (most exposed) around the Hunterston site, which includes both Hunterston A and Hunterston B, for 2022 was less than 0.005 millisieverts, which is well below the legal annual dose limit of one millisievert as set out in paragraph 26, Schedule 8 of EASR18.

Scottish Pollutant Release Inventory (SPRI)

The Scottish Pollutant Release Inventory (SPRI) is a publicly accessible electronic database of releases of pollutants to all environmental media and transfers of non-radioactive waste. We intend that, as far as practicable, SPRI be the principle means by which information on Scottish pollutant releases and non-radioactive waste transfers is collected and made public. Wherever possible, such information will be collected and presented by this one system. The data for 2022, including that from Hunterston A and B, have been published and are available on SEPA's website under "*Environment/Environmental data/SPRI*".

Mr Keith Hammond

Radioactive Substances Specialist/*Speisealach Stuthan Reidio-beo*

21/02/2024



HUNTERSTON A

SITE STAKEHOLDER GROUP REPORT

SITE DIRECTOR – MARK BLACKLEY

MARCH 2024

HUNTERSTON A
SITE DIRECTOR'S REPORT TO THE SITE STAKEHOLDER GROUP
MARCH 2024

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 Conventional, Nuclear, Radiological, Environmental or Security issues over the reporting period.

With regards to the Final Warning Letter on site ventilation systems and stacks SEPA has deemed the site to have returned to compliance with the EA(S)R Standard Conditions A2.1 and A3.1.

With regards to the bunker waste characterisation NRS have produced a scope document which will assess options for desktop-based refinement of the package inventories, options for waste stream fingerprint refinement through physical sampling and analysis and options for final package measurement.

We continue to retrieve waste from SAWB Number 1. 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). We are currently processing box 1209 which we anticipate will be the final box of bulk material. 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.

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.

Active Commissioning of the New Effluent Treatment Plant (NEffTP) at HNA is planned to start Active Commissioning before the financial year-end.

The CCP and Miscellaneous Delay Tanks are planned for decontamination to start before the financial year-end. The team are now focused on finalising the commissioning steps for the ventilation system prior to starting decontamination works before moving onto the de-planting of redundant structures and equipment.

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.

We have successfully completed the transfer of all three electrical site supplies from the old primary substation to the new primary substation.

The Reactor SRU roofs are now complete. Overall, 75% of the Sarna Bar repairs are complete and almost 50% of the Sika coating is complete.

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 passed 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 have 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 SSoW 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 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.

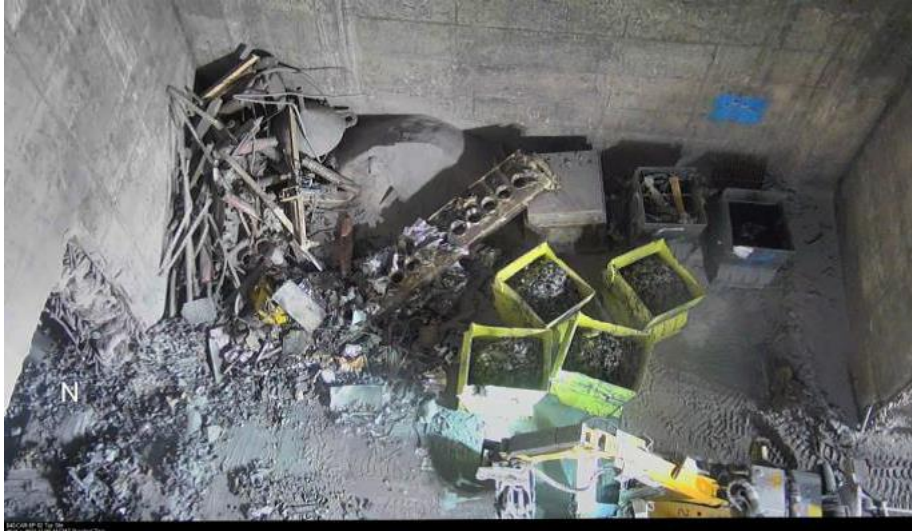
To date, the SAWBR team have safely exported a cumulative total of **316** 3M³ boxes from Bunker 1 to the ILW Store equating to **187.2** Tonnes of Bunker 1 waste.

