



Performance Report to DSG Site Restoration Sub Group

For the period 1st January – 31st March 2025

NRS Dounreay Delivery Business Key Points

NRS Dounreay has produced an updated 1-year plan based on annual funding of £212M for FY 24/25. This final funding amount included a small amount of additional funding compared to earlier expectations, allowing the site to progress on shaft and silo activities as well as bring forward decommissioning activities in high hazard facilities in the FCA. (For clarity – the final funding figure for 2025/26 is £221M).

Our regulatory return-to-routine plan continues to address the one Improvement Notice and two Enforcement Letters that remain open. Two Enforcement letters were closed during the period. We expect it will take around two years to return to routine regulatory attention level for safety (not before July 2026). This is to allow NRS Dounreay to demonstrate improvements for asset stewardship and EHSSQ capability development.

As part of the return to green for its site stewardship, the site will have delivered c.£12M of asset intervention during FY24/25 (up from c. £9m FY23/24). This will increase to c.£19M for FY25/26. Planned interventions have targeted building fabric (water ingress) and electrical distribution systems, but emerging issues have increased their scope to include steam and vent systems. Contingency work is complete, ensuring heating provision to “must do” areas using 4-packaged steam generators, with long term stabilisation scheduled for FY25/26.

Operational, Enabling and Programme Delivery Target Status

A detailed table of the status of our operational, enabling and programme delivery targets is attached as Appendix A.

- GKT2 (operational targets) is forecasting ‘Stretch – On Track’.
- GKT 2.1 (consignment of CHILW drums) has previously been reported ‘Completed at Stretch’ but included drums in storage for over 12 months. Planned consignment of the four CHILW drums from 1215 will allow this target to be achieved at stretch.
- GKT2.2 (consignment of RHILW drums) has achieved ‘On Target’. Achieving Stretch is dependent on recovery of the FCA crane (awaiting rail bolt).
- GKT 2.3 (consignment of HHISO containers) is achieved at stretch.
- GKT 2.4 (LLW diversion) is ‘Completed at Stretch’, taking the total to 63 tonnes consigned to date (revised down from 67.6T).

- Of our OKTs (enabling targets), OKT9 (key asset interventions) has recovered to 'stretch' in period and OKT3 (Asset Management Plans) to 'On Target'.
- OKT11 (transformation – effective spending) has moved from 'Unachievable' to 'At risk' through identification of cost avoidance previously delivered but not accounted against the target. All other OKTs continue to track as 'On Target'.

Programme Delivery Update

Reactors Programme

Legacy alkali metal waste storage improvements are progressing as planned with the short-term improvements now implemented. Position paper has been issued to ONR confirming the corrective work undertaken and the associated evidence in which to close out the enforcement action. ONR is currently reviewing the paper and plans to carry out a further site inspection in May before a final decision is made. Evidence of progress of the longer-term solution, that being a new store, is expected. This will be provided through the ongoing new store design work and agreement of a site group key target associated with physical preparation of the new store ground location i.e. demolition of a redundant structure termed DN026 to make way for the new store.

All infrastructure improvement activities, those being upgrades to the effluent treatment plant, PFR reactor hall roof and PFR 'glazed wall' replacement, are progressing as planned. Recent weather conditions have supported good progress being made on the outside works.

A business decision has been made to close out the current ventilation upgrade commercial contract due to significant forecast cost increases. The project will now review its future commercial strategy, and following the associated sanction approval, will seek a new contract for all site installation and commissioning work.

Breeder return-to-green plan progressing as scheduled. Several issues are now being managed to expedite return to operations and retrieve the next batch of fuel elements. An outage programme will be implemented later.

Fuel Cycle Area Programme

Following the successful achievement of GKT 1.6 (Cut and Core South Transfer Cell walls) in Q3, the D1217 team has levelled the floor of the cell to allow access for a crane enabling removal of 24 blocks to date in Q4.

The NDA/NRS Scabbler innovation project being run by the D1217 Project Team is continuing to make good progress with key control integration completed.

D1203 Vent Improvement Project: Phase 1 of the civil work has been completed, and the main power supply cables have been run from the substation.

Decommissioning of the Recovery Area within D1203 was successfully completed ahead of schedule (420 airline suit entries, 26 crates of bulk waste and 96 Low Level Waste drums consigned).

