



Site Stakeholder Group

HUNTERSTON SITE STAKEHOLDER GROUP

The Seventy Fifth Meeting of the Hunterston Site Stakeholder Group will take place
on Thursday 6 March 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 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 NDA

David Wallace

15.10 NRS Corporate Update

Bill Hamilton

15.20 Update from Scottish Government

Diane Hamilton

***Members Question and Answer Session
Public Forum***

15.30 Any Other Business

Next Meeting Thursday 12 June 2025

**HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
SUMMARY OF KEY POINTS FROM THE MEETING
HELD ON THURSDAY 5 DECEMBER 2024
AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG**

Chair's Opening Remarks

The Chair welcomed the attendees.

Hunterston B Report – Mr Joe Struthers

Mr Struthers reported that reactor 4 had been 95% defueled and 14 of 308 channels were still to be defueled. This was due for completion by December/January ahead of the site being declared fuel free by June 2025. Following individual consultation about post-defueling and transfer to NRS, aspirations of 93% of staff had been met. Opportunities had been provided for around 30 employees through the EDF Glasgow office. Mr Struthers had accepted a corporate leadership role within EDF that would be based in Glasgow, and this would be his last SSG.

SEPA Report – Mr Keith Hammond

Mr Hammond reported that the EASR variation application submitted by EDF had gone out to the Scottish Government, ONR and Food Standards Scotland, none of whom had made any comment. It would go out to consultation in early-2025. Discharges at Hunterston had been at 0.13 millisieverts, which had been well below the 1 millisievert limit.

Hunterston A Report – Mr Richard Gibson

Mr Gibson reported that it had been identified that some of the laboratory equipment might not have been calibrated to the required standards. A number of issues had been identified, and SEPA had instructed that NRS cease the use of their site laboratory for any sampling related to authorised discharge limits. It was not believed that any authorised limits had been exceeded or any environment harm caused as a result. Some site activities that require use of the laboratory have been paused, but arrangements for alternative analysis services are being put in place, and we hope to be able to start to relax these operational restrictions shortly.

Active commissioning had commenced for the Wet Intermediate Level Waste Recovery & Encapsulation Plant (WILWREP) system, and three of the drums of acid had been successfully encapsulated.

ONR Report – Mr Peter Hughes

Mr Hughes reported on a RIDDOR event due to an individual receiving a cut on their head. Site actions undertaken had been deemed to be appropriate. An enforcement letter had been issued to a roof contractor due to use of isocyanide paint without adequate PPE. The ONR was aware of the issue with the laboratory and was looking at activities to support SEPA and the site in a return to service.

SEPA Report – Ms Melanie Hayes

Ms Hayes reported that the NRS had requested an extension to deadlines in an information notice, which was being considered. A variation request for gaseous discharges was available for comment until 20 December. SEPA would be undertaking its own investigation into the laboratory failures over the coming months before the laboratory could be put back into use.

Update from NRS – Mr Bill Hamilton

Mr Hamilton reported that engagement was taking place with local communities near NRS sites, and this would include the Hunterston area in the 2025/26 financial year. Polling had shown that there was not a large degree of awareness of what was being done on site. A restructure was taking place at within NRS to split the sites between two businesses while covering solo and combined/AGR sites. This would allow more senior strategic focus on sites.

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 6 March 2025



**MINUTES OF THE MEETING OF THE
HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
HELD AT THE WATERSIDE HOTEL, ARDROSSAN ROAD, WEST KILBRIDE, KA23 9NG
THURSDAY 5 December 2024**

Attendance/Apologies list

Attendance

Ms Rita Holmes	Fairlie CC (Chair)
Mr John Lamb	West Kilbride CC
Cllr Tom Marshall	North Ayrshire Council
Mr Jamie Woodburn	Largs CC
Mr Graham Buckley	West Kilbride CC
Mr Alan Holden	Fairlie CC

Operators and Officers

Mr Joe Struthers	EDF (Station Director)
Mr Daniel Smith	Site Director (Hunterston A)
Mr Richard Gibson	Engineering Manager (Hunterston A)
Mr Keith Hammond	SEPA (Site Inspector, Hunterston B)
Ms Melanie Hayes	SEPA (Site Inspector, Hunterston A)
Mr Stewart Ballantine	SEPA (Commissioning Manager)
Mr Peter Hughes	ONR (Site Inspector, Hunterston A)
Mr Bill Hamilton	External Affairs Director, NRS
Ms Claire Aitken	NRS
Mr Colin Hargreaves	NRS Site Inspector

In Attendance

Mr Matthew Dent	Minute taker
Three members of the public	

Apologies

Mr Stuart McGhie	Vice Chair
Mr David Wallace	NDA (Stakeholder Lead Scotland)
Ms Diane Hamilton	Scottish Government
Mr Steve Saunders	ONR (Site Inspector, Hunterston B)
Ms Fiona McCall	EDF
Mr Craig Hatton	North Ayrshire Council (Chief Executive)
Mr Stewart McKenzie	North Ayrshire Council
Mr Ian Murdoch	North Ayrshire Council
Cllr Eleanor Collier	North Ayrshire Council
Mr Alastair Walker	NRS
Mr Angus Cochran-Patrick	Hunterston Estate
Mr John G McHenery	Cumbræ Community Council

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1. CHAIR'S OPENING REMARKS AND DECLARATIONS OF INTEREST

The Chair opened the meeting and invited attendees to introduce themselves. Apologies were noted from David Wallace, Diane Hamilton, Steve Saunders, Craig Hatton, Stewart McKenzie, Alistair Walker, Ian Murdoch, Angus Cochran-Patrick and Stuart McGhie. Bill Hamilton would be arriving late.

