



Site Stakeholder Group

HUNTERSTON SITE STAKEHOLDER GROUP

The Seventy Third Meeting of the Hunterston Site Stakeholder Group will take place on Thursday 5 September 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

13.50 Hunterston B Site Reports

Hunterston B Report – Joe Struthers

ONR Report – Steve Saunders

SEPA Report – Keith Hammond

Members Question and Answer Session Public Forum

14.25 Hunterston A Site Reports

Hunterston A Site Report – Mark Blackley

ONR Report – Peter Hughes

SEPA Report – Melanie Hayes

14.55 Ayrshire Civil Contingencies Team Update

Members Question and Answer Session Public Forum

15.00 Update from NDA

David Wallace

15.10 NRS Corporate Update - Introduction to Thinks Insight

Bill Hamilton

15.20 Update from Scottish Government

Diane Hamilton

Members Question and Answer Session Public Forum

15.30 Any Other Business

Next Meeting Thursday 5 December 2024

**HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
SUMMARY OF KEY POINTS FROM THE MEETING
HELD ON THURSDAY 13 JUNE 2024
AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG**

Chair's Opening Remarks

The Chair reported that she and the Vice Chair had received monthly updates from Hunterston A and B. Mr McGhie highlighted that the recent NRS national forum had included a proposal for SSG chair and vice chair payments to be recorded as part of NRS's payroll.

Actions and Approval of Previous Minutes

The minutes of the meeting of 7 March 2024 were approved.

Hunterston B Report – Mr Joe Struthers

Mr Struthers reported that defueling of Hunterston B reactor 4 had been paused in February to complete a fuel route outage. 86 of the 308 channels had been defueled. Challenges concerning the removal of the tie bar end fitting component were being addressed. Reactor 4 defueling had resumed. The site had encountered an issue with the Charge Machine CO2 supply. A full investigation had commenced, leading to process improvements and additional training. The total recordable injury rate (TRIR) sat at zero. The level 1 emergency demonstration exercise had been completed. Work continued with NRS and associated trade unions to design and agree the deconstruction organisational structures.

ONR Report – Mr Steve Saunders

Mr Saunders reported that Hunterston B had performed an annual demonstration of its emergency arrangements. The ONR, in conjunction with SEPA, had reviewed the proposed station decommissioning plan. Hunterston B had submitted its Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations (EIADR) document.

SEPA Report – Mr Keith Hammond

Mr Hammond reported that the EASR permit application remained ongoing. The next habits survey of the combined Hunterston site was scheduled to be undertaken by the University of Stirling in the summer.

Hunterston A Report – Mr Mark Blackley

Mr Blackley reported that the site had successfully demonstrated the implementation of its contingency arrangements to the Company Internal Assurance Team. The final box of bulk material had been retrieved from the bunker, and the WILWREP had been reconfigured to start retrieving acid. Decontamination work on the pond and miscellaneous delay tanks had commenced. The ILW packages in SILWE would be processed manually and without the KUKA robots. The reactor roof repairs were expected to be completed by July.

ONR Report – Mr Peter Hughes

Mr Hughes stated that had held inspections that had focused on radioactive waste management and information security. The findings had been suitable and sufficient. There had also been an inspection on the Construction (Design & Management) and the Management of Health and Safety at Work Regulations. The ONR had determined that Hunterston A was appropriately implementing its arrangements.

SEPA Report – Ms Melanie Hayes

Ms Hayes reported that a walkdown of the SILWE facility had been undertaken. The gaseous discharge returns open actions were expected to be closed during the second half of the year. The permit variation application to include the SILWE gaseous discharge stack within the site permit was expected to go out to public consultation in the coming months. The aqueous discharge variation application had yet to be submitted, and there had been another minor leak of F-gas on site.

Update from NDA – Mr David Wallace

Mr Wallace reported that Peter Hill had been appointed as the new NDA chair, while Chris Train had been appointed as the new chair of Sellafield. The first meeting of a Cross Party Group on Civil Nuclear Industry had taken place on 27 March. A consultation was being prepared for strategy 5. The next stakeholder conference would be held on 17 and 18 September.

Questions were 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 5 September 2024



**MINUTES OF THE MEETING OF THE
HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
HELD AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG
THURSDAY 13 JUNE 2024**

Attendance/Apologies list

Attendance

Ms Rita Holmes
Mr Stuart McGhie
Mr Jamie Woodburn
Mr Graeme Buckley
Cllr Eleanor Collier
Cllr Tom Marshall
Mr William Jack

Fairlie CC (Chair)
EDF (Vice Chair)
Largs CC
West Kilbride CC
North Ayrshire Council
North Ayrshire Council
NFU Scotland

Operators and Officers

Mr Mark Blackley
Mr Joe Struthers
Ms Fiona McCall
Mr Paul Dale
Mr Keith Hammond
Ms Melanie Hayes
Mr Bill Hamilton
Mr David Wallace
Mr Steve Saunders
Mr Peter Hughes
Mr Geoffrey Dore

NRS (Site Director, Hunterston A)
EDF (Station Director)
Senior External Affairs Manager, EDF
Director, SEPA
SEPA (Site Inspector, Hunterston B)
SEPA (Site Inspector, Hunterston A)
External Affairs Director, NRS
NDA (Stakeholder Lead Scotland)
ONR (Site Inspector, Hunterston B)
ONR (Site Inspector, Hunterston A)
Minute taker

In Attendance

Ms Anne Bannatyne
Mr Calum Corral
Ms Linda Hepburn
Mr Alan Holden
Mr Michael Mann
Mr John Riddell

Member of Public
Journalist
Member of Public
Member of Public
Member of Public
Member of Public

Apologies

Dr Clare Bond
Mr Angus Cochran-Patrick
Ms Aileen Craig
Ms Diane Hamilton
Mr Colin Hargreaves
Mr Craig Hatton
Cllr Alan Hill
Mr John McHenery

Committee on Radioactive Waste Management (CoRWM)
Hunterston Estate
North Ayrshire Council
Scottish Government
NRS Site Inspector
Chief Executive Officer, North Ayrshire Council
North Coast and Cumbraes Council
Hunterston Estate

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1. CHAIR'S OPENING REMARKS AND DECLARATIONS OF INTEREST

The Chair opened the meeting and invited attendees to introduce themselves. Apologies were noted from Dr Clare Bond, Angus Cochran-Patrick, Aileen Craig, Diane Hamilton, Colin Hargreaves, Craig Hatton, Cllr Alan Hill and John McHenery.

No interests were declared.

2. CHAIR AND VICE CHAIR UPDATES AND CORRESPONDENCE

The Chair reported that she and the Vice Chair had received monthly updates from Mark Blackley. They had also met with Joe Struthers to discuss changes and the transition at Hunterston B.

Stuart McGhie reported that the recent NRS national forum had included a proposal for SSG chair and vice chair payments to be recorded as part of NRS's payroll. He cautioned that this proposal would remove individuality and independence from the Chair and Vice Chair. Stuart McGhie noted that the draft documents from the November 2023 meeting had yet to be circulated. The next meeting was scheduled for 8 and 9 July.

Bill Hamilton explained that HMRC had provided new guidance concerning national insurance and income tax payments. The guidance had been reviewed by external auditors, who had confirmed that SSG chairs and vice chairs would be added to the payroll system in order to comply with HMRC guidance. However, the chairs and vice chairs would not be classified as employees of NRS. NRS had been extremely open in explaining this guidance. Bill Hamilton noted that the SSGs had been formed under the auspices of the NDA, and NRS only helped administer the SSGs. He also understood that the NDA had requested that an additional independent accountant provide a second opinion. The current proposal was on hold, and there would be further discussions.

Stuart McGhie stated that there was great concern that, should a chair or vice chair be paid by NRS/NDA, they would no longer remain independent. He acknowledged that Bill Hamilton had been transparent during the process. Bill Hamilton said NRS did not want to alter the current arrangement.

Stuart McGhie proposed that a document be shared at the next Chair and Vice Chair national forum that would outline the proposal. Bill Hamilton welcomed Stuart McGhie's suggestion.

ACTION: A document to be shared at the next Chair and Vice Chair national forum outlining the proposed changes to Chair and Vice Chair payments.

Stuart McGhie proposed wording that set out the independence of the Chair and Vice Chair. Bill Hamilton said that, while this was a possibility, the priority was to continue as normal.

3. ACTIONS AND APPROVAL OF PREVIOUS MINUTES

There were no outstanding actions from the previous meeting.

Cllr Eleanor Collier proposed that the minutes of the previous meeting be approved. The motion was seconded by Stuart McGhie. The minutes of the meeting of 7 March 2024 were approved as a true and accurate representation of the meeting.

4. HUNTERSTON B SITE REPORTS

Hunterston B Site Report

Joe Struthers presented his report.

Defueling of Hunterston B reactor 4 had been paused, as planned, for three weeks in February to complete a fuel route outage. 86 of the 308 channels had been defueled. A process had

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been put in place to address the challenges in relation to removal of the tie bar end fitting component, and the mechanism would not prevent defueling for more than 24 hours.

There had been another fuel route outage that had been completed, and reactor 4 defueling had been resumed.

Joe Struthers reported that there had been an issue with the Charge Machine CO₂ supply in March. Pressurisation of the fuelling machine had been initiated for a short period before protections had kicked in. The cause of this had been a valve opening due to the incorrect positioning of a switch. While there had been no safety consequences, a full investigation had commenced. This had led to process improvements and additional training.

Following the completion of defueling, Hunterston B would seek to adjust its site arrangements to transition the site from defueling delivery to deconstruction delivery. Work was progressing well to design and justify the arrangements, while engagement continued with NRS to deliver a seamless transfer of site.

Safety performance had remained strong, and the total recordable injury rate (TRIR) sat at zero. Joe Struthers reported that there had been one event in which a rain cover had been ejected from a diesel generator exhaust stack. Although no harm had been caused, an investigation had been conducted to understand the failure of the mechanism and to prevent a reoccurrence.

There were no significant environmental events to report during the period.

The level 1 emergency demonstration exercise had been completed. Work continued with NRS and associated trade unions to design and agree the deconstruction organisational structures for Hunterston B. The structure would be in place once the station transferred to NRS in 2026, approximately nine months after fuel-free verification (FFV). After continued consultation and engagement with internal and external regulators, staff had been briefed on the joint-agreed structure. Staff engagement would continue as Hunterston B moved through collective consultation. It was noted that the new structure would involve a reduction in the staffing level, to 244. Staff morale remained high, and individuals were keen to demonstrate their peak performance in defueling.

ONR Report

Steve Saunders presented his report.

Due to the reduced risk of the site, the ONR had targeted the continued safety fuelling and preparations for transition and transfer. In the preceding six months, it had conducted inspections in the areas of management of change. The overarching management of change paper would only set out the changes. There would be further interactions with Hunterston B as each justification for the various departments was implemented.

It was noted that, under LC11, Hunterston B was required to perform an annual demonstration of its emergency arrangements. Although this had changed, as the number of possible events and accidents at the site had reduced significantly, areas of improvement had been identified in crime scene management. On site medical treatment of contaminated casualties had also been highlighted as a potential area of improvement. This area would be monitored as part of routine business.

The ONR, in conjunction with SEPA, had reviewed the proposed station decommissioning plan. The ONR was satisfied that Hunterston B had an appropriate strategy and plan in place.

Hunterston B had submitted its Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations (EIADR) document, and the ONR was considering the application and consultation responses. It hoped to issue a consent decision in early July.

SEPA Report

Keith Hammond presented his report.

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The ONR and SEPA had conducted a joint inspection on the decommissioning and delivery plan. SEPA had specifically reviewed the waste management plan. The decommissioning and delivery plan had matured significantly, and SEPA was satisfied that Hunterston B was on track. However, it had highlighted that the waste management plan required further clarity.

The EASR permit application remained ongoing. The next habits survey of the combined Hunterston site was scheduled to be undertaken by the University of Stirling in the summer.

Questions & Answers

Stuart McGhie recorded that, during their meeting with Hunterston B, he and the Chair had been provided with sufficient information. The meeting had been incredibly productive.

The Chair referred to the charge machine incident and asked if it had been due to a different reactor pressure now that Hunterston B was not generating energy. Joe Struthers explained that it had been related to a different process for defueling. The defueling machine had been designed to operate at 40 bar but was operating at a much lower pressure. The switch for the defueling machine had been incorrectly positioned. The process had been changed to prevent a reoccurrence.

The Chair asked if there had been any danger. Joe Struthers said there had not been any danger. The fuel had been safe. More robust steps had been taken to prevent a reoccurrence.

