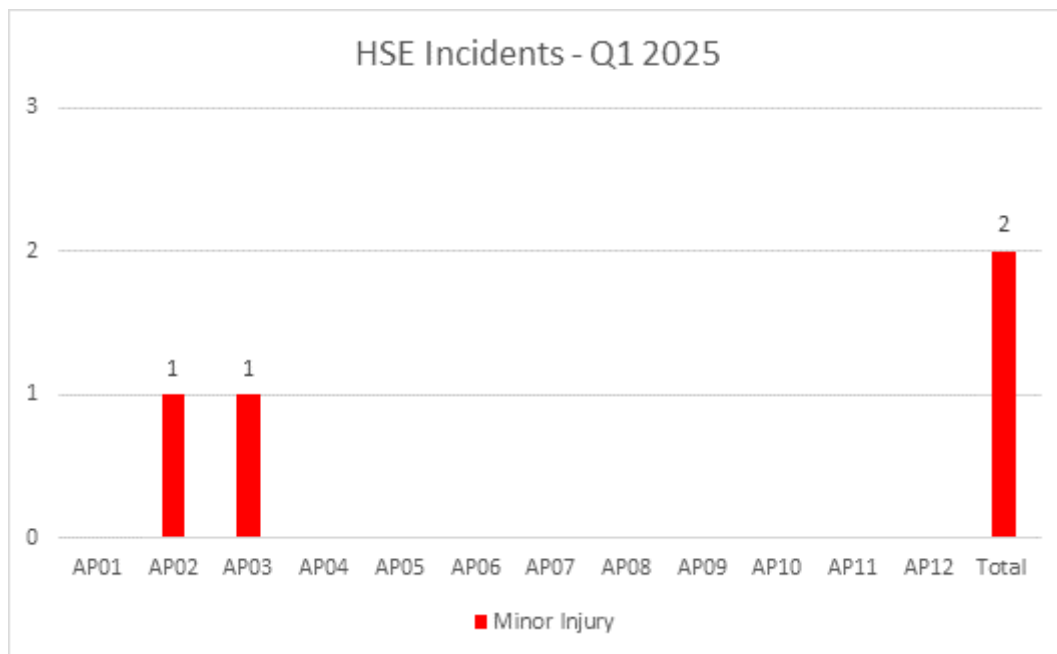


VULCAN NRTE Report to the DSG – April 2025**Health and Safety**

Since my last report to the DSG subgroup in January, Vulcan hasn't had any lost time accidents, but unfortunately, we have had 2 minor injuries. Although we prevent access to certain areas of site during high winds where, due to the disposition of the buildings, the wind is stronger than the general prevailing conditions (choke points), an employee was knocked over by a wind gust, sustaining minor injuries to a hand and knee. This person was assisted by a first aider, but no treatment was required, and the employee returned to work. Also, although the weather conditions were benign at the time, an employee slipped on a path and sustained a minor injury to their knee. The path was gritted, signs erected, and subsequently power washed.

Please note that this graph is taken from a Rolls-Royce management system and AP stands for Accounting Period; with AP01 effectively aligning with January, AP02 aligning with February, so forth.

Environment

As reported previously, in February we identified that the site sewage effluent flowmeter had experienced a defect due to rodent intervention, which meant that we were unable to record the volume of sewage discharged from site. Although we were unable to record the flow volume during this period, we were able to demonstrate, through historic records and knowledge of freshwater consumption, that the discharges remained within the permitted limits. As has been relayed to the group previously, we have been working on upgrading the sewage flowmeter – this package of work recently came to fruition, with the installation of the upgraded flowmeter during the week commencing 10 March. The new flowmeter includes an email capability to allow constant monitoring of effluent flow volumes and the alerting

of key staff in the event of a fault on the flowmeter. It is intended that this email alert will allow prompt response to any flowmeter failures, like those briefed to the DSG over the last few years. An additional package of work is in progress to add a similar email notification to the sewage emergency overflow.