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.

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.

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.



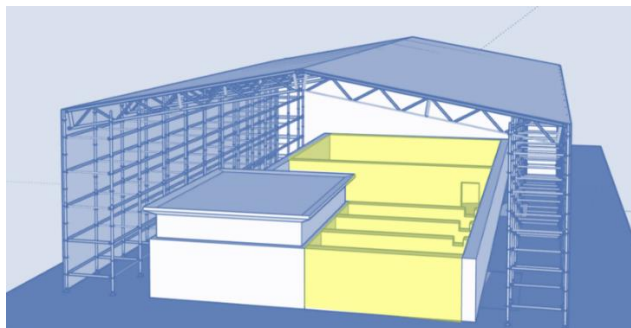
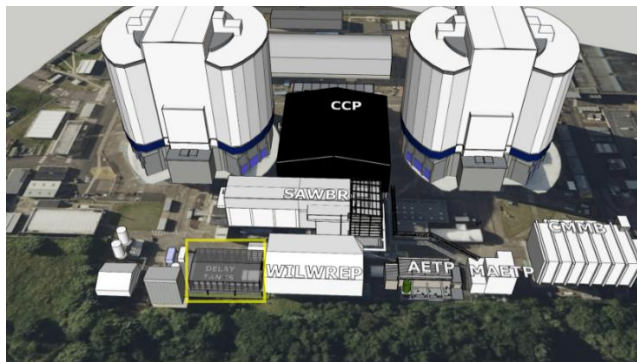
3.4 Ponds Programme

CCP Delay Tanks

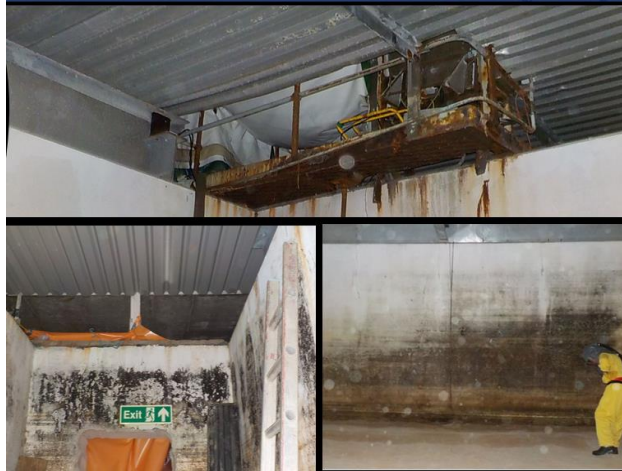
The CCP and Miscellaneous Delay Tanks are planned for decontamination to start before the financial year-end. The project team have made significant progress towards achieving this milestone as follows:

- 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 be in the Delay Tanks by March performing decontamination works before moving onto the de-planting of redundant structures and equipment.



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 out with 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.

