



Site Stakeholder Group

HUNTERSTON SITE STAKEHOLDER GROUP

The Seventy Sixth Meeting of the Hunterston Site Stakeholder Group will take place on Thursday 12 June 2025 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 – Andy Dalling

ONR Report – Bert Broadley/Tim

Saunders

SEPA Report – Keith Hammond

Members Question and Answer Session Public Forum

14.25 Hunterston A Site Reports

Hunterston A Site Report – Daniel Smith

ONR Report – Peter Hughes

SEPA Report – Melanie Hayes

Members Question and Answer Session Public Forum

15.00 Update from Scottish Government
Diane Hamilton

15.10 Update from NDA
David Wallace

15.20 NRS Corporate Update
Bill Hamilton

Members Question and Answer Session Public Forum

15.30 Any Other Business

Next Meeting Thursday 4 September 2025

**HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
SUMMARY OF KEY POINTS FROM THE MEETING
HELD ON THURSDAY 6 MARCH 2025
AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG**

Chair's Opening Remarks

The Chair welcomed the attendees.

Hunterston B Report – Mr Andy Dalling

Mr Dalling reported that Reactor 4 had been emptied in 14 months, which was two months quicker than Reactor 3. Work had been proceeding on emptying the pond, and the final flask had been dispatched at the end of February. A new safety case would be formally submitted to the ONR for assessment with a view to implementation later in the year. Security plans and arrangements were also being worked on ahead of formal submission. The end of 2024 had been reached with a Total Recordable Injury Rate of zero. A reorganisation exercise was taking place for when the site was fuel free, and a consultation was taking place.

ONR Report – Mr Bert Saunders

Mr Saunders reported that a number of inspections had been carried out in the second half of 2024, all of which had found adequate arrangements implemented correctly. Since the report had been drafted, there had been one reportable injury, which had not been a significant incident.

SEPA Report – Mr Keith Hammond

Mr Hammond reported that SEPA had found no contraventions in relation to the plans for the active effluent discharge line. Applications had been received to vary the permit to change the aqueous discharge and the transfer application to move the permit from EDF to NRS. The expected transfer date was around 1 April 2026. SEPA was running consultations on three documents until 5 May 2025.

Hunterston A Report – Mr Richard Gibson

Mr Gibson reported that Storm Eowyn had caused some damage on site to cladding, but overall impact had been limited. The situation with the site laboratory was being managed through the event recovery process. The laboratory was expected to be completed for reinspection by the summer. NRS was undergoing a funding review to reflect a reduction in government funding for the next funding period. Due to the maturity of projects at Hunterston A, he did not expect any key works at the site to be significantly affected.

ONR Report – Mr Peter Hughes

Mr Hughes reported that inspections carried out from 1 October 2024 to 31 December 2024 had been green. The ONR was continuing to support SEPA regarding the laboratory incident.

SEPA Report – Ms Melanie Hayes

Ms Hayes reported that SEPA had attended the site to commence its investigation into the onsite laboratories. This matter had caused a delay to the monthly discharge returns, so three-month rolling extensions had been granted and would continue until the laboratories returned to service. SEPA expected to have all the requested information by the end of June.

Update from NDA – Mr David Wallace

Mr Hamilton reported that the NDA business plan had been delayed and was due out for consultation on 10 March for a six-week consultation period. The next meeting of the Cross-Party Group in the Scottish Parliament on Civil Nuclear Industry would be on 24 March.

Update from the Scottish Government – Ms Diane Hamilton

Ms Hamilton reported that the Environmental Authorisations (Scotland) Amendment Regulations 2025 had been laid before Parliament on 27 February and would come into force on 1 June 2025.

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 12 June 2025



**MINUTES OF THE MEETING OF THE
HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
HELD AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG
THURSDAY 6 MARCH 2025**

Attendance/Apologies list

Attendance

Ms Rita Holmes
Mr Stuart McGhie
Mr John Lamb
Mr Jamie Woodburn

Fairlie CC (Chair)
HNB Union Rep (Vice Chair)
West Kilbride CC
Largs CC

Operators and Officers

Ms Fiona McCall
Mr Andy Dalling
Mr Richard Gibson
Mr Keith Hammond
Ms Melanie Hayes
Mr Paul Dale
Mr Peter Hughes
Mr Bert Saunders
Ms Claire Aitken
Mr David Wallace
Ms Diane Hamilton

EDF
Site Director (Hunterston B)
Engineering Manager (Hunterston A)
SEPA (Site Inspector, Hunterston B)
SEPA (Site Inspector, Hunterston A)
SEPA
ONR (Site Inspector, Hunterston A)
ONR (Site Inspector, Hunterston B)
NRS
NDA (Stakeholder Lead Scotland)
Scottish Government

In Attendance

Mr Alan Holden
Cllr Ian Murdoch
Mr Angus Cochran Patrick
Mr Matthew Dent
Members of the public

Member of the Public
North Ayrshire Council
Hunterston Estate
Minute taker

Apologies

Mr Daniel Smith
Mr Bill Hamilton
Mr Willie Jack
Cllr Eleanor Collier
Colin Hargreaves

Site Director (Hunterston A)
External Affairs Director, NRS
NFU
North Coast and Cumbraes Council
Lead Site Inspector NRS

1. CHAIR'S OPENING REMARKS AND DECLARATIONS OF INTEREST

The Chair opened the meeting at 13.35. Apologies were noted from Bill Hamilton, Daniel Smith and Willie Jack.

The Chair noted that, at the previous meeting, there had been few community council attendees. There had not been an attendee from Cumbrae or Skelmorlie Community Councils in some time. Skelmorlie Community Council had a new chair and vice-chair, and an invitation had been extended.

No interests were declared.

2. CHAIR AND VICE CHAIR UPDATES AND CORRESPONDENCE

The Chair presented her report.

The Chair had attended a strategy workshop on 15 January with the ONR and NGOs at which the ONR had shared a strategy document. On 21 January, the Chair had attended an online meeting with John McNamara, as they co-chaired the NDA/NGO forum. There had been an online meeting with chairs and vice chairs regarding emoluments. There had been an introduction to the new NRS sustainability strategy, as well as regular updates to the Chair and Vice Chair with the Hunterston A and Hunterston B site directors.

The next meeting of the Cross-Party Group in the Scottish Parliament on Civil Nuclear Industry would be held at Annan Athletic Club on 24 March. Anyone who wanted to attend should contact David Wallace. The Teams invite would come out shortly.

A review had taken place of SSGs, and new guidelines would be coming out. The hope was that SSGs would reach a wider audience.

A consultation on aqueous discharge variations at Hunterston A and B was currently live on the SEPA website and would close on 22 April.

3. ACTIONS AND APPROVAL OF PREVIOUS MINUTES

John Lamb proposed that the minutes of the previous meeting be approved. Jamie Woodburn seconded the motion. The minutes of the meeting of 5 December 2024 were approved as a true and accurate representation of the meeting.

4. HUNTERSTON B SITE REPORTS

Hunterston B Site Report

Andy Dalling presented his report.

Andy Dalling introduced himself as the new station director for Hunterston B, having started on 10 February. He had worked at Hunterston in various positions for 13 years.

