



HUNTERSTON A

SITE STAKEHOLDER GROUP REPORT

SITE DIRECTOR – DANIEL SMITH

JUNE 2025

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

1 SITE DIRECTOR OVERVIEW

Within the period there have been no safety events which have resulted in harm (zero first aid treatments and zero Lost Time Accidents (LTA)) however during April a significant event occurred on site which was required to be reported to our regulators as a dangerous occurrence under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

The event involved a dropped scaffold load from a forklift which caused damage to an electrical cable and loss of electrical supplies to one of our facilities. No one was injured and the event was promptly responded to by both NRS and the affected Contract Partner. As a result of this event and other events across the NRS fleet, a safety stand down for all was held on all NRS sites.

The event is currently being investigated by the Contractor and NRS is undertaking a Root Cause Investigation into the event to ensure full understanding of how this event occurred and to place corrective actions to prevent recurrence across NRS.

The site successfully demonstrated its emergency arrangements on its tri-annual ONR witnessed emergency demonstration exercise on 28th May. The exercise was rated as a pass with no regulatory actions.

Within the period the 2025 NDA Group Employee Engagement Survey has been completed across NRS. The site received a positive set of results with both an improved participation rate and an improved engagement score against last year. The results have been briefed to the workforce and the Site Leadership Team have recently agreed an action plan to continue throughout the year.

The site remains in Event Recovery for the issues associated with the use of our site laboratory as previously reported. The Event Recovery continues to make good progress with the workstreams progressed to manage our site activities, maintain compliance sampling via an external accredited laboratory, invest to deliver improvements to the site laboratory and actions in place to increase environmental compliance awareness across all site personnel. The work we have conducted on the Event Recovery has been shared with SEPA and we will continue to keep them updated as the work streams progress.

Good progress has been made on our waste facilities within the period with both the Solid Active Waste Bunker Retrieval (SAWBR) and the Wet Intermediate Level Waste

Retrieval & Encapsulation Plant (WILWREP) facilities being returned to operation to manage waste reduction.

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. 9 months have passed since the last Lost Time Accident (LTA) where an operative suffered a minor head injury. There have been 0 First Aid Case (FAC) injuries occur during this reporting period.

During April a significant event occurred on site which was required to be reported to our regulators as a Dangerous Occurrence under the Reporting of Injuries, diseases and Dangerous Occurrences Regulations (RIDDOR).

The event involved the movement of scaffolding equipment via forklift. A load fell from the forks as it was being lifted and fell onto another object and pushed it into an electrical cable causing damage (arc flash). Luckily no one was injured but the event resulting in loss of power supply to one of our facilities.

Recovery from the event was safely managed so that the cable could be repaired and power supply re-instated to the facility. The event is currently being investigated by the Contractor and NRS is undertaking a Root Cause Investigation into the event to ensure full understanding of how this event occurred and to capture, learn, place corrective actions to prevent recurrence and share the findings throughout NRS and wider audience.

Our regulator (ONR) was made aware of the event and have visited site for information gathering as part of their investigations.

As a result of this event and other events across the NRS fleet, a safety stand down for all was held on all NRS sites. The focus was on High-potential events. These are near miss events or incidents that, if circumstances were different, could have resulted in a fatality or life changing injury. The high-potential events involved pedestrians, vehicles and unsuitable working at height practices. The stand down safety briefing described the events and identified shortfalls that must be avoided.

Human performance refresher training programme was rolled out on site during April. The training was well attended, and further training is being planned. The purpose of the Human performance programme is to

- reduce the frequency of events by anticipating, monitoring, responding and learning from human error

- Reduce the severity of events that occur by verifying that appropriate robust controls, barriers, and safeguards are in place, as well as proactively finding and eliminating latent system weaknesses.
- Enhance Organisational Performance.

Reporting culture on site remains strong and Q Pulse reports are submitted daily. A new digital assurance application has been introduced for recording task and field observations and safety conversations. The digital assurance application allows NRS to self-check against standards and expectations when working on NRS sites. Safety conversations encourage engagement and challenge working practices on site.

The Event Review Team (ERT) meeting continues to meet weekly to review the previous week's events to ensure they are suitably addressed and categorised.

