Site Stakeholder Group

Hunterston Site Stakeholder Group
Notice of the Eighty First - Meeting
The next meeting of the Hunterston Site Stakeholder Group will be held:
Thursday 3 September 2026

Seamill, Hydro, West Kilbride, Ayrshire, KA23 9NB

13:30 hrs

AGENDA

13.30 **Chairman's Opening Remarks and Declarations of Interest**

13.35 **Chair and Vice Chair Updates and Correspondence**

13.45 **Actions and approval of previous Minutes**

13.50 **Hunterston B Site Reports**

Hunterston B Report – Andy Dalling
ONR Report – Tim Saunders
SEPA Report – Keith Hammond

Members Question and Answer Session
Public Forum

14.25 **Hunterston A Site Reports**

Hunterston A Site Presentation – Daniel Smith
ONR Report – Tanya MacLeod
SEPA Report – Melanie Hayes

Members Question and Answer Session
Public Forum

15.05 **Update from Scottish Government**

Diane Hamilton

Members Question and Answer Session
Public Forum

15.30 **Any Other Business**

DATE OF NEXT MEETING 3 December (via teams)

MINUTES OF THE MEETING OF THE
HUNTERSTON A STAKEHOLDER GROUP (SSG)
HELD AT
SEAMILL HYDRO, 39 ARDROSSAN ROAD, WEST KILBRIDE, AYRSHIRE KA23 9NB
ON TUESDAY 2nd JUNE AT 13:38

Attendance

Ms R Holmes	Fairlie CC (Chair)
Mr S McGhie	Hunterston B Union Rep (Vice Chair)

Operators and Officers

Mr R Gibson	Engineering Manager (Hunterston A)
Mr A Dalling	Site Director (Hunterston B)
Ms M Hayes	SEPA (Site Inspector, Hunterston A)
Mr K Hammond	SEPA (Site Inspector, Hunterston B)
Ms C Aitken	Comms & Socio-economic Lead – Scottish Sites
Ms N Thomson	Communications Coordinator (Hunterston B)

In Attendance

Mr K Macintosh	Largs CC
Mr S Mackenzie	North Ayrshire CC
Mr G Buckley	West Kilbride CC
Ms I Agnew	Skelmorlie CC
Mr G Madden	Minute taker

MEMBERS OF THE PUBLIC

Mr A Holden
Mr J Riddick
Mr D Reid

APOLOGIES

Mr Daniel Smith	Site Director Hunterston A
Ms D Hamilton	Scottish Government
Ms A Craig	North Ayrshire Council
Mr A Cochron Patrick	Hunterston Estate
Ms E Collier	North Coast and Cumbraes Council
Mr J McHenry	Cumbrae Community Council
Mr P Roche	Member of the public
Ms L Jeffrey	Ayrshire Civil Contingencies Team
Mr I Murdoch	North Ayrshire Council
Ms M Jones	Socio-economics Lead, NRS
Mr S McKenzie	North Ayrshire Council
Mr T Saunders	ONR
Ms T MacLeod	ONR
Mr J Lamb	Member of the public

1. CHAIR'S OPENING REMARKS AND DECLARATIONS OF INTEREST

The Chair opened the meeting at 13.38.

Apologies had been received from Daniel Smith, Aileen Craig, Diane Hamilton, Mair Jones, Angus Cochron Patrick, Eleanor Collier, John McHenry, Peter Roche, John Lamb, Lesley Jeffery, Ian Murdoch, Tim Saunders, Tanya MacLeod and Scott McKenzie.

No interests were declared.

2. CHAIR AND VICE CHAIR UPDATES AND CORRESPONDENCE

The Chair reported that she and the Vice Chair had attended a dinner to celebrate Hunterston B transferring to the NDA and NRS. She had visited Sizewell A and B on 10 March and had also attended the Sizewell SSG. The Chair and Vice Chair had joined a SSG chairs and vice chairs meeting on 17 April. The meeting had addressed the future of stakeholder engagement. It had been communicated that the NDA would no longer attend SSG meetings. A meeting with NGOs had taken place on 13 May and had covered Sizewell C and the nuclear taskforce. The Chair and the Vice Chair had also visited the radio chemistry lab.