The Chair asked if SEPA had concluded on the discharge. Keith Hammond explained that it had requested information regarding the short-term release. EDF had conducted this work and had submitted it to SEPA, and SEPA was reviewing it.

The Chair queried the discharge amount that a swimmer would be exposed to. Keith Hammond said that, should both stations discharge their annual limits in one setting, an individual swimmer would be exposed to approximately 200 micro sieverts. The Chair asked if there had been any studies regarding contamination of the sediment near the discharge pipe. Keith Hammond said there had not been any. He added that he understood that a survey would be conducted as part of the decommissioning project plan.

Cllr Eleanor Collier asked if SEPA undertook any independent checks for water quality. Keith Hammond explained that SEPA, in conjunction with several other regulators, published Radioactivity in Food and the Environment (RIFE) reports annually.

The Chair asked if there were any plans for temporary or permanent asbestos storage on site. Joe Struthers suggested that he provide information on this at the next SSG. He also noted that any previously disposed asbestos would have utilised asbestos approved disposal routes.

ACTION: Joe Struthers to provide information regarding Hunterston B's plans for temporary or permanent asbestos storage on site at the next SSG.

The Chair noted that the Hunterston B report had highlighted legionella and asked if it was present within many areas of the plant. Joe Struthers stated that Hunterston B had approved contractors who would help manage the risk of legionella.

The Chair asked if there would be changes in shift work. Joe Struthers responded that any changes would be subject to an appropriate approval process.

The Chair requested an update on the crime scene management. Steve Saunders explained that, as the station moved to deconstruction, the balance of risk would change from nuclear to conventional. He was confident that Hunterston B could appropriately respond to a nuclear emergency, and he wanted to identify areas that the site could test that would be relevant for the next phase of operation. This included an individual suffering a serious injury on site. Should this be a fatality, the site would need to follow guidelines such as preserving the scene.

5. HUNTERSTON A SITE REPORTS

Hunterston A Site Report

Mark Blackley presented his report.

There had been no new significant safety issues during the reporting period. The site had successfully demonstrated the implementation of its contingency arrangements to the Company Internal Assurance Team.

The final box of bulk material had been retrieved from the bunker. The team would Hoover the dust within the bunker. The WILWREP had been reconfigured to start retrieving acid. The site had identified that it needed to undertake further work to reassess the aerial discharge monitoring techniques and the associated reporting arrangements.

Decontamination work on the pond and miscellaneous delay tanks had commenced the previous week. Hunterston A had decided to process the ILW packages in SILWE manually and without the KUKA robots. The design was currently being amended.

The reactor roof repairs were expected to be completed by July. A steel cradle rail system had been removed from the perimeter roof fascia of the charge machine maintenance building glazed tower structure.

The mental health first aid group had organised several activities to support the 2024 Mental Health Awareness Week campaign. This had coincided with the opening of a dedicated wellbeing cabin on site.

ONR Report

Peter Hughes presented his report.

Peter Hughes stated that an inspection in March had focused on radioactive waste management. It had been determined that Hunterston A's current arrangement was suitable and sufficient.

A security inspection focusing on information had been held, and the findings had been suitable and sufficient. Peter Hughes had attended the site during the week commencing 10 June to perform an inspection on the Construction (Design & Management) and the Management of Health and Safety at Work Regulations. The ONR had determined that Hunterston A was appropriately implementing its arrangements.

SEPA Report

Melanie Hayes presented her report.

There had been no site inspections since the last SSG.

A walkdown of the SILWE facility had been undertaken in order to support the variation application that SEPA had received last year. SEPA had requested further information, of which Hunterston A had submitted.

Melanie Hayes highlighted the gaseous discharge returns and reminded the SSG that Hunterston A had been issued with an information notice. The site continued to work through the three actions, and it was expected that they would be closed during the second half of the year.

The permit variation application to include the SILWE gaseous discharge stack within the site permit was expected to go out to public consultation in the coming months. The aqueous discharge variation application had yet to be submitted, as SEPA had requested further information. SEPA would review this information before deciding whether the application would be duly made.

There had been another minor leak of F-gas on site. SEPA's F-gas specialist had requested further information, which Hunterston A had provided.

Questions & Answers

The Chair referred to the permit variation application to include the SILWE gaseous discharge stack within the site permit. She asked if it was common for this to go out to public consultation. Melanie Hayes responded that it was.

The Chair asked if the increase was due to the additional discharge pipe. Paul Dale replied that it was. The additional discharge was associated with the facility becoming operational. The Chair asked what would happen if the public decided that it did not want an additional discharge pipe. Paul Dale said this was part of the risk. SEPA would follow a statutory process.

The Chair asked if the reconfiguration of the WILWREP had identified any problems. Mark Blackley said it had not. The Chair asked if all discharges would go out to sea. Mark Blackley responded that Hunterston A was working on the aerial discharges. It had measured the discharges from the site, and it had added additional sampling onto the discharge route. It was currently reassessing the additional equipment.

The Chair asked if the acid was being contained in one tank. Mark Blackley said it was being contained in two tanks. The acid would be pumped through the tanks, into the facility and then encapsulated within the WILWREP.

Mark Blackley referred to the miscellaneous tanks and said it would likely take several weeks to decontaminate them because there was not as much activity in the tanks, as had been previously anticipated.

The Chair queried the potential dosage for the SILWE encapsulation plant. Mark Blackley stated that a dose assessment had been produced as part of the initial concept design. The concept design had included 100 mm of shielding, and the dose had been approximately 0.1 millisieverts per year for each operator. The Chair queried the dose from the package minus shielding. Mark Blackley responded that this would vary depending on the packages. The dose had increased to more than 1 millisievert per person, remaining within legal and safety limits.

The Chair asked if the design had been completed. Mark Blackley responded that the shielding aspect of the design was close to completion, but the change of the control system remained at the concept stage.

The Chair asked if there was a large volume of radioactive dust within the vaults. Mark Blackley said that, over four weeks, the plant had not accumulated enough material to fill one box. It was anticipated that up to six packages of fine dust would need to be retrieved.

The Chair asked if SEPA and Hunterston A had considered the recharacterisation of the waste within the stainless-steel boxes. Mark Blackley recollected that Hunterston A had previously briefed the SSG that it had initiated a scope of work in this area, and it expected to complete this by the end of the calendar year. SEPA would be kept informed throughout the process.

Paul Dale said there was a clear driver for the encapsulation of bunker 1, and this had been agreed with the ONR. The other bunker waste would need to be properly characterised before a decision was made on the management functions.

John Riddell recalled that he had previously highlighted the removal of the temporary cladding on the Hunterston A station reactor, but nothing had happened. He asked who was responsible for this. Mark Blackley responded that Hunterston A had intended to replace the current weather membrane with a metal cladding. This had been based on a care and maintenance strategy. Much work had been undertaken across all NRS sites to have site-specific strategies for decommissioning, and Hunterston A was reviewing implementing a

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site-specific strategy. The result of the demolition survey would determine the most appropriate solution.

John Riddell said he had heard the same comments the last time he attended a SSG meeting. His question had not been answered. He again asked when the temporary cladding would be removed, adding that immediate action was necessary. The Chair noted that the SSG had repeatedly suggested that the height of the site be reduced. She added that she suspected that the NDA and NRS would be responsible for deciding this.

The Chair stated that she recalled it being said that the NDA and NRS would adopt a process whereby it would continually decommission Hunterston A. Bill Hamilton said this was one plan. NRS, under the guidance of the NDA, was reviewing site-specific strategies that would meet the needs of the site and the community. He added that patience needed to be exercised.

The Chair stated that it appeared that, should work commence to decommission the site, Hunterston A would remain 'stuck' with a temporary barrier. Mark Blackley said this was not necessarily the case. The temporary barrier had a limited lifespan, and the site-specific decommissioning strategy would outlive its lifespan. A decision needed to be taken on the most appropriate approach to decommission whatever was inside the barrier.

Cllr Tom Marshall stated that, while he appreciated the comments, nothing had been done. The situation was 'appalling', and he was disappointed. Mark Blackley said that, should the cladding be covered, it would impact the properties and the weather barrier. The cladding could not be easily coated.

Jamie Woodburn stated that he had repeatedly raised the same issues. He asked how many individuals were working on the strategy and when it was due to be completed. Cllr Eleanor Collier voiced her support for John Riddell, Cllr Tom Marshall and Jamie Woodburn's comments. She was of the view that NRS did not want to accommodate the requests of residents. David Wallace stated that there needed to be recognition that there was a major problem. He, Mark Blackley and Bill Hamilton would need to inform the business that there was real concern and also re-emphasise the strong feelings that were emerging from the SSG.

ACTION: David Wallace, Mark Blackley and Bill Hamilton to inform the NDA and NRS of the concerns highlighted by the SSG regarding the removal of the temporary cladding.

William Jack noted that, should the barrier be removed, the building would remain in position. Cllr Eleanor Collier stated that there was neither a plan nor a timescale. Local members wanted some comfort that it could provide to constituents. Jamie Woodburn said the community had not been informed about the future of the site.

6. AYRSHIRE CIVIL CONTINGENCIES TEAM UPDATE

It was noted that there was no report.

7. UPDATE FROM NDA

David Wallace presented his report.

Peter Hill had been appointed as the new NDA chair, while Chris Train had been appointed as the new chair of Sellafeld.

The first meeting of the Cross Party Group on Civil Nuclear Industry had taken place on 27 March, and the next meeting was scheduled for 11 September.

A consultation was being prepared for strategy 5, which was due for publication in March 2026. The next stakeholder conference would be held on 17 and 18 September, in Manchester.

Jamie Woodburn asked what had driven the need for SSG reviews. David Wallace said the SSG reviews would address best practice, and it did not necessarily mean that there was an

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issue with the groups. The NDA would assimilate all comments and decide upon the best way to move forward.

The Chair asked when Dungeness B would be fuel free. Fiona McCall responded that it would likely be fuel free by 2028-29.

8. NRS CORPORATE UPDATE – INTRODUCTION TO THINKS INSIGHT

It was noted that, due to the upcoming general election, Bill Hamilton would not provide a presentation on Thinks Insight.

9. UPDATE FROM SCOTTISH GOVERNMENT

Report

Diane Hamilton was not present.

10. ANY OTHER BUSINESS

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

Next Meeting date: Thursday 5 September 2024.

Actions from Hunterston SSG Meetings

ACTIONS FOLLOWING SSG MEETING 13.06.24

ACTION	DETAIL	RESPONSE	STATUS	DATE
Bill Hamilton to present the outcomes of the engagement work	Following the major piece of engagement around the future of the site, decommissioning strategy and end-of-state, Bill Hamilton to present the results to a future meeting of the SSG	Bill to present the results of the Think Insight work on decommissioning to the September meeting of the SSG.	ONGOING	Due - 05.09.24
Joe Struthers to provide an update on asbestos storage	Joe Struthers to provide information regarding Hunterston B's plans for temporary or permanent asbestos storage on site at the next SSG.		ONGOING	Due - 05.09.24
Inform NDA and NRS of SSG views on temporary cladding	David Wallace, Mark Blackley and Bill Hamilton to inform the NDA and NRS of the concerns highlighted by the SSG regarding the removal of the temporary cladding at Hunterston A.	Issue raised with NRS Sites Managing Director Site Director progressing the issue.	ONGOING	

Site Stakeholder Group

Hunterston B Station Director's Report
Period: May 2024 to July 2024

1. Defueling

Defueling on Reactor 4 was paused as planned for approximately four weeks in mid-May to complete the final fuel route outage where statutory compliance work was completed on the charge machine. The fuel route outage was completed safely to plan, allowing defueling operations to recommence.

Over the period Reactor 4 defueling has progressed and is now more than 50% defueled.

In the last report the action plan to complete mitigations for difficulties in removing a component called a “tie bar end fitting” was discussed. The tie bar end fitting is a component which is removed during the fuel strip process to allow the fuel elements to be separated and sent to the cooling pond.

All action plan mitigations are now complete, with the final action to install revised tooling in the Irradiated Fuel Dismantling (IFD) cell completed during the May Fuel Route Outage.

Since the action plan mitigation has been completed, there have been no further issues during the removal of tie bar end fittings and defueling has been progressed to plan.

2. Transfer and Deconstruction

Site Transition

Upon completion of defueling, we will seek to adjust our site arrangements in order to transition the site to deconstruction. This will mean a new safety case, emergency arrangements, security arrangements and organisational structure. Work is progressing well to design and justify these arrangements so they can be implemented at fuel free verification (FFV).

