



ONR Site Report

Nuclear Restoration Services Ltd – Dounreay

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Report for period: 1 January – 31 March 2025

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Approved by: DFW Deputy Delivery Lead

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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 for the Dounreay Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/ilc/>).

Site inspectors from ONR usually attend Dounreay 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

ONR site inspectors made inspections on the following dates during the reporting period 1 January to 31 March 2025:

- 28 to 30 January 2025
- 4 to 6 March 2025
- 12 March 2025
- 18 to 20 March 2025

2. Routine Matters

2.1. Inspections

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

- the Energy Act 2013;
- regulations made under the Energy Act 2013, for example the Nuclear Industries Security Regulations 2003 and the Nuclear Safeguards (EU Exit) Regulations 2019;
- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- 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 legal compliance. 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 Dounreay covered the following:

- Decommissioning arrangements, focusing on Dounreay's Life Time Plan (LTP) and its implementation. This inspection has closed out a longstanding regulatory issue with site associated with lack of an achievable decommissioning plan as sought via Licence Condition 35.
- Compliance with fire safety legislation, this inspection identified issues with the control of acetylene on site which was promptly addressed by NRS Dounreay.
- Compliance with Control of Major Accident Hazards (COMAH) Inspection, this inspection considered that Dounreay is continuing to develop their arrangements to control major chemical accident hazards, as sought by the COMAH legislation.
- Cyber security and site security culture interventions.
- Physical inventory take evaluation and waste characterisation inspections for nuclear material safeguarding purposes.

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at [Publication search | Office for Nuclear Regulation \(onr.org.uk.\)](https://www.onr.org.uk/publication-search) on our website www.onr.org.uk.

In addition:

- ONR agreed to the close out of a regulatory issue relating to the storage and build-up of redundant chemicals within facilities at Dounreay. Dounreay have reported that they have reduced their holdings of legacy chemicals by 70% from 2024 levels and are still reducing their inventory.
- ONR agreed to the close out of a regulatory issue associated with NRS Dounreay processes for managing building heating and water tight integrity. Dounreay has shown they have a comprehensive approach to understanding the conditions of their buildings and recording identified defects. Work is still required to address all known defects, this will be considered via ongoing regulatory business with site.
- ONR remains informed of all major site activities that may affect nuclear safety, security and conventional health & safety and continues to undertake proportionate assessment activities necessary to support the release of regulatory hold-points placed on a number of the projects on site.

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

2.2. Other Work

The ONR site inspectors continue to conduct formal quarterly reviews of the site's progress in delivering a number of agreed improvement activities. This includes:

- Development of arrangements to control major chemical accident hazards, as sought by the COMAH legislation
- Asset management arrangements
- Alkali metal storage and disposal arrangements
- Electrical safety
- Asbestos management and safety
- Establishing appropriate waste routes for hazardous waste materials
- Reporting and investigation of incidents and organisational learning

During the reporting period ONR site inspectors held meetings with safety representatives to support their function of representing employees and receiving information on matters affecting their health, safety, and welfare at work.

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.

Within this period Dounreay has reported the following events to ONR:

- On 29 January 2025 operators tried to gain access to the gamma calibration facility and found the access door lock engaged. The door lock is linked to a gamma detector on the back wall. The monitor linked to the door interlock was recording a radiation count. A colocated monitor was reading background and none of the other parts of the system were engaged, therefore, the operators were confident that the source was not exposed. Dounreay followed their design modification process to regain entry to the facility. They were able to use an extended health physics probe to confirm that there were no elevated levels of radiation present. The detector that was linked to the door interlocks was replaced with a similar model. I consider that Dounreay responded appropriately to the event and no further regulatory follow up is therefore required.
- For a period in early February 2025 Dounreay reported there was insufficient available "On Call" radiation protection advisors to meet NRS Dounreay Site Emergency Arrangements as required under licence condition 11 (LC11). Dounreay has revised its emergency arrangements to reflect its current capabilities. I consider that Dounreay responded appropriately to the event, and further engagement with NRS Dounreay is planned to further understand the availability of radiation protection advisors to support the business.
- On 6 February 2025 members of the NRS Dounreay transport team attempted to remove a small items monitor from the laundry facility. The small items monitor weighed approximately 1900 Kg. Whilst manoeuvring the monitor it toppled over, directly towards another employee not related to the task. The other employee narrowly avoided the falling object and only sustained minor injuries. A site investigation has been submitted to ONR. ONR is considering the event through our enforcement management model.

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. In addition, inspectors may take a range of enforcement actions, including issuing an enforcement notice. Within this period ONR has not issued any permissioning or enforcement notices.

5. News from ONR

For the latest news and information from ONR, please read and subscribe to our regular email newsletter 'ONR News' at [Latest news | Office for Nuclear Regulation \(onr.org.uk\)](http://www.onr.org.uk/latest-news).

6. Contacts

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