The government had estimated that the transfer of all AGRs to NDA and NRS for decommissioning would result in a £1 billion saving. The NDA project academy had expanded nationally. The NDA was of the view that the House of Lords briefing would play an important role in the NDA's mission. The NDA had agreed upon a standardised waste container initiative; the first order for a Pegasus transport package had been received.

Ken Macintosh asked how the £1 billion figure had materialised. Andy Dalling replied that there was potential for £1 billion in savings as part of the transfer. The transfer would eradicate the need to build an ILW store at Hunterston B. There would also be economies of scale. The synergies would become apparent as part of the ongoing NRS programme.

3. ACTIONS AND APPROVAL OF PREVIOUS MINUTES

Responding to the action regarding possible signage for the low-level waste (LLW) pits, Richard Gibson stated that Hunterston A was considering creating signage for the Very LLW pits. Consultation was taking place with the NRS central land quality team, and he hoped to provide a response at the next SSG.

The minutes of the previous meeting were approved.

4. HUNTERSTON B SITE REPORT

Hunterston B Site Report

Andy Dalling delivered his report. The transfer to NDA and NRS had taken place. integration activities continued; staff were familiarising themselves with new IT, processes and ways of working.

The business plan continued to progress. Cladding for the north elevation had been replaced, and work would now commence on the south elevation. Hunterston B continued to advance the alternative active discharge line project. It hoped to award a contract for the design build work. The electrical overlay project was progressing well.

A thorough review had taken place following the improvement notice from ONR, and the notice had been closed before the transfer. An investigation had taken place following the oil leak in the lagoons. Improvements had been made to the oil abatement plant. The site was also considering implementing further enhancements to the lagoon.

Hunterston B had met the transfer aspirations of 99% of staff. 246 people had transferred over to NRS, and Hunterston B would welcome a period of stability. It would now grow its capability to deliver more decommissioning work.

SEPA Report

Keith Hammond reported that the transfer had progressed well. SEPA had transferred the radioactive substances, the industrial activities and water activity permits, and had also issued a new registration for abstraction.

Keith Hammond had visited the site twice since the last SSG. SEPA was satisfied with Hunterston B's investigation and resulting actions following the non-radioactive oil event in March. It would continue to monitor this.

Q&A

Stuart McGhie asked what would happen with the remaining portion of land that EDF had oversight of. Andy Dalling responded that the land area was significant in size. Hunterston B was being kept updated on any land developments, and there were strong links between the NRS and EDF commercial teams.

The Chair said she understood that part of EDF land would be taken over by the organisation that would be bringing in subsea cable from Northern Ireland. Andy Dalling stated that the organisation wanted to use the field adjacent to Hunterston B.

The Chair said she had assumed that the land proposed for the data centre belonged to Hunterston Estate rather than EDF. Ken Macintosh replied that it did. The Chair noted that a previous SEPA representative had been concerned about flooding in this area. Ken Macintosh stated that, while flooding had taken place in this area, the issue was solvable.

Alan Holden asked whether the new cladding was flammable. Andy Dalling stated that Galbestos cladding had not been removed. There had been a like-for-like replacement of sheets, and the new cladding was not flammable.

Alan Holden asked if the oil leak had been related to one of the transformers on the side of the station. Andy Dalling replied that it had been related to station auxiliary transformer 4. Alan Holden asked if the main oil tanks had been pumped out. Andy Dalling stated that the investigation had concluded that the main oil tracks had not been pumped out. This had caused an overflow of oil to the lagoon where the abatement plant had protect the environment.