Good progress was being made with defueling. Reactor 4 had been emptied in 14 months, which had been two months quicker than Reactor 3. Subsequently, work had been proceeding on emptying the pond, where flasking operations had come in. The final flask had been dispatched at the end of February. Verification checks were taking place ahead of external communications.

In terms of site transition, arrangements were being updated with a new safety case to be introduced. This would be formally submitted to the ONR for assessment with a view to implementation later in the year. Security plans were being adjusted, and once these had been approved by the ONR they would be shared. Emergency arrangements were also being worked through, ahead of formal submission. Small-scale deconstruction work was taking place, but this would ramp up as transition progressed.

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Safety performance continued to be good, reaching the end of 2024 with a zero Total Recordable Injury Rate (TRIR). There had been a significant safety campaign in January to avoid complacency.

A reorganisation exercise was taking place to move onto deconstruction. Once the site was fuel free sometime before June 2025, this would be enacted. The formal consultation and communication had taken place with staff. Recruitment for vacancies was underway, and the aim was no compulsory redundancies.

ONR Report

Bert Saunders presented his report.

The report covered the dates from 1 July 2024 to 31 December 2024, during which time the ONR had carried out a number of inspections covering emergency arrangements, management of change and decommissioning fire life safety. It had also provided consent for an environmental impact assessment for decommissioning regulations. Each of these inspections had found adequate arrangements implemented correctly. In terms of safety and security performance, the ONR was content for the period.

Since the report had been published, there had been one reportable injury, disease or dangerous occurrence. A member of CNC had twisted their knee descending stairs. This was regrettable, but not a significant incident.

The ONR was currently engaged with Hunterston B's proportional stepdown and emergency arrangements and management of change. With the site risk reducing, it was sensible to step down those arrangements, but suitable underpinning was required.

SEPA Report

Keith Hammond presented his report.

SEPA had been onsite in the previous week to update on the plans for the active effluent discharge line. No contraventions had been found.

There had been two separate applications. The application to vary the permit to change the aqueous discharge had gone out to consultation until 22 April. The transfer application to move the permit from EDF to NRS had been received and was being worked on. A provisional determination date of the end of January 2026 had been proposed. The expected transfer date was around 1 April 2026. There was no public consultation associated with this application.

There had been no environmental events within the period.

Consultations were being undertaken by SEPA on three documents. The first was the objectives and principles for regulation radioactive substances activities. The second was the environmental standards for inputs of radioactive substances to groundwater. The third was the near-surface disposal facilities on land for solid radioactive waste. These consultations run to 5 May 2025.

Questions & Answers

John Lamb noted there had been a report at a previous SSG meeting regarding the Civil Nuclear Police officers and asked which date that they would be present on the site until. Andy Dalling explained that the date the CNP was working to was August. John Lamb asked whether EDF would recruit its own security personnel. Andy Dalling explained that EDF would retain its own security, but these individuals would not be armed.

John Lamb queried how many staff were on site currently. Andy Dalling explained that there were around 380 staff onsite, and around 150 contractors. This would change in line with the

organisational changes. The new number would be 246. John Lamb asked whether the contractors were for specific operations. Andy Dalling confirmed that they were.

Angus Cochran Patrick asked whether the EDF private security patrols would continue around the estate. Andy Dalling believed these would continue, but he would check and make sure.

ACTION: Andy Dalling to check whether private security patrols would continue on the estate.

Ian Murdoch asked what the next drop in staff numbers would be following the fall to 246. Andy Dalling said there were no further plans to reduce numbers. Stuart McGhie queried whether there was an opportunity to transfer staff for certain tasks across from B site to A Site. Andy Dalling said this was something NRS could potentially look at in the future, but the number of staff to support Hunterston B was set at 246.

The Chair queried whether the fish farm buildings had ever been included in the nuclear site. Andy Dalling confirmed they had not.

The Chair noted interest in the plans for the new active effluent treatment discharge line, as it would be a big difference with a dramatically reduced flow rate and moving away from the tidal windows. The Chair asked whether there were plans to extend the line into deeper water. Melanie Hayes explained that this was included in the consultation document. The pipe would not be lengthened.

The Chair noted the reference to a biodegradable leak and queried whether this was non-toxic. Keith Hammond explained it was largely non-toxic. One of the problems with detection was that it biodegraded before it could be found.

The Chair queried the meaning of CDM. Bert Saunders explained it referred to construction design and management regulations.

The Chair queried given the issues with laboratories whether there was a possibility of having one laboratory which could deal with all radioactive matters for the west coast. Keith Hammond agreed this would be a strategic ideal given the lack of capacity within the UK. In this case the laboratory was set up to service its own permit requirements. After transfer of Hunterston B there could be change.

5. HUNTERSTON A SITE REPORTS

Hunterston A Site Report

Richard Gibson presented his report.

Safety performance had been good, with no safety events above the minor categorisation. Storm Eowyn had caused some damage on site to the cladding. Personnel onsite had been minimised ahead of the storm and operations had been ceased, meaning that overall impact had been limited. There had been no risk to the public at the time, and repairs had now been completed allowing decommissioning work to recommence.

At the last SSG meeting, an update had been provided on the situation with the site laboratory. This was being managed through the event recovery process. Good progress was being made around plans for improvement to the physical laboratory structure, as well as revision of procedures and management. The laboratory was expected to be completed for reinspection by the summer.

Good progress had been made on the solid waste recovery plant. The team had prepared containers for the two partial fuel elements. These had been recovered and would be transported to the store sometime in March for interim storage.

NRS was undergoing a funding review alongside the rest of the NDA. This was expected to reflect a reduction in government funding for the next funding period. On some sites this may mean a pause or slowdown in operations. Due to the maturity of projects at Hunterston A, however, it was not anticipated that any key site activities would be significantly impacted as

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the Hunterston A principal waste processing facilities were built and either already in operation or at the end of commissioning and pausing operations would save very little money.

The NRS transition team had submitted applications to the ONR and to SEPA, which detailed how Hunterston B would safely join the NRS fleet.

ONR Report

Peter Hughes presented his report.

The report covered the period from 1 October 2024 to 31 December 2024. During that time an inspection carried out had been green.

The ONR was continuing to support SEPA in regard to the laboratory incident and was aware of progress towards bringing the site back into compliance.

SEPA Report

Melanie Hayes presented her report.

In January, SEPA had attended the site to commence its investigation into the onsite laboratories. This would be ongoing over coming months. A lot of information had been requested. SEPA would be back onsite in two weeks' time to continue this. This matter had caused a delay to the monthly discharge returns, hence three-month rolling extensions had been granted and would continue until the laboratories returned to service.

Since the last SSG meeting, some of the actions from the information notice issued to NRS were still incomplete. SEPA expected to have all of the requested information by the end of June. NRS had been aware that an extension of this deadline would not be granted.

The consultation on the SILWE permit variation application had closed on 20 December with no representations made. A decision would be made in due course.

