

Bradwell Local Community Liaison Council (LCLC) (Meeting No. 77)

Agenda

Wednesday, 2nd October 2024

Via ZOOM Meeting to commence at 19:00

Introduction	Brian Main
Apologies for absence	Brian Main
Approval of the previous minutes –27 th March 2024	Brian Main
Matters arising from the previous minutes.	Brian Main
NRS Corporate Update	Bill Hamilton
Bradwell Site Director's Report	Alan Walker
Nuclear Decommissioning Authority Update	Alastair Findlay
Environment Agency Site Inspector's Report	James Heavingham
AOB	Brian Main

Please be reminded following a request from the Chairman, any requested amendments to the previous minutes should be submitted to the LCLC Secretariat in writing prior to the meeting:
bradwell.communications@magnoxsites.com.

BRADWELL SITE LCLC

Draft minutes of the 76th Local Community Liaison Council (LCLC) meeting

held via Zoom

7.00 pm Wednesday 27 March 2024

ATTENDANCE

LCLC Executive

Brian Main	-	LCLC Chairman
Cllr John White	-	Deputy Chairman

LCLC Members

Ian Cuthbert	-	Bradwell/Dungeness/Sizewell A Site Director
Cllr Ian Clarke	-	
Cllr Tony Fittock	-	Althorne Parish Council
James Heavingham	-	ONR
Cllr Andrea Luxford Vaughan	-	Colchester City Council
Cllr Matthew Neall	-	Maldon District Council
Cllr John Noble	-	Bradwell Parish Council
Cllr Jayne Rumary	-	Tillingham Village Council

Other Attendees

Andrew Blowers		
Bea Chandler		
Eirian Vaughan Lewis	-	NRS Communications & Socio-Economic Lead
Linda Gemmill		
Janine Claber	-	Virtual event host

I Introduction

3303 The Chairman welcomed everyone to the meeting and thanked them for attending at this new, experimental time.

II Apologies for Absence

3304 Received from Bill Hamilton of NRS; Pip Hatt of NDA; Cllr John Lambert of Latchingdon Parish Council, Cllr Paul Burgess of Althorne Parish Council and Cllr Paula Spenceley of Maldon District Council.

III Approval of the Previous Minutes

3305 The minutes were approved as a true record of the meeting on 27 September 2023.

IV Matters Arising from the Previous Minutes

3306 There were no matters arising.

V Bradwell Site Director's Report

3307 Ian Cuthbert announced that his tenure as interim Site Director for three sites would be ending shortly and that Alan Walker would be the new Bradwell Site Director from 8 April.

3308 Ian noted that there had been a problem of water ingress in December, due to heavy rainfall, but the general condition had held up well. A mental health first aider would attend the site in March to raise awareness and reduce the stigma around mental health issues. A five-year care and maintenance inspection was due to start in September, which would last for three months. Data from previous inspections continued to be reviewed.

- ILW update: 137 Mosaiks had been sent from Dungeness into ISF to date and the resin was finished. A number of drums were transported from Bradwell to Sizewell, sampled and sent off for disposal.

Any future waste arising from Bradwell would be transferred to Sizewell, maintaining Bradwell low level waste at zero.

- Socio-economic spend 2023-24: £1,035,035 had been committed to date (£61,000 at Bradwell) and there was £1,328 remaining. £1,020,035 is available annually across all sites. Ian encouraged people to put in applications for funds and reminded the meeting that up to £2,000 per application was available under the Good Neighbour scheme, with up to £6,000 being allocated per site. Eirian could advise on any potential applications.
- The NDA socio-economic strategy consultation had closed on 21 February 2024 and the comments and feedback were now being considered.

3309 Andrew Blowers asked about the water ingress and the possible effect on future planning, ie was it seeping up from the ground or due to rainfall? Ian replied that excessively heavy rainfall in December was the main cause and he was not aware of any other issues.

3310 Matthew Neall asked about the socio-economic funds and whether schools could apply. His village hall also needed work which would require funding. Ian stated that schools should be eligible for funding of up to £2,000 and thought that the village hall would most likely be supported. Eirian Vaughan Lewis offered to send the criteria for funding to Matthew and to provide any help required. The Chairman encouraged anyone with a local project to submit an application.

3311 John White noted that his village was five miles from Bradwell and had, in the past, had its cows and fish tested for radioactivity. He asked whether his local football team could apply for funding as he was not sure whether they were included in the area Bradwell would fund.

The Chairman assumed that the area covered would be a circular radius (perhaps up to 15 miles?) around the site and invited John to submit an application.

VI Nuclear Decommissioning Authority Update

- 3312 No representative of the NDA was present, although an update had been received in advance of the meeting. Andrew Blowers commented that the NDA had split into four sections and that a representative of the Nuclear Waste Services (NWS) section should attend our meetings. The Chairman agreed to remind them of this.
- 3313 John White asked whether we should have a report from NWS, rather than NDA, and how many groups remained in discussions before we could go for planning for the GDF. Andrew Blowers, who is part of the NDA Exchange, a working group to look into this subject, stated that there had been three partnerships in West Cumbria, working with local communities towards acceptance or rejection of plans. Two sites remained which could take a GDF plus another in north Lincolnshire, which was investigating and would move towards a community vote. Other sites had also been considered but had withdrawn or been blocked. Andrew felt that a lot more work needed to be done in the early stages to avoid arriving at an automatic rejection later along the line. Andrew would be working with a team from NWS to look at how to handle the siting strategy.

VII Environment Agency Site Inspector's Report

- 3314 James Heavingham reported that monthly meetings were continuing at Sizewell A and they were looking at such issues as the water ingress at Bradwell. Quarterly meetings were also held between the Environment Agency, NRS and the ONR, where the environmental impact of any incidents at Bradwell were discussed. The care and maintenance inspection and the arrangements that were in place were being reviewed. James noted that NRS had a robust system in place for this and the reports were of a good standard and very detailed.
- 3315 The land quality management plans and the surface water monitoring plans were reviewed in February and it was noted that a robust system was in place for managing and monitoring areas of contaminated land. Nuclear waste and any discharges were being checked and were consistent with previous years. No breaches of the permit had occurred.
- 3316 James commented on a question from the last meeting, about an increase in radioactivity in the food and environment reports. In 2020 the total dose for a representative person around the Bradwell site was less than 0.005 mSv; in 2021 this had increased to 0.006 mSv but had dropped back to the 2020 level in 2022 and was due entirely to direct radiation from the site and not from any discharge. To put this in context, James noted that the average person receives a dose of 2.7 mSv annually, from various sources.