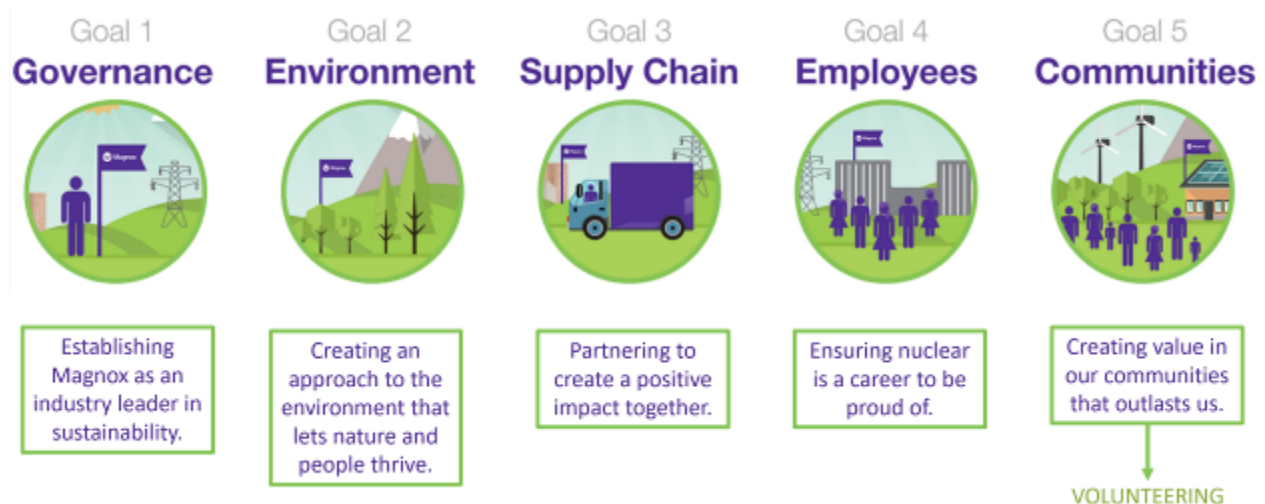
8 SOCIO-ECONOMIC / STAKEHOLDER UPDATE

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



Office for
Nuclear Regulation

ONR Site Report

Nuclear Restoration Services – Hunterston A

ONR Site Report

Nuclear Restoration Services - Hunterston A

Report for period: 1 October – 31 December 2023

Authored by: P Hughes, Nominated Site Inspector

Approved by: I Phillips, Delivery Lead Decommissioning, Fuel, and Waste

Issue No.: 1

Publication Date: January 2024

ONR Record Ref. No.: 2024/90

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

Site inspectors from ONR usually attend Hunterston 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 1 October – 31 December 2023:

12 December 2023

The ONR site security inspector inspected the site on the following date:

14 November 2023

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 Hunterston A covered the following:

- incidents on the site;
- quality assurance and records;
- security (Provision of Security Guard Services)

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

Throughout this reporting period, ONR's nominated site safety inspector has held regular telephone meetings with Hunterston A leadership team representatives to maintain situational awareness of matters related to nuclear safety.

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.

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.

Matters and events of particular note during the period were:

- A RIDDOR event was reported due to an individual receiving a fractured ankle. The injury occurred during an uncontrolled lowering of a CCTV mast during maintenance activities. ONR is following up as part of normal interactions with Nuclear Restoration Services.

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 ONR, please read and subscribe to our regular email newsletter 'ONR News' at www.onr.org.uk/onrnews.

6. Contacts

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
website: www.onr.org.uk
email: Contact@onr.gov.uk

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Hunterston Site Stakeholder Group

SEPA Update- Hunterston A

7th March 2024

Regulation

Environmental Authorisations (Scotland) Regulations 2018 (EASR)- radioactive substances

Telephone communication with the site continued throughout the period since the last SSG in September, including formal monthly staying in touch telephone calls. Routine teleconferences with Hunterston A on local issues, and the corporate Magnox Ltd team on strategic issues have also continued as before.

Site visits continue in order to ensure compliance with the site permit. Two site inspections have been undertaken since the last SSG reporting period.

SEPA Site Inspection 6-7th February 2024

SEPA issued Magnox Hunterston A with an Information Notice in June 2023, which requested timelines for certain information be provided to SEPA by 10th August 2023 with regards to the site ventilation system defects. Magnox responded in August 2023 with dates for the provision of the requested information, all of which was received by SEPA by the dates provided in response to the Information Notice.

The purpose of this site inspection was to discuss the information provided by Magnox and whether the site had returned to compliance with the conditions of EASR which they were found to have breached.

Subject to some minor amendments to the reports prepared by Hunterston A, SEPA is content that based on the information provided, and the visual inspection of a selection of the ventilation systems where corrective work was undertaken, the site has returned to compliance with the breached EASR standard conditions with respect to the ventilation system defects.