No interests were declared.

2. CHAIR AND VICE CHAIR UPDATES AND CORRESPONDENCE

The Chair presented her report.

The Chair had attended the NDA NGO forum and received a presentation on the Radiological Response and Emergency Management System, which automatically measured, analysed and informed on background radiation levels on a 48-hour basis.

Meetings had taken place to discuss the SSG review report's findings and how it might shape future SSG meetings. The Chair noted concerns about attendance of voting members at the SSG meetings. JW noted that he found it challenging having to take time off work unpaid, and Larg CC was struggling to get someone who could attend the SSG meetings.

The cross-party group on nuclear would meet on from 18.00 to 20.00 on 17 December in Committee Room at the Scottish Parliament to discuss nuclear waste. The meeting would also be available online.

Alongside the chair of the Sizewell SSG, the Chair had toured Hunterston A and Hunterston B. They had been impressed by the teams at the A station, which had explained their work and the challenges they had met and solved.

The Chair welcomed Daniel Smith, who had taken up the role of Hunterston A Site Director from Monday 2 December.

3. ACTIONS AND APPROVAL OF PREVIOUS MINUTES

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

Claire Aitken went through the actions from the previous meeting.

To provide an update on the weather barrier

Richard Gibson noted that, at the previous SSG meeting, Mark Blackley had explained that the current strategy was to retain the current weather barrier for longer than originally planned and not replace it with metal cladding. The site had investigated the possibility of changing the colour of the current plastic barrier. This was considered technically possible, but no similar applications had been found where this had been carried out. There was a risk that any new coating would not adhere effectively and could delaminate through time, resulting in a more unsightly exterior. It would also invalidate manufacturer warranties. The potential cost had been estimated at £1 million. It had been concluded that the risk of failure and cost had made this unviable.

Hunterston A and B to schedule a walkaround to view the external buildings.

The Chair explained that, as Stuart McGhie was unable to attend, this had been put on hold.

Joe Struthers to ascertain if more samples were tested regionally or on site.

Joe Struthers reported that sampling through defueling was as it had been through generation. There had been a small number of sample points at which frequency had been changed, and there was no intention to reduce sampling moving into deconstruction.

Diane Hamilton to circulate a link to the draft higher activity waste policy to John Lamb.

Diane Hamilton was not present. John Lamb noted that he had not received this. Claire Aitken would chase it with Diane Hamilton.

4. HUNTERSTON B SITE REPORTS

Hunterston B Site Report

Joe Struthers presented his report.

There had been no significant safety events during the reporting period. Total Recordable Injury Rate (TRIR) remained at zero and the radiation dose was slightly below plan for the year.

Good progress continued with defueling, and at present reactor 4 had been 95% defueled. 14 of the 308 channels were still to be defueled, which was aimed to be completed by end of December or early January, for the site to be declared fuel-free by June 2025. Good progress was also being made on transfer and deconstruction, with the post defueling safety case being worked on with the NRS to deliver a seamless transfer. NRS training facilities were being set up on site. Deconstruction focus was on early works and preparations, and further early deconstruction work would commence early in the New Year.

Following individual consultation with staff about post-defueling and transfer to NRS, aspirations of 93% of staff had been met. Over the next 18 months, there would be further opportunities for staff, and it was hoped that there would be minimal or no compulsory redundancies. The best fit process had been used to match aspirations and skills to the deconstruction structure agreed with NRS. The trade unions had participated with a positive outcome. There were a few vacancies in the structure, and an internal recruitment phase would begin in the next few months. Opportunities had been provided for around 30 employees through the EDF Glasgow office.

Joe Struthers noted that he had been offered and had accepted a corporate leadership role within EDF based in Glasgow. Recruitment for his successor was nearing a conclusion and would be confirmed and communicated in due course. Handover was likely to be in Q1 2025, subject to necessary approvals. Therefore, this was likely to be Joe Struthers's last SSG meeting as station director for Hunterston B. He thanked the Chair and SSG members for their patience, support and healthy challenge.

ONR Report

There was no ONR report for Hunterston B.

SEPA Report

Keith Hammond presented his report.

The last inspection had taken place in October and had focused on issues with data returns. Good progress had been made, and SEPA was happy with this. SEPA was also looking at plans for the increased effluent discharge line, on which good progress had also been made. The for an EASR variance application had been duly made, and had gone out to the Scottish Government, ONR and Food Standards Scotland, none of whom had made any comment. It was intended to go out to consultation in early 2025.

Radioactivity In Food and the Environment (RIFE) 29 had been published in November. This included all the monitoring that SEPA had undertaken to demonstrate that discharges were within the 1 millisievert per year limit, which they all had been. For Hunterston, which was dealt with as a combined site due to proximity of the two stations, had been far below the limit

at 0.13 millisieverts. The Scottish Pollutant Release Inventory (SPRI) had also been updated for 2023 and was available on the SEPA website.

