Winfrith Site Stakeholder Group

Date: Tuesday, 18th November 2025
Time: Refreshments 13:45hrs, meeting starts 14:00hrs
Location: Winfrith Village Hall, Winfrith Newburgh, Dorchester DT2 8LR

AGENDA

1.	Welcome and Introduction (Chairman)	Barry Quinn (10)
	(a) Apologies for absence	
	(b) Minutes of the previous meeting and matters arising	
2.	NRS Winfrith Site Report – Site Director	Gary Reid (15)
3.	Nuclear Decommissioning Authority	Alastair Findlay (10)
4.	Regulators:	
	(a) Office for Nuclear Regulations (ONR)	Graham Simpson (10)
	(b) Environment Agency (EA)	Rebecca Cleverley (10)
5.	Project Update	
	(a) Update on end state proposals and applications	Ellanor Joyce Jo Hodgson (15)
6.	Any Other Business	Barry Quinn (10)

Chairman: Barry Quinn
Communications Lead: Bethany Sear
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Date of issue: 04/11/2025

WINFRITH SITE STAKEHOLDER GROUP (SSG)

Tuesday 13 May 2025

Winfrith Village Hall

Meeting reference SG35

Attendees:

Nic Johnson	Vice Chair and representative of Winfrith Parish Council
Will Matheson	NRS – Regional EHSS&Q Manager
Rob Coan	NRS – Winfrith Site Manager
Andy Philps	NRS – Programme Delivery Manager
Bethany Sear	NRS – Harwell & Winfrith Site Communications
Debbie Paterson	NRS – Minutes
Alastair Findlay	NDA Head of Regional Affairs
Elly Joyce	NRS – Site End State Manager, Harwell & Winfrith
Stuart Clark	NRS – Property Manager
Rebecca Cleverley	Environment Agency (EA)
James Heavingham	Environment Agency (EA)
Ian Jackson	Tradebe
Mark Graham	Tradebe
Jack Inman	Dorset Wildlife Trust
David Cobb	Cobb Framing
Fiona Bowles	Resident

Apologies for absence – Barry Quinn (SSG Chair), Gary Reid (NRS), Graham Simpson (ONR), Alister Wintle (Environment Agency) and Bill Hamilton (NRS).

1. Welcome and Introduction – Nic Johnson

Nic Johnson welcomed attendees to the meeting.

- Apologies received from Barry Quinn who was unable to attend today's meeting due to a personal commitment.
- Condolences were expressed to Sandra Ellis, the previous SSG Chair on the sudden passing of her husband, Trevor.
- In preparation for today's meeting, the event was publicised on local community Facebook pages to encourage representatives to attend. The East Lulworth Community Facebook administration had decided that the meeting was not of interest to residents and subsequently removed the information.
- The SSG Chair/Deputy Chair continue to receive regular updates both in person and via Teams. On the 25 April 2025, the SSG Chair and Vice Chair attended a meeting at site which included a briefing on the work carried out at Dragon followed by a tour of site.
- The Chair and Vice Chair had attended a number of Teams meetings which focused on budgets and an independent SSG review. Initially, the news regarding Government budget cuts on decommissioning would have had an

impact on SGHWR, however after a period of lobbying additional funds were allocated to ensure the project remains on track.
- Lloyd Hatton, MP for South Dorset visited site on the 14 February 2025.
- The next SSG/NDA Chairs meeting would be held in July 2025 in Manchester. The limited travel options available from Dorset had been acknowledged and future meetings would be held in Birmingham.
- The Chair and Vice Chair attended an online forum in March 2025 to discuss the NDA independent report of the SSG. The common thread among SSG chairs is that the meetings should be completely independent and not appointed by the NDA or other organisation.

Minutes of last meeting

The minutes were accepted as a true and accurate record.

A copy of the organogram displaying the relationships between Contractors, Regulators and areas of responsibility/ownership requested at the previous meeting had been produced. Site Stakeholder Groups

2. NRS Winfrith Site Report - Will Matheson

Will Matheson introduced himself to the meeting. Updates were given on the following:

Health, Safety, Security, Environment & Quality Safety
Site Operations - Current Work Programmes
- SGHWR reactor decommissioning.
- DRAGON reactor decommissioning.
- Waste – processing / consignment / legacy waste reduction.
- Plant and Structures – ALES operations and Decommissioning.
- DASA – Autonomous Security System trials.
- Thorium Project – Encapsulation trials.
- Asset Care – ALES Fire detection upgrade, Main Gate reconfiguration (re-design) and roof / gutter repairs to building A544.

SGHWR
- Engineering effort currently focussed on underpinning design opportunities.
- Structural alterations continue within the facility with further penetrations having been cut and floors removed to allow for plant installation for Core Segmentation.

Mini-MILWEP
- Intermediate Low Level Waste (ILW) produced is packaged into concrete boxes and cemented ready for transport to Harwell for future disposal. Currently forecast to be delivered by the end of 2025.

DRAGON
- Dragon is currently in the process of remotely removing the core of the reactor using a robotic arm and laser cutter.

Plant & Structures (P&S)
- Sea Pipeline Decommissioning project currently paused due to funding reprioritisation.
- A42/44 old fire station demolition completed.

- A511 ALES – Demolition completed.
- Blacknoll Reservoir – Pre-planning application for demolition had gone through process and full planning application is in preparation stage. Schedule for demolition subject to funding priorities before Winter 2026.

Other
- Recruitment for 2025 under review. 3 apprentices completed April 2025 – now transferring to post (1 x electrical / 2 x mechanical from 2021 cohort). 1 x Project Management (Level 6 / degree) apprentice (joined 2024 / 4-year apprenticeship),
- 3 x Health Physics Monitor apprentice vacancies recruitment currently underway.
- Recent site visits include: 10 graduates from the NRS fleet visit to SGHWR and a visit by Paramedic Operation Officers from South-Western Ambulance Service to carry out a deep dive into our First Aid arrangements.

Demolitions
- Winfrith Fire Station, Telephone Exchange and SECC and A51.1 structures and garages.

DASA – Autonomous Security System Trials
- Supplier innovations are deployed onsite.
- Mid-trial showcase with government bodies on the 25 / 26 June 2025 where suppliers will demonstrate their innovation capabilities to a range of Government stakeholders.

Sustainability
- Solar hybrid generators installed to provide power to four projects operating Supplier innovations are deployed onsite.
- A series of nature walking routes would be mapped out so staff can enjoy the diverse array of plants and animals onsite during their lunchtime walks.
- Surplus timber had been repurposed into picnic benches to provide seating on newly established nature walks.

Magnox Socio-economic Funding Support 2024-2025
Winfrith funded projects 2024/2025 to date as follows:
- Good neighbour - 2 projects totalling £2,364.46
- Tumbledown Farm - £85,000
- Dorset Wildlife Trust (Multiyear project) - £26,910.00

For further information please go to:
NRS working with our communities - GOV.UK (www.gov.uk)

Dorset Wildlife Trust - Heathland Heritage Traineeships
The Dorset Heathland Heritage Traineeships project provides training and work experience in the countryside management sector for six young people local to the NRS Winfrith area.

- The set up of 18 volunteering tasks for the local community.
- 900 hrs of volunteering time created.
- 4 trainees recruited – one who has entered full time employment after training.
- 30 different activities have been created to engage local community.