SEPA Site Inspection 7th December 2023

A walk down of the SILWE facility was undertaken in order to support the variation application that was received by SEPA last year. SEPA requires further information in order to support the permit variation application and has requested this information from the site.

SEPA Site Inspection 28th March 2023 – update February 2024

SEPA undertook an inspection of the process employed by Hunterston A to submit the monthly gaseous discharge returns. The inspection focused specifically on the process for sample receipt in the labs and monthly reporting of the gaseous ‘any other radionuclides’ on the permit, i.e., the particulate alpha and beta.

During the inspections SEPA found that Hunterston A are not reporting the monthly gaseous ‘all other radionuclides’ as per the requirements of Schedule 2: Data Return Requirements of the Environmental Authorisation (Scotland) Regulations 2018.

The site was therefore deemed to be non-compliant with a number of standard conditions of the site EASR permit.

In July SEPA wrote to the site requesting timelines for a return to compliance as well as confirmation of the status of the data provided in previously submitted data returns. The site provided a response on 10th August, and SEPA is in the process of considering the programme supplied by the site and will respond in due course.

Update – The site has been served with an Information Notice to ensure that the timelines provided by the site to address these matters are adhered to. These timelines are for the provision of information SEPA believes is necessary to ensure current and future compliance at the site.

Permit Variation Application

SEPA received an EASR permit variation application from Magnox HNA on Monday 21st August 2023. This application is primarily for the operation of the SILWE plant, which requires a permit variation in order to include the SILWE gaseous discharge stack within the site permit. In addition, the permit variation requests an increase to the site gaseous discharge limits due to the operation of this new facility as well as other imminent work on the site. Note that SEPA will consider the encapsulation of bunker 1 wastes only at this time due to the ongoing discussions around the appropriateness of the characterisation of the bunker wastes. The timely encapsulation of bunker 1 wastes is deemed necessary by ONR, and is outlined in the Joint Statement provided to Magnox HNA by ONR and SEPA last year.

Review of Characterisation of ILW Bunker Waste

SEPA received an optioneering report from Magnox on 28th March 2022 entitled “Review of Options for Managing Waste from The Hunterston A Solid Active Waste Bunkers Given its Status at May 2021 WD/REP/0032/21”.

Having initially reviewed the information sent, SEPA considered there needed to be a review of the underpinning characterisation work and whether this is sufficient to underpin the optioneering decisions.

SEPA procured a specialist contractor to review the model and associated work undertaken by Magnox with regards to the characterisation of the SAWB waste. The review commenced in December 2022 and SEPA received a final version of the report in June, which was shared with ONR prior to being sent to Magnox shortly afterwards.

SEPA, ONR and Magnox had a joint meeting to discuss the findings of the report and a way forward on 15th November 2023. SEPA are awaiting further information from Magnox.

Non-Rad Regulation

There has been one issue reported to SEPA relating to non-rad regulation, with regards to minor leaks of F-Gas from refrigerant systems, since the last scheduled SSG meeting.

During planned maintenance a fault was identified with one of the air conditioning units associated with the sites IT room. The subsequent investigation has identified the loss of 2.4 Kg of R32 gas as 0.2 Kg of gas has been reclaimed from the system which holds 2.6 Kg. This equates to a loss of 1.62 Te CO2 equivalent.

During planned maintenance a loss of gas was identified from one of the air conditioning units associated with the sites Intermediate Level Waste (ILW) Store. The subsequent investigation has identified the loss of 10.6 Kg of R407C gas as 26 Kg of gas has been reclaimed from the system which holds 36.6 Kg. This equates to a loss of 18.8 Te CO2 equivalent.

Environmental Events

EASR

There were no reportable incidents or non-compliance events affecting SEPA's interests at Hunterston A known to have occurred since the last meeting of the SSG at the time of writing this report.

Pollution Prevention and Control (PPC)

There were no reportable incidents, complaints or non-compliance events affecting SEPA's interests at Hunterston A known to have occurred since the last meeting of the SSG at the time of writing this report.