The Chair referenced the removal of the reactor cooling water pipework and asked if the work would take place in a confined space. Andy Dalling replied that work would take place above ground. The Chair asked if the SSG would have visibility of the detailed design for the active effluent discharge line. Andy Dalling replied that SEPA was reviewing the permit variation. The detailed design would cover necessary changes to the plant to meet the new permit requirements. The concept design would involve threading a small pipe through the culvert. The discharge point would remain the same. The work would commence in Easter 2027. While progress would be visible to the public, Andy Dalling agreed to provide an overview of the design at future SSGs. The Chair asked if Hunterston A was involved in discussions on the permit variation. Andy Dalling confirmed this.

The Chair asked if the transport desktop exercise had taken place. Andy Dalling confirmed that it had. He agreed to follow up on this in the next report.

Action: Andy Dalling to provide an update on the transport desktop exercise for Hunterston B.

The Chair noted that the report for Hunterston B had referenced emergent faults in the irradiated fuel dismantling (IFD) Cell. Andy Dalling clarified that this was an error. Hunterston B no longer used the IFD.

The Chair asked if the station transformer would remain on site. Andy Dalling stated that the oil leak associated with the transformer had been monitored for several years. A new discharge line was required, as this would allow Hunterston B to shut down its main CW pumps. Consequently, the site would no longer need to rely on the 132KV supply. At that point the station transformer would be removed from service.

The Chair noted that the revocation of the registration for water discharge activity was now covered by a general binding rule (GBR). She asked if this would result in any difference. Keith Hammond responded that it would not.

5. HUNTERSTON A SITE REPORT

Hunterston A Site Report

Richard Gibson reported that Hunterston A's business plan had closed on 31 March. The waste retrieval programme had achieved all of its annual targets. Key ageing assets and staff welfare facilities had been significantly improved. Staff had supported the Hunterston B transfer, and considerable improvements had been made to environmental safety management systems. This had culminated in the withdrawal of the SEPA prohibition regulatory notice.

Hunterston A had consistently been one of the top sites within the NRS fleet for several key metrics, such as employee engagement, safety inspections and compliance activities. A more challenging waste processing target had been set for the year. Key site works included progressing the pond roof overclad and delivering the SILWE plan.

Hunterston A would strengthen ties with Hunterston B through key activities. Cross-site networks would be embedded. Hunterston B would also encourage use of the collaboration hub.

The new chemistry laboratory at Hunterston A had opened on 1 April. The facility had been praised as a standard setter across NRS. Hunterston A had celebrated success at the NRS Excellence Awards, and Robin Rowell and the Higher Active Waste (HAW) team had won the innovation award.

Richard Gibson reported on EHSSQ. Regarding TRIR and DACR, there had been no lost time accidents or recordable injuries in the last 18 months. Environmental management improvements were ongoing and included the laboratory work. The human performance rollout continued. New safety campaigns that focused on different themes were being rolled out across the site. The first campaign on asbestos had been successfully delivered.

The annual emergency exercise had been conducted, and the assessors had been satisfied with the demonstration. The refurbished canteen had opened. Two new waste bag monitors (WBMs) were being commissioned. The WBMs would accurately measure various weights and density of material. Campaign 3 testing for the SILWE project was underway.

The ponds team continued with de-planting work after making significant progress in bay 4. The LLW team had exceeded its annual targets and had delivered every single one at stretch level. LLW and HAW targets for the current year were being exceeded. The plant and structures team had undertaken cold duct cladding removal in the reactors.

As part of sustainability work, Hunterston A staff had taken part in a site-wide litter pick on 7 May. Hunterston A would also push for an increased use of local suppliers on site and would sign up to a pollinator corridor initiative. Socio-economic funding for the current year was open.

SEPA Report

Melaine Hayes presented her report. A joint SEPA and ONR inspection had taken place in March. The inspection had addressed the retrospective calculation of doses received by members of the public due to gaseous and liquid discharges and direct radiation shine[?] from the Hunterston A site. No instances of non-compliance had been detected during the inspection.