Questions?
On a previous visit to site, the question was raised as to whether any hazardous substances are discharged via the pipeline to Arish Mell. It was explained that when

the pipeline is decommissioned it would be cut into sections, transferred to the Winfrith site for cleaning, encased and sent to Harwell for onward disposal.

Q1: If the pipeline is left in situ is there a risk of contamination to the land and why is the pipeline cleaned?
A1: Discharges of radioactive material from either the stack or via the pipeline are done so in strict accordance with the permit issued by the Environment Agency. Cleaning of the pipeline would be carried out in order to comply with regulations. Any work carried out would be undertaken under strict controls with nothing prejudicial to members of the public or the environment.

Q2: When will End State be achieved?
A2: End State is expected to be achieved between 2036 – 2040 subject to funding.

Q3: The earlier video provided an overview of achievements over the last 12 months but does not include an insight against programme delivery timescales or the impact of government budgets/funding. Would it be possible to include this information in future meetings?
A3: The Site Progress summary provides a snapshot of the targets for the financial year, and the progress made. A more detailed explanation could be made available in order to provide a bigger picture.

Q4: If low level radiation is present in the pipeline, can it not be sealed and left in place as opposed to removal, which would be a more disruptive option?
A4: A good question. Various optioneering studies had been carried out in 2020. At that time, removal of the pipeline was considered the best option. The project is currently paused. Further updates would be provided via forums such as the SSG as and when the project progresses.

3. Update on Dragon Decommissioning Work - Andy Philps

Andy Philps, Programme Delivery Manager, provided a presentation on the Reactor Core Decommissioning, dismantling the reactor core using Laser cutting technology. A copy of the presentation can be found by clicking on the link.
Site Stakeholder Groups

4. NDA Report - Alastair Findlay

Alastair Findlay provided a short presentation celebrating the 20th year anniversary of Nuclear Decommissioning and strategic milestones.

The NDA Report had been issued prior the meeting and can be found by clicking on the link. Site Stakeholder Groups

5. NRS Corporate Update - Bill Hamilton (not in attendance)

Bill Hamilton submitted his apologies for the meeting. An NRS Corporate update will be provided at the next meeting.

6. Regulators

6a. Office for Nuclear Regulation (ONR) - (not in attendance)

The ONR Report was issued prior the meeting and can be found by clicking on the link. Site Stakeholder Groups

6b. Environment Agency (EA) - Rebecca Cleverley and James Heavingham

Apologies received from Alister Wintle who was due to attend today's meeting.

- Alister Wintle would be replaced by Rebecca Cleverley as the new Site Regulator.
- Solid Waste Management inspection on 04 June 2025 covering environmental monitoring and characterisation.

James Heavingham would lead the Winfrith Permit Variation to vary Radioactive Substances Regulation application submitted in December 2024 as Permit Project Manager. A high level review of the application would be conducted. The first public consultation would be held on the 03 June 2025 and would allow members of the public and other stakeholders to examine NRS's proposal and comment. The consultation period would last for 12 weeks.

The EA Report had been issued prior to the meeting and can be found by clicking on the link Site Stakeholder Groups

7. Project Update - Update on end state proposals and applications - Elly Joyce

Covered as part of the earlier discussions.

8. Any Other Business - Nic Johnson

Nic Johnson thanked attendees for their participation.

He commented that it can be difficult to fully understand some of the terminology around the various discussions.

Rebecca Cleverley (Environment Agency) referred to the 'Radioactivity in Food and the Environment 2023' which is published on the GOV.UK website which provides lots of useful information and explanation around radiation. A copy of report can be found by clicking on the link below.
https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports

Date of Next Meeting – 18 November 2025

NDA Update for Winfrith

November 2025

Contents

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

Government Update

The Government Spending Review process informs decisions on public spending. NDA group funding is made up of the funding we receive from Government and the income we generate. We have already communicated on NDA group funding for 2025/26 which at just over £4bn includes increased Government funding, demonstrating significant public investment in our nuclear sites and facilities though this will not be without challenges.

We have now been advised of our allocation for 2026/27 through to 2029/30 from our Government sponsoring department, the Department for Energy Security and Net Zero (DESNZ). This gives the NDA long term visibility of our Government funding to the end of the decade.

Despite funding challenges, we're focused on our nationally important mission to ensure the safe and efficient decommissioning of the UK's nuclear legacy, with much to deliver, including a Geological Disposal Facility (GDF), which remains government's policy for the long-term storage solution for the most hazardous radioactive waste. Additionally, we are preparing for the transition of the Advanced Gas-Cooled Reactors (AGR) into our group for decommissioning, thereby expanding our responsibilities and scope. Our role in new nuclear initiatives remains important, highlighting our part in supporting the UK's energy security and sustainability goals.

Outreach activities

David Peattie, NDA Group CEO, Clive Nixon, Group Chief Nuclear Strategy Officer, and Holly Cresswell, International Relations Manager, represented the NDA at the recent UK-France Civil Nuclear Seminar. The event brought together senior figures to explore future collaboration between the UK and France in civil nuclear with panel sessions considering:

- Building a Workforce for the Future
- Ensuring a Responsible Nuclear Legacy
- Preparing for European Ambitions: Advanced Modular Reactors and Research

A key discussion point included the critical role of international collaboration in delivering our mission, particularly in tackling shared challenges in decommissioning, dismantling, and waste management. Whilst a key takeaway was the value of our partnerships—especially the knowledge exchange through Nuclear Waste Services (NWS) on radioactive waste and geological disposal. These relationships help us

strengthen our technical capabilities and deliver more effectively for the UK public.

We also reaffirmed our long-standing cooperation with the French Alternative Energies and Atomic Energy Commission (CEA), agreeing to deepen collaboration on decommissioning and waste management—areas central to our work.

The nuclear industry has marked three significant anniversaries as His Majesty the King met with members of the Nuclear Decommissioning Authority (NDA) group in Caithness Scotland, during his annual visit to the region. The visit recognised the NDA group's progress in its national mission to safely decommission the UK's earliest nuclear sites, and its long-standing contribution to sustainability and economic development in the region and across the UK.

The visit coincided with the NDA group marking several significant milestones including the 20th anniversary of the NDA and 70 years for NRS Dounreay, which has been an enduring presence at the heart of the Caithness community. This year also marks 50 years for Pacific Nuclear Transport Ltd (PNTL). Founded in 1975, PNTL is the world's leading maritime nuclear transporter and part of NDA subsidiary, Nuclear Transport Solutions (NTS). The King also viewed the Pacific Heron, part of the PNTL fleet of ships designed to safely transport nuclear materials around the globe.

Engagement priorities for 2025

As you are aware, the consultation on the NDA draft **Strategy 5** was launched on 7 August and closed on 29 September. 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. Now the consultation has concluded we are analysing comments with the final document expected to be published in March 2026.

Publications, public service and policy updates

The NDA Annual Report and Accounts 2024/25 sets out the progress we're making against our mission, from safely decommissioning existing sites to preparing to take responsibility for more, while managing radioactive waste for our existing programme and new nuclear.

As we mark our 20th anniversary, this year's report reflects a strong year of delivery across the NDA group with continued progress on our mission: safely decommissioning our sites, managing radioactive waste, and preparing to take on new responsibilities.