VIII Any Other Business

- 3317 **Questions previously submitted to the NRS by Ian Clarke** – Ian Cuthbert responded as follows:
- Sea defences: the photos previously shared were from further down the estuary and the question should be directed to the Local Authority, which would have a shoreline plan.
 - Graphite cores: the site in Wales had a long-term plan to remove the graphite core as a lead site. The current strategy was to dispose of it to GDF but the plan could be revised as new technologies develop. Ian confirmed that incineration was being considered but this was in its infancy. No inspections of the graphite were currently being undertaken; determining its condition would be part of future activities, based on learnings from other sites and current technology at the time.
 - Heat exchangers: although these had been removed at Berkeley and Trawsfynydd, each site was different and Bradwell's had been overclad and were deemed to be in good condition; much better condition than at Dungeness. Regarding structural integrity,

annual inspections were carried out but the data indicated that the frequency may be reduced. Ian confirmed that the heat exchangers were supported sufficiently to withstand a seismic event.

- Outfall: this was still in use under the existing permit and would be used for decommissioning. There was no indication of silting and the outfall was no longer flushed. The remains of the structure were expected to be removed during final site clearance, beginning in 2071.
- FED vaults: low rates of groundwater ingress were expected during the care and maintenance stage and were constantly monitored. There was no evidence of any egress of water.
- Cooling ponds: this water was disposed of through outfall but a dispensation had not been required to increase active discharges as they were within the previous limits.
- Near surface disposal of ILW: Ian Clarke had asked if the volunteering principle for such facilities was being applied and at what level. Ian Cuthbert was unable to answer this question; however, he confirmed that current plans for ILW were that it would go to GDF, which would be available around 2050.
- Final site clearance: the current strategy was for decommissioning work to begin in 2071. All ILW will have gone to GDF by then.

Ian Clarke noted that two of the three photos of the sea defences had been taken from the opposite side of the estuary, where stronger sea walls than Bradwell's had collapsed in surge tides. The image of the sea wall at Bradwell was taken during a minor surge tide and the water was close to the top. Ian's concern was that the sea walls around the Bradwell site may need reassessment in view of the other walls which had collapsed.

Ian Cuthbert was unable to answer the question and the Chairman reminded the meeting that we had been informed that such issues should be addressed to the Local Authority. James Heavingham understood that these plans were managed by the Environment Agency and the Local Authority and said that plans that were in place could be found on the gov.uk website by searching for 'shoreline management plans'. **Action:** Ian Cuthbert to pose the question within the Environment Agency and report back.

Matthew Neall ascertained that the relevant Local Authority would be Essex and offered to help push the ECC representatives to respond, if necessary, and asked Ian Clarke to send the photos to him.

Ian Clarke asked for clarification of the response regarding the outfall into the estuary as this meeting had been told that it was being used but item 3294 of the previous meeting stated that this was no longer a permitted discharge route. James Heavingham stated that, when the site was operational, it had a main discharge route for the radioactive cooling water and also had a secondary discharge for surface water. When the site went into care and maintenance, the radioactive water discharge point was removed from the permit. Ian asked whether that still ran out to the main outfall; it was confirmed that it does.

Ian asked about when decommissioning work would start again and the date for final site clearance. Ian Cuthbert stated that the work would start in 2071 and should be completed in 2094.

- 3318 Andrew Blowers asked if we could have a note of the replies to Ian Clarke's questions or whether we could ensure that someone from NWS would be present at the next meeting to explain what is happening in more depth. The Chairman pointed out that the comments would be in the minutes of this meeting and that he already had an action to follow up on attendance by NWS. Andrew felt that a presentation by NWS was required on this issue.

3319 Andrew felt that the issue of ILW was particularly important, and that NWS needed to be clearer on this. There was the prospect of an ILW facility whose purpose and the implications for Bradwell were unknown. He was concerned that some of the waste, instead of going to a GDF, might be destined for an NSF and he would like to know if that was in prospect.

3320 Andrew was also concerned about the prospect of inspections becoming less frequent at a time when deterioration of large structures may be likely to increase and therefore need more frequent inspection. The Chairman emphasised that reduced frequency of inspections would occur only if things did not change much over time.

Ian Clarke asked if we could request a site-specific report from NWS for the next meeting. The Chairman already planned to action this.

3321 **Other business:** Brian Main had attended a national conference of sites similar to Bradwell, where two main points about communications with the public were made. It was felt that engagement needed to be improved and that we need to enable scrutiny by allowing members of the public to attend our meetings and SSG Chairs could attend national meetings. Many SSGs were suffering from low attendance at meetings, and it was thought that the fact that the local power station was offering money for local causes, if publicised more widely, might encourage attendance at meetings.

Matthew Neall agreed that we should make ourselves more attractive to the public. Brian suggested that Matthew and Tony Fittock could get together to devise a publicity campaign for us to communicate better and make ourselves more visible.

Ian Clarke asked Brian to clarify who he wanted to aim such a campaign at; Brian said it was to make us more visible to the general public and encourage people to want to attend our meetings.

3322 Ian Clarke acknowledged that the Chairman would pursue NDA attendance at our meeting but wanted to emphasise that the report they had sent was too general and information needed to be site-specific.

IX Questions from Bradwell Action Network

3323 Linda stated that there were 1,500 local members in their Facebook group and mentioned two questions raised there:

- (i) Why was such a large building not covered with solar panels to make it productive?

Ian Cuthbert stated that this matter was being considered at various sites and he would pass the query on to his colleague. He was not sure whether we could pick up the national grid but would ask.

- (ii) Many pictures had been available when Bradwell was built but none have been seen of the decommissioning.

The Chairman stated that there have been publications on the decommissioning, so pictures were available, although there was nothing photo-worthy happening now. He would speak to the member who had posed the question.