Target Zero campaigns continue with topics changing each month. Topic during March was Hazard Perception, April was Human Performance. In the middle of April, the topic changed due to the dangerous occurrence event, with the topic being High potential consequence events. Target zero for May has been Setting to work, Point of Work Safety Assessment (POWSA) and the use of Human Performance.

The Site safety representatives meet fortnightly with site management to discuss safety issues/improvements such as welfare, traffic management and housekeeping.

The Site Health, Environment, Safety, Advisory Committee (HESAC) meeting is held bi-monthly and is well attended.

2.2 Emergency Arrangements

The site's Accident and Emergency Arrangements are regularly evaluated and validated to ensure they remain proportionate to the risks on site. The site Accident and Emergency Arrangements and Contingency Handbook have been updated with no significant changes to our Emergency Arrangements or capability.

In preparation for the Site's tri-annual ONR emergency demonstration exercise the site has delivered over 5 live emergency exercises and 2 table top exercises over the last 2 months focusing on successfully demonstrating the Site's capability to effectively and efficiently react, respond and recover for a significant event. Exercise "North Ridge" will be demonstrated in the morning of 28th May to the ONR and Company Internal Assurance Team.

Additionally, as part of the Site's Emergency Scheme Members succession planning we are actively recruiting new staff members to join the team. New members will be fully

trained in nuclear first aid, rescue from height and many more emergency response skills to ensure the Site's emergency arrangements are resultant.

Finally, the site continues to work closely with local Civil Contingency Teams and look forward to welcoming the team sometime in June for a site visit.

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 with Bulk Waste clearance achieved in March 2024.

The SAWBR team are progressing through 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.

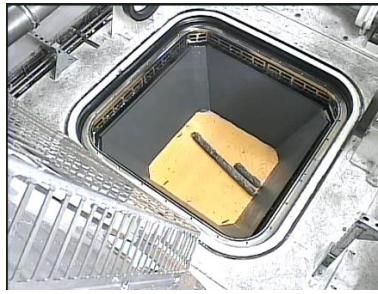
During the reporting period the facility has completed its Quarterly maintenance activities and progressed the recovery of residual bunker wastes.

On Friday 23rd May the team successfully transported the recovered fuel from SAWBR to the ILW Store using a box that had been prepared specifically for the fuel debris. This represents the end of 2 years of preparation , engagement with regulators and engineering design work to achieve. With the fuel now removed, the team will now begin to recover the residual waste materials in the bunker and are developing plans for the size reduction of the miscellaneous waste items and routing to appropriate waste stream and final clean up.

Pictures below showing Fuel being processed through the SAWBR facility.



Fuel being Tipped



Fuel in 3m3 box



Fuel in bucket

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 reconfigured to retrieve and encapsulate radioactive Nitric acid.

The Active commissioning phase for the recovery and encapsulation of nitric acid from the Acid Storage Facility (ASF) was progressed during the reporting period. In total 3 drums of waste have been produced during the Active Commissioning phase. Each drum containing approx. 1500kg of acid waste, plus the neutralisation agent and grout mixture.

An amendment to the Engineering Advice Note (EAN) pertaining to our discharge reporting arrangements has now allowed Acid processing to recommence. The two-acid 3M³ drums that were stored within the WILWREP canyon have now been removed to the ILW store which has allowed completion of compliance maintenance activities within the WILWREP canyon.

The Testing and Commissioning Panel that governs the plants commissioning arrangements met on Tuesday 27.05.25 and provided authority to recommence acid processing. A further 2 drums representing a further 3.3Te of high hazard reduction was achieved in week.

The team is looking forward to discharging the Active Commissioning phase and moving into normal operations in the next months ahead. This will allow further high hazard reduction this year with plans to recover in excess of 60Te of material.



3M³ Drum being exported from WILWREP to the ILW Store

3.3 Solid Intermediate Level Waste Encapsulation (SILWE) Project

The SILWE facility is designated to encapsulate the 3M³ packages containing solid waste. This waste is retrieved from the Solid Active Waste Bunker (SAWB). Once encapsulated, the packages will be ready for long term storage within the Intermediate Level Waste Store.