In the last quarter we have:

- progressed development of the Post Defueling Safety Case with the authoring of two key reference documents which have now entered the internal verification stage. A review of the plan has been conducted and the forecast approval date for the case has been updated to July 2025 (which includes time for ONR review)
- commenced individual consultation with staff to populate the agreed Deconstruction Organisation (see People Section for more detail)
- commenced authoring of the justifications (Engineering Change) to remove plant from service following Fuel Free Verification.

Site Transfer to NRS

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.

In June an NRS staff engagement session was held on site. We welcomed colleagues from NRS to discuss their new 10-year strategy, decommissioning, transition and transfer as well as hearing from a number of our “A” station colleagues about their own career journeys within the NRS group.

In July, the NDA board visited the site and we shared with them our plans for Deconstruction of the Site and hosted a plant tour.



Deconstruction Delivery

Work continues to prepare for deconstruction, which will start following the completion of defueling. There are two key programmes that are the foundations of the Deconstruction Plan; Waste and Demolition. The overall decommissioning strategy remains ‘Early Safestore’.

We continue to work closely with NRS to further develop our Deconstruction Plans, this close working arrangement has led to a significant update to the plan which has now been through the change control process within EDF. The change has added more detail to the plans, refines the logic behind the plans and builds in operational experience from NRS.

Some highlights for the quarter in terms of delivery have been the completion some key enabling works (stator removal, slab pour for new cabins, concept design complete) for the new Deconstruction Waste Processing Facility (DWPF) which is planned for completion early 2026.

3. Safety and Environment

Station Industrial Safety Performance

Over the last three months the station has experienced no significant safety events and maintained a strong industrial safety performance overall.

At the start of July, a local fire alarm was initiated in the Hunterston B District Survey Laboratory. The site fire team were promptly deployed to investigate and confirmed a smell of burning with a small amount of smoke present. On further investigation, it was identified that a component on a computer Uninterruptible Power Supply (UPS) was overheating, causing the alarm to initiate. All electrics were immediately powered down, which stopped

the equipment overheating, and there was no fire or flames, with no firefighting medium required.

Scottish Fire & Rescue Service were called to site as per our procedures, confirmed there was no fire and assisted with ventilation of the building.

Safety performance during the reporting period remains on plan, Total Recordable Injury Rate (TRIR) sits at 0.

Over the last quarter, two compliance evaluations were completed: COSHH (Control Of Substances Hazardous to Health) and RPE (Respiratory Protective Equipment). A third evaluation, DSEAR (Danger Substances and Explosives Atmosphere Regulations) is in-progress. This helps ensure we maintain compliance in line with our ISO 45001 accreditation. To support this work, we have contracted a seasoned industrial safety engineer with external experience.

Our working groups continue to meet regularly and drive improvements across a wide variety of topics, which include: working at height, COMAH, asbestos, building fabric, and confined space.

The site transport working group has been meeting fortnightly and in July concluded the next phase of internal road upgrades and resurfacing works. This supports earlier works including reducing speed limits, incorporating one-way systems and additional signage.

The industrial safety team lead a small project to enhance the main turnstile and security reception areas. New digital communications screens and notice boards have been erected to help reinforce key safety messages. The plan is to launch a safety campaign in late August / September using the refurbished areas.

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 below 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.

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

Radiation Dose to workers (May 2024 - July 2024)		
Planned collective dose	9.0man.mSv	
Actual collective dose	7.3man.mSv	
	Employee	Contract Partner
Total Dose	6.35man.mSv	0.92man.mSv
Average individual dose	0.020mSv	0.005mSv
Highest individual dose	0.737mSv	0.155mSv
Individuals	313	216

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 February 2023 to April 2024.

The site 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 water system. The radioactive discharge permits 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. As previously reported, 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 does not request a change to the permit limits. SEPA have declared that the application is 'duly made' and have started their process of consultation with the relevant agencies.

Emergency Arrangements

There have been no issues with the emergency arrangements during this reporting period.

As the lead defueling station, Hunterston B continues to work closely with the fleet Emergency Preparedness Group as the station looks to optimise our emergency arrangements in line with the risk profile of a defueling site.

In July a workshop was held to outline the proposed changes, gain alignment, perform a walk down of the facilities and support the plan to aid the transition from defueling emergency arrangements to those required for a deconstruction site.

During the period we completed a Counter Terrorism Emergency Exercise demonstration, which was assessed by both our internal Emergency Arrangements Review Team (EART) and our external regulator, ONR.

The exercise required full site participation and allowed us to demonstrate our Emergency Arrangements in line with Site Licence Condition 11.

The exercise was successful and was deemed to be 'an adequate demonstration of our arrangements' by ONR. This rating is the best that can be achieved, and our regulators were satisfied with our demonstration.

A successful assessed emergency exercise can only be achieved with the support of everyone on-site, including all the exercise participants and the personnel involved in the preparation and training for these exercises and everyone onsite can be proud of this result.

The new exercise season is due to commence at the end of August and run until mid-October.

4. People

There has been a change to the management team with Graeme Campbell, Project Controls Manager leaving the station in June. A Management of Change paper was approved to bring together the Project Controls Department and Transfer & Deconstruction (T&D) Department with Andy Dalling, currently the T&D Manager, becoming the departmental manager for both.

Recognising the station is continuing to go through a time of change, Joe Struthers, Station Director has been holding Q&A sessions with all the teams across the station. These sessions are held face to face and give people an opportunity to ask any questions. All employees had the opportunity to attend TUPE awareness training in June delivered by the Employee Relations team. The sessions gave information on the legal context of TUPE and in relation to what it will mean for employees if they transfer to NRS. These sessions were well attended, and questions asked were captured for a FAQ document shared with all employees.



Clive Potheary, Pensions Manager, visited site at the end of June and held a number of pensions sessions over two days with everyone invited to the relevant session for their pension scheme. This was a chance to understand the pension arrangements in relation to transfer and ask any questions.

Collective Consultation with the Trade Union Representatives concluded on the 13th June. The consultation process for employees started on the 8th July and is open until the 18th August. All managers, leaders and TU reps received “Just in Time” training to go through the consultation process and this made clear the line management requirements. This stage of the consultation process requires line managers to have a 1-1 conversation and gives employees the chance to share their aspirations.

Understanding that this is a time of change, which can bring uncertainty, employees have continued to be encouraged to use the wellbeing support available. This includes the Mental Health First Aiders (MHFA). In May, it was Mental Health Awareness week and the MHFA’s visited different departments and encouraged everyone to have a ‘Time Out’ and move in line with this year’s theme of ‘Movement for our mental health.’ This was also an opportunity for people to recognise who the MHFA’s are and to have a conversation.

In June, Debs Sheppard (Electrical Industries Charity) who is a qualified MHFA trainer came on site delivering refresher training to the MHFA’s. This covered having discussions on a range of scenarios. The training gave a safe space to practice different scenarios and refresh on the skills to be a MHFA.



In July, organised by Occupational Health, Andy’s Man Club spoke with our MHFA’s and shared information about the work they do to support men’s mental health and the clubs which are set up locally as another means of signposting to for people.

5. Company Update

Heysham 2 power station reaches significant milestone

Heysham 2 power station is on track to become the UK’s most productive nuclear power station after hitting a significant generation milestone. It is one of seven Advanced Gas-cooled Reactor stations that were built as a fleet several decades ago and which together have operated alongside coal, then gas and more recently wind and solar sources.

The station has now produced 300TWh of low-carbon electricity, enough to power every home in Lancashire for 147 years. The only nuclear site in the UK to have produced more is Hinkley Point B in Somerset which ended generation in July 2022 on 311TWh.

Martin Cheetham, Station Director at Heysham 2 Power Station, said: “This achievement really highlights the station’s ongoing and significant role in providing reliable electricity to support the UK’s energy needs.

“Through construction and generation the station has been part of the community for 44 years, providing thousands of jobs and along with Heysham 1 contributing more than £30m to the local economy each year.

“This milestone is testament to the hard work and dedication of our team, some of whom have been here since we started generating in 1988, and all of them helping to lead the transition to a cleaner, low-carbon electric future.”

Torness peregrines take flight as station marks environmental anniversary

Torness Power Station’s visiting pair of peregrines have had another successful year as the site celebrates a decade of environmental excellence.

More than 50 chicks have fledged from the station’s rooftop since records began 25 years ago and this year the pair have successfully raised another two. Chicks 54 and 55 have recently flown the nest.

Peregrine falcons are the fastest creatures in the animal kingdom, reaching speeds of more than 200mph during their hunting dive. The power station provides a secure breeding environment for these apex predators, away from egg thieves and with a plentiful food supply.

This year also marks 10 years since the station secured the Biodiversity Benchmark. The accreditation, which is awarded by The Wildlife Trusts, certifies the good management of biodiversity on sites owned by businesses. It is the only site in East Lothian to hold the accreditation.

The Wildlife Trusts’ Head of Corporate Partnerships, Emma Price Thomas, said: “It’s fantastic news that peregrines at Torness Power Station have had another successful year. Stories like this show that through careful management, wildlife can thrive in unlikely places. Retaining the *Biodiversity Benchmark* at Torness for 10 years is testament to EDF’s commitment to improving their sites for wildlife.

“This certification challenges businesses to take responsibility for nature recovery through effective habitat management, surveying and sustainable use of land. Torness is being managed well for wildlife and we look forward to seeing even more success stories in the future.”

The site supports a wide range of wildlife and has become a haven for some rare species. It currently supports the only known breeding pairs of ringed plover in East Lothian with the population up to three pairs since 2019.

It is also Scotland’s first and only known site supporting ivy mining bee, along with 120 other invertebrate species.

Other highlights include:

- In total, 21 species of butterfly and 187 moth species have been recorded at Torness, including Brimstone, which was seen during the hot weather of 2022. Buckthorn shrubs have been planted to provide habitat for Brimstone as part of a wider initiative by East Lothian Council.
- Thirty-nine species of bird have been recorded breeding at Torness over the last 10 years. In addition to the ringed plover and the peregrine, yellow wagtails breed on site most years, an uncommon species in East Lothian.

- Areas disturbed by construction of the station in the 1980s now support a diverse range of plants including locally uncommon yellow bartsia, pyramidal orchid and common broomrape.

Clare Galloway, who works in the station's Environmental Safety Group, said: "We actively manage the land around the power station to make sure it is as welcoming to as diverse range of flora and fauna as possible.

"As well as roping off areas of the car park to support breeding birds, we plant specific shrubs and plants to give a variety of species the best chance of flourishing possible.

"It is always a delight to make new discoveries when we carry out our monitoring and it just goes to show that nature and industry can co-exist if a sustainable approach is taken."

6. **Contacts**

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

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Hunterston Site Stakeholders Group SEPA Update- Hunterston B



If you would like this document in an accessible format, such as large print, audio recording or braille, please contact SEPA by emailing equalities@sepa.org.uk

Regulation

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

We have continued 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.

We have visited the station once since the last SSG meeting. On 21 August 2024, SEPA attended the site to monitor the station's waste management plans, inspect the District Survey Laboratory and to receive an update on the station's Transition and Deconstruction projects. No contraventions were identified.

SEPA staff attended the start-up meeting for the Hunterston Habits Survey on 24 June 2024. The survey is being undertaken by the University of Stirling.

The station applied to SEPA on 31 January 2024 to vary its EASR permit to remove the minimum aqueous discharge flow rate ($7\text{m}^3/\text{s}$) and tidal window requirements (one hour after high tide to one hour before low tide) whilst keeping the same discharge point. The further information requested from the station, including a short-term release dose assessment to a swimmer during a discharge, has been provided and the application has been Duly Made. The application has been sent to Scottish Ministers, Office for Nuclear Regulation and Food Standards Scotland for comment. The application is expected to be determined by 1 August 2026.

Pollution Prevention and Control (PPC)

SEPA continues to monitor the minor leak of non-radioactive biodegradable oil from an oil-filled cable which services a transformer on site to ensure it is having no significant environmental impact. 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)

There have been no issues relating to the station's COMAH requirements since the last scheduled SSG meeting.

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 Gase Emissions (F-Gas)

There have been no other issues relating to the station's 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 the station 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

22/08/2024



HUNTERSTON A

SITE STAKEHOLDER GROUP REPORT

SITE DIRECTOR – MARK BLACKLEY

SEPTEMBER 2024

HUNTERSTON A
SITE DIRECTOR'S REPORT TO THE SITE STAKEHOLDER GROUP
SEPTEMBER 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 has been one reportable injury. A Radiological Monitor bumped his head in C3 conditions and sustained a minor (less than 1cm) cut. The Monitor did not return to work but did not require medical attention. The Monitor subsequently obtained a note from a doctor which said he had been unable to work because of a work-related head injury.