Linda offered to publicise LCLC meetings on the Facebook group to encourage people to attend. The Chairman accepted this offer as a way of encouraging attendance by more Bradwell people.

Matthew Neall suggested to Ian Cuthbert that, if solar panels were to be put on Bradwell A, some electric vehicle points could be installed in the parking area to be powered by them.

Andrew Blowers suggested asking EDF to put solar panels on Bradwell B.

- 3324 Timing of the LCLC meeting: after canvassing the views of those present, the Chairman confirmed that an evening meeting seemed more popular (or at least less onerous) than a daytime meeting and proposed that the current timing continue, to enable working members of the public to attend.

The Future of NRS sites

Bradwell - 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).

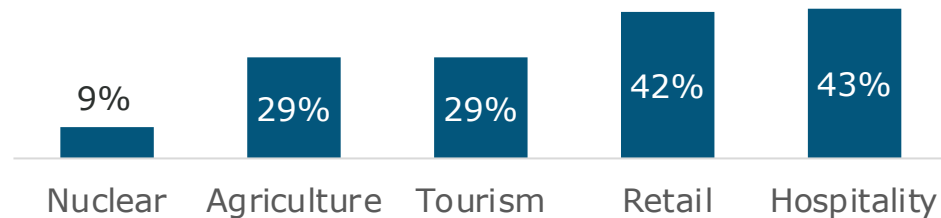
Key findings



Bradwell's local economy is felt to be more diverse than other sites, while green space and amenities are most valued by residents

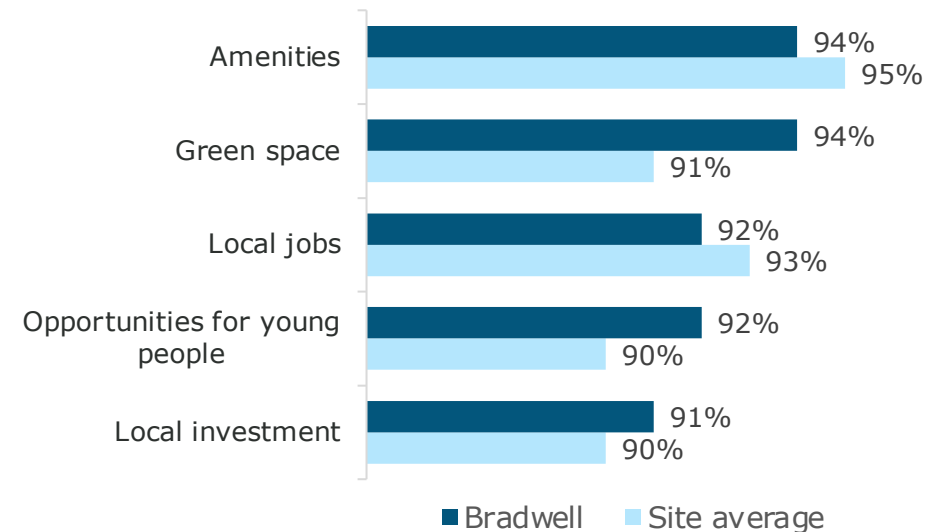
Which of the following areas do you feel has the biggest positive impact on your local economy?

Bradwell - Selected responses



Few residents spontaneously associate Bradwell with nuclear energy production.

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



Bradwell's scores closely align with the rest of the sample.

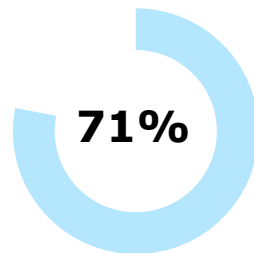
Knowledge about and support for nuclear energy in the UK is consistent with the site average

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



■ 1-2 ■ 3-4 ■ 5-6 ■ 7-8 ■ 9-10

Support for nuclear power to provide energy in the UK



Just under half of Bradwell residents rate their knowledge of nuclear energy in the UK as a **7/10 or higher** (48%).

Meanwhile, **seven in ten** (71%) say they **support** the use of nuclear power in the UK.

Both scores are **closely in line with the average** across sites (49% and 72% respectively).

"Nuclear power is cheaper than coal or gas."

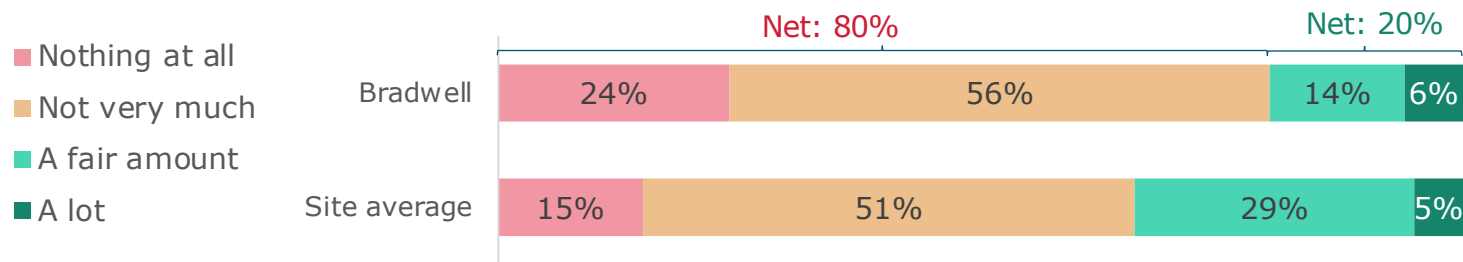
Online community, Bradwell

"I have read that power stations have been designed to provide low and clean carbon electricity to many homes."