The building crane upgrade works within D1206 have successfully been completed and the crane returned to service. This is a critical enabler for the active filter change project.

The Steam Project team has successfully completed the works to return steam to the four key facilities identified at project outset, namely D1208, D2700, D1201 and D2001 with the provision of four new steam boilers.

Availability of electrical resource was flagged in the previous period as an issue across the programme, however there is an improving picture on this front (several trade vacancies filled and positive forward pipeline).

Balance of Site Programme

Shaft & Silo: The programme business case is drafted and will commence formal governance steps in June. Business cases are being written for the associated projects, and these will be submitted for sanction approval sequentially from April 2025 onwards (under current sanction).

Advanced Transition Works – Service Diversion Works Phase 1 materials were delivered to site and the Mechanical & Electrical Service Diversion 1 contract commenced.

Drum Handling – Remaining Factory Acceptance Tests (FATs) and integrated testing is progressing in accordance with test schedule.

DCPSE2: Quality risk assessment analysis, on schedule and cost, was completed and a full NDA business case to re-sanction the project to completion is being finalised before submission to Group Investment Committee in April. External roadworks were completed and works on drum handling crane and container crane testing and commissioning were progressed in period.

Non-Active Drains: Efforts focussed on updating key project documents and establishing the business justification. The mechanical, electrical and instrumentation supply and installation was issued for tender and the returned bids evaluation completed which has enabled a preferred bidder to be identified pending contract award.

D1432 Boiler House: Bund construction commenced with shuttering and blinding concrete base placed. Rebar fixing was completed and main concrete pours now underway. Engineering substantiation reports and supporting calculations were updated for final approval.

D1310 Labs Upgrades: Supply of Fume Cupboards - all deliveries were completed, and the certificate of completion has been issued.

Commercial

We informed GDES, Morson and Nuvia that we will not extend or renew the Decommissioning Operative Framework contract when it expires at end of FY25. Communications have also been issued to local stakeholders (including Chamber of Commerce) and the workforce. Approx. 80 people will transfer to NRS upon completion of existing contracts.

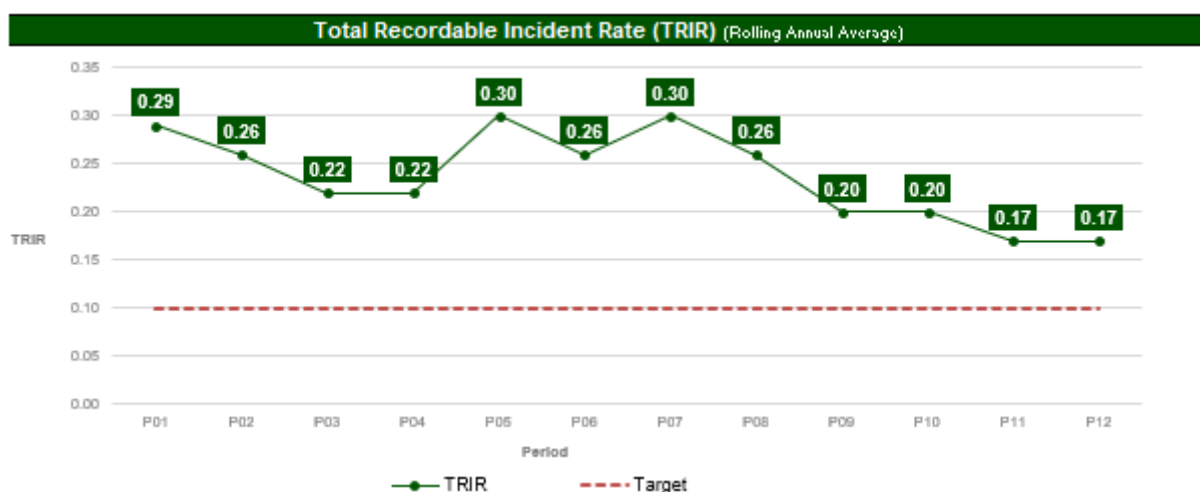
EHSSQ Performance

The NRS Dounreay total recordable incident rate (excluding CNC) has improved to 0.17. In this reporting period we have had one RIDDOR (reporting of injuries, diseases and dangerous occurrences regulations) reportable injury:

- RIDDOR event - An NRS employee was diagnosed as having a reportable occupational disease under RIDDOR on 27 January 2025 by Dounreay OHD, relating to use of gloves.