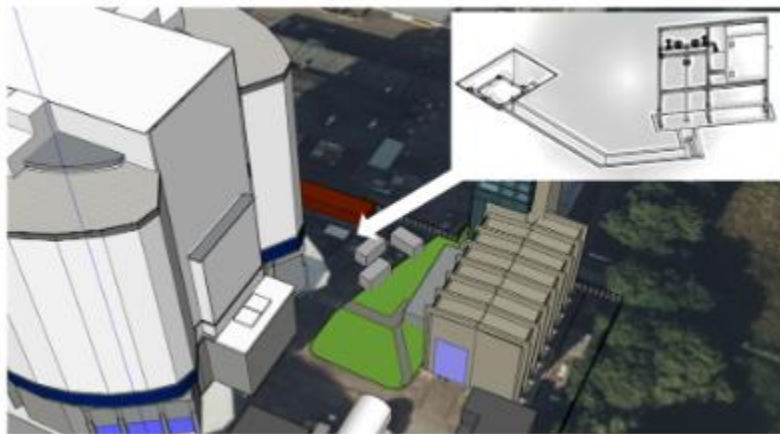
Casualty recovery demo from modified package

Recently the project were required to review and revise the method through which they carried out activities in and around the conveyors. This called for the manufacture of a tailor made package, allowing access and egress by personnel, to facilitate the modification of grout station components. Prior to allowing workface activities to commence, a demonstration of the rescue arrangements had to be implemented and endorsed. The exercise was successful and work is planned to commence as soon as the Principal Contractor's emergency response plan, has been amended and accepted.

C3 Shower Pumping Station

The Pond programme has a live project to divert all sources of miscellaneous effluent on site to the NEffTP. As part of this wider project JGC are currently designing and installing a pumping station 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 bowsers effectively isolating this source from the Active Drains.

The scope involves civils for excavation and plinth installation followed by mechanical and electrical installation. Within the reporting period a successful FAT was carried out on the electrical aspects of the system. This was performed at the premises of JGC's sub-contractor Controlmax and the NRS team were impressed by the standards of workmanship they witnessed. Coring specialist BD Nuclear are due on-site in the first week of June to complete the excavation works and will be closely followed by JGC to complete the installation.



Location of New Pumping Station for C3 showers





Factory Acceptance Test photos showing weatherproof electrical enclosure and control unit.

UHP Skid Deplanting

During decommissioning of the Cartridge Cooling Pond, Ultra High Pressure water jetting was used in conjunction concrete shaving to decontaminate the pond walls and floor. The high pressure water was supplied by two large UHP skids which have long since become redundant and had been stored in the Skip Refurb Plant within the CCP.

Within the reporting period the team completed deplanting and size reduction of the skids, allowing them to be processed as waste and freeing up real estate within the CCP building for other uses.

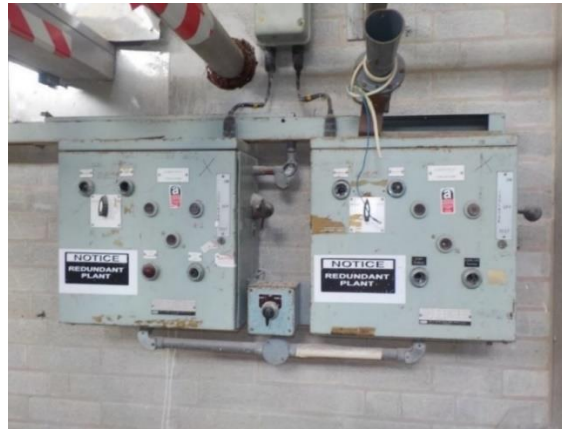




UHP Skids pre and post-deplanting

AETP Electrical Deplanting

The project team has been working to expedite a scope of electrical depplanting within the AETP. Within the reporting period “proving dead” has been concluded along with any required isolations. Asbestos surveys have been completed and temporary works for shielding has also been installed to ensure adequate radiological protection whilst the works are carried out. Physical depplanting will soon commence.



Example redundant electrical Panels in AETP

4. PEOPLE

4.1 Site HR

In line with the Business Plan for 2025/26, resourcing has commenced on a number of priority vacancies which will enable the site to backfill some key skill areas, including Environment, Radiological Protection and Waste. Recruitment on these vacancies is at varying stages of the process from advert to offer.

In support of one of the HR Blue Chips, 'Line Managers to People Managers' the site held our first People Manager Forum in May for team leaders who have responsibility for people. The purpose of the workshops is to provide additional support and coaching to this group so that they are better enabled to support and manage their teams. The forum was led by the Site Director, supported by the Site HR Business Partner, and covered a number of topics areas, which were very positively received. Future forums will be held on a 6 weekly basis.