Online community, Bradwell

However, knowledge about Bradwell's own nuclear power station is low

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

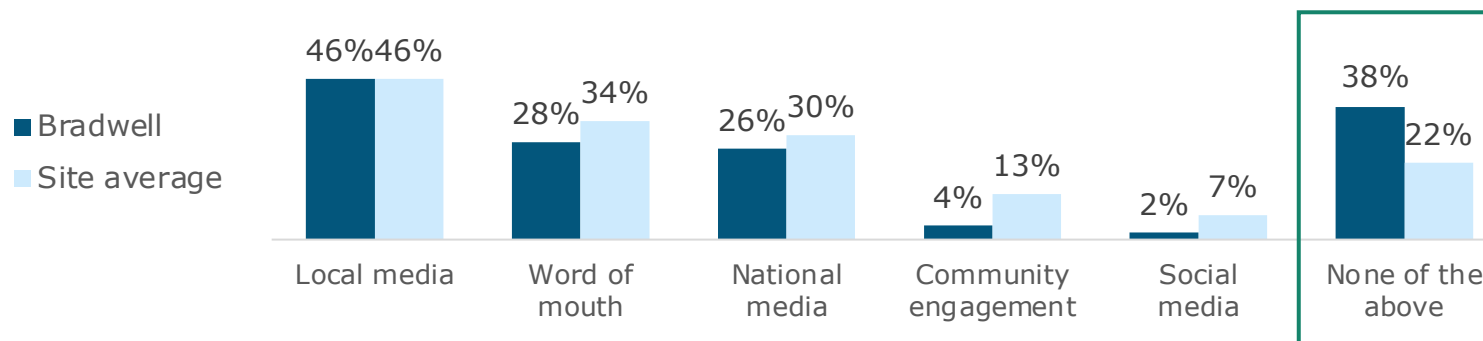


Four fifths (80%) of the sample say they **do not know very much** about their site, significantly more than the site average (66%).

"I don't have any personal experience or connection with my local site and can only say I have driven past it a few times."

Online Community, Bradwell

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



Meanwhile, just under two in five claim **not to have heard anything** about their local site from typical sources (38%), again significantly more than the site average (22%).

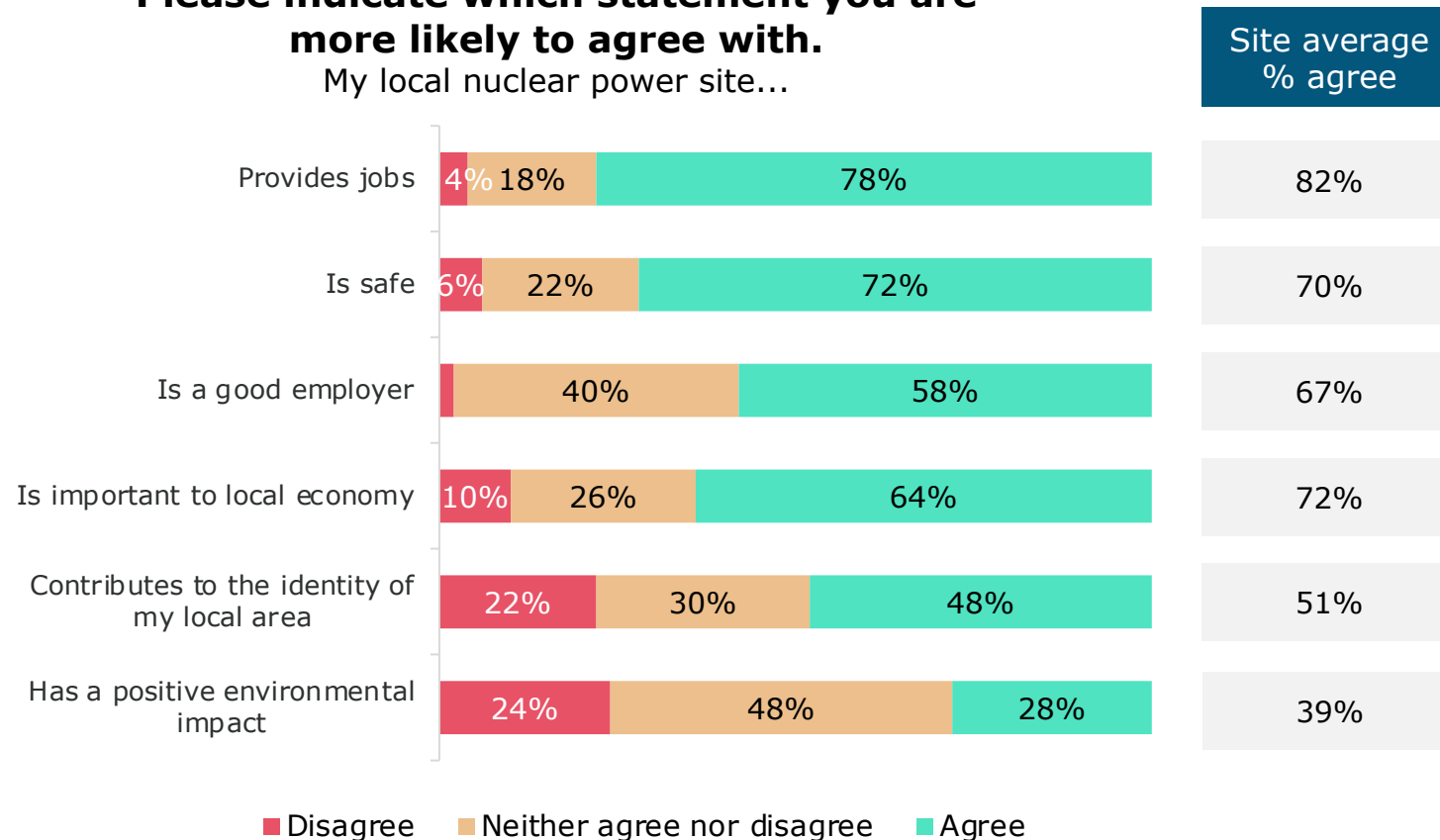
"I haven't heard any news about the power station."

Online Community, Bradwell

Attitudes towards the site are broadly positive, though some benefits are felt less strongly than elsewhere

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

My local nuclear power site...



Residents feel that Bradwell is **safe** and **provides jobs**.