Work had been recommended on the aqueous discharge variation application, and SEPA expected to determine the variation application by 31 October. SEPA had withdrawn its regulatory notice for the laboratory and had commended the amount of work undertaken by Hunterston A to address it. Hunterston A was progressing the workstreams in relation to the characterisation of ILW bunker waste. A waste package weighing and assay campaign was complete. The sampling of identified waste packages should begin in early summer 2026.

Q&A

Stuart McGhie referred to the socio-economic fund and asked if Hunterston A would have any input into the utilisation of the Willie Mackie Skills Hub at Ayrshire College. Richard Gibson replied that Hunterston A did not have input into how the facility was utilised. However, the intention was for future apprentices to use the facility.

The Chair noted that the joint SEPA and ONR inspection had addressed the direct radiation shine from the Hunterston A site. Melanie Hayes clarified that ONR had addressed this aspect. Richard Gibson said there was no radiation shine on site.

The Chair highlighted the SILWE project and asked why Hunterston A had applied considerable pressure on SEPA. Richard Gibson stated that Hunterston A had not intended to apply pressure on SEPA but rather optimise the plan. Melanie Hayes added that Hunterston A had not applied any pressure on SEPA.

The Chair asked if the sampling monitors were in a fixed position. Richard Gibson confirmed that they were.

The Chair asked about the packaging being used for LLW. Richard Gibson responded that Pac-Tek bags were used. This was standard proof packaging for LLW.

The Chair commended SEPA for its role in helping to facilitate the opening of the chemistry laboratory. Melanie Hayes praised Hunterston A's transparency during the process.

6. SCOTTISH GOVERNMENT REPORT

It was noted that Diane Hamilton had submitted a report in advance of the meeting. Phil Carson had joined the Scottish Government team on 5 May, on an 18-month secondment from NRS.

7. ANY OTHER BUSINESS

Claire Aitken stated that elections would take place at the next meeting. Should anyone wish to stand for chair or vice chair, she would contact them prior to the next meeting.

The Chair thanked attendees and closed the meeting at 14.41.

Actions from Hunterston SSG Meetings

ACTIONS FOLLOWING SSG MEETING 02.06.36

ACTION	DETAIL	RESPONSE	STATUS	DATE
D Smith to investigate possible signage of low waste pits	The Chair said that there were five pits of low activity, high-volume waste which had been deposited on reclaimed land, covered with an impermeable cover, and grassed over. Since that point in time, the SSG had asked for it to be signposted. D Smith to investigate.	Update (02.06.26) Richard Gibson stated that Hunterston A was considering creating signage for the variable LLW pits. Consultation was taking place with the NRS central land quality team, and he hoped to provide a response at the next SSG.	Ongoing	
Andy Dalling to provide an update on the transport desktop exercise for Hunterston B.	The Chair asked if the transport desktop exercise had taken place at Hunterston B. Andy Dalling confirmed that it had. He would provide an update at the next SSG meeting.			
Effluent Discharge Line updates	The Chair asked if the SSG would have visibility of the detailed design for the active effluent discharge line.	Andy Dalling agreed to provide an overview of the design at future SSGs	Ongoing	

NRS
Nuclear Restoration Services

Site Stakeholder Group Report

Hunterston B

May – Jul 2026

1. Introduction

Hunterston B is a Decommissioning Site with two Advanced Gas-Cooled Reactors (AGR) in North Ayrshire that ceased electricity generation in 2022. Between 2022 and 2025, the site successfully defueled both reactors, marking a significant milestone in its transition to decommissioning.

In April 2026, the site and its employees transferred to Nuclear Restoration Services (NRS), a subsidiary of the Nuclear Decommissioning Authority (NDA). With defueling and transfer complete, the site's mission is now focused on the safe and efficient decommissioning of Hunterston B. The first and most significant phase of the plan is to get the site to 'Safestore' involving the demolition and removal of much of the site over the next 15 to 20 years.