Key highlights from the last 12 months include:

- Sellafield is now removing waste from all four legacy ponds and silos; a major milestone in hazard reduction.
- Nuclear Waste Services is progressing with final capping at the LLW Repository.
- Visible skyline changes across the estate, including the demolition of Sizewell A's turbine hall.
- Ongoing work to identify a suitable site and community for a Geological Disposal Facility.
- Innovation in action: sail trials for NTS ships and autonomous security systems at Winfrith.
- Preparations continue for the transfer of the AGR fleet and potential decommissioning of the Vulcan site.

Additionally, we've seen improvements in safety, environmental performance, and cyber security, supported by the opening of a new cyber facility to boost collaboration.

2024/25 also saw another year of significant investment in our people and communities. We had a record early careers intake in 2025 with over 420 apprentices and 300 graduates. As well as that, we saw continued support for skills, schools, and supply chain development - part of our £49m annual investment.
And finally, we saw the continued ongoing delivery of our Inclusion Strategy, with real progress on equality, diversity, and inclusion.

Read the report here: Nuclear Decommissioning Authority: Annual Report and Accounts 2024 to 2025 - GOV.UK

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

Office for Nuclear Regulation

ONR site report

Nuclear Restoration Services Ltd – Winfrith

ONR site report

Nuclear Restoration Services Ltd – Winfrith

Report for period: 1 January – 30 June 2025

Authored by: Nominated Site Inspector

Approved by: Deputy Delivery Lead, DFW Subdirectorate

Issue: 1

Published: October 2025

Record reference: 2025/35182

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 Winfrith Site Stakeholder Group and are also available on our website: www.onr.org.uk/publications/regulatory-reports/site-specific-reports/llcssg-reports.

Our site inspectors usually attend Winfrith 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.

Contents

1. Inspections

1.1. Date(s) of inspection

Our site inspector made inspections on the following dates during the report period 1 January to 30 June 2025:

- 11 March 2025
- 17 June 2025

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 the Nuclear Restoration Services Ltd Winfrith site covered the following:

- Security emergency arrangements and preparedness.

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: www.onr.org.uk/publications/regulatory-reports/site-specific-reports/inspection-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 held regular meetings with the Nuclear Restoration Services Ltd Winfrith leadership team representatives to maintain situational awareness of matters related to nuclear safety. No significant issues were highlighted by ONR.

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 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.

Reports detailing the above regulatory decisions can be found on our website: www.onr.org.uk/publications/regulatory-reports/site-specific-reports/project-assessment-reports.

5. News from ONR

For the latest updates and information on our work, please subscribe to our regular email newsletter, ONR News, at www.onr.org.uk/news/newsletter.

6. Contacts

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Environment Agency report

Winfrith Site Stakeholder Group November 2025

This report covers the Environment Agency's regulation of the Winfrith Nuclear permitted site since the last SSG report and meeting in May 2025.

Radioactive substances regulation

We regulate processes and systems associated with radioactive waste disposals. We do this through environmental permits that contain conditions and limits the operator must comply with, to minimise wastes and protect people and the wider environment. We check compliance with the permits through routine interaction with the operator and by undertaking regulatory inspections.

Working with colleagues across the Environment Agency, we also regulate and control other activities through our environmental permits, including surface and groundwater discharges. Through our corporate objectives, aims and general duties, we also provide advice and guidance to protect or enhance the wider environment and support sustainable development.

Regulatory compliance interactions are recorded in Radioactive Substances Compliance Assessment Reports (RASCARs). These summarise the type of work we have undertaken, describe any non-compliance or observations and good practice, and include actions or recommendations from our findings. They are public register records and can be provided on request (please see the 'further information' section at the end of this document to find out how to request public register records-in the link below).

Permitting

Nuclear Restoration Services (NRS) Winfrith hold permits under the Environmental Permitting Regulations (EPR): one covers Environment Agency regulated radiological discharges and waste transfers from the site (the Radioactive Substances Regulation (RSR) EPR permit); the others cover the discharge of non-radiological aqueous effluent via the Winfrith Sea Pipeline (the EPR water discharge permit).

Winfrith permit variation update

As previously reported to the SSG, in December 2024 NRS applied to the Environment Agency to vary (change) its existing RSR Environmental Permit to allow it to make a small number of specified on-site disposals of solid radioactive waste at the Winfrith site. The application has been made to enable the partial infilling of the below-ground voids of the Steam Generating Heavy Water Reactor (SGHWR) and Dragon Reactor with low-level radioactive waste from on-site demolition operations.

A separate 'Deposit for Recovery' permit application (EPR/CP3329LD) has also been made to cover the reuse on site of non-radiological and non-hazardous construction and demolition waste from the site. Waste recovery on land, or 'deposit for recovery', is when a company uses waste material in place of non-waste material it would otherwise have used to perform a function.

A key part of the decision-making process is checking whether on-site disposals of waste are optimised and can be implemented in a safe and compliant manner. Optimisation is the principle of ensuring that all exposures to radiation of any members of the public, and of the population as a whole, are kept as low as reasonably achievable (ALARA). This principle is

incorporated into UK law. Optimisation balances the potential harm associated with the radioactivity against the benefits to society, the economy and the environment. We want to be assured that this proposed disposal route is the right thing to do considering social, economic and environmental factors whilst ensuring that people and the environment are protected.

The nature of the radioactive waste

Both the SGHWR and Dragon reactors have large sub-surface structures or basements constructed from reinforced concrete. NRS plans to demolish all remaining site buildings, including the reactor buildings, to ground level. At SGHWR and Dragon, the plan is to use the wastes produced from the demolition of the above-ground structures to backfill the sub-surface structures. Some of the concrete floors and walls of the sub-surface structures have low levels of radioactive contamination. NRS is not proposing to dispose of any other type of radioactive waste on site, and it will not be importing radioactive waste from other locations. NRS has said that the majority of the radioactive waste will be Very Low Level Waste (VLLW) with a smaller proportion of Low Level Waste (LLW).

It should be noted that most of the demolition waste will not be radioactive and NRS has also applied for a 'Deposit for Recovery' Environmental Permit to allow it to use this non-radioactive demolition waste material to infill the sub-surface structures.

Public consultation update

Our initial public consultation closed on 5 September. For the Radioactive Substances Permit variation (EPR/PB3898DC/V004), we received a total 27 response. 8 responders did not wish their comments to be made public, the remaining 19 are available on line here: Published responses for DT2 8WG, Nuclear Restoration Services Limited, EPR/PB3898DC/V004: application to change (vary) the radioactive substances permit at Winfrith nuclear site - Environment Agency - Citizen Space

For the deposit for recovery permit application (EPR/CP3329LD/A001), we received 15 responses, which can all be viewed here: Published responses for DT2 8WG, Nuclear Restoration Services Limited, EPR/CP3329LD/A001: environmental permit consultation - Environment Agency - Citizen Space

We have also provided the SSG with a collation of these comments as annexes to this report. It should be noted that there are some duplicates, where the responder has made the same comment for both permit applications.

We will fully consider all of the comments and questions raised during our technical assessment of the permit applications.