Questions & Answers

John Lamb noted that the overall decommissioning strategy remained as early safe store, and this had been EDF's proposition from the beginning. In contrast, A Station was not safe store but effectively decommissioning the whole plant. John Lamb queried there was discussion around this between EDF and NRS. Joe Struthers explained that current strategy at Hunterston B was early safe store, and EDF were working closely with NRS to underpin this.

John Lamb noted that the old fish farm had been cleared internally and would be deconstructed in the following year. He asked whether application had been made for a demolition order. Joe Struthers stated that all necessary preparation works were proceeding, including engaging with the local authority and the necessary environmental surveys that needed to be in place before demolition began.

Jamie Woodburn asked whether there were any plans to mark completion of defueling and whether local schools were involved, and if not, whether they could be. Joe Struthers said this could be done jointly with NRS. He would take an action to provide an update on this.

ACTION: Joe Struthers to update on plans to mark completion of defueling.

The Chair queried whether there were still any hazards associated with the old fish farm. Joe Struthers reported that there were no industrial hazards associated with the buildings being empty. However, at deconstruction, they would need to ensure it was secure and access restricted to manage hazards.

The Chair queried the reference in the EDF report to emergent faults in the irradiated fuel dismantling. Joe Struthers explained that the majority of the emergent faults had been associated with the tie bar end fittings. A lot of upgrade work had been found to improve consistency and reliability. Since this, there had not been further issues. Keith Hammond explained that the sample was taken from a laminar flow within the stack in order to not get a false reading from the eddies at the edge.

5. HUNTERSTON A SITE REPORTS

Hunterston A Site Report

Richard Gibson presented his report.

At the end of August, it had been identified that some of the laboratory equipment might not have been calibrated to the required standards. Site investigation had been carried out and had identified a number of issues relating to work constructions, training and instrument testing. A copy of the investigation had been provided to SEPA, and the shortfalls had been sufficient for SEPA to write to Richard Gibson and instruct that NRS cease the use of its site laboratory for any sampling related to authorised discharge limits. Any drift in reading would have been minor against the authorised discharge limits. It was not believed that any authorised limits had been exceeded or any environment harm caused as a result. Nevertheless, NRS was taking the issue very seriously.

As a result of the restriction around use of the laboratory, there had been changes to activities to minimise the requirement for laboratory testing. This had meant shutting down one of the waste recovery facilities, with staff redeployed to other duties. Progress had been made in implementing arrangements for alternative laboratory services at another NRS site and a commercial laboratory, which would hopefully allow the relaxation of site operational restrictions soon.

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A security demonstration exercise had been held in September with the support of Police Scotland. It had been a particularly challenging scenario centred around protester activity and a drone crash. Richard Gibson had been pleased with the professionalism shown.

Active commissioning had commenced for the Wet Intermediate Level Waste Recovery & Encapsulation Plant (WILWREP) system, and three of the drums of acid had been successfully encapsulated. The waste facility had been repaired and returned to service, allowing the early completion of the annual waste recovery target.

The reactor roof repairs had been completed, and the contractor had been demobilised. The replacement of the old safety netting around the package store had been replaced.

ONR Report

Peter Hughes presented his report.

During the period from 1 July to 30 September, Peter Hughes had been on site for one inspection at the end of August. No issues had been found from that inspection.

The site had reported a Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) event due to an individual suffering a cut on their head. The site actions undertaken had been deemed to be appropriate.

The ONR had had to issue the roof contractor an enforcement letter due to the use of paint, which was an isocyanide affecting respiration, without adequate equipment in place to protect workers. This enforcement letter had been complied with.

The ONR had been aware of the issue with the laboratory and was looking at activities required to support SEPA and the site in terms of a return to service.

Peter Hughes had been onsite that week with a joint security focus on maintenance, which had been appropriate. The ONR had issued its chief nuclear inspector's report, and Hunterston A remained at normal regulatory attention level. The report was available on the ONR website.

SEPA Report

Melanie Hayes presented her report.

An information notice had been issued to the site at the start of the year relating to the discharge returns. NRS had failed to meet the 31 October deadline for two of the actions and had requested an extension, which had been provided. With the various laboratory issues a further extension had been requested to the remaining actions to 2025. This was processing through SEPA internal processes.

The variation request for gaseous discharges relating to the authorised discharge point for SILWE was still available for consultation until 20 December. It was very likely that the determination period would not meet the deadline in October 2025.

A regulatory notice had been issued to the site on 12 November requiring immediate cessation of use of the onsite laboratory for the purpose of demonstrating compliance with the site EASR permit, following SEPA review of the NRS internal investigation into shortcomings 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. SEPA would undertake its own investigation over the coming months before the laboratory could be put back into use.

Questions & Answers

John Lamb noted the gaseous radioactive discharges and queried whether the numbers provided were cumulative or total. Richard Gibson explained that it had been over the previous

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12 months. John Lamb queried whether it represented a normal amount of discharge. Richard Gibson confirmed that it did.