This report provides an update on progress against the mission between May and July 2026, covering key areas including safety, asset care, programmes, waste management and our people.

2. Integration

Hunterston B continues to integrate into NRS ways of working, with teams across the site adopting new processes, systems and approaches that align with the wider organisation. This includes increased collaboration with colleagues across NRS and participation in company-wide initiatives and events.

As part of the transition, employees are becoming more familiar with NRS tools, policies and expectations, helping to build stronger connections across the business and ensuring a consistent approach to delivering decommissioning activities safely, securely and efficiently.

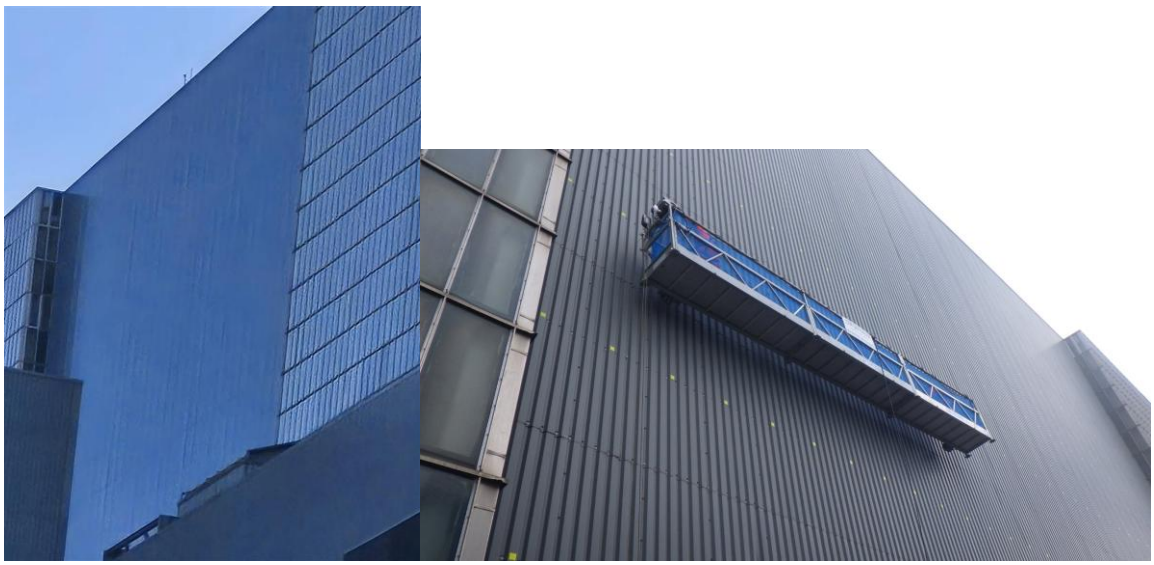
3. Decommissioning

The main mission for the site is to progress Decommissioning to the point of safestore. The mission can be broken down into three main areas, Asset Care, Programmes and Waste Operations. A summary of progress against these areas can be found below.

2.1 Asset Care

The Asset Care Programme on site is designed to keep the site infrastructure in good condition such that decommissioning activities can be performed safely. Each year a series of small projects will be delivered to achieve this objective. In the current financial year 26/27 we expect to discharge over £3m worth of projects to improve the overall condition of the site.

So far, the Charge hall cladding Project has been completed, a complex project involving working at height and the replacement of 40 Tonnes of cladding to ensure its integrity for the rest of the Decommissioning mission.



Charge hall cladding

Good progress has been made with a number of other projects as follows;

- Repair to structural steelwork within the Deaerator area has commenced
- Preparatory works have progressed for Active Drain Cover upgrades and the Turbine Hall Louvre installation, both of which will commence in the coming months.
- The final stage of the upgrade to the active effluent discharge line (landward, separate from the discharge to sea project) has commenced.