Permit determination update

Currently, specialists from our Nuclear Waste Assessment team are carefully reviewing the information that NRS has submitted to support its permit variation application. In the coming months, it is likely that we will request further information from NRS for aspects of its application where we have additional questions or require clarification. We will consult the public again when we have made a draft decision on the applications.

The distinction between the permit application and the planning application

NRS's permit applications are to allow them to dispose of demolition waste on site, in the sub-surface structures of SGHWR and Dragon only. The planning application will consider the restoration of the site taken as a whole. The permit determination process is independent of planning process.

Regulatory and compliance activities

We check compliance with the permits through regular contact with the operator and through site meetings and inspections. We also receive and assess a range of monthly reports from the site. For all inspections, we issue RASCAR reports.

We continue to hold weekly (virtual) meetings with the NRS environment team and relevant NRS managers, to ensure permit compliance and reporting requirements remain fit for purpose during ongoing decommissioning work and assess emerging issues and progress with actions.

We also work closely with the Winfrith site End State team and other relevant stakeholders (including Dorset Council, Natural England and ONR) to facilitate planning for the site's final stage decommissioning work. This work is required to meet the Environment Agency guidance on requirements for release of the site from radioactive substances regulation (once all the relevant decommissioning work and verification monitoring has been completed). Whilst the precise end state date for the site is still to be confirmed, preparatory work to achieve final stage decommissioning continues.

Inspection work since May 2025 SSG report

In June 2025 we completed an inspection of the arrangements for the disposal of solid waste at Winfrith. We reviewed relevant procedures beforehand and met with NRS staff to discuss waste management arrangements. On the days of the inspection we focussed on the practical aspects of waste management. We carried out a walk down of facilities at the site to see how NRS is managing its solid waste, from creation to disposal. NRS staff present for the whole or part of the visit included: Environment Manager, Head of EHSSQ, Head of Waste, ATO (Authority to Operate) Holders for SGHWR and Dragon, Project Managers and Waste Team members. The staff we spoke to were knowledgeable, open to questioning and committed to compliance. We did not identify any non-compliances with the site permit.

In September 2025 we completed an inspection of the environmental monitoring programme (EMP) for Winfrith. Nuclear operators must define, document and carry out an EMP using best available techniques. This is in accordance with condition 3.2.1 of the permit held by NRS Ltd for the Winfrith site. It allows NRS to collect data on levels of radioactivity in the environment. To comply with its environmental permit, NRS is required to periodically review its environmental monitoring arrangements to ensure they are suitable and sufficient. The Winfrith EMP was reviewed at the end of 2020 and all new EMP arrangements are now embedded. We were provided with relevant documents before arriving at site where we met with NRS staff to discuss arrangements. We carried out a walkdown round the perimeter of the Winfrith site to see the equipment NRS has in place for environmental monitoring, such as rainwater collection points and passive shades for the collection of airborne particulate. We were hosted on the day by the Environment Manager and Team. As above, the staff we spoke to were knowledgeable, open to questioning and committed to compliance. We did not identify any non-compliances with the site permit.

In October 2025 we undertook a Teams-based inspection of NRS's readiness for a partial permit surrender at the Harwell site. Our review indicates there is a non-compliance with permit condition 1.1.1(a). We were unable to identify elements within the NRS written management system that set out land quality procedures or guidance capable of providing confidence in the site’s end-state condition at the point of land release. Whilst the intervention was specifically targeted at Harwell, Winfrith uses the same management system. It is likely that we will score

Winfrith with a single non-compliance in this instance. We will report on the outcome of this at the November meeting.

Discharge reports

The site's environmental permit requires NRS to use Best Available Techniques (BAT) to minimise generation of radioactive waste and minimise any permitted releases into the environment. The site is required to report permitted liquid and gaseous discharges to the environment on a regular (quarterly) basis. We assess these reports and produce a RASCAR on our findings.

Limits are set in the Winfrith EPR permit to control the maximum level of radioactivity that can be discharged to atmosphere as a gaseous discharge or to sea, through the Winfrith Sea Pipeline.

Liquid effluent discharged to the sea at Arish Mell via the Active Liquid Effluent System (ALES) and Winfrith Sea Pipeline remain well below permit limits, and at levels equivalent to previous reports.

Atmospheric discharges also remain compliant and well below permitted limits. Although these discharges remain low, it is noted that the relative level of these gaseous discharges may fluctuate as the decommissioning programmes evolve.

Environmental impact

The site environmental permit requires the operator to monitor and assess the impact of discharges on the environment. Monitoring undertaken by the operator, since the May 2025 SSG indicates that the environmental impact from the permitted discharges remains low.

Elevated levels of tritium in the River Win update

The period of elevated tritium results at NRS environmental monitoring sample point 4 that occurred between July 2024 and March 2025 is now over. The April 2025 SP4 tritium value was 6.6 Bq/l, and the most recent value at SP4 (July 2025) was < 4.0 Bq/l, both of which are well within the historic band of expected levels.

Both NRS and Tradebe Inutec have cooperated fully with the EA during investigations and have independently sought to determine the source of the elevated tritium results during this period, particularly in relation to their own operations. Both the sites and the Environment Agency will continue to examine environmental monitoring results to check for any recurrence of elevated tritium results.

Tritium levels in the water around the Winfrith monitoring locations did not represent a hazard to the environment or members of the public. Hence, no specific Environment Agency advice or regulatory action is required at this time.

We will continue to inspect the site operators' radioactive waste infrastructure and operations, in order to ensure appropriate protection of the public and the environment.

We will continue to review the site operators' Environmental Monitoring Programmes and data to ensure it remains suitable and sufficient for purpose.

Any future elevated tritium environmental results would remain of interest to the EA, and we will continue to monitor the results of the sites' Environmental Monitoring Programmes, alongside our own independent monitoring.

Radioactivity in Food and the Environment report

The Environment Agencies and Food Standards Agency also conduct independent environmental monitoring around nuclear sites. These monitoring programmes support our regulatory function and provide reassurance that public radiation exposures are within legal limits. The results of this work are published annually and the latest report, "Radioactivity in Food and the Environment 2023" (RIFE 29), is published on the GOV.UK website.

https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports

This current (29th edition) contains information on radiation exposures (dose) to the public and radioactivity levels in the environment in 2023, from nuclear sites and other industrial and landfill activities.

Radiation doses to the most exposed people are calculated and measured using radioactivity concentrations in samples of food and the environment collected around UK nuclear licensed sites, external dose rates from radiation in sediments, and information on the habits of people living locally around the sites.

The report for the 2023 period continues to show that total doses to the public, from permitted discharges and direct radiation around UK nuclear sites, remained below the annual legal limit to protect members of the public (set at 1 millisievert per annum (mSv)). Radioactivity from natural background, rather than nuclear sites, continues to be the more significant source of exposure to communities in all areas of the UK.

For the 2023 period, data from RIFE 29 for Winfrith, indicates that the total dose to individuals and members of the public from all pathways and sources of radiation from the site was 0.054 mSv (an increase from 0.028mSv in 2022). For the Winfrith site, the representative person in 2023 was an adult living near the site, which is the same potential exposure pathway as identified in previous years.