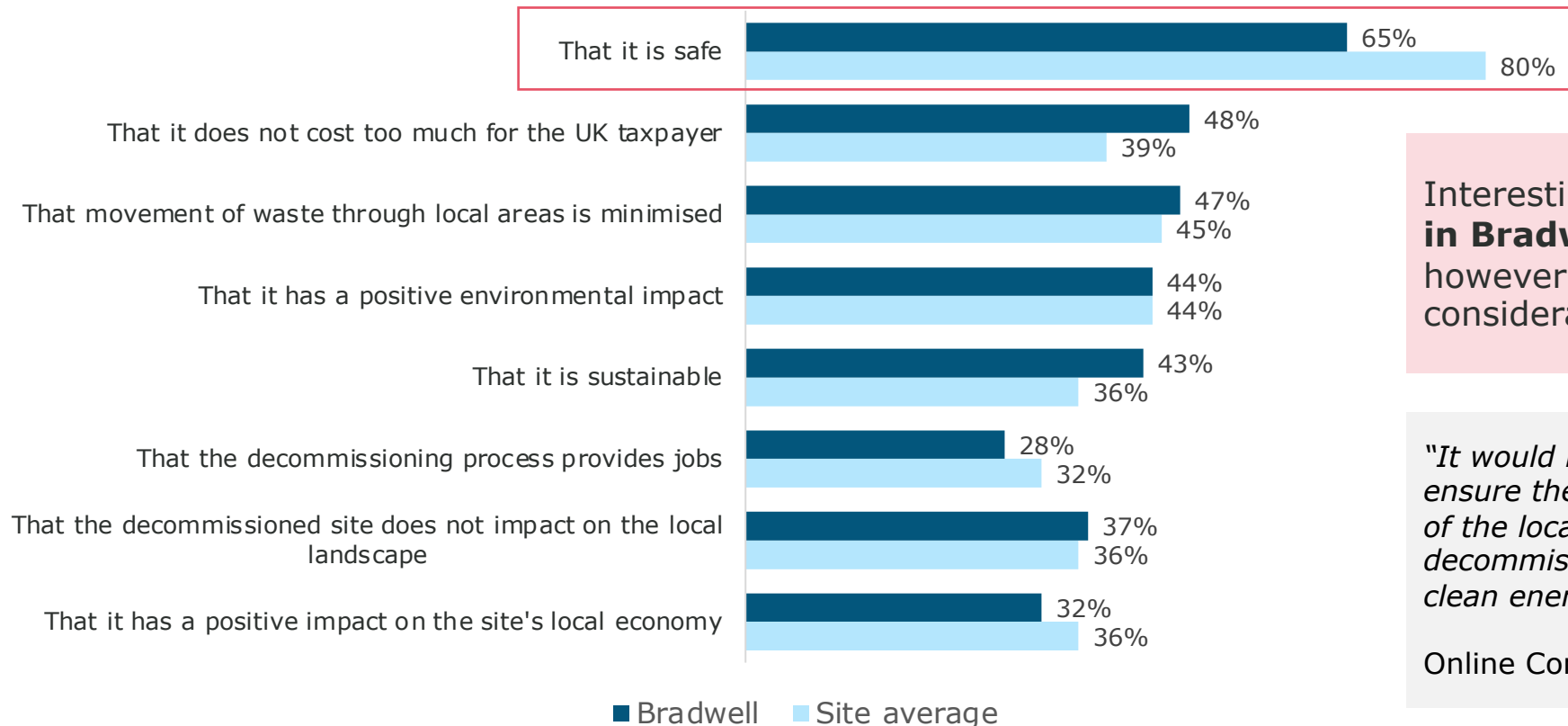
While not significantly less than the site average, Bradwell is rated slightly less on the remaining qualities such as being positive for the local economy and environment.

"We like to visit the beach by it and that has become busier recently, fewer people seem bothered about the site or worries about radioactive waste. I feel worried it will affect the sea life and I don't like the way it's sat in the middle of nature."

Online Community, Bradwell

Safety remains the primary concern for Bradwell's residents, although not as strongly as for other sites

Decommissioning criteria selected as very important

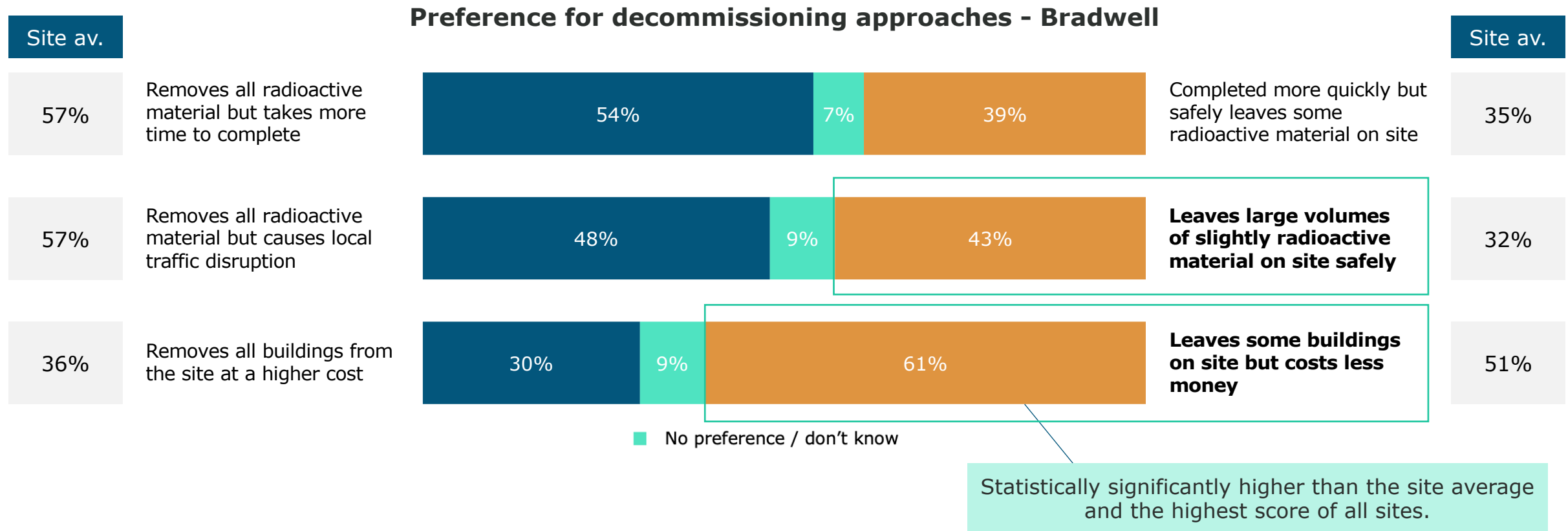


Interestingly, **safety is less important in Bradwell** than the site average, however it is still the most important consideration overall.