Jamie Woodburn queried the life expectancy of the current white cladding on the weather barrier. Richard Gibson explained that the design life had been 10 years. It had been installed 11 years previously. Indications were that it was in a good condition with no significant failures or issues. Jamie Woodburn summarised that the answer to the earlier it was likely that any coating would not work, but regardless NRS would not pay for it as it was too expensive. Daniel Smith explained that it was not solely the cost being prohibitive, but the likelihood of the solution being successful. Jamie Woodburn queried how old the roof on the structure was. Richard Gibson explained the resealing which had been recently completed, subject to another resealing in four years, should be good for another 10 years. Most of the fabric had been replaced at least once. Every indication was that there were five to 10 years left of life in the material. Jamie Woodburn noted that, to members of the community, it was 'a carbuncle' that it seemed they were stuck with. Richard Gibson noted that the maintenance plan had been for the reactors to remain for 60 to 100 years with the metal cladding. It was not the strategy to keep the temporary weather barrier for that same timeframe. Jamie Woodburn said the situation was unsatisfactory.

The Chair said that, if the deconstruction of the reactor building took place, then the weather barrier would be removed. Jamie Woodburn noted that there was no timeline for this. The Chair stated that the site was waiting for the NDA and NRS to decide which stations would be deconstructed and which would be kept in the safe store. Bill Hamilton noted that there was an indicated timeline for all sites. It was being worked on. A major decision had been taken with the NDA not to go for a care and maintenance strategy. Therefore, full metal cladding was not required. Patience was required, as plans for decommissioning were developing. The speed of decommissioning would be dependent on the finances received.

Daniel Smith suggested that Jamie Woodburn visit the site in the New Year to discuss the cladding. Jamie Woodburn welcomed the invitation.

Jamie Woodburn queried the calibration of laboratory equipment and the order of magnitude by which readings had been out. Richard Gibson said verification of this was taking place, but indications suggested that they had not drifted significantly. Jamie Woodburn stated that it was 'embarrassing' that the equipment had not been tested and expressed concerns about what else might have been missed and how faith could be restored. Richard Gibson noted that a significant internal investigation was ongoing and acknowledged Jamie Woodburn's concerns.

Jamie Woodburn asked whether samples were being transported offsite and whether there was any danger to this. Richard Gibson confirmed that an offsite laboratory was being used and transport regulations were being followed. Samples were very small. Peter Hughes confirmed that the regulatory notice would not be lifted until the ONR was content that everything appropriate was in place and the issues had been dealt with. Any further issues that were uncovered would be addressed through the enforcement process.

Cllr Tom Marshall supported Jamie Woodburn's comments regarding the cladding of the weather barrier. He queried why it could not be painted or coated. Daniel Smith noted that there was always a budgetary requirement. A number of paint specialists had been contacted to explore what was possible, but no certainty could be given on the viability of solutions because of the wind movements of the barrier.

The Chair queried what a percussion[?] water tap was. Richard Gibson stated that he thought it was a push-button tap.

The Chair queried whether work had stopped until the laboratory was back in service. Richard Gibson said that, once the regular sampling was covered at another site or laboratory, restrictions in operations would look to be lifted. The Chair queried whether a radiochemist would be recruited for the site. Richard Gibson confirmed this.

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The Chair queried how the new effluent treatment plant was monitored. Richard Gibson explained that it was going through active commission and was not in active usage at present. Once it was online, it would be monitored.

The Chair noted 21 vacancies on site at the moment and queried whether this was higher than normal. Richard Gibson confirmed that it was and that it amounted to around 10%. It raised challenges in some areas, as some technical trades were hard to recruit to in the area.

6. UPDATE FROM NDA

David Wallace was not present but had sent a report.

7. NRS CORPORATE UPDATE

Bill Hamilton presented his report.

There was an engagement strategy with local communities and a trailer that outlined what NRS did and the potential futures for the Anglesey site. A similar exercise would be taken in the Hunterston area in the 2025/26 financial year.

Polling had shown that the biggest concern of communities nearby to sites was safety, but also that there was not a large degree of awareness of what was being done on site.

A restructure was taking place at an executive level within NRS and would not affect the Hunterston site. The sites, aside from Dounreay, were being split between two businesses. One business would be solo sites, and the other combined sites. As the further EDF AGR sites came through to NRS, they would come into the combined sites business. The idea was to have more senior strategic focus on sites.

Questions & Answers

John Lamb noted the announcement that Torness would be extended for another two years and asked if NRS had already started on decommissioning on paper. Bill Hamilton said that it had not. At present, decommissioning was the responsibility of EDF. John Lamb queried whether NRS had an outline of what it would do. Bill Hamilton said it did not. As the handover approached, there would be multiple complex relationships between NRS and EDF.

Jamie Woodburn noted that Bill Hamilton had called for patience and asked how patient people needed to be. He had found the statement very patronising. Bill Hamilton said it was not the job of NRS, EDF or the NDA to decide the future of the site. Ultimately, it would be up to the community. At every site, NRS was doing the work to get to the point of dealing with the reactor buildings, which would take several years. NRS was doing everything it could to find the decommissioning strategies that were acceptable to the community and the regulator and would be financed by the government. Jamie Woodburn stated that he felt that pressure needed to be put on Ministers for something to be done.