The primary source for the attributed dose is from direct radiation from site operational activities rather than discharges and emissions. Within the overall estimates for total dose, exposures associated with the permitted aqueous or gaseous discharges from the site, remain a very small component of the total dose. The increase in total dose has been attributed to decommissioning work undertaken in 2023, which includes removal, temporary storage, and transfer of legacy wastes for off-site disposal. On decommissioning sites that total dose will vary over time depending on activities required to achieve the end state.

Incidents and enforcement

Waste shipments dispatched with incorrect radionuclide inventory:

As previously reported to the SSG, in January Winfrith informed the Environment Agency of an internal review that identified a consignment of drums removed from site in October 2024 did not have a complete radionuclide fingerprint. Two radionuclides were not reported in the inventory although these only accounted for less than 0.1% of the total activity. There is no direct environmental impact from this error. The drums were suitably packaged, transported and suitable for disposal at the receiving site. The error has been identified as a potential breach of permit. The Winfrith site has provided us with a report on its internal investigation. We will report on the outcome of our considerations at the November meeting.

Further details

A public register service covering the all aspects of the Environment Agency's work is available on the GOV.UK website at:

https://environment.data.gov.uk/public-register/view/index

Further information on our role in regulating the use of radioactive substances and related activities on nuclear licensed sites can be found on the Environment Agency pages of the Gov.UK website at:

https://www.gov.uk/government/publications/nuclear-regulation-in-the-environment-agency

Our enforcement and sanctions policy is publicly available on the GOV.UK website at https://www.gov.uk/government/publications/environment-agency-enforcement-and-sanctions-policy/environment-agency-enforcement-and-sanctions-policy

The UK Health Security Agency (UKHSA) has placed guidance on ionising radiation dose comparisons on the GOV.UK at: https://www.gov.uk/government/publications/ionising-radiation-dose-comparisons

UKHSA has also updated and republished its 'Living with radiation' book which is available online here: UKHSA: Living with radiation

The Environment Agency's lead Nuclear Regulator for the NRS Winfrith site is Rebecca Cleverley. Rebecca works within the national Nuclear Regulation Group ((NRG South)), based at the Environment Agency's Wallingford office in Oxfordshire.

James Heavingham will be leading the Winfrith permit variation and deposit for recovery application process as the Permit Project Manager.

NRG (South) undertakes environmental regulation of radioactive substances on nuclear licensed sites in southern England. It works closely with external bodies such as the Office for Nuclear Regulation and local Environment Agency teams that cover other general (non-radioactive substances) environment protection matters such as regulation of groundwater, contaminated land, waste management and water abstraction. Contacts for these activities can be arranged through Rebecca.

Contact details.

Rebecca.Cleverley@environment-agency.gov.uk

Office Address: Environment Agency, Red Kite House, Howbery Park, Wallingford, Oxfordshire, OX10 8BD
Email: nrg@environment-agency.gov.uk

Nuclear Restoration Services Limited, EPR/CP3329LD/A001: environmental permit consultation - collated published responses

We have collated these responses for the Winfrith Site Stakeholder Group. They are available online at: Published responses for DT2 8WG, Nuclear Restoration Services Limited, EPR/CP3329LD/A001: environmental permit consultation - Environment Agency - Citizen Space

Question: Please provide your comments on the environmental permit application received from Nuclear Restoration Services Limited

Response 1018763253

The application seeks to allow the retention of radio active waste within the existing site.

All radio active material must be removed from the site particularly as it is proposed to open the site for public access.

Underground voids filled with inert material should not be a problem, but careful independent checks for radio activity must be continuously carried out to ensure that there is no radio active content

Cost benefit analysis must not be used to justify dumping radio active waste at a site to be opened to the public.

The cost of reclamation must be counted against the cost of the electricity produced.

Electricity produced from nuclear energy has always been incorrectly assessed by ignoring the cost of reclamation and rendering a site safe.

Response 829849731

This seems an eminently sensible and pragmatic approach to the restoration of the site. The underground voids will need to be infilled to avoid structural issues in the future. Using material already onsite is much preferable to bringing in new materials from outside. This will avoid the detrimental environmental impacts from such an approach.

Response 797798096

I agree with this.

Response 598637072

I support the application. We need to support nuclear energy and that means allowing waste management in Dorset.

Response 1072566532

I do not believe the reasons for leaving radioactive waste on site creating a continuing environmental hazard are in any way valid. Less lorry movements and quicker time frames are about cost, not creating a safe radioactive free heathland.

Response 348613931

I am astounded to see that you are planning to bury nuclear waste in Dorset's countryside. The implications for the damage to the area is paramount. You can't really know what will happen in ten or twenty years time. No one can, but surely, something so toxic and damaging to life should be disposed off away from all nature and humanity alike.

We have to protect the future of our children, we are recycling, reducing speed limits, building cycle lanes and leaving verges to grow for nature, but now you want to bury radioactive waste in the countryside, make that make sense. Nine times out of ten, when you get to the consultation stage, you have already decided and I don't doubt for a moment that you are going ahead with this regardless of what is said.

Just remember the second anyone in the area is diagnosed with cancer, you will be blamed and likely sued. Agency after agency in the UK is letting the people down time and time again. The impact this will have on the area is catastrophic. Once you dump it in the ground, there is no going back, the earth and the area is tainted forever.

Response 636703956

Nuclear waste is a byproduct of a failure of previous generations to fully consider the impacts of their policies on producing energy and weapons of mass destruction.

They have all but died out without having to face the dire consequences of their actions.

Environmental legislation is insufficient to deal with enormity of this proposal and to ignore qualitative concerns is grossly inept and inconsiderate.

Residents of Dorset, particularly west Dorset, appreciate the beauty of their environment. As well as realising the disregard Dorset Council has for its residents and businesses.

This permit must be refused.

Response 555449583

I do not want any radioactive material buried on this site. This could have long term omplications for the health of the environment, wildlife and local population. Buried radioactive material could potentially leak into water regardless of what it may be stored in as there is always a chance of erosion..

Response 198934472

The terms of use of the land as defined by the commitments made to the local community was to decommission and restore the site. Currently there should be an ongoing program to of

decommissioning and restoration. Whilst we understand there has been some slippage, to turn the site into a storage facility is inappropriate for the location and contrary to the promises and expectations of the impacted community.

A development such as this is likely to effect property values. Will a compensation scheme be implemented?

Response 891407350

I fully support this application. I worked at Winfrith for 14 years, including 2 years managing the initial SGHWR fuel pond cleanup, draining and surface sealing work in the early 1990's. One very strong option for final decommissioning discussed back then was in situ disposal of the sub-surface structures. The main supporting arguments were the same as those in the current NRS proposal. The added benefit today is 35 years of radioactive decay of the major radioactive contaminants, providing a significantly reduced radiological inventory at the start of the project.

I have looked through the Design Safety Report and Radiological Inventory documents in particular. As I would expect, NRS have carried out a thorough and conservative assessment that, in my opinion, demonstrates an ALARP and BAT solution. The only significant unknown is the SGHWR mortuary tubes, but NRS have a plan to deal with this.

I am pleased to see this sensible approach and look forward to following its progress. How satisfying it would be to see the Winfrith site restored to heathland in my lifetime.

Response 55807592

I agree with the proposal as long as the waste is stored in sealed containers, eliminating the possibility of leakage and contamination. Burying the waste onsite avoids unnecessary transport and costs.