Work continues to resolve the other non-conformances discovered during the internal review of the conventional discharge permits. A site design authority report is in production which will advise on updates that can be made to the licenses, for example; the correction of grid references and changes to discharge limits (with agreement from SEPA).

During a separate review of the site boiler arrangements it was determined, through engagement with SEPA, that our site boilers do not qualify for an exemption to the Pollution Prevention and Control (Scotland) Regulations 2012 as we were previously advised. This has been discussed with SEPA and it was agreed that we can continue running the boilers until they are shut down for the summer to maintain workplace conditions for staff. It is our intention to apply for a PPC Permit by 30 April and have a new permit in place before the boilers are switched on for winter 25/26.

Radioactive Waste Disposal

There have been no challenges to the Approval of Arrangements (AoA) limits during this period.

At the end of March 2025, the annual rolling discharge (expressed as a percentage against the maximum detailed in the SEPA letter of agreement) was:

	Type	Percentage
Gaseous	Noble Gases	0%
	Other radionuclides not specifically listed, taken together.	2.1%
Liquid	Cobalt 60	0.01%
	All other radionuclides not specifically listed, taken together.	0.02%
	Tritium	0%
Solid	No of Drums sent to date	89 Drums

Vulcan continues to transfer drums containing solid Low-Level Waste (LLW) to Dounreay with 36 drums being transferred in February. A further waste assay campaign has also been completed.

Work continues to: (a) produce a new reporting tool, (b) review the gaseous discharge sampling methodology, and (c) review and correct historic discharge records. The first formal update to SEPA was completed at the end of March, with the next due at the end of June. In addition to the existing contract for (a), contracts have been awarded for (b) and (c) and raw data has been provided to the contractor for (c). A further update is planned to be provided during a planned SEPA visit in May to discuss the new EA(S)R 18 permit (to replace our current RSA 93 style).

Site Programme

The recent parliamentary announcement confirming that site operations will continue to at least April 2027 was most welcome. This allows Vulcan to continue to provide valuable work in support of the submarine enterprise. Operations continue to schedule, and we are once again in a data collection phase. However, we also continue to develop and commission new capabilities that are required at a later date.

Events

Since the last meeting, no events have occurred that required reporting to DNSR or ONR, in accordance with their **mandatory** reporting criteria.

Emergency Arrangements

Following the informal engagements last year, the formal process for the planning of this years' nuclear emergency demonstration, LONESTAR 25, has commenced. It will be a combined Level 1 and Level 2 demonstration, and so close co-operation is being maintained with NRS Dounreay and the Highland Council. In preparation for the Level 1 exercise, a tabletop exercise was recently held.

Regulatory Inspections / Audits

On Thursday 03 April, Vulcan hosted a visit from the local SEPA Environment Protection Officer. The focus of the visit was site familiarisation, inspection of the site discharge licenses, and discussion on the non-conformances identified in recent months, and the outcome was positive.

During this reporting period, there have been no regulatory inspections with DNSR. However, DNSR visited site to witness the tabletop exercise. The primary purpose for this was to bring a 'stand-in' inspector up to speed on our emergency arrangements. Unfortunately, our designated Site Inspector will not be available to assess the Level 1 demonstration.

The planned Fire Safety inspection with ONR due this period has been delayed. Welcomingly, the Defence Fire Safety Regulator has recently announced that they will be attending site in September to conduct an inspection.

Vulcan Decommissioning Programme

The Site continues with the hazard reduction programme, identifying and removing redundant equipment from site. A large (specialist) bandsaw that was used for a project several years ago has been identified as suitable for the Submarine Dismantling Project at Rosyth, and will be transferred later this year, after test cuts have been carried out.

The recent parliamentary announcement does not impact on the good work of the joint Saltus project team, who continue to work towards site transition.

Other

March was prostate cancer awareness month, and the people at Vulcan took part in a bake sale and raised over £750 for Prostate Scotland.

I Walker
Commander Royal Navy
Naval Superintendent Vulcan