"It would be ideal to see the future of [the site] ensure the safety, sustainability, and well-being of the local area. This could involve responsible decommissioning, potential repurposing for clean energy generation."

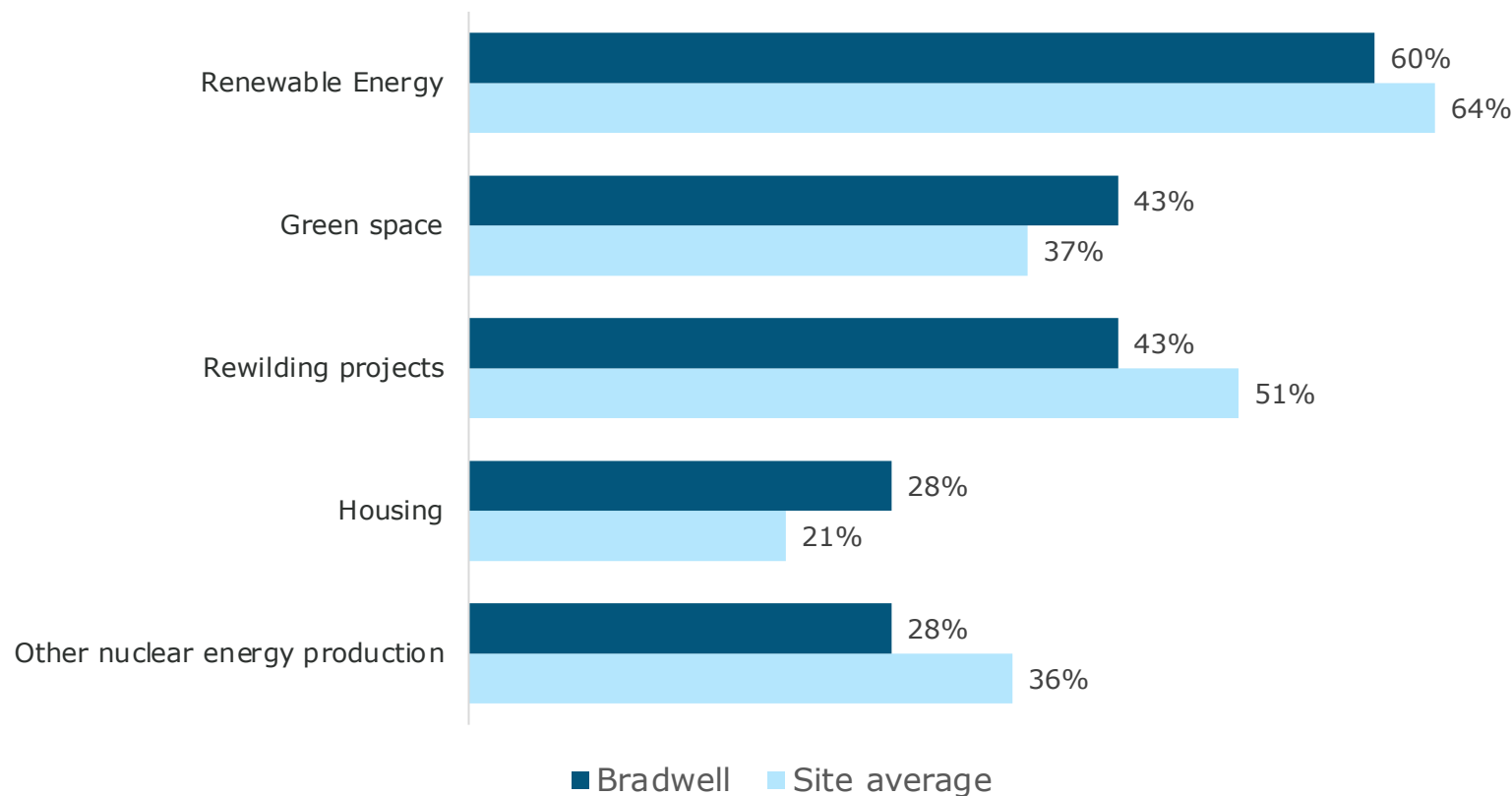
Online Community, Bradwell

Bradwell residents are more likely to prioritise speed, safety, and low cost over the total removal of material and buildings



Green space and housing are relatively more popular as future uses for the Bradwell site

Preferred future use of the site



While none of the scores are significantly above or below the site average, **green space** and **housing** seem to be more popular as future uses of the site, while rewilding scores lower than the site average.

Consistent with other sites, a site for renewable energy is preferred overall.

"I would like to see the site be used towards tackling housing issues so building properties for the purpose of housing the homeless."

Online Community, Bradwell



Thank you!

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NDA Update for Bradwell SSG

October 2024



Contents

1.0 NDA Stakeholder Update October 2024



NDA Stakeholder Update

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

General Election

Following the 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
- 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, will be stepping down over Summer 2024 and her successor has been announced as Liz Peace.
- **Harriet Kemp** recently (30th August) joined the NDA board. She has extensive background and experience in HR matters and remuneration matters including working at Compass Plc, Novartis and Pepsi.

Outreach activities

- During the pre-election period outreach activities was limited but a number of planned commitments which were postponed are now being rescheduled. This included a site visit by the new Energy Minister Lord Hunt. Lord Hunt recorded a short video after his visit which can be watched on the Sellafield Ltd Facebook [page](#)

Engagement priorities for 2024

- We recently held our **Stakeholder Conference** on September 17/18 in Manchester. We'd like to thank all those that attended and engaged and if you haven't already we'd like to encourage you to provide us with feedback via [Slido](#). In due course we'll be putting up videos from the event so check out the [NDA linked In page](#). During the event David Peattie announced that the NDA would be investing an extra £5m over the next five years to support around 20 PhDs. This builds on the current annual spend of £45m in early careers, including apprenticeships, graduates and PhDs.
- 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.
- 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.