8. UPDATE FROM SCOTTISH GOVERNMENT

Diane Hamilton was not present. Claire Aitken reported that Diane Hamilton had said her report was as it had been at the previous meeting.

9. ANY OTHER BUSINESS

The Chair noted that it was Joe Struthers's last meeting. Joe Struthers was presented with a gift in recognition of his service to the SSG. The SSG wished him good luck in the future.

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

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Next Meeting date: Thursday 6 March 2025.

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Site Stakeholder Group

Hunterston B Station Director's Report

Period: November 2024 to January 2025

1. Defueling

Defueling on reactor 4 is now complete. We successfully defueled all 308 channels in ~14 months, which was a terrific achievement for the station. Work has continued to dispatch the remaining spent fuel from the ponds to Sellafield for processing and long-term storage whilst the checks and inspections required to confirm the site as fuel free are also progressing well. We remain on plan to declare the site fuel free verified in June 2025.

2. Transfer and Deconstruction

Site Transition

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

In the last quarter we have:

- Completed internal verification of the Post Defueling Safety Case
- Completed the 'Best Fit' process for populating the agreed Deconstruction Organisation (see People Section for more detail)
- Commenced 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 are working together to deliver the safest, most cost-effective solution for decommissioning the UK's Advanced Gas-cooled Reactor (AGR) fleet. This involves a seamless transfer of the site to NRS after the completion of defueling by EDF. A work break down structure and joint plan has been agreed and outlines the scope of work required to enable transfer by April 2026. Both NRS and EDF remain fully committed to working together to deliver seamless transfer of the site licence to NRS.

In December the NRS application to hold the Site License for the B site was presented to the Site Management Team for review and endorsement.

Deconstruction Delivery

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

Some highlights for the quarter in terms of delivery have been the approval of our Environmental Impact Assessment Decommissioning Regulations (EIADR) submission from the ONR which allows the site to move into the delivery phase of deconstruction following Fuel Free Verification (FFV). Preparation works have been completed for the demolition of the fish farm buildings which will be completed in Q1 2025 and design work is progressing well for a new active effluent discharge line.

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 Total Recordable Injury Rate (TRIR). TRIR sits at 0.

In December we safely removed the last fuel stringer from R4, meaning both reactor 3 and reactor 4 are free from fuel for the first time, this was completed ahead of plan.

On the back of this strong performance the station launched a proactive campaign – ‘Safe Start 2025’. A weeklong period focused on safety for staff and contract partners returning to work after the Christmas and New Year holidays.

“Safe Start” campaigns are crucial for resetting our safety behaviours, putting the spotlight back on site hazards / procedures. It is also important that we check everyone’s fitness for duty, both physically and mentally, recognising that a break from work takes people out of their usual routine and the role that these distractions can have on safety.

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.

In December a third-party contractor was observed to be working unsafely while loading a wheeled Mobile Elevated Working platform (MEWP) in the station external car park. The unsafe practice was addressed at the time, and an investigation commenced. Opportunities for improvement were identified, resulting in formal expectations being communicated to contract partners on their legal responsibilities for loading and unloading equipment. Security procedures were also updated to support.

Towards the end of January, like the rest of the central belt of Scotland, the station experienced the largest storm in a generation, Storm Éowyn. The preparations to protect staff and plant were successfully deployed, which included sending all non-core staff to work from home. These actions ultimately lead to the station experiencing no significant safety issues, although there was some minor cosmetic damage noted and actions placed to rectify.

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 (November 2024 - January 2025)		
Planned collective dose	7.0man.mSv	
Actual collective dose	5.26man.mSv	
	Employee	Contract Partner
Total Dose	4.88man.mSv	0.38man.mSv
Average individual dose	0.017mSv	0.002mSv
Highest individual dose	0.412mSv	0.111mSv
Individuals	284	169

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

Explanatory notes:

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

Environmental Safety

There have been no significant environmental events in the period November 2024 to January 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 in defueling remain at levels well below those authorised by SEPA.

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

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

Emergency Arrangements

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

Hunterston B completed five shift exercises in the last quarter of 2024 which allowed our emergency response team members to practice and improve in their roles as well as authorise a number of new role holders to boost our succession plan. We continue to work on embedding the learning from identified areas or opportunities for improvement from the shift exercises.

Hunterston B held the fleet's first 'Working with Emergency Services' training workshops, the site ran two of these in Qu 4 of 2025 with more requested in 2025. The training was attended by the Scottish Fire & Rescue Service, Scottish Ambulance Service and Police Scotland including the Criminal Investigation Department (CID). A mix of station role holders worked in groups with the emergency services to discuss difficult and at times awkward topics which included decision making in an emergency, crimes scene management and fatality management. Feedback from the site role holders and the emergency services was very positive.

The station continues to work closely with fleet Emergency Preparedness Group as the lead defueling site, we are continuing to work towards an optimised set of emergency arrangements in line with the risk profile of the station and as we move towards the point of transfer to Nuclear Restoration Services (NRS). Our optimised arrangements will be trialled through a series of different exercise scenarios in the first quarter of 2025 with oversight 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.