The 2025 NDA Group Employee Engagement Survey has been completed across NRS. The participation rate for Hunterston A was 86% and the engagement score was increased against last year, so the results have been very positive for the site. The results have been briefed to the workforce and the Site Leadership Team have recently agreed an action plan which will allow us to address three key focus areas throughout the year.

4.2 Occupational Health

Sickness absence levels continue to be monitored and managed by HR, Line Management and Occupational Health. Case Management continues to be utilised to provide support to those on long term sickness and ensure that appropriate return to work plans are in place to support successful return to work. Short term sickness absence is closely monitored and where trends are identified which may require intervention, these are being supported through the company attendance procedure.

In support of Mental Health Awareness Week in May, the theme of which was 'Community' the site Mental Health First Aiders promoted awareness of mental health and the importance of community by highlighting daily key messages and encouraging staff to consider activities which they could undertake to help improve their mental health and wellbeing. This included taking time out for a change of scenery, and completing 'Whole Self MOTs'.

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.

Welfare upgrades are continuing across site using a local contractor. This work activity has resulted in significant improvements to the Contractor's ablutions and toilet facilities on site.

This work has also encompassed improvements to the Admin Reception, Main Conference Room, Training Room and communal areas of the Administration Building.

Further improvements are planned for the Site Control room and relocation of the RCA Training facility to a more suitable location.

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. It has been decided that the most viable option would be to refurbish the current facility. Local contractors have been engaged and this work should commence in the near future.

Repairs have been successfully completed to the access road adjacent to the south of the site to the former Learning and Development centre compound.

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 2025, to the end of April, are as follows:

- Approximately 200 employees and visitors received a total collective dose of 1.278 man.mSv between them.
- Approximately 216 contractors received a total collective dose of 0.960 man.mSv between them.
- The highest individual dose received by an employee was 0.093 mSv.

7 ENVIRONMENT

7.1 Radioactive Discharges (January 2024 - December 2024)

Following cessation of analysis at the sites laboratory the site has engaged with an external laboratory to undertake analysis required to support discharge assessments. This has resulted in an increase in the time taken to assess monthly radioactive discharges. The site is presently compiling the assessment for January 2025. Therefore, the information provided within this section relates to radioactive discharges that occurred during the calendar year 2024.

Solid

Low Level Waste (LLW) disposals to the Low Level Waste Repository (LLWR) continue. 31.19 m3 of LLW and VLLW with a total activity of 0.26 GBq was disposed of during the twelve-month period from January 2024 - December 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 aqueous radioactive discharges during the period January 2024 - December 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 (January 2024 - December 2024)
Tritium	30 GBq	0.019 GBq
Caesium-137	160 GBq	0.043 GBq
Plutonium-241	2 GBq	0.000 GBq
All alpha emitting radionuclides not specifically listed taken together	2 GBq	0.001 GBq
All non-alpha emitting radionuclides not specifically listed taken together	60 GBq	0.044 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 (January 2024 - December 2024)
All authorised outlets taken together.	Tritium	100 MBq	4.432 MBq
	All other radionuclides (excluding tritium)	3 MBq	0.771 MBq
Discharges made as a consequence of reactor breathing	Tritium	3000 MBq	422.07 MBq
	Carbon-14	200 MBq	58.23 MBq

7.2 Non-radiological Environmental update (April 2024 – March 2025)

Treated sewage effluent from the plant is currently being independently assessed by SEPA on a quarterly basis. In addition, monthly independent off-site laboratory sample analysis verifies 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 Controlled Waste Metrics Dashboard. Over the period April 2024 – March 2025, a total of 143.98 tonnes of waste was collected for consignment from site (101.58 tonnes for re-use, recycling, recovery, or composting, 34.24 tonnes sewage waste and 8.16 tonnes for disposal to landfill). This gives a recycling rate of approximately 94.33%.

8. SOCIO-ECONOMIC / STAKEHOLDER UPDATE

NRS socio-economic scheme are proud to have distributed £1.1m in 2024/25 to local organisations to deliver projects in communities close to our sites.