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 October
- 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.
- 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.
- We have recently published our **Nuclear Heritage Strategy**. The NDA are tasked with decommissioning the UK’s legacy nuclear sites, sites and facilities which have been at the heart of delivering nuclear benefits for the UK, including national defence programmes and supplying safe, low-carbon power, for decades.
- The [heritage strategy](#) enables the NDA group to identify and preserve the tangible and intangible assets, objects, and memories of the nuclear industry, the people who worked in it, and the communities that supported it.



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.
- The hearing for the Office for Nuclear Regulation (ONR) charges against Sellafield Ltd under the Nuclear Industries Security Regulations 2003 took place on 20 June at Westminster Magistrates Court in London. Sellafield Ltd entered a guilty plea to all charges. The judge adjourned the hearing until September for sentencing.

Thank you for taking the time to read our update. If you have any questions, please feed-back through the Secretariat or ask Alastair Findlay, NDA head of regional affairs, who will be attending the meeting.



Nuclear
Decommissioning
Authority

Environment Agency Report Bradwell Local Community Liaison Council September 2024

This report covers our regulation of Nuclear Restoration Services Limited (NRS - formerly Magnox Limited) at Bradwell Site, over the period from March 2024 to September 2024.

Radioactive substances regulation

We regulate radioactive waste disposals and discharges to the environment. We do this by placing limits and conditions in environmental permits, which helps us to ensure that radioactive waste discharges are minimised, and that the environment is protected. We carry out regular checks of NRS's compliance with our regulatory requirements.

We also regulate and control other activities through our environmental permits, including surface water discharges to surrounding water bodies and emissions to air.

Radioactive substances compliance assessment reports (RASCARs) summarising our inspections, and any non-compliances found, are made available to the public on request.

Permitting

NRS holds a radioactive substances activity permit under the Environmental Permitting Regulations (EPR) at the Bradwell site (EPR/ZP3493SQ). No changes have been made to the permit since the last LCLC meeting.

Compliance activities

Bradwell site is managed by NRS staff based at Sizewell A. We hold monthly meetings with Sizewell A's environmental management team to discuss any updates to projects or emerging issues at Bradwell site. We also participate in routine quarterly tripartite (NRS, EA and ONR) review meetings.

We review NRS reports of operational events and incidents that have occurred on site and follow-up on these where appropriate. No significant matters of regulatory concern have been raised.

In this period, we have continued our review of the Care and Maintenance management arrangements in place at the Bradwell site. This is a detailed review that will continue throughout 2024 and into 2025. The objective of the regulatory review will be to assess the overall effectiveness of the Care and Maintenance Strategy at the Bradwell site.

In May 2024, we reviewed NRS's management of the site including the availability of resources to maintain the site, internal auditing and assurance and maintaining the aspects and impacts register. We also reviewed NRS's management of information with regards to site performance reporting and statutory permit reporting requirement.

NRS were able to demonstrate that there are sufficient competent persons and resources to operate the activities at the Bradwell site. The training plans and procedures were found to be clear and comprehensive. There is a defined programme in place for ensuring staff

are trained to the required level of competency. The competency of staff is reviewed at an appropriate frequency.

We are currently in the process of reviewing the site operating processes. The aim of this inspection is to verify that NRS have adequate operating processes in place to manage gaseous and aqueous disposals from the site and maintain environmentally critical assets to ensure the impact to the environment is minimised. We will report our findings at the next LCLC meeting.

With regard to Intermediate level wastes (ILW) on site, staff from the EA's Nuclear Waste Assessment Team (NWAT) have been reviewing the wastes stored in the Interim Storage Facility (ISF) to ensure that these wastes are managed appropriately and in accordance with our expectations as outlined within our [Joint Guidance in the Management of Higher Activity Wastes](#) and that they can be safely disposed of to a future Geological Disposal Facility (GDF). In March 2024, NWAT staff accompanied a team from Nuclear Waste Services to audit the packaged waste within the ISF. The audit confirmed that Site Implementation Plan was being implemented satisfactorily, which represented good practice and provided confidence in the quality of the packages stored within the ISF.

Enforcement

We have not identified any permit non-compliances or taken any enforcement action at Bradwell in the period since our last report to the Local Community Liaison Committee in March 2024.

Discharges from site

The site's environmental permit requires Magnox (NRS) to use best available techniques (BAT) to manage its operations and ensure their impacts on the public and wider environment are minimised. Disposal of wastes – as solids, liquid or gases can only be made via permitted routes or by transfer to permitted sites. A report of the liquid and gaseous discharges to the environment, and the results of the environmental monitoring programme must be submitted to us on a periodic basis. We assess these returns to review compliance with requirements of the permit and to review any trends and summarise our findings in a RASCAR.

The discharges from Bradwell site are reported annually, within three months of the end of the calendar year. We received the annual discharge returns for Bradwell site for the 2023 calendar year on time, in February 2024. We are satisfied the levels of reported discharges from site did not cause any regulatory concern and we did not identify any trends of concern.

Liquid radioactive effluent discharges and most gaseous emissions are based on standard reporting values because the dose impact of these emissions is expected to be very low. The standard reporting values are based on historic discharges, measured over an appropriate period. In the case of the reactor buildings, emissions were measured from when defueling was completed in 2006, until 2010. NRS periodically monitor emissions and compare these results with standard reporting values. If the measured result is greater

than a standard reporting value plus four standard deviations from the mean, NRS will reassess the standard reporting value used. Emissions from the reactors were most recently monitored in September 2022. No change to standard reporting values was required.

Discharges from mobile extraction units (MEU's), when used during inspection and maintenance work, are monitored when required and reported in total. There were no discharges from MEUs in 2023.

Discharges of active liquid effluent from the site have ceased. Rainwater drains to a single point on site (the Main Drains Pit) and is periodically discharged to the Blackwater Estuary. Activity concentrations measured in the main drains pit from February 2015 until January 2017 were averaged to derive initial standard reporting values for liquid discharges from Bradwell site. Reporting values were re-assessed in early 2020 using data collected in 2019. This assessment resulted in a small increase to the standard reporting values but did not indicate any significant impact on the environment.