On 6 February, during equipment removal from the laundry, a load fell from a pallet truck. One person sustained a minor injury. A full investigation was carried out and the findings shared with ONR. Actions are being implemented.

The below table covers the period up to the end of March 2025.



ONR Regulatory Enforcement

NRS Dounreay regulatory return to routine plan continues to address the 1 x improvement notice and 2 x enforcement letters that remain open. Two enforcement letters were closed

during the period. There is still a lot of work to do and this is recognition from ONR that we are addressing the issues.

Control of High Hazard Non-Nuclear Activities Enforcement Letter (Sodium Tank Farm Fire: June 2022, (ONR-EL-22-010)) – ONR confirmed in writing 17/12/2024 NRS Dounreay has complied with the points from the enforcement letter and consider that further monitoring of the implementation of these arrangements can be done through normal regulatory interactions. Regulatory Issue RI-10834 has now been closed. [Closed]

Building Weathertight Integrity and Heating Enforcement Letter (ONR-EL-23-045) – ONR is content that NRS Dounreay has made substantive progress improving arrangements for building conditions and agreed that the intent of RI-11876 has been addressed. The correction of all the known asset issues will be a prolonged activity and will be monitored by ONR via normal regulatory business and ONR enhanced regulator attention focus on site. [Closed]

Alkali Metal Storage Improvement Notice – The implementation project is working on an interim storage solution, completion expected 2026, with final closeout planned for June 2025. ONR are very happy with the monthly progress reports. [Ongoing]

Control of the risk presented by Dangerous Substances and Explosive Atmospheres Regulations Enforcement Letter (DSEAR)– Hazardous substances assessment process has been delivered with assessments due 30/09/2025. Building on success to date, DSEAR capability growth needs to be addressed in the next 9 months through staff and leadership training. Two new specialist roles have been recruited, a DSEAR sprint week completed and the ONR March intervention recognised the great progress made with closure extension agreement to 31/12/2025. [Ongoing]

COMAH Lower Tier – Level 3 Regulatory Issue Enforcement Letter – Working Group continues with external SME resource contract in place. Public information submission delivered 31/08/24 and Major Accident Prevention Policy (MAPP) developed and COMAH SQEP capability plan delivered 20/12/24. Two new specialist roles have been recruited, a COMAH sprint week completed and the ONR March intervention recognised the great progress made with closure extension agreement to 30/09/2025. [Ongoing]

AFNOR Audit

As reported previously, in December 2024 AFNOR completed a surveillance audit against ISO 9001, 14001 and 45001 standards with a major non-conformance with regards to COSHH adherence. AFNOR carried out a follow-up intervention in March 2025 and reduced the non-conformance to minor.

SEPA Regulatory Actions

The NRS Dounreay environmental total recordable incident rate has increased to 0.04 from at 0.00 throughout the reporting period due to SEPA confirming two non-compliances in relation to the D2001 Carbon Bed Filter event against conditions A7.1 (You must take samples and conduct measurements, tests, surveys, analyses, and calculations as

necessary in order to ensure compliance with your authorisation) and G1.2 (You must ensure that any radioactive waste you dispose of is only disposed of in the manner described in your authorisation).

All permits/authorisations remain in “good status” except for the site radioactive substance EASR permit which continues to be “at risk”. This is a consequence of recorded non-conformance with arrangements.

Return to Compliance – SEPA has notified that NRS Dounreay has returned to compliance with condition A.4.1 (true, accurate and legible records that ensure and demonstrate compliance with the requirements of your authorisation) in relation to Tritium Discharges from D115 at DFR.