4. People

Andy Dalling, former Transfer and Deconstruction Manager, has been appointed as Hunterston B Station Director, commencing his role in February 2025. Following this appointment, a number of Management Team appointments have been made for the positions of Site Integration Manager, Programmes Manager, Engineering/Performance Improvement Manager and Waste Manager, which completes the population of the Deconstruction Management Team.

Following conclusion of formal consultation, the Best Fit process was completed to populate the Deconstruction structure. This involved consideration by the Management Team of the business requirements, skillsets required, as well as individual preferences. An independent review was carried out by a team consisting of two trade union representative members of the National Joint Council, an independent senior representative from within Nuclear Operations and the Employee Relations Lead for Nuclear, who were satisfied that the agreed processes and principles had been followed.

Employees were informed early December of the outcome of their individual consultation, confirming if they had been matched to a position in the Deconstruction structure. At this

point we have been able to meet 93% of individual aspirations, however recruitment is now underway for the remaining Deconstruction vacancies, which will further increase the number of aspirations we are able to meet.

Employees have been reminded of the support available and health and wellbeing campaigns continue.

Following the success in October last year, the Mental Health First Aiders organised a lunchtime 2.5km walk open to all to promote more regular movement as one of the important things people can do to help protect their mental health. It supported Occupational Health's "1 mile a day" challenge for the month of February and also raised awareness of Hunterston's Mental Health First Aiders. In addition, "Brew Monday" was held in the staff restaurant on 20th January, encouraging employees to come together to enjoy refreshments and conversation, whilst continuing to educate employees on the wellbeing support available.



As part of the ongoing support we are offering to support our employees through a period of change, a team of experts from Pensions, Redeployment and Financial Advisory service were on site for three days in February to deliver a Financial Education event, with tailored sessions for those who are due to transfer to NRS, as well as those that are likely to exit the business via redundancy.

A campaign has commenced to recruit additional Conscious Inclusion Champion volunteers to continue our ambition to creating an inclusive environment where everyone feels welcome, with particular focus on getting the basics right.



5. Company Update

New study shows positive impact of nuclear power stations on UK jobs

In January, a new report was published that outlines the significant contribution that nuclear energy has made to enabling economic growth across the UK over nearly five decades.

The [report](#), by independent consultants, Economic Insight, looks at the economic impact of the current fleet of eight nuclear power stations during their operational lives and shows that since 1976, Hunterston B has:

- Contributed more than £13.3 billion to the UK economy
- Supported more than 2,100 jobs a year during its 46 years of generation
- Avoided 172 million tonnes of carbon, which is like taking every car off the UK's roads for almost two and a half years.

This is the first time the economic impact of the operating phase of the fleet has been analysed in this way and the results clearly show the significant contribution that nuclear power has so far made to tens of thousands of livelihoods across the UK. The report also shows that over 90% of supply chain expenditure is made with UK businesses during operations. In total, the fleet has made a contribution to the UK economy of £123 billion since 1976. With five stations across the UK still generating and hundreds still employed at our decommissioning sites, this figure will continue to grow.

Managing Director of Nuclear Operations, Dr Mark Hartley, said: “Seeing how the combined value of the power, jobs and supply chain adds up over time really helps to throw into sharp relief the positive impact that these facilities have on economic growth. The investment made in these stations over nearly 50 years has paid dividends, and will continue to do so, not just for the people working and living close to the stations but also the millions who benefit from the zero-carbon electricity they produce.”

EDF also published its annual fleet stakeholder [update](#), which outlines the performance of the fleet over the past year and future plans.

The update shows that output from the nuclear fleet stayed steady in 2024 at 37.3TWh with an ambition to maintain that level until at least 2027. Taxes of over £1billion were paid, including over £400million through the new Electricity Generator Levy. In 2024, EDF also confirmed life extensions for the four generating AGR stations and made significant progress in delivering on its defueling contract with the UK Government.

6. **Contacts**

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

Fiona McCall, Senior External Affairs Manager

Tel: 07813 232 347

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

Nikki Thomson, Communications Coordinator

Tel: 01294 826157

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

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

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

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References

There are no sources in the current document.



For the future of our environment

Hunterston Site Stakeholders Group

SEPA Update- Hunterston B

March 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 defueling, transfer and decommissioning.

We have visited the station once since the last SSG meeting. On 11 December 2024, SEPA attended the site to do an end-of-year progress update on documents forming the Integrated Management System for transfer, Radioactive Waste Adviser body membership, the processing of the one difficult fuel stringer and the refurbishment of the Radiochemistry laboratory. The opportunity was also taken to get an overview on the high activity debris vaults from a waste management standpoint in preparation for decommissioning. No contraventions were identified.

The station applied to SEPA on 31 January 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 in the Firth of Clyde. The next step is for SEPA to undertake a formal public consultation on the application. At the time of writing, the application, consultation document and supporting documents were being collated for placing on SEPA's Consultation Hub. We expect to determine the variation application by 1 August 2026.

SEPA has been informed that the joint application to transfer the EASR permit from EDF to NRS will be submitted by the end of February 2025. 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 Gase Emissions (F-Gas)

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

UK Emissions Trading Scheme (ETS)

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

Environmental Events

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

Radioactivity in Food & the Environment (RIFE)

RIFE is a collaborative report on work carried out by SEPA, the other UK environment agencies, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and

the environment. The RIFE reports aim to provide an in-depth assessment of radioactivity in food and the environment in the UK and the public's exposure to radiation, including in the vicinity of Hunterston B. The RIFE report incorporates the results from the analysis of a wide range of samples and key information on local habits to demonstrate both that food remains safe and that the public's exposure to ionising radiation is within legal limits.