During the planned calibration of the WILWREP Manual Stack Train (MST), which is used to sample gaseous discharges, it was discovered that the calibration period had expired. The planned calibration was successfully undertaken, which confirmed that the MST was operating as expected with no drift from the previous calibration. This gives confidence that any discharges have been accurately measured. All other MSTs have been checked to confirm that they are within calibration.

SEPA have confirmed that the Permit variation application for Radioactive aqueous discharges has been duly made. This application will be subject to public consultation.

The SAWBR team have been working to a 'back out plan' for the SAWB Bunkers with the aim of achieving Post Operational Clean Out status. Recovery of the fine dusts has been slower than expected and Brokk 1 has experienced several unrelated faults. Upon receipt of some specialist parts, we expect to return the facility to operation in late August / early September.

WILWREP has been re-configured to start retrieving and encapsulating acid. A re-assessment of the aerial discharge monitoring techniques and reporting arrangements has been carried out. It is anticipated that recovery, neutralisation, and encapsulation of the acidic waste will commence in early September.

It has been previously reported that we will process ILW packages in SILWE manually without the KUKA robots. This package of work (manual swabbing / plug removal and installation) has recently passed design approval. Focus has now switched to the procurement, manufacture and installation of the operator shielding platform, in conjunction with software updates to the package management system.

Progress on the Reactor roof repairs has been slower than expected due to poor weather conditions. This work should be complete in September weather allowing.

The Project to determine what is BPM for dealing with the bunker waste is progressing well. Phase 1 of the Project which produces a 'long list' of 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 is nearing completion. The output from Phase 1 will be provided to SEPA and ONR for comment when completed.

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 0.45 and the Days Away Case Rate (DACR) is 0.45. 10 months have passed since the last Lost Time Accident (LTA) and there have been 2 First Aid Cases (FAC's).

The FAC's resulted from an employee bumped his head on a section of steel angle iron resulting in a minor cut to his head. Secondly an employee caught a finger on a door as it closed. The wound was cleaned and dressed by the First Aider.

Both events are currently under investigation so that we can fully understand how the events occurred and what learning we can capture, make improvements and share to prevent recurrence.

The Risk Assessment workshops have been delivered as planned and will now be delivered as and when required.

The Site will now be focussing on delivery of Hazard Awareness and Risk Perception workshops. These workshops are delivered by the EHSSQ Manager and Head of Safety, are interactive and encourage the attendees to participate in both discussions and exercises. It is intended that by raising hazard awareness and risk perception we are nurturing our site safety culture by providing increased knowledge to our workers to empower them to identify hazards, recognise the risk those hazards present and take appropriate avoiding actions.

The number of QPulses received on site during this reporting period are slightly down from the previous 3 months. It is considered that this is due to the holiday period, though we are monitoring the numbers we receive and are seeing the number of QPulses starting to rise again. The QPulses received are reviewed at the daily safety and compliance meeting to ensure that each event is fully understood, and appropriate actions are placed where required and each QPulse is appropriately categorised in accordance with NRS procedures.

The Site EHSS&Q Manager and Operational Experience Feedback Engineer (OEFE) run the Event Review Team meeting weekly to review progress of investigations, challenge QPulse actions where required, monitor closed and open actions and undertake trending to capture wider learning. The Site OEFE provides our Regulators with a weekly summary of all events that have been reported on site.

Target Zero campaigns continue with topic changing each month. June – Observations & Conversations App launch, July – Standards & Expectations and August – Situational & Spatial awareness. These specific topics are discussed daily at meetings, setting to work, pre and post job briefs and are seen as a proactive measure to raise awareness

and increase knowledge of the topic of the month and assist the site in reaching target zero which is zero Accidents, zero incidents and zero harm

The Local safety forum is a meeting that is held fortnightly and attended by Site Safety Representatives and Site management. The safety Representatives discuss and raise concerns to Site management. Topics can range from Received QPulses, actions placed and other topics that the site workforce have raised with the Safety Reps. The Site HESAC meets bi-monthly and is well attended by Site Safety Representatives and Site Management.

2.2 Emergency Arrangements

The Site Accident, Emergency and Security Contingency Arrangements are rehearsed and tested frequently to ensure the site is equipped to adequately respond to and recover from an emergency. The site is on target to accomplish our 2024 Emergency Training and Exercise Programme with over 10 live emergency exercises and several table-top scenario-based discussions being successfully delivered to date.

Themed training and exercise scenarios are designed and targeted to ensure the site contingency arrangements, staff and contractors are fully prepared to mitigate the consequences of both existing and emerging risks on site.

Recent exercises include responding to an acid spill in a contamination-controlled area in preparations for Wet Intermediate Level Waste Recovery Encapsulation Process (WILWREP) acid reconfiguration, and fire water run-off management.

Planning and preparations are well underway for the site annual Security Exercise which will be assessed by the Company Internal Assurance Team (CIAT) on Tuesday 1st October. Exercise "Purple Moose" has been designed to fully test the site Security contingency arrangements to effectively manage a foreseeable security threat on-site and demonstrate compliance of Nuclear Industries Security Regulations and Principles. Additionally, the site is continuing to develop and test resilience in the emergency management recovery with key staff currently undertaking Event Recovery and Business Continuity training which will be tested during exercise "Black Start" on Wednesday 11th September.

The site continues to strengthen emergency resilience locally, both internally and externally by collaborating with Category 1 Responding partners to enhance the sites Contingency Plans and improve processes to ensure an efficient and coordinated multi-agency response is in a state of readiness if called upon.

3 DECOMMISSIONING PROGRESS

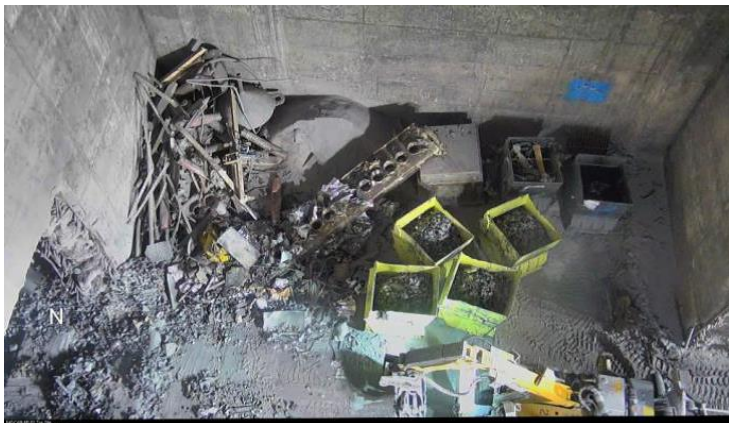
3.1 Solid Active Waste Bunker Retrieval (SAWBR) Project

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 has now been completed which is a significant milestone for Hunterston and NRS.

The SAWBR team have been working to a 'back out plan' for the SAWB Bunkers with the aim of achieving Post Operational Clean Out (POCO) status. This includes a detailed strategy for the processing of the identified orphan wastes, the Fuel debris items and the retrieval of the fine's dusts.

Progress against these activities has been slower than expected with recovery of the fine dusts providing additional technical challenge as well as plant reliability issues. Brokk 1 has experienced several unrelated faults that have delayed activities associated with POCO. Upon receipt of some specialist parts from Brokk Sweden we expect to return the facility to operation in late August and continue with clean-up activities.

During August, Routine Maintenance shutdown in the HAW facilities was successfully completed.



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.

Work is progressing on environmental monitoring related to WILWREP operations, including assessing/setting up monitoring techniques and reporting arrangements.

- Several weeklong vent system samples have been analysed by the site lab and a new verified spread sheet to calculate the results is awaited from our central team. This will allow us to agree a baseline for the vent system prior to active commissioning.
- Operator refamiliarization has been completed by transferring water, already in the buffer tank, to the drum in the canyon and back to the tank whilst further baselining of the ventilation system is undertaken.

Due to the holiday period key resources have been low but the team still hope to have all the required environmental requirements complete within the next few weeks.

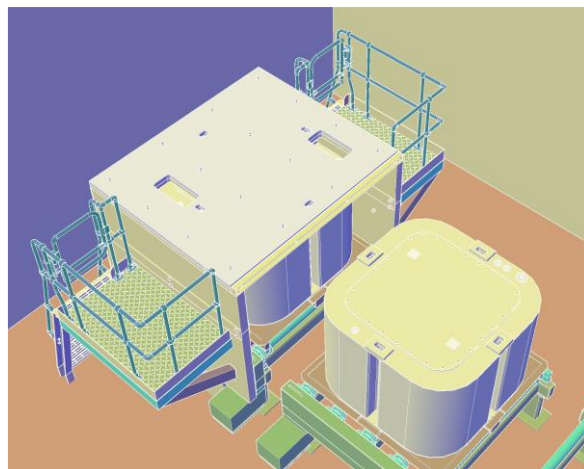
It is expected that WILWREP active commissioning will recommence towards late August/early September.

3.3 Solid Intermediate Level Waste Encapsulation (SILWE) Project

The SILWE facility exists to encapsulate the 3M³ packages containing the solid waste retrieved/recovered from Solid Active Waste Bunker Retrieval (SAWBR) with a grout mix. Once encapsulated, the packages will be ready for long term storage.

The “Plan B” package of work (manual swabbing / plug removal and installation), has recently passed design approval. Focus has now switched to the procurement, manufacture and installation of the operator shielding platform, in conjunction with software updates to the package management system. The common objective is to facilitate a change to manual operations. This package of work has now been renamed as “Plan A”.

Recently an Assurance Team from NDA/NRS, attended SILWE to carry out an annual check on SILWE processes and procedures. The feedback has been positive, with all previous actions now closed. The Project Team’s priority is to become fully resourced to meet the “Set to Work” phase, early next year.

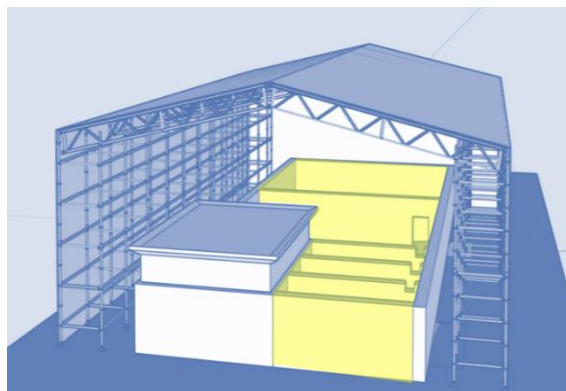


SILWE “Plan A” Operator Shielding Platform

3.4 Ponds Programme

CCP Delay Tanks

The Pond team continue to work in the Misc and CCP delay tanks performing decontamination and de-planting activities. Completion of these works will reduce the radiological hazards onsite and create a passively safe state for the tanks to be handed over to our Plant and Structures team for future demolition.



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



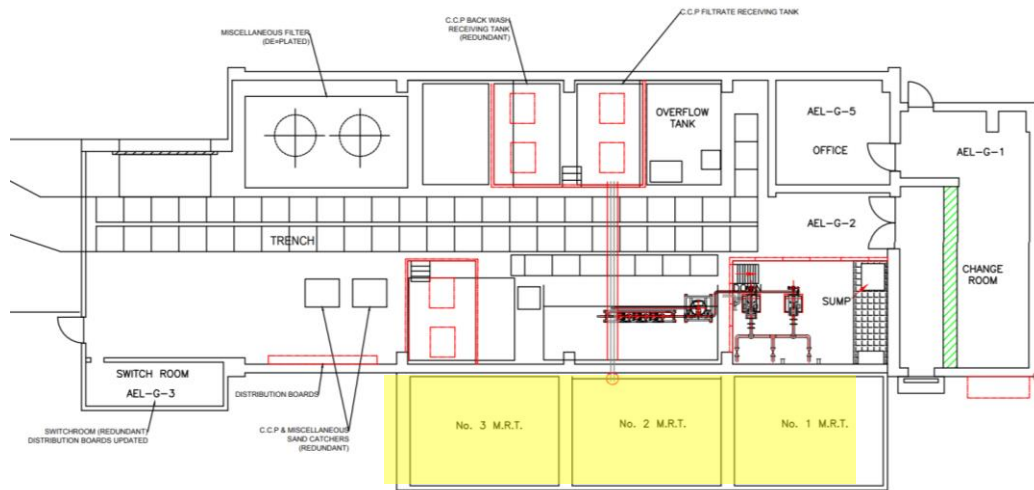
Internal photos of Delay Tanks

Miscellaneous Receiving Tank decommissioning

The Miscellaneous Receiving Tanks (MRTs) form part of the wider AETP facility and are concrete underground tanks approx. 25 m³ in capacity. The access to these tanks is within an external C2 area in the AETP compound. The MRT's are currently operational and used in the treatment of miscellaneous effluent. They receive miscellaneous arisings which are passed through to the Miscellaneous Cartridge Filtration Plant (MCFP) providing removal of suspended solids. The Pond programme is responsible for diverting the existing effluent streams away from the MRT's thus facilitating the

decommissioning of the tanks which will comprise of desludging, decontamination and de-planting.