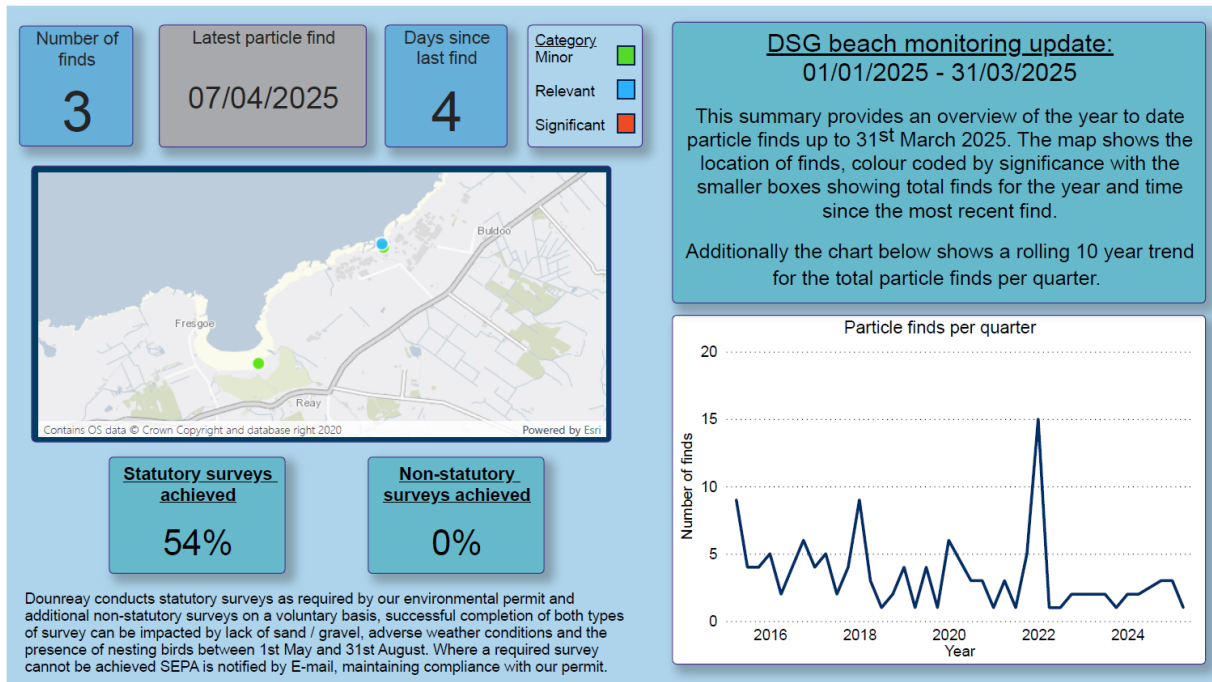
NRS Dounreay has carried on self-monitoring and has notified SEPA of two potential non-compliances.

- Minor over-reporting in the September 2024 monthly report of discharges, established and notified in January 2025
- Defects on a redundant extract duct which is part of the ventilation system connected to the FCA South Stack
- **SEPA Inspections** – In February 2025, SEPA carried out an inspection covering the Nuclear Baseline, vacancies, compliance and investigation action management. The outcome was positive and SEPA stated they have confidence that NRS Dounreay has a robust resource methodology and plan

Onshore Monitoring of Radioactive Particles

All information and updates can be found on the Dounreay environmental monitoring website at:

<https://www.gov.uk/government/publications/onshore-monitoring-of-radioactive-particles>



Success stories

- Graeme Dunnett was awarded an MBE in the King's New Year honours list for services to the nuclear industry
- Five business administration apprentices were awarded their Modern Apprenticeship completion certificates
- Dounreay Gender Balance Network held its eighth anniversary event in March. The theme was 'Accelerate action' with a reflection on past progress and looking forward
- Dounreay won 3 NRS Excellence awards which reward and recognise the work being delivered across the business. The winners were:
 - EDI/Mental Health: Jackie King
 - Collaboration: Dounreay/Sellafield collaboration project team
 - NRS Excellence Team Award: Dounreay D1217 team
- Publication of Dounreay's annual socio-economic review 2023/4 and launch of Dounreay's socio economic impact strategy 2025/26 to 2027/28
- Applications opened for 23 apprenticeships, with a start date in August. We are also recruiting 9 health physics surveyor trainees and have 15 places this year for graduate recruitment

Appendix A - Operational, Enabling & Programme Delivery Target Status

Appendix 1 - Target status as of Period 12 (End of March 2025)										
Please note that all of these target status are currently being Audited and are subject to change.										