Controlled Activities Regulations (CAR)

There were no reportable incidents, complaints or non-compliance events affecting SEPA's interests at Hunterston A known to have occurred since the last meeting of the SSG at the time of writing this report.

Radioactivity in Food & the Environment (RIFE)

RIFE is a collaborative report on work carried out by SEPA, the other UK environment agencies, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and the environment. The RIFE reports aim to provide an in-depth assessment of radioactivity in food and the environment in the UK and the public's exposure to radiation, including in the vicinity of Hunterston A. The RIFE report incorporates the results from the analysis of a wide range of samples and key information on local habits to demonstrate both that food remains safe and that the public's exposure to ionising radiation is within legal limits.

The latest edition (RIFE 28) covering 2022 has been published and can be obtained from SEPA's website along with previous year's reports. RIFE 28 reports that the total dose for the representative person (most exposed) around the Hunterston site, which includes both Hunterston A and Hunterston B, for 2022 was less than 0.005 millisieverts, which is well below the legal annual dose limit of one millisievert as set out in paragraph 26, Schedule 8 of EASR18.

Scottish Pollutant Release Inventory (SPRI)

The Scottish Pollutant Release Inventory (SPRI) is a publicly accessible electronic database of releases of pollutants to all environmental media and transfers of non-radioactive waste. We intend that, as far as practicable, SPRI be the principle means by which information on Scottish pollutant releases and non-radioactive waste transfers is collected and made public. Wherever possible, such information will be collected and presented by this one system. The data for 2022, including that from Hunterston A and B, have been published and are available on SEPA's website under "Environment/Environmental data/SPRI".

Melanie Hayes
Radioactive Substances Specialist
February 2024



NDA Update for Hunterston SSG

March 2024



Contents

1.0 NDA Stakeholder Update March 2024



NDA Stakeholder Update

Please find below a brief update on main points of interest since the last meeting.

- As part of our ongoing commitment to create meaningful engagement with our stakeholders, we recently held our virtual stakeholder summit '**Creating meaningful conversations**'. More than 160 delegates joined the event in December 2023 and initial feedback has been positive. The event covered the progress we are making in delivering our mission, and our wider contributions on sustainability, social value, and skills.
- We are busy planning our next **Regional Stakeholder Roadshow**, which will be held in north Wales on 12 March 2024. The roadshow will focus on innovation and follow the successful format of events in Cumbria and Glasgow which took place in partnership with universities in the regions.
- Our next in person **Stakeholder Conference** will be held later this year. We are still looking to fix both the venue and the date and will keep you informed of our progress.
- The Department for Energy Security and Net Zero has now published its **Civil Nuclear Roadmap to 2050** alongside consultations on its **Approach to siting new nuclear power stations beyond 2025** and **Alternative routes to market for new nuclear projects**. The roadmap includes information and commitments relevant to our mission.
- Following its consultation in 2023, the **Government's new UK policy** on the sustainable and effective management of radioactive substances and nuclear decommissioning will be published later this spring.
- Our latest NDA 2023 **Mission Progress Report** (MPR) was published in November. It shows how we're progressing delivery of the NDA mission and what's still left to do, providing a baseline against which future progress can be tracked. It should be seen in context with the other NDA documents we issue, and it forms part of our commitment to openness and transparency.
- Parliamentary Members of the **Public Accounts Committee**, along with the National Audit Office, visited Sellafield in October. We welcomed the opportunity to open our doors to the body responsible for holding government to account for value for money, allowing us to demonstrate the progress we are making and share some of the challenges we face.