Response 974555384

This incredibly complex subject has been presented to lay people for comment; I am concerned that a subject of such complexity can be resolved in this way. Will the General Public, by giving their approval exonerate all responsibility for this site?

Supporting information is far too complex for the average layman to assimilate. I congratulate the authors of the documents in the detail presented, but feel concerned. The authors are the experts, the consultation is to reassure the populace, their children, and many generations to follow. But, I cannot find any response to the situation where the site monitoring bore holes return samples and readings that were unexpected. What are the criteria? What will take place, what are the remedial actions, who will finance the operation?

I quote from 19 ES(22)P361 Issue 1 - Hydrogeological Risk Assessment.pdf “Based on the three tiers of risk assessment it is concluded the non-radiological hydrogeological risk from the envisaged SGWHR and Dragon reactor End States is acceptable.” I will add “Based on the authors current knowledge.” and “What is acceptable?”

The proposal is for the mortuary holes to be filled with the remains of the two reactors, this is a deviation from the original proposal to save time, money and environmental cost. I must ask if the original proposal was correct, why should we jeopardise future generations? My domestic water is drawn from deep aquifers which will be affected by this development. Affecting ph levels for at least 1000 years. If this consultation is to bring reassurance flooding the project with documents will not bring this about.

I am sure in my response I will have misunderstood many things, but doesn't that highlight the very task you are engaged in?

Response 619472804

The SSG has been aware aware of this proposal for some time through regular meetings with the NDA and also previous local stakeholder engagement by NRS.

We support the application to vary the permit insomuch as it makes economic sense and does not slow down the decommissioning process without putting people and the environment at risk. The levels of radioactivity are low and the SSG website puts this into context relative to everyday exposure. Why spend £m digging up foundations to then have 100s of lorry movements to transport it to another part of the country to put it into another hole in the ground. Locals jest want to see the return to heathland as quickly as possible.

The press release however did not explain this or at least the journalistic interpretation presented a negative view that suggested Winfrith was to become a nuclear waste dump!

The public engagement we feel could have been better engaged and a public exhibition where residents had opportunity to ask questions of the regulator would have addressed concerns.

Response 333268976

Friends of the Earth's position has always been that, as far as possible, nuclear waste should be stored safely, on site, after decommissioning.

Having said that, we recognise that high level waste (spent fuel, metal containment, etc) is best handled at specialist facilities such as Sellafield. We assume that this has already been completed.

As it has been at least 30 years since the Winfrith reactors closed down, much lower level waste (ie with short half-lives) can be deemed relatively benign - so long as it has not been contaminated with particles of higher-level waste.

In these circumstances, we support the principle of these applications, subject to satisfactory assurances on four matters:

1. That external walls, etc., to be demolished are covered during the process, to prevent wind-borne dust escaping over a wider area.

2. That the disposal pits are lined with impermeable material, to prevent leakage into sub-soil and groundwater. If these are the old reactor basements, we assume that they should be impermeable already, but we seek assurances.

3. That, after completion, the site (including vegetation, soil, groundwater and local streams), are monitored for a number of years, to ensure that no future leakage of radioactive materials takes place.

4. That the land is not used, subsequently, for agriculture or public access*, (except for monitoring of radiation levels and land management). We would assume that the ideal solution would be for the land to revert to a heathland reserve, managed by an appropriate body. This should minimise the risk of accidental exposure to the public, of possible disturbance to the burial sites, and to minimise the risks of fire, which may expose radioactive material.

* We recognise that some areas of the heaths may already have access via public footpaths, but we would prefer areas within these perimeter paths to be closed to the public (as happens on MOD owned heathland elsewhere in Dorset).

Response 627463950

The proposal by NRS to dispose of legacy reactor structures at Winfrith by in-situ burial will set an important national precedent within the UK and should be called-in for determination by the Secretary of State for the Environment. The proposal represents a significant departure from recognised IAEA international radioactive waste disposal practice which relies upon multi barrier engineered containment. The key principles of the multi-barrier concept are

(1) Containment and isolation: The primary objective of the entire disposal system is to prevent radioactive substances from ever reaching the surface environment in harmful quantities.

(2) Defence-in-depth: A robust, layered system of engineered and natural barriers provides redundancy. The failure of one barrier will not immediately compromise the entire system.

(4) (sic) Long-term performance: The barriers must be designed to remain effective over the extremely long timeframes necessary for the radioactivity to decay naturally, which can be hundreds of thousands of years.

(5) Integration with the natural barrier: The EBS must be compatible with the local geological environment (host rock) and function in a stable, predictable way over time, even as it evolves and interacts with its surroundings. YouTube videos of the excavation and construction of Winfrith nuclear reactors in the 1960s readily show that engineered barriers were never built nor were these contemplated at that early stage of the UK nuclear programme. The NRS proposal should not proceed.

Nuclear Restoration Services Limited, EPR/PB3898DC/V004: application to change (vary) the radioactive substances permit at Winfrith nuclear site - collated published responses

We have collated these responses for the Winfrith Site Stakeholder Group. They are available online at DT2 8WG, Nuclear Restoration Services Limited, EPR/PB3898DC/V004: application to change (vary) the radioactive substances permit at Winfrith nuclear site - Environment Agency - Citizen Space

Question: Please provide your comments on the environmental permit application received from Nuclear Restoration Services Limited

Response 140581959

I support the proposals made in this application.

At various points in the SWESC and other supporting documents claims are made that some of the underground structures may have low post-closure permeability, although significant uncertainties are noted in this regard. At other points some of the underground structures are noted as having high permeability, again with significant uncertainties in this regard. These claims and the related uncertainties lead to a water balance conclusion that infiltration will be lower than water exiting the systems such that leachate can never build up to surface or near surface levels. As a result 'bathtubbing' scenarios are not (as far as I could see) considered in the risk assessment on any time scale. (Bathtubbing scenarios are often, although not always, included in such assessments, for example HPA-RPD-020, IAEA TECDOC 1380, IAEA ISAM 1.)

In this case, the existence of high integrity concrete tanked structures that have held water previously, which will not be covered during a lengthy period during filling (hence may become saturated without opportunity for drainage), filled with a highly variable fill composition, with holes sealed prior to filling, filled with blocks and some grout, with no leachate management or monitoring wells and then covered with a moderate cap, could lead to a concern that loss of cap integrity on some timescale could, at least somewhat credibly, lead to bathtubbing. It would not be the first example worldwide of such a situation in these kinds of disposals where the water balance did not behave as expected. Given the uncertainties in the water balance assumptions, the uncertain actual integrity/permeability of the emplaced structures, the lack of any intention to install leachate management or monitoring and given that real-world experiences with landfill caps do not always work out as planned, it would seem to be a credible alternative scenario to consider bathtubbing failures on a few realistic timescales. It seems likely the exposures would be low and such an assessment would only serve to make the existing case more robust, including the assumption that leachate monitoring/management/compliance levels are not required for any period.

There is little mention of the potential/uncertainty for contamination having historically leaked from the various mortuary tubes/tanks/basements into the underground environment. This has happened to other mortuary tubes/ponds etc. in the UK and does not usually come to light until the tubes are removed due to the difficulty of characterising underneath such structures.