Questions & Answers

Jamie Woodburn noted that a press release had been issued by the ONR the previous day about an efficiency overhaul at decommissioning nuclear sites, which outlined that over 100 legacy regulatory requirements had been removed. Jamie Woodburn asked why he had found out about this through LinkedIn, and not at the SSG. Peter Hughes said the press release had been issued at the end of December. Jamie Woodburn emphasised that the SSG had not been made aware. Peter Hughes committed that it would be covered in his next report.

Jamie Woodburn asked whether there would be an event to mark the completion of defueling. Andy Dalling said plans were being worked through.

The Chair queried the purpose-built container for the fuel debris which had been isolated in one of the bunkers. Richard Gibson explained these were still in the bunker, but sometime in the month would be transported to the ILW store in the container. The Chair queried how the container was different. Richard Gibson explained it was a modified version of the usual container, to ensure there was adequate space around the fuel elements.

The Chair queried the definition of a category one responder. Richard Gibson explained it was the local community network to support in an emergency. In this instance it referred to Scottish Fire and Rescue, Scottish Ambulance and the police. The Chair suggested it would be useful to have an update from the civil contingency.

The Chair queried the meaning of 'orphan wastes'. Richard Gibson explained these were small amounts of debris which did not fit other definitions. Fine dusts were being dealt with via a vacuum system.

The Chair noted SEPA was having to wait a long time for a backlog of information and queried why. Richard Gibson explained this was partly due to lacking the personnel. The sites were keeping SEPA updated and ensuring there were adequate resources to meet current commitments.

The Chair queried the progress in deciding the characterisation of waste already in boxes. Melanie Hayes explained that this was with NRS. Richard Gibson would feedback on this to the next SSG.

John Lamb queried where the active fuel debris would be stored. Richard Gibson stated this would be in the ILW store. The safety case was still valid for this. The Chair queried the radius for the new emergency plan. Andy Dalling stated that this was being worked on currently.

6. UPDATE FROM NDA

David Wallace presented his report.

The Government had decided to move the plutonium stock to Sellafield, to a specially designed and built facility to be prepared for geological disposal. The Chair noted this decision had been a long time coming. David Wallace noted this would create a lot of jobs, including in design and construction, and operation once it was constructed. A £5 million grant had been announced for PhD student to look at how the material was treated in the centre.

The NDA business plan had been delayed and was due out for consultation on 10 March for a six-week consultation period.

The next meeting of the Cross-Party Group in the Scottish Parliament on Civil Nuclear Industry would be on 24 March. The topic would be site end-states. A meeting had taken place on 17 December on waste policy. All minutes were available on the Scottish Parliament website.

7. NRS CORPORATE UPDATE

No update had been given,

Questions & Answers

The Chair queried how many MSPs attended the meetings of the Cross-Party Group in the Scottish Parliament on Civil Nuclear Industry. David Wallace explained that all MSPs were invited. At the most recent meeting seven had attended.

Jamie Woodburn queried where the output of the independent review of SSGs could be viewed. David Wallace explained that the outcome had been released the previous day, with copies to the Chair and the Vice-Chair. The Chair noted that Claire Aitken would send it onto the rest of the SSG members. David Wallace added that the SSG chairs had until 28 March to feedback their views and that of their SSGs. It would then move to implementation.

ACTION: Claire Aitken to send the outcome of the independent review of SSGs to members of the SSG.

Jamie Woodburn queried how the Chapelcross masterplan had been created. David Wallace stated it had been out for around 12 to 13 years. There was a memorandum of understanding between Dumfries and Galloway Council, the regeneration agency SOSE, and the NDA/NRS. A project board had been formed, to realise the ambitions for the local community. It had been agreed to use the land as a Scottish Government hydrogen hub. A strategic partner was currently being sought with an announcement to be made on 12 March. Jamie Woodburn asked whether such an approach had been considered for Hunterston. David Wallace confirmed that talks had happened but had petered out. The Chair noted that Chapelcross had a large amount of land. Jamie Woodburn asked whether David Wallace could re-engage

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with North Ayrshire Council to ascertain its position. David Wallace agreed to speak to North Ayrshire Council again.

ACTION: David Wallace to speak to North Ayrshire Council regarding a potential cooperative approach to the future of the Hunterston site.

8. UPDATE FROM SCOTTISH GOVERNMENT

Diane Hamilton presented her report.

The Environmental Authorisations (Scotland) Amendment Regulations 2025 had been laid before Parliament on 27 February and would come into force on 1 June 2025. Diane Hamilton could send a link to the regulations to any interested members of the SSG.

Oliver Smith, who was a secondee from NRS, had returned to his role. The Scottish Government hoped to get another secondee going forward.

Jamie Woodburn noted that A strategy was required for the site, and NRS needed to produce options and work with the Scottish Government to see what was possible. The Scottish Government needed to play its part. Jamie Woodburn asked Diane Hamilton to feedback that this needed to start now, and the annual NDA meeting with Cabinet Secretary for Net Zero and Energy offered an opportunity in this regard. Diane Hamilton noted there was a regional development division which dealt with these things, but she would raise the matter.

The Chair noted the compiled views on the review of Scotland's Higher Activity Waste Policy. She queried when a draft policy would be seen. Diane Hamilton explained that the consultation would need to be concluded first.

A member of the public asked whether the regulations still required the appointment of a principal contractor. Bert Saunders confirmed that they did, which would be for NRS once the site moved over to them. Andy Dalling explained that it would be taken on a case-by-case basis for each project.

The Chair asked when the next site meeting would take place. Diane Hamilton said a date would be agreed for the summer.

9. ANY OTHER BUSINESS

The Chair noted that there had been a suggestion to continue to have four meetings per year, but for one of these to be virtual. The Chair's initial reaction had been negative towards this, but she expected to be overruled on this. Angus Cochran Patrick suggested the March meeting might be easier to hold virtually. Jamie Woodburn suggested investigation of hybrid meetings. Ian Murdoch noted that hybrid meetings were difficult.

Stuart McGhie queried whether there was anything in the report of the SSG review which pertained the number of meetings per year. David Wallace stated that the report noted that one way to widen participation was through hybrid meetings. Claire Aitken suggested that she circulate the review report to SSG members, and this discussion could be concluded at the next SSG meeting.

The Chair thanked those present for attending and closed the meeting at 15.11

Next Meeting date: Thursday 12 June 2025.

Actions from Hunterston SSG Meetings

ACTIONS FOLLOWING SSG MEETING 06.03.25

ACTION	DETAIL	RESPONSE	STATUS	DATE
Andy Dalling to check whether private security patrols would continue on the estate.	Following the 'fuel free' verification and the cessation of CNC from HNB, the question was raised as to whether private security patrols would continue on the Hunterston estate as they are at present.		ONGOING	
Update on the waste categorisation at HNA	The Chair queried the progress in deciding the characterisation of waste already in boxes at Hunterston A.	An update will be provided by the Site Director to the SSG on 12.06.25	ONGOING	
Update from Civil Contingencies on arrangements following fuel free and transfer to NRS	The Chair asked whether the involvement of the Civil Contingencies team would change following the 'fuel free' verification and also when EDF transfers to NRS.	An update has been requested from the Local Authority on this point.	ONGOING	
Claire Aitken to send the outcome of the independent review of SSGs to members of the SSG.	Following the independent review of SSGs, send the draft report to SSGs for their information.	The SSG Secretariat issued copies of the report to be issued along with the papers for the SSG meeting.	COMPLETE	
Organise an initial meeting on how to progress a longer term plan for the Hunterston site.	David Wallace to speak to North Ayrshire Council regarding a potential cooperative approach to the future of the Hunterston site.	David Wallace wrote to Craig Hatton, Chief Executive of North Ayrshire Council to enquire whether the Hunterston Area Strategic Group was still in action or if there was an alternative way to take forward a development plan for Hunterston	COMPLETE	17.03.25

Site Stakeholder Group

Hunterston B Station Director's Report
Period: February 2025 to April 2025

1. Defueling

In April, we were able to co confirm that the site had become the first of the UK's seven AGR stations to be completely free of spent nuclear fuel.