The latest edition (RIFE 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

12/02/2025



Office for
Nuclear Regulation

ONR Site Report

Nuclear Restoration Services – Hunterston A

ONR Site Report

Nuclear Restoration Services - Hunterston A

Report for period: 1 October – 31 December 2024

Authored by: Nominated Site Inspector

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

Issue: 1

Published: January 2025

Record reference: 2025/1279

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed to members of the Hunterston Site Stakeholder Group and are also available on the ONR website (www.onr.org.uk/lrc).

Site inspectors from ONR usually attend Hunterston Site Stakeholder Group meetings, where these reports are presented, and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

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1. Inspections

1.1. Date(s) of inspection

The ONR site inspector made inspections on the following dates during the report period 1 October – 31 December 2024:

- 4 – 5 December 2024

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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:

- Examination, maintenance, inspection and testing; and
- Security (reliability, resilience and sustainability).

Members of the public who would like further information on ONR's inspection activities during the reporting period can view site intervention reports at www.onr.org.uk/intervention-records.

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

2.2. Other work

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

The site inspector held a periodic 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:

- Progress on ongoing site investigations;
- Progress on resolving laboratory capability; and
- Hunterston A's decommissioning programme.

3. Non-routine matters

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

Matters and events of note during the period were as follows.

- A regulatory notice has been received from the Scottish Environment Protection Agency (SEPA) requiring Nuclear Restoration Services to undertake measures to ensure compliance with the Site's EASR (Environmental Authorisations (Scotland) Regulations) Permit, with respect to the Hunterston A site laboratory. ONR remains informed on the site's investigation into this matter and is working with SEPA to bring the site back into compliance.

4. Regulatory activity

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

No licence instruments, enforcement notices or enforcement letters were issued during this period.

5. News from ONR

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

6. Contacts

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

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Hunterston Site

Stakeholders Group

SEPA Update

Hunterston A

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Regulation

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

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

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

Site Inspections

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

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

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.

No update available at this time.

SEPA Site Inspection 28th March 2023 – update March 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 - 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.

Permit Variation Applications

Aqueous Discharge Variation Application – Update March 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 - At the time of writing, the application, consultation document and supporting documents were being collated for placing on SEPA's Consultation Hub and it is anticipated that the 8 week consultation period will commence towards the end of February. The SSG will be informed when the consultation goes live.

SILWE Discharge/ Site gaseous discharge increase variation application – update March 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 – Ongoing. Public Consultation closed. No representations were made, and the application will be determined in due course.

Other EASR Regulatory Topics

Regulatory Notice – update March 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 – 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.

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

No events were reported over the period.

Radioactive Substances Consultations

SEPA published three Rad Sub Consultations onto the citizen space hub. The links are below:

Consultation on our Objectives and Principles for Regulating Radioactive Substances Activities
<https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-our-objective-and-principles-for-r/>

Consultation on the Environmental Standards for Inputs of Radioactive Substances into Groundwater
<https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-the-environmental-standards-for-in/>

Consultation on Near-surface Disposal Facilities on Land for Solid Radioactive Wastes: Guidance on Requirements for Authorisation
<https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-near-surface-disposal-facilities-o/>

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,
February 2025



NDA Update for Hunterston SSG

March 2025



Contents

1.0 NDA Stakeholder Update March 2025



NDA Stakeholder Update

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

Government Update

David Peattie, along with Corhyn Parr and Euan Hutton, appeared before the Energy and Net Zero committee (ESNZ) on the 18th December and answered questions on a wide variety of subjects connected to the NDAs mission. The hearing is available to view online [here](#).

The Government laid a Written Ministerial Statement (WMS) in House of Commons on Friday 24 January identifying that DESNZ will work with the NDA to immobilise the UK owned civil separate plutonium inventory at Sellafield. The WMS can be found [here](#) and the press release from NDA [here](#).

Board updates

- The NDA group's All Boards Event took place over 3 and 4 December 2024. It brought together board members from the NDA, Sellafield, NRS, NWS and NTS to network and welcome new appointments to the group. The programme's main topics of discussion included mission delivery and strategy, future funding challenges and opportunities, and further group alignment under the One NDA model

Outreach activities

- On the 15th and 16th January the UK decommissioning sector came together in Telford. On the 15th DECOM 25 took place with delegates from across the decommissioning sector discussing a whole range of topics, including the development of the UK sites and the opportunities for the supply chain, the skills needed to succeed, decommissioning in other sectors and the challenges of preparing for the future of decommissioning. On the 16th January there was an NDA supply chain event proving 1700 delegates the opportunity to connect with 300 exhibiting companies.
- We are in the process of developing and designed our next broad **stakeholder survey**. More details will be available in due course.
- The last **CPG** took place in December 2024 at the **Scottish Parliament** with the main topic being 'Radioactive Waste - dealing with the legacy'. Topics including how waste was generated, how it is dealt with in Scotland, movement of waste located in Scotland and non-energy sources of radioactive waste. There were



around 40 attendees both in person and via Teams. The next CPG will be held in Annan close to CPX site with the main topic being 'Site End States'.