Response 10759916

Disposal of this radioactive waste in situ could potentially have significant environmental benefits by reducing the amount of transportation. Seeing this quantified would help with the demonstration of use of the best available techniques. It could also reduce the amount of secondary waste as the amount of packaging materials could be reduced, so long as similar amounts of packaging aren't used to move the material around site. The amount of physical handling may also be reduced which could provide conventional safety benefits to workers.

Other radioactive disposal sites must provide confidence that the disposable of radioactive waste would not negatively impact the surrounding environment, for example by suitably containing the radioactivity, I would expect to see a similar level of demonstration for disposal of radioactive waste at this site. However lessons could be learnt and best practice shared in order to make demonstrations as efficient as possible to encourage the potential environmental benefits of disposable of radioactive waste with sufficiently low activity in-situ.

Response 775129476

I have no problem with low level nuclear material being buried on the site.

It would be nice if the site was used for a future small nuclear reactor. This could cover the electricity requirements for the whole Isle of Purbeck.

Response 44644672

I live on Redacted text which is Redacted text. I am concerned about the Impact this may have on wildlife and the local environment and would like more information about this.

On a purely selfish level but I am sure I speak for everyone locally, I am concerned a out the impact this could have when we come to sell properties.

Response 220309875

I support the permit. We need to support nuclear energy and that means allowing permits in Dorset

Response 1043120676

In general, I support the proposals since they have the obvious advantage of reducing the need to transport waste material to other sites for disposal, thereby reducing transport carbon emissions. Also other sites may be no more suitable for waste disposal than Winfrith.

I would expect the regulating authority to ensure that radiation emissions from the decommissioned site at Winfrith would be equal to or below those experienced in parts of Britain that have natural sources of radiation due to their unique geology, eg from Radon gas emissions.

Any possible future use of the Winfrith site should also be borne in mind. It has been suggested that Winfrith would be one of many suitable locations for new-generation Small Nuclear Reactors, and the disposal of waste material should not prejudice such developments.

Response 580525628

NRS are a private company, they only wish to get a permit because leaving waste will be cheaper for them and they will make more profit.

The environmental agency have stated "We will only vary the radioactive substances permit if we believe that harm to the environment, people and wildlife will be minimised."

Well the minimum harm is zero harm. Leaving in the waste is not zero harm. Rain and water will spread the radioactivity, insects in the ground will be affected. This is not zero harm hence not a minimum, hence you cannot allow the permit by your own definition.

Response 737389682

This permit must be refused because whilst recognising the disregard Dorset Council has for its residents and businesses, environmental legislation is insufficient to deal with the impact and long term effects on the environment and health of the wildlife and human populations

Response 755899936

No objection as long as it remains within the law and current regulations.

Response 613731093

This proposal is unacceptable on environmental and social grounds. It places unquantifiable rusk on the local community. Once buried the longer-term impacts are unknown and it seems unlikely that there will be any accountability in years to come. When the decommissioning process was started there must have been a proposal for waste management so an explanation is needed to justify why this is the 'best' solution, other than in economic terms.

Response 625202047

I completely oppose this wreckless plan.

As a local resident, mother to young child and Redacted text I cannot support this.

Locals fight hard to preserve the character and nature and all that inhabit this area, whilst jumping through dorset councils hoops to maintain our properties, to allow this would be a smack in the face.

This proposal is unacceptable on environmental and social grounds. It places unquantifiable risk on the local community. Once buried the longer-term impacts are unknown and it seems unlikely that there will be any accountability in years to come. When the decommissioning

process was started there must have been a proposal for waste management so an explanation is needed to justify why this is the 'best' solution, other than in economic terms.

Response 701300730

I think it is a terrible idea, and goes beyond the promises and commitments made to the local community which require restoration of the site.

Response 469438297

I worked at Redacted text during the seventies and have dealt with radioactive materials later in my career.

Materials contaminated at LOW LEVEL should remain on site provided:

They are IMMOBILISED i.e. contaminated material cannot be washed into the environment by rain.

Keeping materials on site avoids transport (e.g. by lorry or train) thus reducing the risk of airborne contamination during loading, long distance transport and unloading at the remote destination.

Keeping the material on site would allow work to be completed more quickly reducing any nuisance caused by traffic etc.

A long term ban on building in the area would save the surrounding heathland for the enjoyment of local people.

Response 73592255

Redacted text Response to EA Consultation - DT2 8WG, Nuclear Restoration Services Limited, EPR/PB3898DC/V004: application to change (vary) the radioactive substances permit at Winfrith nuclear site

General comments:

The amount and length of the documentation provided for the consultation may be viewed as disproportionate for the magnitude of variation requested to the permit.

Specific comments:

• The radiological inventory is extremely small and in very low concentrations.

• The projected peak annual individual radiation doses to representative persons are orders of magnitude lower than what ICRP describes as very low, and indicated as minimal in the context of planned public exposures in the recent COMARE statement on low dose (https://app.box.com/s/amy18jd2jhm5j6liy381ium16d4fomz5/file/1749502314142).

• The assessment report carried out in response to the relatively untried GRR (Guidance on Requirements for Release from Radioactive Substances Regulation), is instructive from the regulatory understanding point of view.

[For the attention of the regulators - clearer regulatory guidance on how to show optimisation is complete in connection with GRR compliance, even if limited only to the radiological aspects, would be helpful.]

• Although it is noted that an accurate value for the contamination remaining in the SGHWR mortuary tubes is not available, it was accepted that these will be cleaned out.

• It was noted that the details regarding the grouting of the SGHWR and Dragon voids have yet to be optimised, as have the cap designs. It is not clear whether grouting would render cap collapse less likely.

Response 117660918

I support the proposals for on-site remediation and efficient encapsulation of quantities of low level waste (LLW) and very low level waste (VLLW)/ non-radioactive waste from decommissioning of facilities at Winfrith, within existing voids on-site, which will require infilling in any case.

Suitable risk assessments will be required in support of the proposed solution, though overall radiological risks associated with LLW and VLLW are usually very low. Having previous experience of risk assessments and safety cases associated with both the SGHWR and Dragon reactors, I can say with confidence that it is exceedingly unlikely that on-site encapsulation and disposal of the wastes will entail increased radiological risk to workers, members of the public or to the environment (noting that off-site disposal will entail some low levels of risk).

On-site disposal is likely to have significant benefits related to other environmental impacts and a substantial cost saving to the tax-payer.

Response 29681575

Application No: P/CONS/2025/00078

Location: Winfrith Nuclear Site Winfrith DT2 8WG

Proposal: Consultations on: EPR/PB3898DC/V004: application to change (vary) the radioactive substances permit at Winfrith Nuclear Site.

EPR/CP3329LD/A001: environmental permit consultation.

I refer to your requests for comments associated with the two public consultations listed above.

I attach comments from our Environmental Protection Team, which outlines their role and input from our contaminated land consultant Redacted text in the future. Redacted text has also been involved with commenting on technical documents to support the Environmental Statement that is currently being worked on by NRS for the upcoming planning application. Redacted text comments at the time were provided in isolation of other documents such as the Waste Management Plan and a Site-Wide Environmental Safety Case, which now form part of the permit applications. However, some observations from Redacted text, which may still be applicable, included:

• Reporting should contain an illustrated/tabulated site conceptual model of potential contaminant linkages related to risk categorisation, as provided for within technical guidance recommendations.