The final flask of spent fuel was dispatched from site in February, but a series of checks had to be completed before the station could formally be confirmed as fuel free. This confirmation came following a series of rigorous checks of the station by EDF and the independent regulator, the Office for Nuclear Regulation (ONR).

The station delivered this milestone on time and on budget. The team started defueling the first reactor in May 2022 and it took two years and 10 months for all the spent fuel to be removed from site and sent to Sellafield for long term storage.

The cost of defueling the power station was covered by the Nuclear Liabilities Fund (NLF), a ring-fenced £20.6 billion fund set up in 1996 specifically to pay for the decommissioning of the current nuclear fleet.

Hunterston B has proven itself an incredible asset for Scotland. Over its 46-year generating life it contributed more than £13.3 billion to the economy and supported thousands of jobs locally every year. It has now delivered in defueling. Successful defueling has been down to the hard work and commitment of everyone involved and we are proud to have been able to deliver such an exceptional performance.

2. Transfer and Deconstruction

Now we are fuel free verified (FFV), we are working to adjust our site arrangements to transition the site to deconstruction. Work is progressing well to design and justify these arrangements so they can be implemented.

In the last quarter we have:

- Presented the Post Defueling Safety Case to the ONR for formal approval.
- We have continued to work closely with our internal and external regulators to agree and demonstrate the step down in our emergency arrangements for the site.
- Completed for the first round of recruitment in support of populating the agreed Deconstruction Organisation
- Continued the removal of plant from service to reflect the plant state.
- Submitted the proposed Site Security Plan for a fuel free site to the ONR for consideration.

Site Transfer to NRS

EDF and NRS have continued to work 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 breakdown 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 March, the NRS application to hold the Site License for the B site was presented to the ONR for approval.

Deconstruction Delivery

Work continues to prepare for deconstruction with two key programmes that are the foundations of the Deconstruction Plan: Waste and Demolition. The overall decommissioning strategy remains 'Early Safestore'.

Some highlights for the quarter in terms of delivery have been –

- The completion of an Remotely Operated Vehicle (ROV) survey of the station cooling water outlet culvert. This involved both camera and sonar inspections utilising specialist contract resource. The output report from this survey confirmed the culvert to be in good condition and will help to further inform the design for the new discharge line project.
- Demolition of the fish farm buildings and on-site substation are due to progress at the end of Q2.
- As part of the Hazard Reduction programme to remove bulk chemicals from site we have safely transported 270,000lts of diesel fuel oil offsite to be utilised at other EDF sites.
- Preparations are underway for the cladding replacement of the top section of the main reactor building. This will be replaced with a like for like and will commence in Q2.
- Ongoing work is progressing collaboratively between EDF and NRS to develop an updated Site Specific Deconstruction Plan which will build on the maturity of the existing plans to provide agreed scope and deliverables.

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.

The station finished 2024 strongly with no accidents and best in fleet TRIR rate. Total Recordable Injury Rate (TRIR) remains at 0.

In April, the station confirmed that following rigorous checks, the ONR has officially declared Hunterston free of all fuel. This marks the end of our defueling mission in an incredible 2 years and 10 months, ahead of our three-year target.

The station has successfully utilised focused safety weeks to champion safe behaviours, this is particularly important during periods of change. Following on from the successful 'Safe Start' campaign in January a further campaign was run after the Easter holidays – 'Spring in to Safety'.

Safety campaigns of this nature are important for resetting our safety behaviours, putting the spotlight back on-site hazards / procedures and making sure we don't fall foul of this during holiday periods (Easter) or when people could become distracted due to organisational changes.

The safety team is working on a wider 'Safety Evolution' as we evolve the safety mindset from a nuclear safety operationally focused site to a programme led deconstruction site. This will again utilise a period to focus on safety – target is end of Q3.

Our working groups continue to meet regularly and drive improvements across a wide variety of topics including, Working at Height, DSEAR, asbestos, building fabric, and confined space.

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 (February 2025 – April 2025)		
Planned collective dose	3.0man.mSv	
Actual collective dose	1.26man.mSv	
	Employee	Contract Partner
Total Dose	1.013man.mSv	0.247man.mSv
Average individual dose	0.003mSv	0.002mSv
Highest individual dose	0.073mSv	0.034mSv
Individuals	272	197

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 2025 to April 2025.

The site continues to record the leak rate of biodegradable insulation fluid from one of the station electricity supply 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 effectively use a tracer. SEPA has been kept fully informed.

Radioactive gaseous and aqueous discharges arising from normal plant operations 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.

Emergency Arrangements

There has been no activation or issues with the emergency arrangements at Hunterston B during this reporting period.

As the fleet lead defueling site, Hunterston B has been progressing through fuel free verification and hazard reduction on site. In parallel to this, the site has been developing a new set of Emergency Arrangements that reflect the remaining hazards and risks on the site going forward. We have been working closely with Nuclear Restoration Services (NRS) and benchmarking other local industrial sites to ensure we have the right level of cover.

The proposed set of arrangements has been tested and optimised through a series of full site exercises and tabletop exercises with oversight provided from the Independent Nuclear Assurance (INA) and The Office for Nuclear Regulation (ONR). If approval is given the station will implement a block of exercises and training for the new arrangements prior to going live mid-summer.

After the go live of the new arrangements the station will look ahead to our Level 1 emergency exercise scheduled for September, this will be assessed by the ONR and a full season of exercise in the new arrangements will be completed on the build up to this.

4. People

With defueling complete, the station is continuing the transition to its deconstruction structure. Following the completion of formal consultation 96% of employee's aspirations have been met

Further recruitment is ongoing with an expectation that the number of employees whose aspirations have not yet been met will decrease.

Following a successful Engagement Day back in June last year, Nuclear Restoration Services (NRS) colleagues joined the site again on 12 March.

The team ran three sessions over the course of the day to allow as many employees to attend as possible. During each session there was opportunity to speak to NRS colleagues from the following departments: Waste, Site Integration, TSS, Engineering, Programmes and People.

There was also information on the wider NRS organisation, including the corporate functions and future landscape of the business.



Andy Dalling held all staff briefing sessions in March. These sessions were held face to face and covered topics like the station business plan and visibility of populated department structures for the Deconstruction Organisation. The sessions also provided employees an opportunity to ask any questions they had.

