

Dounreay Site Stakeholder Group

Site Restoration Sub-Group



Consultation on Environmental Performance Assessment Scheme

SEPA is currently consulting on its proposed replacement to the 2009 – 2019 Compliance Assessment Scheme. The consultation remains open till 30 June 2025, further details available on SEPA's website at the link below;

[Environmental Performance Assessment Scheme | Scottish Environment Protection Agency \(SEPA\)](#)

Site Inspection Work & EASR Compliance

During the reporting period SEPA has engaged regularly with Dounreay on matters relating to ongoing projects including Waste Management, FCA decommissioning and the Shaft & Silo Waste Retrieval Project.

In February SEPA undertook a compliance inspection of NRS-Dounreay's adequacy of resources and found the site to be in compliance with the requirements of EASR.

In respect of the D2001 Carbon Bed Filter (CBF) SEPA has recorded Dounreay as non-compliant with EASR conditions A.7.1 due to the failure to identify the leak from CBF in a timely manner and G.1.2 due to the unauthorised disposal of radioactive liquid waste resulting from the leakage. Further work is required to assess compliance with Conditions B.5.2 a & b which relate to the need to use BPM to remediate any resulting contamination and to carry out that remediation as soon as reasonably practicable. Dounreay have provided SEPA with a timescale for undertaking stage one of that work programme which SEPA are considering.

In August 2024 NRS-Dounreay notified SEPA of the potential discharge of very low levels of radioactivity from the D1401 sump to the environment via the non-active drain system, which may have resulted in NRS being non-compliant with Standard Condition G.4. Dounreay subsequently advised the discharge from the D1401 sump had been routed to the Low Active Drain shortly thereafter. Dounreay advised a flow meter would be installed in the current interim pumped discharge line from the D1401 sump to the LAD duct and through sampling and flow rate data collection would confirm the compliance status by the end of the year (2024). Dounreay installed the required flowmeter in late January 2025. Based on the limited data available the site has been unable to demonstrate compliance with Standard Condition G.4.1 which allows for prescribed small quantities of liquid waste to be disposed of via sewer, river or sea. As a result, the site was recorded as non-compliant with Standard Condition G.1.2 which requires waste only be disposed of via an authorised route as described in the site's authorisation. It should be noted that by virtue of redirecting the discharge to the Low Active Drain the site returned to compliance with the requirements of Standard Condition G.1.2 in August 2024.

Variation Application

SEPA determination of the EASR permit variation application from NRS-Dounreay to make changes to the list of authorised gaseous outlets and remove a specified waste transfer route remains ongoing. The application does not request any change to current discharge limits.

Low Level Radioactive Waste Facility

SEPA continue to engage with the LLWF team on a regular basis and are content that the facility continues to operate in a compliant manner.

Progress continues with the determination of the application to vary the site permit.

Non-Nuclear Site Regulation

SEPA continue to engage with Dounreay in relation to the new Non-Active Drain System.

In March 2025 SEPA officers undertook a compliance inspection on the waste management licence WML/L/1095876. The site was assessed as compliant.

In March 2025 Dounreay discussed applying for CAR registrations to abstract groundwater from sumps at D1208 and D1213.

Vulcan

SEPA continue to engage with Vulcan on updates to its gaseous discharge records and underpinning evidence to support the data. Engagement has taken place in relation to the revised LoA, which is being updated to reflect the requirements of EASR.

In April 2025, following a Vulcan internal review, and after discussions with Vulcan, SEPA visited the Vulcan site to engage with the operators and took the opportunity to carry out compliance inspections on several authorisations. These have all now been assessed as compliant.

Vulcan Non-Nuclear Site Regulation

CAR/S/1186536 – Boiler Blowdown discharge – It was reported that the annual condensate discharge had been discharged out of an incorrect point for several years and no flow data had been recorded for this. This has now been corrected. In addition, accidental pressing of an emergency stop button in January 2025 caused no flow recording for 24 hrs. Steps were put in place to ensure this could not be accidentally pressed in future. There has been no environmental impact due to these errors. It is anticipated that Vulcan may apply to increase their discharge volume slightly which will require a variation.

CAR/L/1001963 – Sewage Discharge. There have been ongoing issues with the flowmeter, and this was fully replaced in March 2025. Vulcan have also raised a modification to install alarm telemetry on their emergency overflow as this was not in place previously.

CAR/S/1186549 – DSMP Cooling Towers discharge – no issues identified.

WPC/N/60609 – Demin Plant discharge – no issues identified.

Vulcan intend to apply for a MCP (Medium Combustion Plant) permit by 30/4/25 for their site boilers.

Stewart Ballantine
Radioactive Substances Unit

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