2.2 Programme

The Decommissioning programme at Hunterston B consists of several projects which will systematically deplant and demolish plant areas and buildings, reducing the sites footprint as per the per the Managed Retreat Strategy to a bespoke designed safestore.

During the reporting period we continued to deliver the early stage of the decommissioning plan for our site as follows;

- Removal of Reactor Cooling Water (RCW) pipework which runs across the site has progressed. This is an enabling project for the new Electrical Overlay.
- The project to deliver the Alternative Active Effluent Discharge Line is progressing as move towards placing a contract for the detailed design and build of the new line.
- Sampling of Carbonaceous Debris from the Pond carried out to help inform works to remove it.

Reactor Cooling Water Pipework (before & after)

2.3 Waste Operations

Waste operations support the decommissioning of Hunterston B through the safe, efficient and compliant dispositioning of radioactive waste and controlled waste generated from activities carried out on the site.

Its purpose is to protect people, the environment, and future generations by ensuring waste is handled, treated, stored, and disposed of in accordance with the principles of the waste hierarchy – prevention, reduction, reuse, recycling, recovery and disposal.

During the reporting period we continue to deliver the early stages of the decommissioning plan for our site, the highlights in terms of waste operations delivery have been

Active Waste

- One incinerable waste shipment dispatched, with 9.3m^3 of Low-Level Waste sent for incineration.

Controlled Waste

- Total of 42te of controlled waste disposed of, with 33te recycled and 9te routed for recovery (incineration with energy recovery).
- Remaining residual bulk hazardous waste chemical removal works have continued.

Redundant Asset Disposal

- Redundant station vehicle sent for disposal reuse through an approved partner.
- A number of redundant electrical motors are being sold to an electrical engineering company in south Scotland for re-use/ repurposing.
- Redundant fire extinguishers are being sold to a training company in the UK.

4. Safety and Environment

4.1 Site Industrial Safety Performance

Safety performance during the reporting period has been strong, with a Total Recordable Injury Rate (TRIR) of zero.

4.2 Radiological Protection

The radiation dose of each worker is assessed individually by an electronic personal dose meter. A computer database keeps records for each worker. Exposure is continuously, monitored and ultimately compared with the levels specified in the Ionising Radiations Regulations (2017) which are the UK Health and Safety legislation that applies to work with radiation.

During the reporting period the Collective Radiation Exposure (CRE) was below plan (see table below). Collective doses are pre-planned for each year based on scheduled maintenance, operational waste activity and decommissioning projects. A breakdown of dose received is shown below (along with a comparison of relevant dose statistics).

All work is fully reviewed and justified in order to ensure all doses received were ALARP (As Low As Reasonably Practicable). This involves justifying and optimising the dose, as well as remaining within those dose limits.

Differences between the actual and planned dose can be down to a range of factors including changes to the work programme, development of new techniques for carrying out work that will result in a lower dose and the deployment of new equipment.

There were no reportable radiological protection events during this reporting period.

Radiation Dose to workers (May 2026 – July 2026)		
Planned collective dose	1.050person.mSv	
Actual collective dose	0.944person.mSv	
	Employee	**Contract Partner**

Total Dose	0.790person.mSv	0.154person.mSv
Highest individual dose	0.066mSv	0.038mSv
Average individual dose	0.004mSv	0.001mSv
Individuals	186	129

Chest X-ray	Transatlantic Flight	CT Scan	Average UK annual dose to public	NRS Dose Constraint	UK legal dose limit for radiation workers
0.014mSv	0.08mSv	2.0mSv	2.6mSv	5.0mSv	20.0mSv

Explanatory notes:

- mSv: milliSieverts (SI unit of dose received by an individual)
- man.mSv: The collective dose for a group of workers (i.e. the total of the doses received by each member of a group).

4.3 Environmental Safety

The site's Radioactive Substances Permit is currently being updated to allow radioactive discharges to the sea to be carried out through the proposed Alternative Active Effluent Discharge Line (AAEDL). Once approved, the revised permit will allow discharges to continue through the existing route (via cooling water dilution) as well as through the new AAEDL once it is installed and commissioned. This permit update will also remove the requirement for discharges to take place only on an ebbing tide.