The team are making strong progress having recently had the options assessment for desludging of the tanks approved. Characterisation activities are ongoing, and the engineering focus shall now shift to detail design of sludge retrieval and encapsulation.



Miscellaneous receiving Tanks (highlighted yellow)

C3 Shower Pumping Station

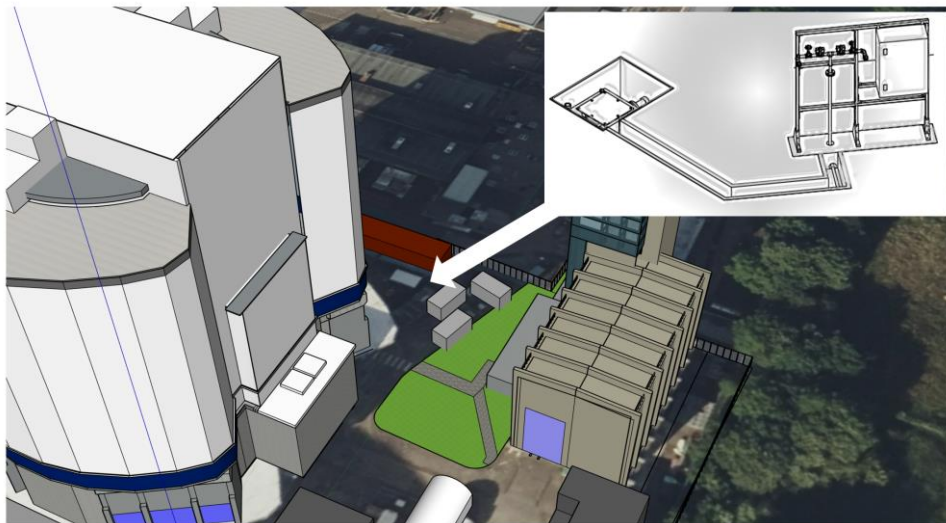
The Pond programme have a live project to divert all sources of miscellaneous effluent on site to the New Effluent Treatment Plant (NEffTP). This will be achieved through local collection and transfer to the plant by bowser and will free up the site Active Drains, Misc Filtration Plant and Misc Receiving Tanks for decommissioning.

As part of this wider project a pumping station is being designed to collect arisings from the C3 showers on site. The small plant will pump shower water from the sump adjacent to the C3 showers directly to the Misc. effluent bowzers effectively isolating this source from the Active Drains.

Progress to date is as follows:

- Site survey conducted.
- Mechanical, Civil and Electrical designs completed and submitted for approval by NRS.

A design review will be held imminently following which the contractor will be looking to mobilise to site for installation.



Location of New Pumping Station for C3 showers

PEOPLE

4.1 Site HR

Resourcing activity continues as we work to fill the 23 vacancies which we currently have on the site. Many of the vacancies have arisen from internal candidates being successful in applications for promoted posts either at site or within other departments in the central support office. Resourcing is at various stages, with some roles undergoing approval to recruit, some at offer stage with candidates undergoing onboarding, whilst others are at advert or interview stage. We continue to recognise difficulties in the resourcing of a few of the vacancies, due to the specialist skillsets required and current market conditions.

We recently welcomed two new Graduate Apprentices to the site, who are undergoing degree level apprenticeships supported by Glasgow Caledonian University.

The Employee Engagement survey for 2024 closed on 31st May and we are currently reviewing the results and feedback received. Across the company, all sites are working to develop an action plan for the coming year to address any areas of improvement that have been identified. The survey results will also shortly be shared with the workforce across all sites.

4.2 Occupational Health

Sickness levels continue to remain high compared 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.

The site Mental Health First Aiders recently organised a Step Challenge for staff with a number of teams competing to get the highest number of steps. The challenge encouraged those involved into healthier walking habits during the working week to increase their level of movement, which is directly linked to mental health.

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 delays, primarily associated with bad weather, the second phase of road line markings is approximately 95% complete. This brings significant improvements to the site with regards to traffic management.

Initial specifications for the replacement shower facility have been refreshed in conjunction with Engineering and are now progressing through the procurement process. Several options are being considered and progressed currently.

A contract is due to be placed with a local contractor in early September for further welfare upgrades across site. This will focus on Contractor's changeroom and toilet facilities on site.

Progress of this year's work packs is ongoing through production of specifications, quotation requests and contractor engagement.

A portfolio of work packs for 2025/26 and 2026/27 is 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 July, are as follows:

- Approximately 203 employees and visitors received a total collective dose of 6.284 man.mSv between them.
- Approximately 321 contractors received a total collective dose of 4.154 man.mSv between them.
- The highest individual dose received by an employee was 1.130 mSv.
- The highest individual dose received by a contractor was 0.432 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 (July 2023 - June 2024)

Solid

Low Level Waste (LLW) disposals to the Low Level Waste Repository (LLWR) continue. 27.01 m³ of LLW and VLLW with a total activity of 0.07 GBq was disposed of during the twelve-month period from July 2023 - June 2024. 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 July 2023 - June 2024 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 (July 2023 - June 2024)
Tritium	30 GBq	0.007 GBq
Caesium-137	160 GBq	0.047 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	0.045 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 (July 2023 - June 2024)
All authorised outlets taken together.	Tritium	100 MBq	0.3 MBq
	All other radionuclides (excluding tritium)	3 MBq	0.191 MBq
Discharges made as a consequence of reactor breathing	Tritium	3000 MBq	398.74 MBq
	Carbon-14	200 MBq	59.57 MBq

7.2 Non-radiological Environmental update (July 2023 - June 2024)

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.

Waste disposal and recycling is recorded in the company unified dashboard. Over the period July 2023 - June 2024, a total of 128.06 tonnes of waste was collected for consignment from site (124.02 tonnes for re-use, recycling, recovery, or composting, 29.58 tonnes sewage waste and 4.04 tonnes for disposal to landfill). This gives a recycling rate of approximately 96.85%.

7.3 Environmental Events

West Kilbride Development Group benefitted from £840 towards producing 500 copies of an updated 3rd edition leaflet of the successful 'Guide to West Kilbride'. The guide is targeted at visitors and directs them to local attractions such as Portencross Castle, the Barony Centre and the Craft Town venues. The leaflet helps to sustain the economy of the area by encouraging visitors to support these facilities and so contribute to the economic wellbeing of the town.

Winton Rovers CIC have been awarded £10,000 towards a £788,000 transformational project. Ardrossan Winton Rovers raised the capital funding to install a 3G pitch, upgraded floodlighting and new changing room/meeting room facilities.

Ardrossan Winton Rovers have committed to developing a Community Sports Hub by creating a partnership with two other local organisations. Various sports and community initiatives will benefit, providing sufficient income to help ensure the financial sustainability of the facility.

A Facility Development Officer will be employed to operate the hub, along with part time roles, generating pitch hire fees and securing further grant funding towards staffing and overhead costs and support activity programmes at the facility.

The club currently has 16 teams with more than 325 registered players under the umbrella of Ardrossan Winton Rovers Youth Academy.

The first phase of reconstruction to replace the grass pitch with a synthetic surface and replacing the floodlights and will be complete by late September. The new modular changing rooms are due to be in place by the end of October, followed by a new stand roof in the summer of 2025.



Work commenced replacing the pitch

The Outdoor Partnership, an organisation originally formed in North West Wales, has secured £300,000 NRS socio-economic funding over the next three years to continue with the delivery of the successful 'Opening Doors to the Outdoors' project in North West Wales and North Ayrshire as part of a £630,000 project.

Founded in 2004, now operating across the UK, The Outdoor Partnership (TOP) has been successfully 'Enhancing People's Lives through Outdoor Activity' for 18 years, creating real employment opportunities for people in the outdoors; empowering communities and removing inequality of access to outdoor activities for underrepresented and disadvantaged groups, with over 25,000 people benefiting annually.

Having secured significant Lottery funding to emulate their success in similar, high areas of deprivation in the UK, in 2020, TOP consulted with many groups and organisations in North Ayrshire and created partnerships with schools, colleges and clubs and local council departments. A Development Officer is now in post and has built a close working relationship with many outdoor clubs in the area from canoe / kayak clubs, hillwalking clubs, uniformed groups, schools and outdoor centres. Club surveys and consultations conducted since 2020 have identified many gaps which TOP are working to close and develop further to "Open the doors to the outdoors" to targeted disadvantaged groups in North Ayrshire.

The aim is to emulate the fantastic work already carried out in North West Wales by improving community cohesion by accessing outdoor activities for people in the outdoor sector, by providing affordable, accessible, sustainable and fun outdoor activity programmes:

- Increase opportunities for new volunteer leaders in community based clubs and groups, improving physical and mental well-being for up to 300 people across the region through the provision of sustainable life-long outdoor activities.
- Increase annual training, volunteering and employment opportunities for unemployed people living in poverty through the provision of supported training programmes in hillwalking, climbing and paddle-sports skills.
- Increase number of opportunities for people from disadvantaged and under-represented groups to engage in outdoor activities for lifelong physical and mental wellbeing (women and girls, people with pan disabilities, ethnic minority groups, etc).
- Increase number of social prescribing opportunities for 200 people suffering mental ill health and/or physically inactive to engage in outdoor activities for lifelong physical and mental wellbeing.

• Above Adventure, Kilmarnock

Indoor Climbing Development

2020 –2024 Funding spent - £6000

- Saturday Clubs
- Holiday Programmes
- Outreach Programmes
- Come and Try Sessions
- Climbing & Belaying Courses
- Mobile climbing Wall Sessions

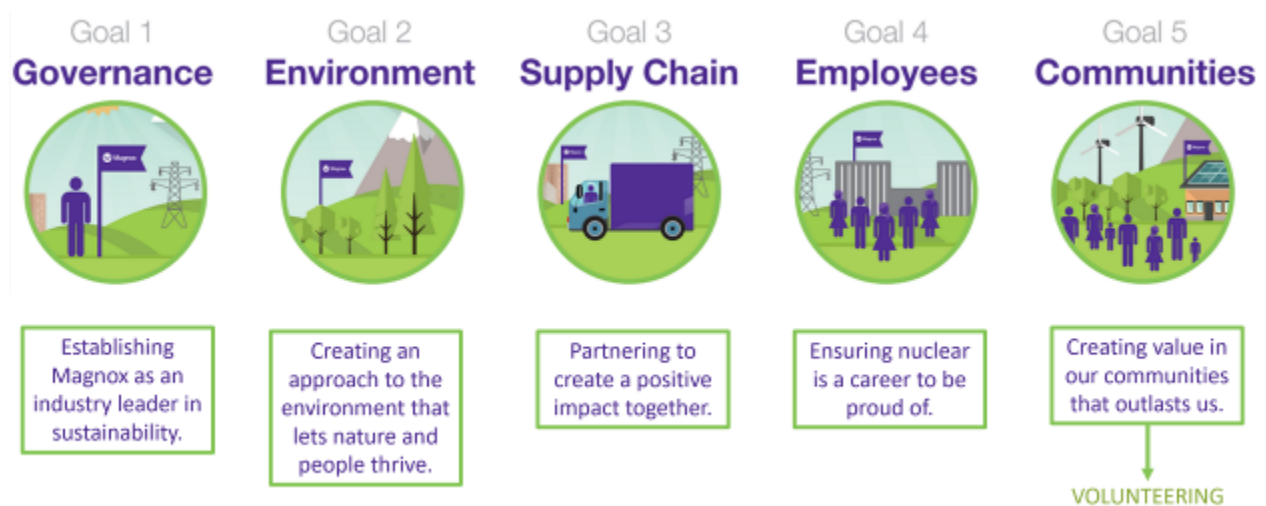


One of the clubs at Above Adventure in Kilmarnock.

9 SUSTAINABILITY

9.1 Sustainability Strategy

NRS's sustainability strategy centres around five goals: governance, environment, supply chain, employees, and communities. Goal 5 recognises NRS'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

After a successful soft launch with 3 Sites including Hunterston A, NRS has established a new Volunteering Standard. The Standard describes how to find opportunities to volunteer in local communities and how to request paid time off for volunteering activities.

Our company agreement states “The company may at its discretion grant additional paid leave of up to one week, and additional unpaid leave, to enable employees to undertake voluntary work in the local community”.

Further volunteering opportunities for volunteering are being promoted to staff as well as encouraging local charities and organisations to register with Neighbourly.