The company Pensions Manager visited site in February 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. Origen Financial Services continue to provide monthly clinics for staff to provide independent financial advice on areas of financial planning.

5. Company Update

Hunterston B administers a community fund, which is used to support local groups and charitable organisations.

Over the past period grants have been made to:

- Community Hub of Hope, an organisation which offers mental health support (£250)
- Abbey Primary School in Kilwinning (£250)
- Montgomerie Park Early Years Class in Irvine (£250)
- MND Scotland (£500)

New figures show Hinkley Point C is driving growth across Britain and boosting the South West's economy

The Hinkley Point C 2025 Socio-Economic Report shows:

- 26,000 workers across Britain are now helping to build the new power station as it hits peak construction, with numbers expected to rise
- Over 14,000 people have already been trained in the project's new Centres of Excellence, giving them new skills and better jobs
- 35% of the workforce are from Britain's most deprived areas
- 1,500 apprentices trained so far with 70% from the South West
- British supply chain of over 4,000 businesses is ready to support the next new nuclear project at Sizewell C and future SMR projects
- £5.3bn spent with South West suppliers, driving growth in the region
- £17m of grants have been awarded to local community projects

As the construction of the Hinkley Point C nuclear power station hits a new peak, the project's latest Socio-Economic Report reveals how its immense scale is helping drive growth and productivity across Britain, whilst giving the South West economy long term benefits. The full report and case studies can be [read here](#).

The number of people working directly for the project in Britain is currently 18,000. Around 12,000 are working on the site itself, with 3,000 more expected in the next 12 months. With the fit-out phase accelerating, an additional 8,000 people are supporting the project as part of the supply chain, including factories in Bristol, Somerset, Wales and right across the country.

This British supply chain of over 4,000 businesses now has the experience, skills and people to work on the next new nuclear projects at Sizewell C and future SMRs, as well as the other infrastructure and energy projects needed to drive growth in Britain. Case studies in the report show that businesses are growing their capability and workforce, helping them win new work beyond Hinkley Point C.

The advantage of hosting Britain's first new nuclear project has helped the South West region position itself as a leading centre of nuclear and engineering skills, with around 3,500 nuclear jobs in Bristol alone and a new nuclear centre opening at Aztec West later this year.

Locally, the town of Bridgwater is seeing productivity levels 10% higher than surrounding towns whilst the district around Hinkley Point C has seen an increase in the number of medium-sized companies that is ten-times higher than the South West region.

Torness achieves significant generation milestone

Torness power station has consolidated its place as Scotland's most productive low carbon asset by reaching the milestone of 300TWh (Terawatt hours) of electricity generation. That is enough to power every home in Scotland for 36 years, almost the same number of years the station has been generating for.

The station, which is Scotland's last operating nuclear power station, clocked up the achievement last week. It is one of seven Advanced Gas-cooled Reactor (AGR) stations which have been providing reliable baseload electricity for nearly 50 years, as well as grid stability, which is increasingly important as the power system decarbonises and conventional thermal plants, like coal and gas, are replaced by renewable generation. Three of these stations are now defueling and the four that are generating, including Torness, are currently due to stop generating by March 2030.

Station Director, Paul Forrest, said: "This is a huge milestone for the station. Torness has produced enough electricity to power every home in Scotland for 36 years and has played a significant role in decarbonising the grid.

"More than that, it has been of huge benefit to East Lothian with around seven hundred people working at the site and nearly two thousand further jobs supported through our supply chain and the local businesses staff support with their spending.

"I am proud of the contribution Torness has made, and I am committed to ensuring it continues to quietly support the UK's transition to a cleaner, zero carbon electric future."

A [recent report](#) on the economic value of the UK's current nuclear fleet found that, over its generating lifetime, Torness has already contributed more than £16 billion of economic value to the UK, many times its initial construction cost. This number excludes vital but hard to measure

benefits like the contribution to security of electricity supply, system stability provided to the Grid and what value you ascribe to the fact that zero carbon dioxide (CO₂) enters the atmosphere from the process. Over its lifetime the station has prevented more than 146 million tonnes of CO₂ from entering the atmosphere. That is equivalent to taking every car in Scotland off the roads for more than 20 years.

Since acquisition 16 years ago EDF has invested around £8 billion in the fleet and is investing a further £1.3 billion over the next three years (2025-27) to help sustain current levels of generation boost energy security and cut carbon.

When EDF took over the nuclear fleet in 2009, Torness was due to stop generating in March 2023. Following a decision to extend the station's generating life in December 2024, its current end of generation date is March 2030.

6. Contacts

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

Fiona McCall, Senior External Affairs Manager

Tel: 07813 232 347

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Nikki Thomson, Communications Coordinator

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ONR Site Report

EDF Energy – Hunterston B

ONR Site Report

EDF Energy - Hunterston B

Report for period: 1 July 2024 – 31 December 2024

Authored by: Nominated Site Inspector

Approved by: Delivery Lead Operating Reactors

Issue: 1

Published: February 2025

Record reference: 2025/3272

Foreword

This report is issued as part of our 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 our [website](#).

Our site inspectors 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 us via email at contact@onr.gov.uk.

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1. Inspections

1.1. Date(s) of inspection

Our site inspector and specialist inspectors made inspections on the following dates during the report period 1 June 2024 – 31 December 2024:

- 23 - 24 July
- 4 - 5 September
- 29 October
- 5 November
- 3 December

The ONR site security inspector made inspections on the following dates:

- 23 - 24 July
- 5 – 6 November

2. Routine matters

2.1. Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the Energy Act 2013;
- the Health and Safety at Work etc Act 1974 (HSWA74); and
- regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The inspections entail monitoring the licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of Hunterston B covered the following:

- Emergency Arrangements

- Management of Change
- Decommissioning
- Fire (Scotland) Act 2005 & the Fire Safety (Scotland) Regulations 2006

Emergency Arrangements

On 24 July 2024, our safety and security inspectors evaluated a demonstration of the site security emergency arrangements. The emergency exercise was judged to be an adequate demonstration of the security emergency response required under Licence Condition (LC) 11 and Regulation 4 (3) (d) of the Nuclear Industries Security Regulations (NISR) 2003 (as amended).

As with all exercises, some learning opportunities were identified which were discussed with the station as part of the post-exercise briefings.

On 5 November 2025, our safety inspectors attended site to discuss the station's proposals to update the site safety emergency arrangements post fuel free to reflect the reduced hazard. This will require the station to seek formal approval under LC 11. We will judge the adequacy of these proposals as part of this approval.

Management of Change

On 4 September 2024, our site inspector attended site to discuss progress regarding the Hunterston B Management of Organisational Change (MOC) proposal for the introduction of the deconstruction organisation at the site. This precedes planned transfer of the site to ownership by Nuclear Restoration Services.

An overarching MOC has been produced, which does not enact any change itself, providing the basis for development of a series of department-by-department enacting MOCs. We will judge the adequacy of these proposals via these enacting MOCs.

Decommissioning

On 29 October 2024, our site inspector attended site to discuss progress with Hunterston B's site specific decommissioning plan. The station has now produced a deconstruction plan based on the site specific decommissioning plan, which is independent of the dutyholder.