These proposed changes have been assessed using industry-standard dispersion modelling software, with the modelling independently reviewed and verified by SEPA. To provide additional reassurance, the site's environmental monitoring programme will be reviewed to consider additional monitoring local to the new AAEDL, before it becomes operational.

As part of this AAEDL work, the site is also applying for a Marine Licence to permit activities on the seabed associated with the project. The application will include European Protected Species licensing to ensure that marine wildlife and protected species in the local area are appropriately safeguarded and are not adversely affected by the work.

Following the minor transformer oil leak in March 2026, improvements to the site's oil abatement plant are progressing well and continue to strengthen the site's environmental protection measures.

The programme of off-site environmental monitoring and radiation surveys in the district has continued throughout the period and demonstrates that the radiological discharges from the station have a negligible impact on the local environment. Reports are provided monthly and quarterly to SEPA, detailing the samples and results of analysis performed.

On 25th June 2026, as part of the site's hazardous waste removal project, residual contents from sulphuric acid tanks and pipework, including flushing liquids, were removed from site for disposal (approximately 28 tonnes). The sulphuric acid concentration was estimated to be less than 1%, based on calculations of the remaining contents and dilution from flushing the tanks

and pipework with water. As a result, the waste was consigned using the appropriate Hazardous Waste / Special Waste documentation for a concentration of less than 1%.

On arrival at the receiving facility, routine sampling identified the acid concentration as 4.6%. This meant the waste could not be accepted under the original consignment arrangements and was subsequently redirected to an alternative licensed disposal facility that was able to receive the material.

Importantly, there was no impact on environmental safety, the workforce, or the public. The event relates to a waste classification and compliance issue.

The site has investigated the event through its Team Based Fact Finding process to understand the factors involved and identify appropriate corrective actions to strengthen future arrangements.

The site continues to record the leak rate of biodegradable insulation fluid from one of the station electricity supply Transformer cables. If the rate increases to a point where a tracer can be detected, further investigation will be carried out. So far, the leak rate has been too low to use a tracer effectively. SEPA has been kept fully informed.

4.4 Emergency Preparedness

Preparations for the forthcoming exercise programme are ongoing, with two station exercises scheduled for early August ahead of the Observed Exercise on 26 August 2026, which will be overseen by members of the NRS Internal Oversight Team. These exercises will provide an important opportunity to test and demonstrate the effectiveness of emergency arrangements, while rehearsing realistic scenarios associated with deconstruction.

During May and June, a series of desktop exercises were conducted to enhance the team's understanding and application of arrangements for responding to Radioactive Material Transport Package incidents.

Following transfer to NRS on 1st April 2026, the Emergency Preparedness team has continued to strengthen its integration within NRS governance and operational processes. The team is now actively engaged with the Emergency Preparedness Peer Group, benefiting from collaborative working, the sharing of operational experience, and ongoing support from Hunterston A.

5. People

Following the recent site transfer, the focus has been on ensuring a smooth transition and embedding new ways of working as part of NRS. The site is now progressing well towards business-as-usual activity, with employees adapting positively.

Following a period of training and development to support the transition, employees are settling well into their new roles and responsibilities. Employee engagement continues to be a core focus, with the latest survey results communicated across the site and resulting action plan being tracked through the People Governance Forum to drive continuous improvement and address key themes identified by employees.

A significant achievement during the reporting period was a successful Office for Nuclear Regulation (ONR) inspection of Organisational Capability in June, providing positive assurance regarding the site's resource management, skills, competence, and arrangements to support safe and effective decommissioning. This outcome reflects the continued commitment of leaders and employees to maintaining high standards and regulatory compliance.