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
20 June	Paul Winkle NRS Sites Managing Director - Talks delivery
25/26/27 June	Radiological Protection peer group – Ian Goldsmith HoP Radiological Protection
10 th July	University of Glasgow - hosted by Paul Malloy NRS Professor Dimitrios Pezaros, Professor of Computer Networks and RAEng Research Chair and Dr Marco Cook – from Computing Science Dept at the University of Glasgow - hosted by Paul Malloy NRS
18 July	NDA Board- David Peattie Chief Executive Officer NDA
5/6/7 August	SILWE/NDA Review- Dave Rushton Lead Programme Manager, Caron Weaver NRS Programme Delivery Director
13/14 August	SEPA Inspection – Melanie Hayes - Principal Inspector (Radioactive Substances)
29 August	University of Glasgow - hosted by Paul Malloy NRS C&I Nuclear Industry Forum (CINIF) work.
28/29 August	ONR Inspection – Peter Hughes (Nominated Site Inspector)



Office for
Nuclear Regulation

ONR Site Report

Nuclear Restoration Services – Hunterston A

ONR Site Report

Nuclear Restoration Services - Hunterston A

Report for period: 1 April – 30 June 2024

Authored by: Nominated Site Inspector

Approved by: Delivery Lead Decommissioning, Fuel, and Waste

Issue No.: 1

Publication Date: July 2024

ONR Record Ref. No.: 2024/30771

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/ilc/>).

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 April 2024 – 30 June 2024:

- 11-13 June 2024

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)
- 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:

- conventional (non-nuclear) health and safety

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.

During the inspection I also held meetings with site representatives to discuss:

- Progress on addressing certain regulatory matters
- topical plant matters (including modifications)
- topical safety management matters
- topical compliance matters

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.

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

4. Regulatory activity

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'Licence Instruments' (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

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

5. News from ONR

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

6. Contacts

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Hunterston Site

Stakeholders Group

SEPA Update

Hunterston A



If you would like this document in an accessible format, such as large print, audio recording or braille, please contact SEPA by emailing equalities@sepa.org.uk

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 NRS team on strategic issues have also continued as before.

Site visits continue in order to ensure compliance with the site permit.

Site Inspections

Two site visits have been undertaken since the last SSG meeting. Updates to ongoing situations are in bold.

SEPA Site Inspections 12 June and 13/14 August 2024

SEPA undertook an inspection at Hunterston A on 12 June 2024 which focussed on the management and storage of Low Activity Wastes. It was determined necessary to undertake a follow up inspection to allow the site to better present the required evidence to show compliance with the site EASR Standard Conditions. This inspection was undertaken on 13 and 14 August 2024. Hunterston A was found to be compliant with all conditions assessed.

SEPA Site Inspection 6-7th February 2024 - **update August 2024**

SEPA issued NRS 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. NRS 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 NRS 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.

Update: Additional information has been received and SEPA is going through its internal process to withdraw the Information Notice served on NRS in July last year with regards to making improvements to ventilation systems on the site and the inspection of these assets.

SEPA Site Inspection 7th December 2023 – update August 2024

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.

Update: SEPA received communication from the site with regards to the information requested after the inspection in December. All information is subject to actions contained within a Forward Action Plan for the facility, which is due to be completed prior to the operation of the facility.

SEPA Site Inspection 28th March 2023 – update August 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.

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.

Update – SEPA are awaiting information to close out the Notice, these actions will be delivered during 2024 as per the dates provided by NRS.

Permit Variation Applications

Aqueous Discharge Variation Application

NRS applied to SEPA on 28 February 2024 to vary its EASR permit 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. The further information requested from the station, including a short-term release dose assessment to a swimmer during a discharge, was provided in June 2024, and the application has been deemed Duly Made. The application has been sent to Scottish Ministers, Office for Nuclear Regulation and Food Standards Scotland for comment. The application is expected to be determined by 1 August 2026.

SILWE Discharge/ Site gaseous discharge increase variation application – **update August 2024**

SEPA received an EASR permit variation application from NRS 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 NRS HNA by ONR and SEPA last year.

Update – Ongoing. Public Consultation will be published later this year. This has been delayed slightly due to a request from Food Standards Scotland (FSS) for an extension to the initial consultation with them. This was to run a risk assessment as the variation application is for an increase in site discharges. A response from FSS has just been received which states that FSS are content that there isn't a significant change to the risks from consumption of food. Subsequently the public consultation will be published once it has been through internal review processes.

Other EASR Regulatory Topics

Review of Characterisation of ILW Bunker Waste – update August 2024

SEPA received an optioneering report from NRS 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 NRS 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 NRS shortly afterwards.

SEPA, ONR and NRS had a joint meeting to discuss the findings of the report and a way forward on 15th November 2023.

NRS provided SEPA with a high-level scoping document which highlighted work areas required to ensure that an adequate demonstration of BPM is provided for the decisions regarding further characterisation of the bunker wastes.

Update: As yet SEPA have not received any further engagement from NRS since the receipt of the scoping document.

Other Regulatory Topics

Habits Survey

SEPA staff attended the start-up meeting for the Hunterston Habits Survey on 24 June 2024. The survey is being undertaken by the University of Stirling.

Fluorinated Greenhouse Gas Emissions (F-Gas)

A loss of refrigerant gas was identified at Hunterston A Site. Ongoing issues with the administration building air conditioning system prompted the decision to degas unserviceable units. During degassing activities, it was identified that one of the air conditioning units associated with the site's administrative building (Admin AHU 3) had a loss of refrigerant gas. The investigation identified the loss of 0.45 kg of R410A gas. This equates to a loss of 0.93 tonnes of CO₂ equivalent.

A loss of refrigerant gas was identified at Hunterston A Site. Upgrades were being made to the Admin Ground Floor IT Room Split 1 AHU, replacing the old unit with a new similar Daikin unit. During the degassing activities of the old unit, it was identified that the air conditioning unit had a loss of refrigerant gas. The investigation identified the loss of 1.8 kg of R32 F-gas. This equates to a loss of 1.20 tonnes of CO₂ equivalent.

Environmental Events

SEPA were notified of a loss of refrigerant gas at Hunterston A Site on 18 July 2024, and again on the 25 July 2024. The site is liaising with the F Gas Specialist at SEPA with regards to these losses.

Radioactivity and Food in 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".

Melanie Hayes

Radioactive Substances Specialist

August 2024



NDA Update for Hunterston SSG

September 2024



Contents

1.0 NDA Stakeholder Update September 2024



NDA Stakeholder Update

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

General Election

Following the recent General Election the Labour Party, with Sir Keir Starmer as the new UK Prime Minister, won with a majority of c170. Within the Department for Energy and Net Zero the Rt Hon Ed Miliband has been appointed as the new Secretary of State with his team of Rt Hon Lord Hunt OBE as Minister of State for Energy and Net Zero, Sarah Jones MP as Minister of State for Industry, Kerry McCarty MP as Parliamentary Under Secretary for Climate, Miatta Fahnbulleh MP, Parliamentary Under Secretary for Energy Consumers and Michael Shanks MP as Parliamentary Under Secretary for Energy.

The new Secretary of State has advised the priorities for the department are:

1. delivering our mission to boost energy independence and cutting bills through clean power by 2030
2. taking back control of our energy with Great British Energy
3. upgrading Britain's homes and cutting fuel poverty through our Warm Homes Plan
4. standing up for consumers by reforming our energy system
5. creating good jobs in Britain's industrial heartlands, including a just transition for the industries based in the North Sea
6. leading on international climate action, based on our domestic achievements

The announcement and launch of Great British Energy (GBE), a publicly owned, clean-energy company which will be headquartered in Scotland has now been made by the Secretary of State. The aim is to speed up the deployment of mature and new technologies, as well as local energy projects, to support the government's aim of decarbonising the UK's electricity system by 2030 whilst also ensuring we can meet future demand as we further decarbonise the economy. GBE will be paid for by a windfall tax on oil and gas giants and will invest clean power projects all across the United Kingdom. [Juergen Maier](#), former CEO of Siemens UK, has been announced as Chair of Great British Energy.

- Following the election we have seen significant constituency level change at NDA sites with ten now represented by a new MP, including Josh MacAlister covering the sites at Sellafield and Drigg, Julie Minns for Carlisle and the NTS offices and Michelle Scrogam for Barrow and Furness.



- We are contacting new constituency MPs at and around our sites and Ministers in key Whitehall departments introducing the work of the NDA group and seeking an early meeting.
- Additionally, over the coming weeks and months, we will be working through the policy implications of a new government for the NDA group.

Board updates

- As previously announced **Adrienne Kelbie CBE**, Chair of Nuclear Waste Services (NWS) board, has stepped down and her successor has been named as Liz Peace. Liz has more than 35 years' experience in government and the property sector, including as Chief Executive of the British Property Federation for 13 years, and currently holds a range of Chair, non-executive and advisory roles. She was awarded a CBE in 2008 for services to the property industry. The full announcement can be read [here](#)

Outreach activities

- During the pre-election period outreach activities was limited but a number of planned commitments which were postponed are now being rescheduled including a Treasury department visit to Sellafield and a site visit by the officials from DESNZ and UKGI.
- The next **Cross-Party Group** will be held on Wednesday 11th September 2024 in Committee Room 5 at the Scottish Parliament. 'Skills' will be the main topic for consideration.
- NDA is working with NIA to establish a similar **CPG in the Welsh Parliament**.
- Gillian Martin MSP has been appointed as **Acting Cabinet Secretary** for Net Zero and NDA is in the process of arranging its annual Ministerial briefing.
- NDA will be supporting the **SEPA Vibes Awards** to be held in Glasgow in November 2024.

Engagement priorities for 2024

- In response to previous feedback, the first **SSG Chairs and Vice-Chairs event** to reflect a group-wide approach involving the NDA, NRS and other OpCo CEOs was held on July 8/9. This combined event provided richer discussion and a chance for the SSG delegates to talk about their opportunities and challenges. It also featured updates on socio-economics and the NDA's heritage strategy.
- As mentioned in previous updates, our **independent review into the SSGs** is underway. This exercise will provide an opportunity to reflect on the successes of the stakeholder voice in the local community over the last 20 years. It will also allow us to consider how best to address some of the challenges that face us as we think about the future. Our Chairs and Vice-Chairs played a role in helping to draft the scope of the review and they received a short progress update at the SSG Chairs and Vice-Chairs meeting mentioned above.

- Our next in person **Stakeholder Conference** will be held on September 17/18 in Manchester at the airport Radisson Blu hotel. We are working with a range of stakeholders to draft the content and agenda to ensure we create an event of value to all delegates.
- We are in the process of developing and designed our next broad **stakeholder survey**. More details will be available in due course.
- Preparation is underway for **Strategy V** which we expect to publish in March 2026. Our strategy document is published every 5 years and describes our high-level approach to delivering our mission. Within that we identify several critical enablers essential to the successful delivery of our mission including public and stakeholder engagement. We will engage early with stakeholders during the development of the document and its subsequent consultation.
- **SCCORS** (Scottish Councils Committee on Radioactive Substances), has established closer links with NuLeaf and have commenced the recruitment process for an Engagement Officer to promote closer links with Scotland's local authorities.
- NDA was pleased to support the recent **CPX Masterplan** announcement and is leading the search for a Strategic Partner.

Publications, public service and policy updates

- The previous Government and devolved administrations published an updated policy for nuclear decommissioning and managing radioactive substances, including radioactive waste. Publication follows consultation undertaken last year on the proposals. [Read details of the policy here.](#)
- The policy included an expectation that the NDA should explore with stakeholders the potential for optimising the LLW Repository to take suitable, less hazardous intermediate level waste.
- Engagement with the local community and relevant stakeholders will be an important part of this work, alongside further technical evaluation. If appropriate, the project would proceed to creation of a final business case and seek necessary approvals.
- Nuclear Waste Services will be working with relevant key stakeholders, to inform its thinking
- We expect to publish our Annual Report and Accounts in September.
- The **Scottish Government** is about to start its review into its policy for higher activity radioactive waste (HAW). The policy framework is set out in a 2011 Policy and the 2016 Implementation Strategy. The anticipated timeline is: Commence review – mid 2024, Hold a public consultation – early 2025, issue a revised Policy document – late 2025.
- NDA is in the process of recruiting for its third **secondment** into SG's Radioactive Waste Substances Team – supporting the review and consultation for Scotland's HAW Policy.