- The first Wales CPG took place at the Senedd in January 2025.

Engagement priorities for 2025

- As mentioned in previous updates, we have undertaken an independent review into the SSGs. This exercise provides an opportunity to reflect on the successes of the stakeholder voice in the local community over the last 20 years and how best to address some of the challenges that face us as we think about the future. Following the conclusion of the report we are working with the chair and vice chair of the National Site Stakeholder forum on implementation.
- Nuclear week in Parliament took place at the end of January with the NDA and NDA group Operating Companies hosting events. The event included a Scottish Round Table hosted by NRS AND Jamie Stone MP.
- As you will be aware 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. The strategy will go out to consultation in May 2025.

Publications, public service and policy updates

- As previously advised, we expect the Scottish Government to start its review into its policy for higher activity radioactive waste (HAW) over the next few weeks. The policy framework is set out in a 2011 Policy and the 2016 Implementation Strategy.
- Following the publication of the Chapelcross masterplan in August 2024, the NDA has been leading work to identify a strategic partner for the development that will deliver the vision for the site's transformation into a green energy hub. We are now evaluating the proposals from potential partners and hope to be able to make an announcement this Spring.



- DESNZ has [opened a consultation](#) on the draft of the new nuclear National Policy Statement (EN-7), applicable to nuclear power stations expected to deploy beyond 2025. The consultation closes **midday 3 April**.

Mission delivery

- The NDA recently launched its brand-new, specialised cyber facility to accelerate collaboration and innovation across nuclear operators and the supply chain, enhancing the collective ability to successfully defend against cyber threats. The Group Cyberspace Collaboration Centre (GCCC) provides a space for experts in cyber, digital and security to come together and share knowledge and learning on how best to defend against evolving threats. The centre is a multi-functional space for collaborating, brainstorming, workshops, talks, learning and tutorials, cyber exercising, incident management and more. It aims to encourage our cyber, digital and security experts to think and work differently, with our shared future foremost in mind.

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

SCOTTISH GOVERNMENT UPDATE TO HUNTERSTON SITE STAKEHOLDER GROUP – 6TH MARCH 2025

SCOTTISH GOVERNMENT RADIOACTIVE SUBSTANCES AND NUCLEAR DECOMMISSIONING POLICY TEAM

Review of Scotland's Higher Activity Waste Policy

We conducted our initial round of engagement with stakeholders last year and are currently considering the responses received before moving forward. Thank you to everyone who provided information or took part in discussions. There will be further opportunity to input as we move through the review process and we will provide further updates as this work progresses.

A high level summary of some of the main views received is included below;

- A number of stakeholders asked for clarity around particular areas of the policy including;
 - the interface between the revised UK Radioactive Waste Policy and SG Policy;
 - the interpretation of near-site;
 - what is meant by retrievability;
 - what will happen to challenging wastes that will not be suitable for near surface disposal, including reconsideration of our policy regarding geological disposal;
 - the definition of near surface.
- Include consideration of sustainability, value for money, intergenerational equity and waste management principles considerations;
- Updates in light of technical developments over the last 13 years;
- The idea that radioactive waste can be disposed of be rejected in favour of indefinite storage and development of another solution;
- Any process or activity that involves new or additional radioactive discharges into the environment be opposed;
- The policy of 'dilute and disperse' as a form of radioactive waste management (i.e. discharges into the sea or atmosphere) be rejected in favour of a policy of 'concentrate and contain' (i.e. store safely on-site);
- The principle of waste minimisation be supported;
- The unnecessary transport of radioactive and other hazardous wastes be opposed;
- Wastes should ideally be managed on-site where produced (or as near as possible to the site) in a facility that allows monitoring and retrieval of the wastes;
- the term higher activity waste is confusing due to its similarity with the term high level waste and should be phased out.

8th Joint Convention Review

We are involved with wider UK work being led by ONR on the 8th Joint Convention report for the International Atomic Energy Authority on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management, ensuring that Scottish policies and priorities are presented appropriately. The next review meeting is due to be held from 17th of March until 28th of March 2025. Dan Couldridge from the team will be part of the UK delegation attending the first week.

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, is being organised for Spring 2025. The meeting will cover a number of issues including progress across the three NDA sites in Scotland as well as the expanding NDA mission in Scotland with the future transfers of Hunterston B, Torness and the potential transfer of the Vulcan site from the MOD, for decommissioning.

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

The Environmental Authorisation (Scotland) Regulations 2018 (EASR 2018) are being amended to bring together all the permissioning arrangements for SEPA's four main regulatory regimes (Water, Waste, Radioactive Substances and Pollution Prevention and Control) into an integrated structure and under a single standardised procedure. As per previous updates to this group, these also include some technical updates to the radioactive substances provisions to make improvements from SEPA's experience of operating the regime since 2018.

The new regulations (Environmental Authorisations (Scotland) Amendment Regulations 2025) will now be laid on the 27 February 2025, with the coming into force date scheduled for 1st June 2025.

Diane Hamilton
Scottish Government