It was noted that EDF would be undertaking a number of deconstruction activities prior to transfer to Nuclear Restoration Services. Consequently, on the 26 November 2024, we held a meeting with representatives from Hunterston B and Hinkley Point B to provide some advice and observations in relation to the requirements of the Construction (Design and Management) Regulations 2015 (CDM). An inspection of the station's compliance with CDM is planned during 2025.

Fire Life Safety

On 3 December 2024, our site inspector and our specialist inspectors carried out a compliance inspection under the Fire (Scotland) Act 2005 & the Fire Safety (Scotland) Regulations 2006.

The inspection judged that the station had met the legal requirements and implemented appropriate measures to ensure that conventional fire risks have been reduced as so far as is reasonably practicable.

Nuclear Reactors (Environmental Impact Assessment for Decommissioning Regulations) (EIADR)

The Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations, 1999, as amended (EIADR) is a legal instrument that requires the environmental impact of decommissioning nuclear power stations and other nuclear reactors to be considered in detail before consent for the decommissioning project to commence can be granted. To obtain consent, the dutyholder submits an environmental statement to us. This presents a detailed environmental impact assessment for the proposed decommissioning project and any features of the project or measures envisaged to avoid, prevent or reduce and, if possible, offset, any likely significant adverse effects on the environment. Further information can be found [here](#).

On 1 December 2023, we received an application for consent under the EIADR from EDF Energy for Hunterston B power station.

To support this request, EDF Energy submitted an environmental statement to us which presents a detailed environmental impact assessment for the proposed decommissioning project. This details the measures that are intended to avoid, prevent or reduce and, if possible, offset, any likely significant adverse effects on the environment.

We held a public consultation from 7 December 2023 to 28 March 2024 to inform our decision on the EIADR consent. We thank all consultees who responded to the consultation.

After due consideration of the application and the consultation responses, we assessed that the application met the requirements of EIADR and has therefore been granted consent for the decommissioning project. The Project Assessment Report provides information on the consent decision and is available on our [website](#). [Consultation on the EDF Energy Nuclear Generation Ltd EIADR application for consent for Hunterston B power station | Office for Nuclear Regulation \(onr.org.uk\)](#). Our response to the consultation is also available on our website.

Members of the public, who would like further information on our inspection activities during the reporting period, can view site Inspection Records on our [website](#).

Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

2.2. Other work

Our site inspector attended the SSG on 5 September 2024.

3. Non-routine matters

Licensees are required to have arrangements to respond to non-routine matters and events. Our 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

We may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, we issue 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.

- The following LIs, enforcement notices and enforcement letters have been issued during the period.

Table 1: Licence Instruments and enforcement notices issued by ONR during this period

Date	Type	Reference	Description
09/08/24	Consent	ONRW-2019369590-11519	Consent for Dismantling or Decommissioning under EIADR Regulation 4

Reports detailing the above regulatory decisions can be found on our [website](#).

5. News from ONR

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

6. Contacts

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References

There are no sources in the current document.



For the future of our environment

Hunterston Site Stakeholders Group

SEPA Update- Hunterston B

June 2025

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 Environment Standards and Sustainability Branch as well as monthly updates from the EDF internal regulator on site. We have also attended routine meetings with corporate EDF, NRS, ONR and EA on strategic issues, including transfer to NRS and decommissioning.

We have visited the station twice since the last SSG meeting. On 2 April 2025, we attended the Annual Review of Safety, Security, Safeguards and Environment. The station presented a good reflection of its performance of the previous year.

On 23 April 2025, SEPA attended the site to monitor progress on the station's efforts to refurbish the active drains system which has been allowing the ingress of uncontaminated water into the system and thereby creating unnecessary radioactive waste requiring treatment and discharge. The station also presented its preliminary findings from the Remotely Operated Vehicle (ROV) survey of the discharge culvert conducted in March 2025. No blockages or significant debris were found in the culvert. The information gathered will allow the station to proceed with the detailed design of the Alternative Active Effluent Discharge Line.

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 in the Firth of Clyde. The formal public consultation on the application closed on 22 April 2025, with no representations being received. We expect to determine the variation application by 1 August 2026.

EDF and NRS have submitted a joint application to transfer the EASR permit for radioactive substances activities from EDF to NRS. We intend to determine the transfer application prior to the anticipated transfer date of 1 April 2026. Please note that there will be no formal public consultation on the transfer application.

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 Gas 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 29) covering 2023 has been published and can be obtained from SEPA's website along with previous year's reports. RIFE 29 reports that the total dose for the representative person (most exposed) around the Hunterston site, which includes both Hunterston A and Hunterston B, for 2023 was less than 0.013 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 2023, 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

14/05/2025



Office for
Nuclear Regulation

ONR site report

Nuclear Restoration Services – Hunterston A

ONR site report

Nuclear Restoration Services - Hunterston A

Report for period: 1 January – 31 March 2025

Authored by: Nominated Site Inspector

Approved by: Head of Regulation Decommissioning, Fuel, and Waste

Issue: 1

Published: April 2025

Record reference: 2025/11804

Foreword

This report is issued as part of our 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 our website: www.onr.org.uk/publications/regulatory-reports/site-specific-reports/lcsg-reports.

Our site inspectors 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 us via email at contact@onr.gov.uk.

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1. Inspections

1.1. Date(s) of inspection

Our site inspector made inspections on the following dates during the report period 1 January to 31 March 2025:

- 4 – 5 March 2025

2. Routine matters

2.1. Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- The conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- The Energy Act 2013;
- The Health and Safety at Work etc Act 1974 (HSWA74); and
- Regulations made under HSWA74, for example, the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The inspections entail monitoring the licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of Hunterston A covered the following:

- A joint Nuclear Security and Safety inspection on organisational capability staff training, qualifications and experience.

Members of the public who would like further information on our inspection activities during the reporting period can view site inspection records on our website: www.onr.org.uk/publications/regulatory-reports/site-specific-reports/inspection-records.

Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

2.2. Other work

Throughout this reporting period, our 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 in person meeting with safety representatives to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

During this period, they also held in person and virtual meetings with site representatives to discuss:

- Storm Eowyn damage:
- Progress on restoring laboratory capability at Hunterston A; and
- Hunterston A's decommissioning programme.

3. Non-routine matters

Licensees are required to have arrangements to respond to non-routine matters and events. Our 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

We may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, we issue regulatory documents, which either permit an activity or require some form of action to be taken. These are usually collectively termed licence instruments but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an enforcement notice.

The following licence instruments, enforcement notices and enforcement letters have been issued during the period:

We have withdrawn several legacy specifications from Hunterston A, to reduce regulatory burden on the licensee. The legacy specifications are from when the plant was operational and provide no additional safety benefit for Hunterston A which is well advanced into their decommissioning life cycle phase. This is captured in Table 1.

Table 1: Licence instruments and enforcement notices issued by ONR during this period

Date	Type	Reference	Description
09/01/25	Letter	ONR-SDFW-NRS-90065N	Withdrawal of nuclear maintenance schedule preface approvals & legacy licence condition specifications

Reports detailing the above regulatory decisions can be found on our website: www.onr.org.uk/publications/regulatory-reports/site-specific-reports/project-assessment-reports.