- The new nuclear industry skills “roadmap” has been launched aimed at attracting and retaining the sector’s workforce of the future. The National Nuclear Strategic Plan for Skills (Skills Plan) is based on sector collaboration, investment in training, leadership development and improving diversity. The NDA is a signatory to the charter, which was signed at Westminster, that underpins the goal to double the number of new apprenticeships by 2026 and recruit 40,000 new jobs by 2030.
- The **NAO value for money study** into whether Sellafield and the NDA are taking a sustainable approach to decommissioning, leading to permanent hazard reduction is underway, with visits to Sellafield and formal interviews now completed. We expect the study to be published on 23 October.

Mission delivery

- NWS and the NDA have established an innovative partnership for the enhanced management of asbestos waste, awarding two contracts to establish the **Asbestos Innovation Partnership**. This partnership will work with the NDA group and the supply chain, to test and develop new solutions to treat asbestos waste, helping to deliver efficiencies and enable more effective waste management.
- A collaboration between NRS, NTS and NWS has achieved a significant milestone by transporting the final waste from the Treated Radwaste Store (TRS) in Winfrith to the LLWR for disposal. The completion of this project ahead of schedule means that the need for **waste storage at Winfrith** which closed in 1990 has been removed, leaving the site ready for decommissioning.
- NDA and NRS have underlined their commitment to Government to, where possible, safely accelerate **land release at Harwell** site to maximise the economic impact of decommissioning. We have identified clear areas of strategic importance and will work together with the Harwell Campus joint venture on developing options for those areas. We are at early stages and still progressing the current release of plots, aiming to have a broader plan for land release this autumn.
- At Sellafield, the first transfer of fuel from an A1 skip to the new 63 can rack in support of the AGR programme has been made. This is a significant milestone presenting new capability that will, via further 63 can racks, enable storage of the volumes of EDF fuel needed into the 2030s.
- Industrial action at **NRS Dounreay** was suspended and work to rule ceased in period, to allow employees to be balloted on a new pay offer which was accepted.
- We’ve opened a new joint **Cyber Security Operations facility** at Hinton House in Warrington, bringing together capability from the NDA (delivering services for the wider group) and Sellafield. Protecting our businesses and keeping our information secure is vital and this new facility will help, enable the cyber teams to co-locate and better collaborate to defend against common cyber threats.



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



Nuclear
Decommissioning
Authority

The Future of NRS sites

Hunterston - Site-specific report

Thinks Insight & Strategy

About the site-specific reports

The following site-specific reports have been written using data from the quantitative survey conducted by Thinks as part of their public research on behalf of NRS. Verbatim responses from the online community have also been included to illustrate the findings.

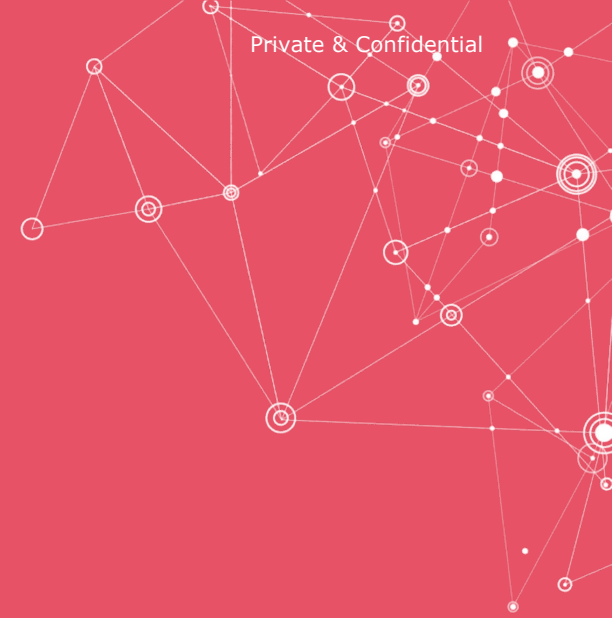
The survey asked 2100 respondents, comprising:

- **Nat rep sample:** 1000 people, demographically representative of the UK
- **Local boost:** 600 respondents who live within 40 minutes of an NRS site (50 participants in each of 12 sites)*
- **Young people boost:** A boost of 500x 11-18-year-olds

The data informing the site-specific reports comes from a combination of the local boost sample and those in the Nat rep sample who live near an NRS site. Please note that this means the base sizes for each site are small (<100). Differences between the sites are therefore to be treated indicatively, rather than as statistically significant.

It is also worth noting that views towards priorities and strategies for decommissioning are consistent across the sites, and these can be found in more detail in the full report, which contains analysis across all NRS sites and from all phases of the research (the online community, deliberative workshops and the survey).

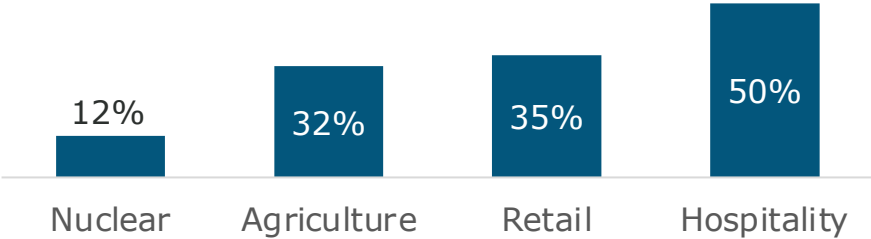
Key findings



Residents associate their local economy with hospitality, while local amenities is the top priority

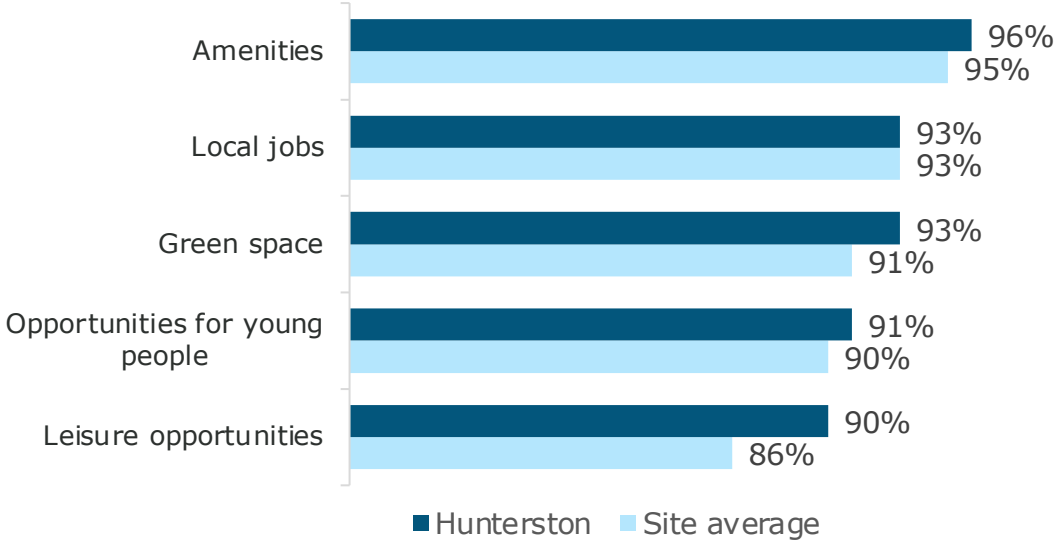
Which of the following areas do you feel has the biggest positive impact on your local economy?

Hunterston - Selected responses



A minority of local residents associate Hunterston with nuclear energy production (12%).

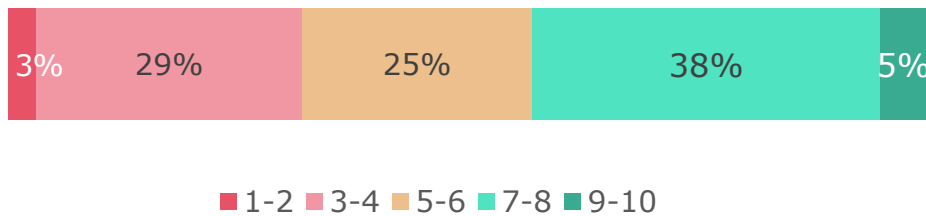
Which areas of public life are important for the future of your local area? Showing % who scored 7-10 / 10 (Top 5 Hunterston responses)



Hunterston's scores closely align with other sites, with amenities, local jobs and green space remaining as top priorities for the local area.

Hunterston residents' knowledge and support for nuclear energy is consistent with other sites

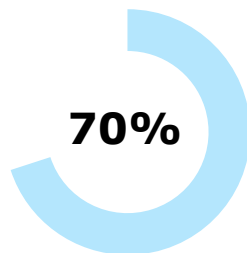
How much do you feel you know about nuclear energy in the UK?



Just over two fifths of Hunterston residents rate their knowledge of nuclear energy as a **7/10 or higher** (43%), in line with the sample average (49%).

Meanwhile, **seven in ten** (70%) say they **support** the use of nuclear power in the UK, also in line with the average across sites (72%).

Support for nuclear power to provide energy in the UK



"The site provides power for not only the local area but all the west of Scotland."

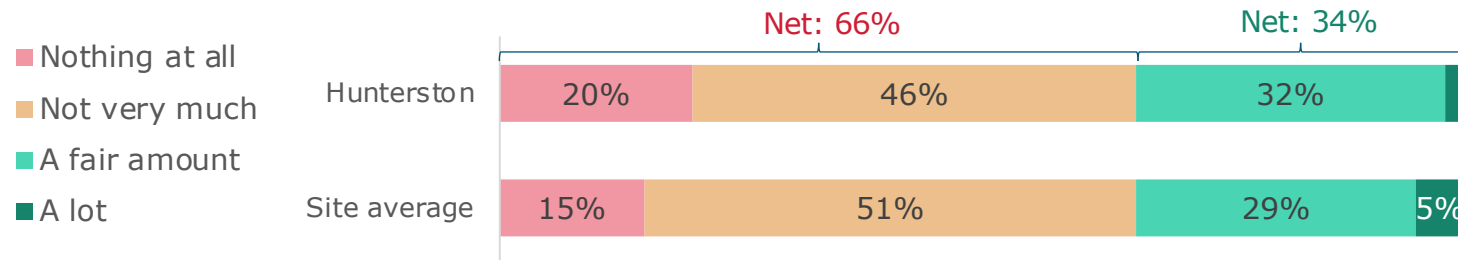
Online community, Hunterston

"I think [the site] benefited to local area and the whole of Scotland with the energy it has produced."

Online community, Hunterston

Awareness of Hunterston is similar to other sites, but residents are less likely to hear about it in local media

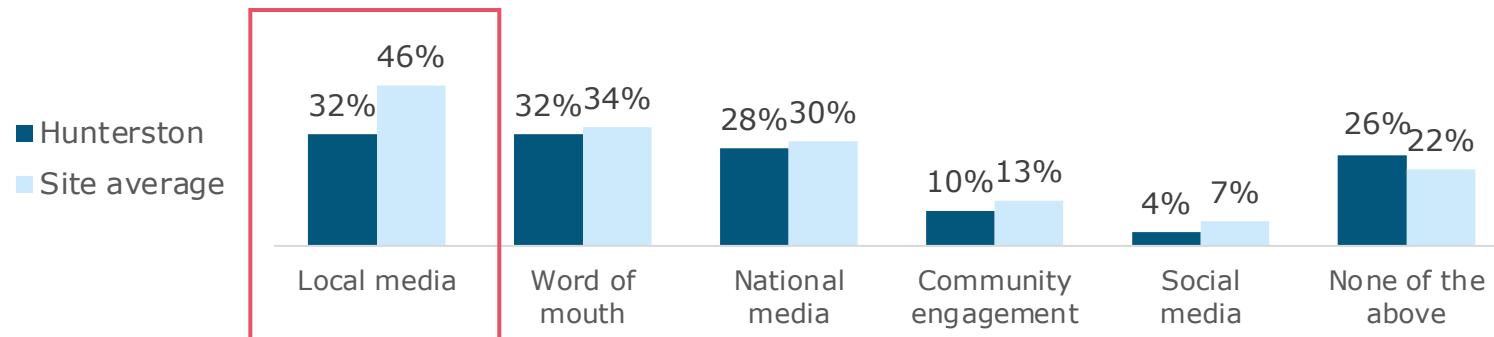
How much do you feel you know about your local nuclear site?



"My dad worked there when I was a baby."

Online Community, Hunterston

Where, if anywhere, have you heard about your local nuclear site?