- Our updated **Social Impact and Communities Strategy** is being finalised as a result of a recent consultation exercise. The strategy is updated every three years and updated where necessary. The last one was published as the pandemic took hold and much has changed since then.
- At the end of last year, the Scottish Parliament Standards Committee gave approval to the establishment of a **Cross Party Group** on Nuclear Decommissioning. The CPG will be co-chaired by Oliver Mundell MSP (Conservative) and Colin Smyth MSP (Labour) MSP, and the Deputy Convenor will be Emma Harper MSP (SNP). The first meeting will be on March 27th in the Scottish Parliament. See link for further details:
[Civil Nuclear Industry | Scottish Parliament Website](#)
- Scottish Government engaged stakeholders on its **NSD Technical Report** on 21st February. The report has been developed as a technical options paper which will inform any future decisions on SG Waste Policy going forward.
- The second year of our **NDA group graduate programme** has opened, with the number of opportunities doubling to 120 across a diverse range of professional disciplines. The programme complements our support to the industry to build a long-term and sustainable pipeline of skills.
- Nuclear Waste Services (NWS) has begun aerial surveys and studies to evaluate potential sites suitable to host a **Geological Disposal Facility** (GDF), to permanently dispose of the UK's higher activity waste. Three communities are in the siting process, following one down-selection decision taken last year. A fourth community has joined the process in January – South Holderness.
- NWS worked with the Nuclear Industry Association to take members of the All Parliamentary Party Group on Nuclear Energy to visit the **Finnish Geological Disposal Facility** (GDF) ONKALO, currently under construction. This helped bring this vital project to life and shined a light on the progress we are making in this country.
- Her Royal Highness **The Princess Royal** visited Nuclear Transport Solutions' home port in Barrow-in-Furness to explore one of Pacific Nuclear Transport Limited's (PNTL) specialist nuclear vessels, and a Direct Rail Services (DRS) locomotive.

Thank you for taking the time to read our update. If you have any questions, please feed-back through the Secretariat.





Nuclear
Decommissioning
Authority

SCOTTISH GOVERNMENT UPDATE TO HUNTERSTON SITE STAKEHOLDER GROUP – 7TH MARCH 2024

SCOTTISH GOVERNMENT RADIOACTIVE SUBSTANCES AND NUCLEAR DECOMMISSIONING POLICY TEAM

Four Nations Policy Consultation on UK Radioactive Substances and Nuclear Decommissioning Policy Framework

Scottish Government are continuing to work with the UK Government and other devolved administrations on the publication of the revised framework document. The aim is for this to be published sometime in March. We will send out a link to published framework once it is available.

Public Attitudes to Radioactive Waste Management Survey

The ‘Public Attitudes to Radioactive Waste Management’ survey was conducted between the 8th and 11th of January 2024. 2160 responses were received. The results are due to be published in the Spring. We will advise the SSG when the results are available.

This wider public engagement work was undertaken to understand societal attitudes towards radioactive waste management, delivering on a research and development commitment made in the 2016 Implementation Strategy. This work complements specific engagement undertaken by the Scottish Government with stakeholders in the sector, including the communities around Scotland’s nuclear sites and will inform implementation of the SG Higher Activity Radioactive Waste (HAW) Policy and any future review.

The Environmental Authorisation (Scotland) Regulations 2018 (EASR 2018) updates

The Environmental Authorisation (Scotland) Regulations 2018 (EASR 2018) are being amended to bring together all the permissioning arrangements for SEPA’s four main regulatory regimes (Water, Waste, Radioactive Substances and Pollution Prevention and Control) into an integrated structure and under a single standardised procedure.

The Scottish Government is working with SEPA on proposed amendments to the Regulations. The public consultation for the amendments was released in December and it contains some minor amendments to the Rad Subs framework. Alongside bringing together the regulatory regimes, there are some clarifications to the Regulations in relation to radioactive substance activities but no significant changes.

The consultation closes on 31st of March 2024 and can be found at;

[Scottish Government consultations - Citizen Space](#)

Technical Investigations of the Near-Surface Disposal of HAW from Sites in Scotland
- SSG Presentation

The project to consider technical factors around the implementation of near surface disposal concepts in Scotland has now concluded. A presentation for SSG members on the outputs from the technical work conducted jointly between NDA and SG on Near Surface Disposal took place virtually on the 21st of February. This presentation was arranged to keep SSG members informed of the outputs of this work and to provide an opportunity for any questions, as part of our ongoing engagement.

Diane Hamilton

Scottish Government