Environmental impact

The Environment Agencies and Food Standards Agency carry out independent environmental monitoring around nuclear sites. These monitoring programmes support our regulatory function and provide reassurance that public radiation exposures are low and within legal limits. The results of this work are published annually and the latest report, "Radioactivity in Food and the Environment 2022" (RIFE 28), has been published on the GOV.UK website:

[RIFE 28 Summary, Radioactivity in food and the environment, 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/rife-28-summary)

The RIFE report presents an assessment of annual radiological dose to individuals (termed 'the representative person') in the local population who are most exposed to radiation from each nuclear licensed site. In 2022, the total annual dose to the representative person from all pathways and sources of radiation from Bradwell site was less than 5 microsieverts and was slightly down from the dose of 6 microsieverts recorded in 2021.

The report for 2022 shows that doses to the public, remained well below the legal limit of 1000 microsieverts for anthropogenic sources of radiation. The annual dose in 2022 is also below the dose constraint of 300 microsieverts to members of the public from discharges and direct radiation. The average annual radiation dose received in the UK from all sources of radiation is 2700 microsieverts. (Radioactivity from natural background is a more significant source of exposure than nuclear sites, to communities in all areas of the UK.)

Bradwell site's permit requires NRS to carry out a programme of environmental monitoring to monitor and assess the impact of discharges on the environment. NRS report on the results of this programme annually, within three months of the end of the calendar year. The results of the environmental monitoring programme for the 2023 calendar year were received on 20 March 2024. A review of the returns found that they were consistent with previous years and identified no results or trends of concern.

Additional information

Bradwell B: Changes to ground investigation permit and water resource licence

Bradwell B is not related to Bradwell A or NRS, but the LCLC was considered an appropriate forum to share this information for the interest of members.

Water discharge activity permit application

Bradwell Power Generation Company Limited (company reference 09941394) has withdrawn its water discharge activity (WDA) permit application (application reference EPR/RB3096WZ/A001) for the proposed discharge (to a tributary of the Weymarks River) of treated rainfall dependent site drainage and groundwater ingress from a settlement and attenuation system serving Bradwell B (BRB) load test and ground investigation site (located at a site adjacent to Weymarks Farm, Bradwell on Sea, Southminster, Essex, CM0 7JB).

The withdrawal of the WDA permit application was confirmed by the applicant via e-mail and letter dated 15 November 2023. We have now formally confirmed the withdrawal of the WDA permit application via e-mail and letter to Bradwell Power Generation Company Limited.

Water resources waste transfer licence

The water resources water transfer licence issued to Bradwell Power Generation Company Limited (licence reference AN/037/0039/014) for the Bradwell B load test and ground investigation site has now expired. Although this licence was issued and became effective on 11 September 2020 (with an expiry date of 31 March 2025), a condition of the license (condition 6.2) stated that it will cease to be of any effect if the excavation (load testing excavation) has not been constructed by 31 March 2023. As no construction occurred in relation to the proposed development, the water resources license ceased to be of any effect on 31 March 2023.

Bradwell Power Generation Company Limited therefore no longer holds any water resources licenses, and no longer has any active water discharge activity environmental permit applications in determination with us. As we have had no active engagement from Bradwell B for a while we have taken the step to stand down our Bradwell B project team.

Public consultation on our guidance for operators who are applying for a permit to operate a solid radioactive waste disposal facility

This autumn we are launching a 12-week public consultation about updates we are proposing to our current guidance about how we regulate near surface and geological disposal facilities.

The draft guidance will set out what a developer must show us for them to be granted an environmental permit for a radioactive waste disposal facility.

The draft guidance for consultation will be presented in two parts:

- Disposal facilities for solid radioactive waste: guidance on the requirements for authorisation (GRA)
- Guidance on staged regulation

Disposal facilities for solid radioactive waste: Guidance on the requirements for authorisation (GRA)

The GRA will replace these existing documents:

[2009 Guidance on Requirements for Authorisation \(GRA\) of Near-surface Disposal Facilities on Land for Solid Radioactive Wastes for England, Scotland, Wales and Northern Ireland](#)

[2009 Guidance on Requirements for Authorisation \(GRA\) of Geological Disposal Facilities on Land for Solid Radioactive Wastes for England, Wales and Northern Ireland](#)

Guidance on staged regulation

Some of the staged regulation guidance is new, and some used to be in the 2009 geological disposal GRA. The guidance explains how we will make permitting decisions, and what an operator will have to show us to get a permit, for the early stages of development of a potential geological disposal facility.

Consultation

We'll publicise the consultation to stakeholders during the autumn. Following consultation and careful consideration of all relevant comments we will publish the new guidance in 2025.

The consultation will be linked from this page [Nuclear consultations - Environment Agency - Citizen Space \(environment-agency.gov.uk\)](#)

Further information

NRG(S) is responsible for the environmental regulation of radioactive waste disposals on or from nuclear licensed sites in southern England (and in south Wales, on behalf of Natural Resources Wales). We work closely with the local Environment Agency teams in **Essex Area** in relation to other Environment Agency roles and responsibilities.

Address Environment Agency, Nuclear Regulation Group, Red Kite House, Howbery Park, Wallingford, Oxfordshire, OX10 8BD

Regulators' Email james.heavingham@environment-agency.gov.uk

customer service line 03708 506 506

incident hotline 0800 80 70 60

floodline 03459 88 11 88

Page 5 of 6

A public register service is available on the GOV.UK website at:

<https://environment.data.gov.uk/public-register/view/index>

Alternatively, you can request access to public documents directly by contacting the Customers and Engagement Team in the Wallingford office. Please email

WTenquiries@environment-agency.gov.uk

Further information on our role in regulating the use of radioactive substances and related activities on nuclear licensed sites can be found on the Environment Agency pages of the Gov.UK website at:

<https://www.gov.uk/government/publications/nuclear-regulation-in-the-environment-agency>

Our enforcement and sanctions policy is publicly available on the GOV.UK website at

<https://www.gov.uk/government/publications/environment-agency-enforcement-and-sanctions-policy/environment-agency-enforcement-and-sanctions-policy>

Public Health England has placed guidance on ionising radiation dose comparisons on the GOV.UK at:

<https://www.gov.uk/government/publications/ionising-radiation-dose-comparisons>