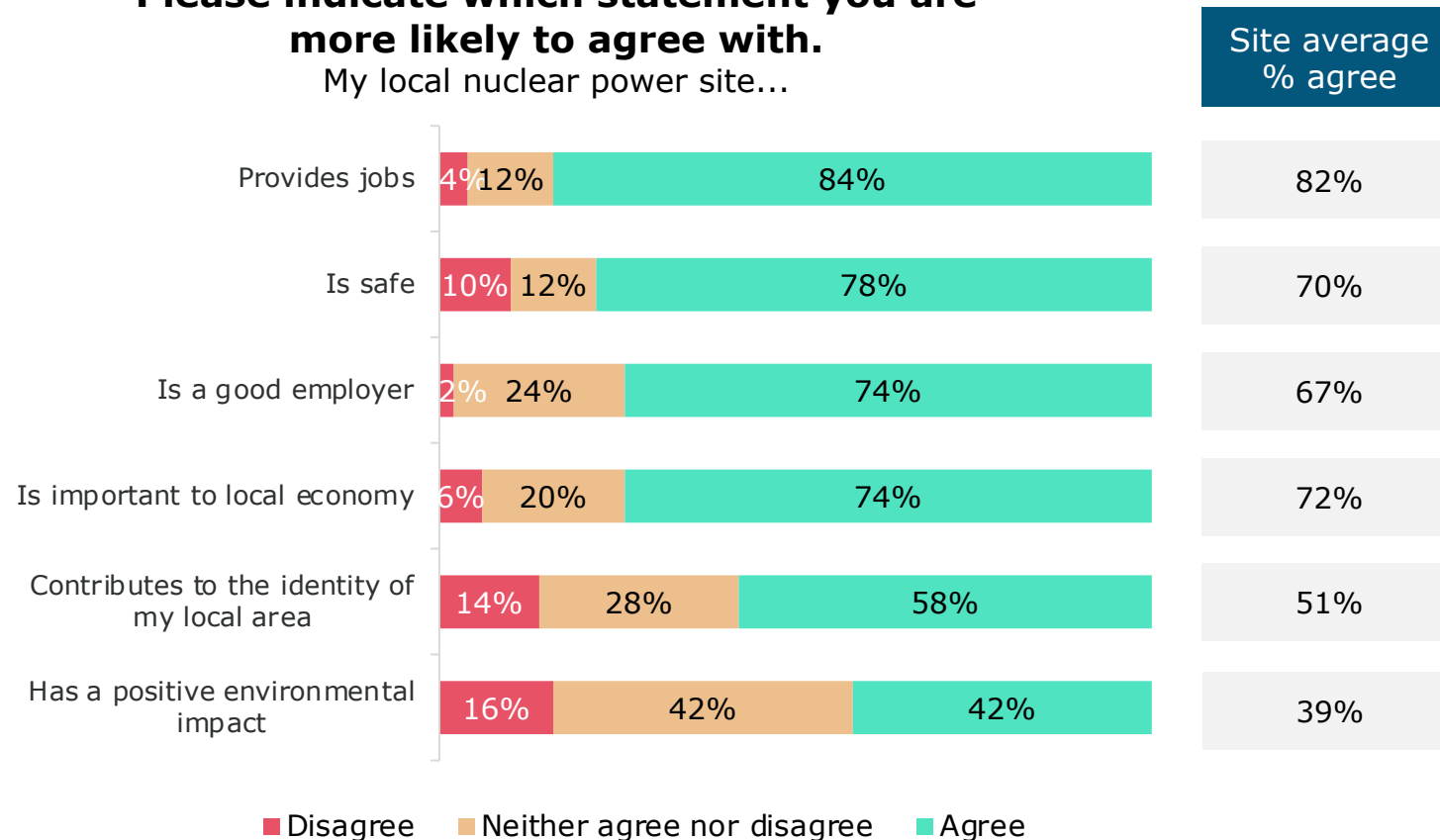
"It's getting decommissioned. I've heard people locally talk about it."

Online Community, Hunterston

Provision of jobs is the main association those living near Hunterston have with the site

Please indicate which statement you are more likely to agree with.

My local nuclear power site...



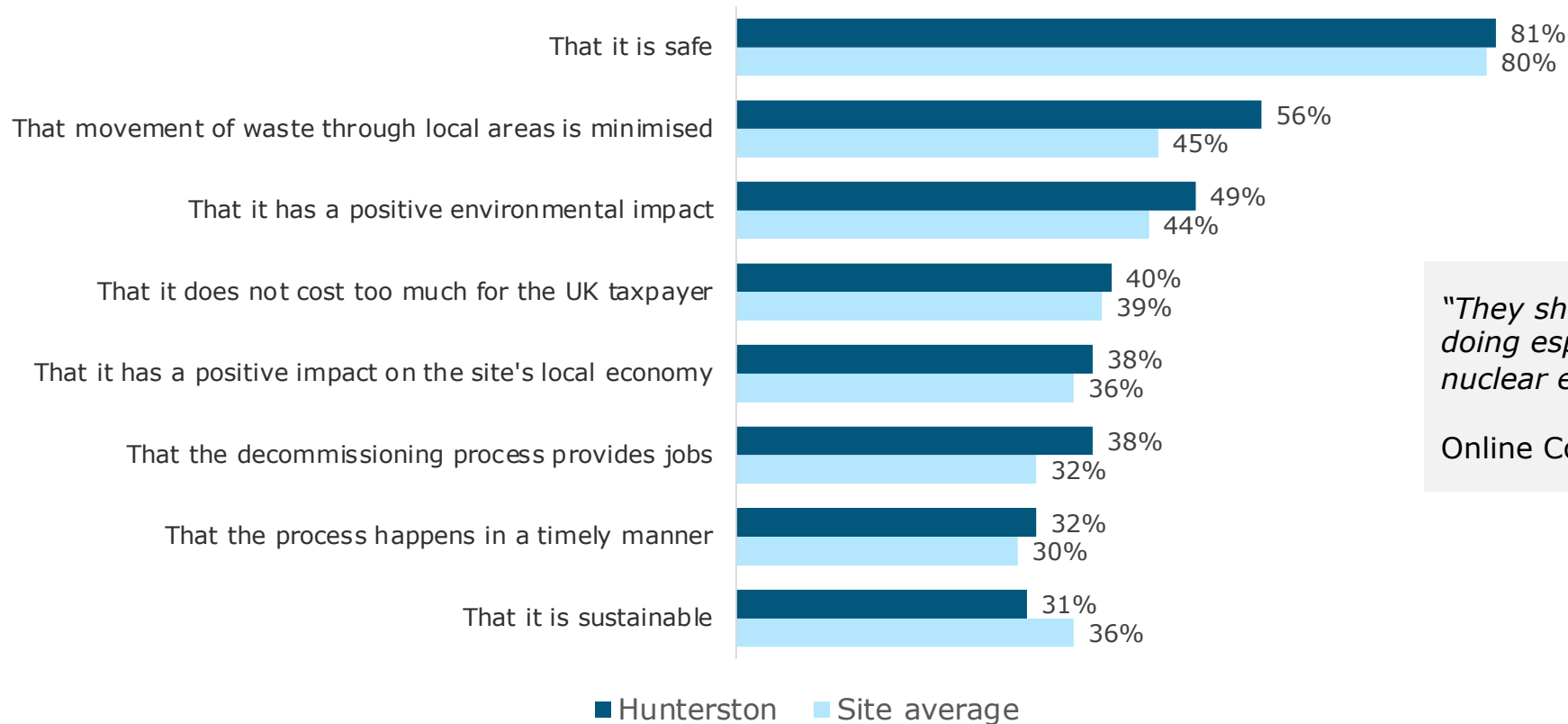
Residents are positive about Hunterston's contributions to the local area, seeing the site as providing jobs (84%), safe (78%), a good employer (74%) and important for the local economy (74%).

"I would say it is overwhelmingly positive to the area economically and obviously benefits every single person who used energy."

Online Community, Hunterston

Priorities for decommissioning the Hunterston site are consistent with other sites, with safety ranking top

Decommissioning criteria selected as very important

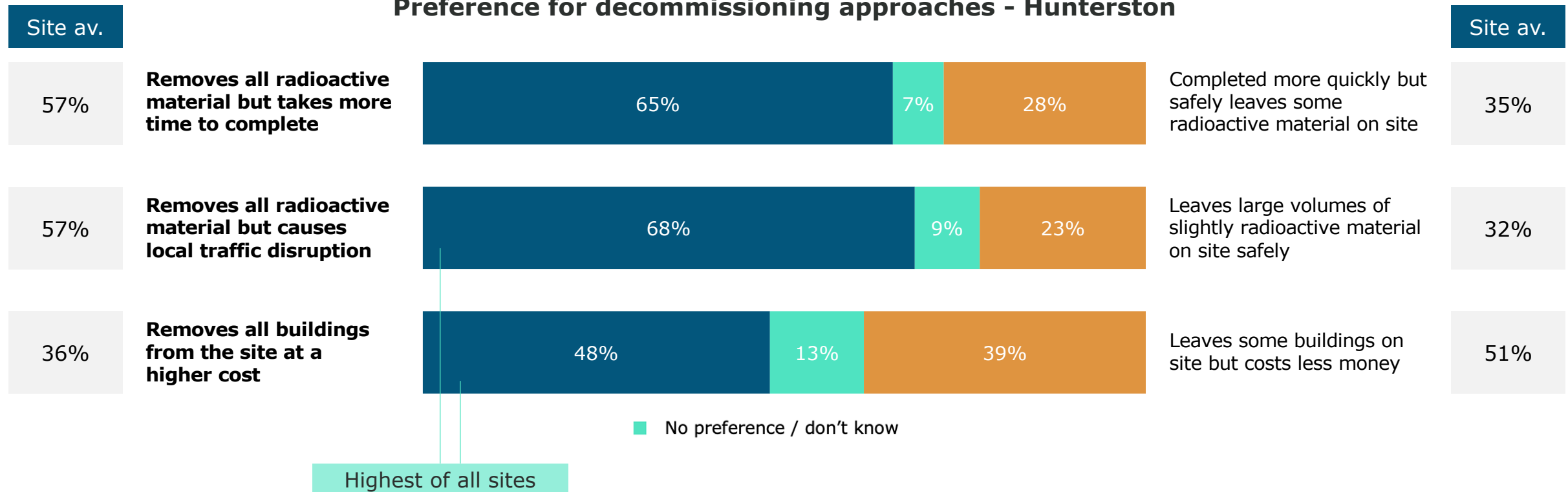


"They should keep up what they are doing especially with safety concerns as nuclear energy can be very dangerous."

Online Community, Hunterston

Hunterston residents are more tolerant of disruption and costs to ensure the removal of all materials and buildings

Preference for decommissioning approaches - Hunterston





Thank you!

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SCOTTISH GOVERNMENT UPDATE TO HUNTERSTON SITE STAKEHOLDER GROUP – 5TH SEPTEMBER 2024

SCOTTISH GOVERNMENT RADIOACTIVE SUBSTANCES AND NUCLEAR DECOMMISSIONING POLICY TEAM

Review of Scotland's Higher Activity Waste Policy

The Scottish Government places great importance on the need to address Scotland's radioactive waste legacy and is committed to the safe, secure and responsible management of waste with care for people and the environment. Our policy framework for higher activity radioactive waste (HAW) is set out in a [2011 Policy](#) and [2016 Implementation Strategy](#).

The [Implementation Strategy](#) committed the Scottish Government to reviewing this policy framework no more than 10 years from 2016. We have now commenced this review, the anticipated timeline for which is set out below:

- Commence review – mid 2024
- Hold a public consultation – early 2025
- Issue a revised Policy document – late 2025

To inform this review and development of the public consultation we are inviting your initial views on the issues, as previously communicated. If you would like to share your thoughts in writing, we would ask that these be sent to oli.smith@gov.scot.

Scottish Government Ministerial Changes

Mairi McAllan MSP is now on a period of maternity leave until early 2025, and so Gillian Martin MSP has taken up the role of [Acting Cabinet Secretary for Net Zero and Energy](#) in her absence which includes responsibility for our work on Radioactive Substances and Nuclear Decommissioning.

Public Attitudes to Radioactive Waste Management Survey

The 2016 Implementation Strategy identifies that we will *identify public attitudes and societal concerns in Scotland of the topic of radioactive waste management*. In January this year, public attitudes were surveyed in an online questionnaire and the results of this survey are now available online. Included in the publication is a short summary of some of the key findings for ease of reference:

[Radioactive Waste Management - Public Attitudes Survey for Scotland - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/radioactive-waste-management-public-attitudes-survey-for-scotland/pages/2/)

The survey explored four key areas:

- Knowledge of radioactive waste management
- Attitudes towards radioactive waste management
- Priorities in radioactive waste management
- Decision-making in radioactive waste management

As we review the 2011 Policy, the insights provided by this survey will help to inform our approach and appreciation of the issues to address, alongside the range of other engagement and development work we already undertake.

Diane Hamilton
Scottish Government