5. News from ONR

For the latest updates and information on our work, please subscribe to our regular email newsletter, ONR News, at www.onr.org.uk/news/newsletter.

6. Contacts

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Hunterston Site

Stakeholders Group

SEPA Update

Hunterston A



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Regulation

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

Engagement with the site continued throughout the period since the last SSG in March, including formal monthly and weekly update meetings. Routine discussions with Hunterston A on site issues, and the corporate NRS team on strategic issues have also continued.

Site Inspections

One site visit has been undertaken since the last SSG meeting. Updates to ongoing situations are in bold.

SEPA Site Visit 17-18 March 2025

SEPA attended the Hunterston A site to continue its investigation into the laboratory issues.

SEPA Site Visit 21 – 23 January 2025

SEPA attended the Hunterston A site to commence it's investigation into the laboratory issues. This was the initial stages of the investigation, and this will be ongoing over the coming months.

SEPA Site Inspection 23-24 October 2024 – **update June 2025**

SEPA attended site to undertake an inspection which primarily focussed on the Wet ILW Retrieval and Encapsulation Plant (WILWREP) with regards to the sampling system put in place to assess potential gaseous discharges during the encapsulation of the acid waste which is currently being retrieved. In addition an inspection was undertaken of site gaseous sampling systems with

regards to assessing whether the site is isokinetically sampling. Isokinetic sampling is the widely used industry method of collecting representative samples of particulate matter and gases from the stack. It ensures that the velocity of the sampled gas is the same as the stack gas velocity.

SEPA did not find any non-compliances whilst undertaking the inspections however, requested the site provide some additional information.

HNA have provided information to close out the actions left with the site which is being considered by SEPA.

SEPA Site Inspection 28th March 2023 – update June 2025

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.

SEPA have varied the Information Notice originally issued to NRS Hunterston A in January of this year following NRS failure to meet a deadline for provision of information specified within the notice. The variation extends the deadline from 31st October to 28th of November for item 2b and 2c of the Notice only, all other outstanding deadlines remain unaltered.

Update March 2025 - SEPA have varied the Information Notice originally issued to NRS Hunterston A in January 2024 following a request from NRS for an extension to the dates for actions 2b, 2c, 3b, 4a and 4b within the information notice as they were not able to adhere with the dates previously outlined. NRS formally outlined the inability to adhere to this date in letter dated 27 November 2024.

NRS indicated that they will be in a position to submit the required information to meet Actions 2b and 2c by 30 April 2025, Action 3b by 31 May 2025, Actions 4a and 4b by 30 June 2025.

SEPA subsequently varied the Information Notice to the dates requested by NRS Hunterston A.

Update June 2025 – at the time of preparing this report, NRS have provided SEPA with information to close out actions 2b and 2c, which was received prior to the renewed action date of 30 April. SEPA will consider the information provided in due course.

Permit Variation Applications

Aqueous Discharge Variation Application – Update June 2025

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 is expected to be determined by 1 August 2026.

Update June 2025 - At the time of writing, the 8-week consultation period for the application has ended (22 April 2025). No representations were made and SEPA will consider the application in due course.

SILWE Discharge/ Site gaseous discharge increase variation application – **update June 2025**

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 March 2025 – Ongoing. Public Consultation closed. No representations were made, and the application will be determined in due course.

Update June 2025 - the application will be determined in due course

Other EASR Regulatory Topics

Regulatory Notice – **update June 2025**

SEPA served NRS Hunterston A with a Regulatory Notice on 12th November 2024 requiring it to immediately cease use of the onsite laboratory for the purposes of demonstrating compliance with the site EASR permit. SEPA took this decision following the review of NRS internal investigation into shortcomings at the laboratory regarding acceptance into service and use of equipment,

failure to follow or have in place adequate processes and procedures to achieve compliance and potential shortfalls in staff training. NRS have taken steps to put in place alternative laboratory arrangements to underpin its demonstration of compliance with the site permit whilst the Regulatory Notice is in effect.

Update March 2025 – due to the site receiving the regulatory notice, subsequently necessitating the use of alternative lab resource for the analysis of the samples to provide the statutory discharge reporting to SEPA, the site requested an ongoing extension to the dates for the month discharge returns. SEPA agreed to a rolling 3 month extension to the provision of the monthly returns.

Update June 2025 – SEPA continue to liaise with the site regarding the onsite laboratory. SEPA is in the process of undertaking an investigation and the outcome of this will be available in due course.

Review of Characterisation of ILW Bunker Waste

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.

SEPA received a report in September outlining Assay Options for Solid Active Waste Bunker Boxes and responded with comments to NRS with regards to this work. SEPA await further engagement in due course.

No further update available

Other Regulatory Topics

Habits Survey

The Hunterston Habits Survey continues. The survey is being undertaken by the University of Stirling.

Fluorinated Greenhouse Gas Emissions (F-Gas)

No events reported over the period.

Environmental Events

On the 9 April 2025 SEPA were advised of a new q-pulse that had been raised in relation to a potential discrepancy between system drawings for the LLWPF vent system and the installed plant. The internal site investigation is ongoing.

Radioactive Substances Consultations

SEPA published the Environmental Performance Assessment Scheme (EPAS) Consultation onto the citizen space hub. A link to this is here for ease [Environmental Performance Assessment Scheme \(EPAS\) - a fair way to report performance - Scottish Environment Protection Agency - Citizen Space](#): The consultation will end on the 30 June 2025.

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 29) covering 2023 has been published and can be obtained from SEPA's website along with previous year's reports. RiFE 29 reports that the total dose for the representative person (most exposed) around the Hunterston site, which includes both Hunterston A and Hunterston B, for 2023 was 0.013 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 2023, 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,

May 2025

SCOTTISH GOVERNMENT UPDATE TO HUNTERSTON SITE STAKEHOLDER GROUP – 12th JUNE 2025

SCOTTISH GOVERNMENT RADIOACTIVE SUBSTANCES AND NUCLEAR DECOMMISSIONING POLICY TEAM

Annual NDA meeting with Cabinet Secretary for Net Zero and Energy

The annual meeting between the Cabinet Secretary for Net Zero and Energy, the NDA Chair and NDA CEO, as set out in the NDA Framework document, took place on the 29th of April. This was a positive meeting covering the NDA's priorities, performance and its current and future activities. In particular, the NDA's 20th anniversary, Dounreay's 70th anniversary and the upcoming transfer of Hunterston B were highlighted. Also discussed was the ongoing SG Higher Activity Waste Policy review and NDA's input to this work.

Scottish Nuclear Sites Stakeholder Group Meeting (SSSG)

We are in the process of organising the next SSSG meeting for later this year. A doodle poll to choose a date for the meeting was emailed out on 14th May. The SSSG will likely be held at Victoria Quay in Edinburgh, with a hybrid option. If you would like to attend the SSSG and are not currently on the distribution list, please contact me via email and I will add you to the list.