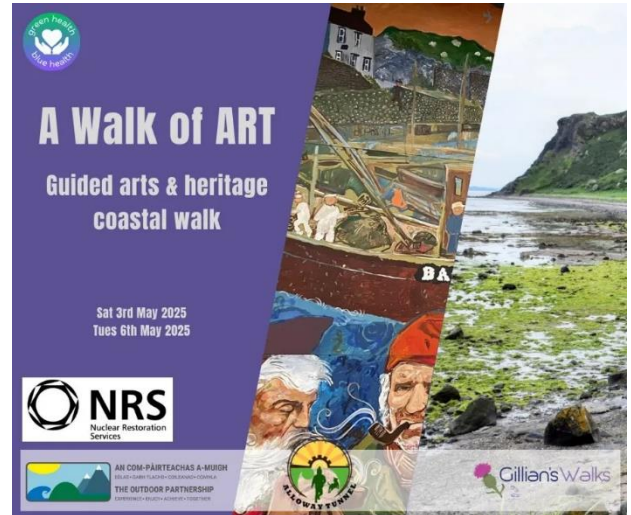
£78,447 supported communities close to Hunterston A site.

The Outdoor Partnership, will receive £50,000 a year over three years to deliver the 'Opening Doors to the Outdoors' programme in North Ayrshire. This is part of a £420,000 project also covering North Wales.

The programme will deliver the following in North Ayrshire:

- Improved access to outdoor activities for over 1700 people, by providing affordable, accessible, sustainable, and fun outdoor activity programmes to improve health, social and economic wellbeing.
- Taster sessions and development programmes for 450 people in the region annually.
- Establish 2 new Inclusive clubs and groups in the region annually.
- Provide training, mentor support and National Governing Body qualifications for 150 young people and provide exit routes to employment.
- Organise annual festivals and events across the region for children, young people, adults, families, people from deprived and disadvantaged communities.
- Provide additional 1300 new opportunities in community clubs and groups for disadvantaged and under-represented groups annually.
- Establish 4 new sustainable community run clubs and groups annually, supporting them to develop strong governance.
- Increased annual training, volunteering, and employment opportunities for 450 unemployed people from disadvantaged and under-represented groups living in poverty and isolation through the provision of supported employability and training programmes in hillwalking, climbing and paddle-sports skills.
- Establish a 16-week Pathways to Employment programme in the region annually supporting 52 people providing training and National Governing Body qualifications and providing exit routes for participants to life-long participation in community clubs and groups, further learning and training, volunteering opportunities and sustained employment.
- Support 10 people into sustained employment annually.

Some examples of what's on offer:



Every year, the 'good neighbour' fund at Hunterston A receives £6000 to support local initiatives and organisations within our local community that deliver projects or services for the benefit of local people. There was an exception in 2024/25, allocating £10,447.

NRS are pleased to have supported additional worthy projects by utilising underspend from other sites.

Some of the 'good neighbour' projects we supported include:



AC Irvine 2014's Football Team proudly modelling their new NRS kit, having received £750 from the socio-economic scheme.



CS Dance Academy also benefitted from NRS's support, with £800 for new uniforms, allowing them to feel part of a team while attending the world championships in Orlando. The group raised £26,000 to cover the cost of the trip.

Fairlie Organic Growers purchased raised beds and equipment with £1,360 from NRS to teach pupils from Fairlie primary school how to plant fruit trees in their after-school club.



For more information on the scheme, please visit

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

For good neighbour applications up to £2,000, contact Claire Aitken

Claire.aitken@NRServices.uk

To discuss larger applications please contact Mair Jones

mair.jones@NRServices.uk

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
25 th March	Gary Swift/Andrew Roberts – Senior Trade Union reps
16 th April	Police Scotland & Chapelcross security
8 May	Dr Andrew Munro (NRS) – Managing Director NRS AGR paired sites
21 May	Leadership Team Business Plan Review
27 May	ONR CNS Security Culture – Nathan Marston Inspector for protective security
28 May	Emergency Exercise (North Ridge) - Site lead witnessed by ONR
29 May	ONR Inspection - Peter Hughes, Nominated Site Inspector Darren Cummings, Principal Nuclear Safety Inspector – Radiation Protection
4 June	CS&IA Security & Safeguards roadshow - Kayleigh Wright Security Analyst (GRC) Cyber Security & Information Assurance
12 June	Site Stakeholder Group -Waterside Hotel Seamill