• The need for a watching brief and further investigation/risk assessment should be emphasised.

• Reporting should indicate how the processes need to be seen as integrated regulatory processes co-joined with development control procedures through statutory consultations.

• Technical reporting should include a site-specific algorithm of regulatory involvement across planning, environmental permitting and environmental protection to provide clarity and adequate consideration of regulatory resources needed by each regulator/stakeholder moving forward with this site's land quality improvement objectives.

Our Ecologist has reviewed the Habitats Risk Assessment and considers that it covers the habitats and environmental impacts. Along with the Highways Authority, comments from our Landscape Officer are also attached and note that the ultimate landscape impacts of this will remain in accordance with the overall site wide restoration proposals.

At a strategic level, the Redacted text sets out the vision for the future of Dorset and includes four strategic priorities of:

• Provide high-quality and affordable housing

• Grow our Economy

• Communities for all

• Respond to the climate and nature crisis

The Winfrith Nuclear Site is a key site to support these priorities, in particular to 'Grow our Economy' and 'Respond to the climate and nature crisis'.

The site is ecologically sensitive, with much of it located within the Winfrith Heath Site of Special Scientific Interest (SSSI). This area is also designated as Dorset Heathlands Special Area of Conservation, Special Protection Area and Ramsar site. The End State land use of heathland with public access, that is currently agreed for the Winfrith Nuclear Site, acknowledges this sensitivity.

The draft Dorset Local Nature Recovery Strategy 2025 states that 'the amount of variety of wildlife in our country has reduced and many areas for nature have been split up or lost, leading to a nature emergency'. The strategy identifies twelve priorities, of which Priority 3 relates to heathlands. Winfrith provides an opportunity to enable heathland habitats to be 'made bigger through expanding them, and more joined up to enable wildlife to travel between them for food, water, breeding and to increase resilience to climate change'. One of the potential activities is identified as restoring heathland habitat on former minerals and waste sites.

The site also benefits from road and rail connections, utility connections and the potential for world class digital connectivity, as a legacy of its former use. As a result of the location, geological and physical assets of the NRS (Winfrith) site, it has the potential to be a location for the production of clean energy, including renewable hydrogen. This could play a significant role in Dorset's energy transition to net zero, as well as providing energy security for the UK.

Energising Dorset, the Council's Economic Growth Strategy details the Council's ambitions that future growth in Dorset's economy is centred on clean energy generation, storage, distribution and research use, with a particular focus on renewable hydrogen production, carbon capture and storage and possibly small modular nuclear reactors (SMRs). In the 'How we will do this' section of 'Ambitious for Clean Energy', one of the actions is to 'develop, adopt and implement a new masterplan for the Nuclear Restoration Services (NRS) Winfrith site prioritising clean energy production as part of the End State'.

With the ecological and economic opportunities of the Winfrith Nuclear Site in mind, Redacted text has tendered for the production of a new masterplan framework, setting out an updated End State for the Winfrith Nuclear Restoration Services (NRS) site in Dorset. Options for the brownfield land within the site to be utilised for employment purposes and the other areas to be returned to heathland with open public access are to be explored. This is reflected in the emerging Dorset Local Plan which is currently under consultation.

Policy 10 of the Bournemouth, Christchurch, Poole and Dorset Waste Plan, which was adopted in 2019, specifically considers the decommissioning and restoration of Winfrith Nuclear Licenced Site. It states that 'on-site recovery or disposal of waste originating from the decommissioning of the Winfrith facility will be permitted where it would demonstrably support the site's restoration to open heathland and public access…' The economic opportunities currently being explored are also supported in objective f, which states that the 'restoration programme should have regard to the opportunity for land at the northern end, which lies within the Dorset Innovation Park Enterprise Zone boundary, to be considered for uses which contribute to the Innovation Park's status as a strategic employment site'.

Yours sincerely

Redacted text

Senior Planning Officer

Minerals & Waste Team

Redacted text

Response 365496012

Dear Sir/Madam,

I am writing a response to the decommissioning of the Winfrith nuclear site Redacted text position has always been that, as far as possible, nuclear waste should be stored safely on site after decommissioning. Having said that, we recognise that high level waste (spent fuel, metal containment, etc.) is best handled at specialist facilities such as Sellafield. As it has been some 30 years since the Winfrith reactors closed down, much lower level waste (i.e. with short half-lives) can be deemed as a significantly reduced radiological hazard; so long as it has not been contaminated with bits of higher-level waste.

Hence, we support the principle of these applications, with 4 provisos:

1. That external walls, etc., to be demolished are covered during the process, to prevent wind-borne dust escaping over a wider area.

2. That the disposal pits are lined with impermeable material, to prevent leakage into sub-soil and groundwater.

3. That, after completion, the site (including vegetation, soil, groundwater and local streams), are monitored to ensure no future leakage of radioactive materials. Environment Agency or IAEA guidance on dust control and groundwater protection, should be followed. This should be carried out at least annually for a minimum of 30 years post-closure.

4. That the land is not used, subsequently, for agriculture. Any subsequent public access must be consistent with environmental safety, with preference for conservation use such as heathland restoration.

Yours sincerely

Redacted text

Response 65532507

The proposal by NRS to dispose of legacy reactor structures at Winfrith by in-situ burial will set an important national precedent within the UK and should be called-in for determination by the Secretary of State for the Environment. The proposal represents a significant departure from recognised IAEA international radioactive waste disposal practice which relies upon multi barrier engineered containment. The key principles of the multi-barrier concept are:

(1) Containment and isolation: The primary objective of the entire disposal system is to prevent radioactive substances from ever reaching the surface environment in harmful quantities.

(2) Defence-in-depth: A robust, layered system of engineered and natural barriers provides redundancy. The failure of one barrier will not immediately compromise the entire system.

(4) (sic) Long-term performance: The barriers must be designed to remain effective over the extremely long timeframes necessary for the radioactivity to decay naturally, which can be hundreds of thousands of years.

(5) Integration with the natural barrier: The EBS must be compatible with the local geological environment (host rock) and function in a stable, predictable way over time, even as it evolves and interacts with its surroundings. YouTube videos of the excavation and construction of Winfrith nuclear reactors in the 1960s readily show that engineered barriers were never built nor were these contemplated at that early stage of the UK nuclear programme. The NRS proposal should not proceed.

Response 423636750

Hi,

I am contacting you regarding the following application: Application reference number: EPR/PB3898DC/V004

Regulated facility type: Radioactive substances activity. The variation application has been made to enable the partial infilling of the below ground voids at the Steam Generating Heavy

Water Reactor and Dragon Reactor at the Winfrith Site with low-level radioactive waste from on-site demolition operations.

Regulated facility address: Winfrith Site, Gatemore Road, Winfrith Newburgh, Dorset, DT2 8WG

I just don't think we should be putting radioactive waste in the ground, especially in an area of such ecological sensitivity. All radioactive waste needs to be kept in a tectonically secure area, where it won't leach into the environment, for as long as it takes until it is safe.

Ideally, it shouldn't be generated in the first place, as I think we lack the means for longlasting, safe, and economically viable disposal.

Kind regards,

Redacted text