Scottish Councils Committee on Radioactive Substances (SCCORS) meeting

SCCORS had its first meeting in a number of years on 7th May. Dan Couldridge attended to provide a presentation with an overview of the Rad Subs team and the work we do. This was followed up with a short discussion on social attitudes to managing radioactive waste, skills and particular aspects of Scottish Government policy.

NDA Strategy V

Scottish Government are continuing to work with the NDA on their Strategy V document to ensure that Scottish Policy and practices are properly reflected. The aim is for the consultation for Strategy V to be released in July. We will also work with the NDA to make sure the consultation is promoted as widely as possible and links will be shared when available.

Diane Hamilton
Scottish Government



NDA Update for
Hunterston SSG
June 2025



Contents

1.0 NDA Stakeholder Update June 2025

**NDA Stakeholder Update**

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

Government Update

Seth Kybird has been appointed as Interim Chief Executive Officer (CEO) of Nuclear Waste Services (NWS). He succeeds Corhyn Parr who has led NWS as CEO since its formation in 2022. Seth joins NWS on an 18-month secondment from Nuclear Transport Solutions (NTS).

While Seth is on secondment Ben Whittard, Chief Development Officer and Managing Director of Shipping and Solutions, and Ciara Middlehurst, Chief Operating Officer, will become joint NTS interim CEOs. Both have strong leadership track records, and a wealth of knowledge and experience gained from inside and outside the NDA group. They both know NTS well and are committed to driving the future success of the organisation.

Spending Review

The Government Spending Review process informs decisions on public spending. NDA group funding is made up of the funding we receive from Government and the income we generate. We have already communicated on NDA group funding for 2025/26 which at just over £4bn includes increased Government funding, demonstrating significant public investment in our nuclear sites and facilities though this will not be without challenges.

We recently submitted our spending review submission for 2026/27-2029/30 to our Government sponsoring department, the Department for Energy Security and Net Zero (DESNZ). This comprehensive submission outlines the NDA group's budgetary needs and plans. We expect Government will make its final decisions on public spending for the next few years in the summer, after which Government departments, including DESNZ, will receive their funding allocations. Subsequently, we will receive confirmation of our Government funding.

The national fiscal environment remains very challenging and, across Government, departments are being squeezed. While we are confident of sustained Government investment into our mission, when considered against inflation and our plans to accelerate our mission and drive growth, our overall funding will not be sufficient to cover all that we'd like to do across the NDA group. This underscores the importance of efficiency in our operations, aligning with the Government's drive for a more efficient public sector.

Despite funding challenges, we're focused on our nationally important mission to ensure the safe and efficient decommissioning of the UK's nuclear legacy, with much to



deliver, including a Geological Disposal Facility (GDF), which remains government's policy for the long-term storage solution for the most hazardous radioactive waste. Additionally, we are preparing for the transition of the Advanced Gas-Cooled Reactors (AGR) into our group for decommissioning, thereby expanding our responsibilities and scope. Our role in new nuclear initiatives remains important, highlighting our part in supporting the UK's energy security and sustainability goals.

Outreach activities

- The NDA has been commended on its commitment to transparency following a 2 day visit to West Cumbria on 7/8 April by the [NDA NGO forum](#). The visit was an excellent example of teamwork across NDA, Sellafield Sites and Nuclear Waste Services with Forum representatives from a range of NGOs shown around Sellafield site and the Low Level Waste Repository. The Forum had senior leaders from across NDA Group present to answer queries on a range of key topics.
- MSP members of the **CPG** visited CPX late March. Later in the day, the formal CPG was held in Annan – the first CPG to be held outside of the Scottish Parliament. The main topic was 'Ste End States'. The next CPG will be held at the Scottish Parliament on May 27th 2025.
- Co-Chair of the CPG Oliver Mundell MSP was a guest speaker **Decom Week 2025** in Aberdeen where he spoke about 'Widening the political conversation' about decommissioning in Scotland and the work of the CPG.
- The first full **SCCORS** meeting since the pandemic took place in Glasgow on May 7th with over 30 members attending both in person and on-line. There will be 2 meetings a year with the next taking place on November 12th 2025.

Engagement priorities for 2025

- The NDA celebrates its 20th anniversary this year and are planning a range of events. Today we have a video and timeline presentation to share with the SSG.
- Our review into the SSGs has concluded with an update to the **NDA Guidance to the SSGs** following discussions with the Chair and Deputy Chair of the National SSG Forum and a meeting with all SSG Chairs and Deputy Chairs. This recognises the value of the stakeholder voice in the local communities around our sites and how to address some of the challenges that face us as we move into the future.
- 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. It has now been agreed that the strategy will go out to consultation for a 12-week period from 7 July 2025 to 29 September 2025.

- **Festival of Politics** – Dounreay will feature as part of this year's 'Festival of Politics' with a panel discussing 'The Atomics – the story of Dounreay's people'. The event will be held on Wednesday August 20th, 4pm-5.15pm. Tickets for the general public will be available.

Publications, public service and policy updates

- On 10th March, we published our Draft **Business Plan** covering the years 2025 – 2028 for a six-week consultation period, which closed on 22nd April. The Draft Business Plan reflects our most recent Strategy, published in 2021, and sets out key activities and the progress expected across our sites during the next three years, in line with funding allocated by the Department of Energy Security and Net Zero (DESNZ). The consultation was run in accordance with the criteria set out in the [Cabinet Office's Consultation principles guidelines](#).
- Once we have considered all the submissions the draft document, which can be found using the following link: [Nuclear Decommissioning Authority: Draft Business Plan 2025 to 2028 for consultation - GOV.UK](#), will be amended and a final document published.
- In February 2025 the NDA published its **Nature Recovery Plan (NRP)** which can be found following [this link](#). Through its implementation we will help address the decline of biodiversity by conserving and restoring natural habitats and species within our control as well as supporting government aims and objectives for nature recovery. The NRP will be a living document, subject to periodic review and considering any new research, policy and guidance as they become available.
- We have recently published our **Gender Pay Gap** report for 2023-24. The NDA group are committed to creating great places to work and inclusive working environments. This includes ensuring we have female representation at all levels across our organisations and supporting women in their professional growth. This report summarises the gender pay gap for 2023/24 for the NDA group as a whole and within the individual organisations that make up the group. The report can be read [here](#).

Mission delivery



- The NDA Group welcomes the government's decision to immobilise the UK's inventory of civil separated plutonium at Sellafield. Immobilisation will put the material beyond reach, further mitigating the long-term safety and security risks associated with it. We will continue to progress research and development work to identify the preferred technology for immobilisation, converting the material to an even safer and more safer form ready for final disposal in a Geological Disposal Facility (GDF).
- We are also funding a £5m Plutonium Ceramics Academic Hub at the Universities of Manchester and Sheffield. Over the next five years, the Hub will fund around 20 PhD students and two post-doctoral researchers, equipping them with the expertise to develop solutions and inform critical decisions on the safe management, storage and disposal of one of the world's largest civilian inventories of separated plutonium.

Thank you for taking the time to read our update. If you have any questions, please feed-back through the Secretariat or raise with the NDA official at the SSG meeting.



Nuclear
Decommissioning
Authority