Workforce planning activities continue to support current and future business needs. A positive development for the site is the arrival of two apprentices and two graduate placements, who will commence their roles during August and September respectively. These new starters will bring fresh skills and perspectives to the teams. Furthermore, in July Hunterston welcomed a group of NDA graduates for a site visit designed to help them broaden their professional networks and gain a deeper understanding of the important work taking place across the sites. The event provided a valuable opportunity for the graduates to learn more about decommissioning operations and build connections with colleagues from across NRS, while gaining a greater appreciation of the work being delivered at both Hunterston A and Hunterston B.

Andy Dalling, Site Director, has continued to host monthly leadership sessions covering topics such as the station business plan, people plan and the evolution of safety. These sessions have been well attended, with strong engagement from leaders and clear messages identified for cascade. They also provide a valuable forum for leaders and Trade Union representatives to come together, ask questions and share experiences.

6. Contact

For more information about anything in this report or other station issues, contact:

Nikki Thomson, Communications Advisor

Tel: 01294 826157 E-mail: nikki.thomson@nservices.uk

Office for Nuclear Regulation

ONR Site Report

EDF Energy / Nuclear Restoration Services – Hunterston B

ONR Site Report

EDF Energy / Nuclear Restoration Services - Hunterston B

Report for period: 1 January to 30 June 2026

Authored by: T Saunders, Nominated Site Inspector

Approved by: T Eagleton, Head of Regulation, Decommissioning Fuel and Waste

Issue: 1

Published: 2026

Record reference:

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 of the Hunterston Site Stakeholder Group and are also available on our website.

Our site inspectors usually attend Hunterston 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.

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1. Inspections

1.1. Date(s) of inspection and site visits

During the reporting period, our site safety inspector and specialist inspectors undertook inspections and site visits to sample the adequacy and implementation of arrangements relevant to nuclear safety, organisational capability and conventional health and safety on:

- 9 to 12 February 2026
- 16 to 19 March 2026
- 22 to 25 June 2026

Our site security inspector also undertook a site visit during the report period, on 11 March 2026.

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 (NSL) granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the Energy Act 2013;
- the Health and Safety at Work etc Act 1974 (HSWA74);
- the Nuclear Industries Security Regulations 2003 (as amended); 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 to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of, and site visits to Hunterston B covered:

- Electrical safety under the Electricity at Work Regulations, 1989;

- Maintenance of compliance by EDF Nuclear Generation Ltd (EDF Energy) prior to site relicensing;
- Preparations for site transfer from EDF Energy to Nuclear Restoration Services (NRS);
- Relicensing of Hunterston B and site transfer to NRS;
- Capability of the post-transfer organisation; and
- Handover of site security inspector responsibilities.

Electrical safety under the Electricity at Work Regulations, 1989

As reported in the previous site report, an electrical safety event occurred at Hunterston B on 7 November 2025. An ONR electrical safety specialist inspector and the nominated site inspector undertook enquiries into the event and the licensee's response on 18 December 2025. These enquiries identified significant shortfalls in compliance with the Electricity at Work Regulations 1989.

Consequently, ONR served Improvement Notice ONR-IN-1267 relating to the management and control of a 415 V electrical cable.

The licensee submitted an action plan to address the identified shortfalls, which ONR reviewed and accepted.

ONR subsequently undertook on-site interventions on 11 February and 19 March 2026 to assess implementation of the improvement actions and compliance with the requirements of the Improvement Notice.

ONR judged that the licensee had:

- adequately reviewed, revised and implemented arrangements for the construction, maintenance, testing and control of portable electrical equipment;

- strengthened arrangements governing the introduction, management and deployment of portable electrical equipment on site;

- improved arrangements for the control, planning and risk assessment of work on electrical systems; and

- developed and delivered appropriate learning and awareness programmes to personnel responsible for controlling, assessing and undertaking electrical work.

ONR therefore concluded that the licensee had complied with the requirements of Improvement Notice ONR-IN-1267 and the notice was closed. The associated regulatory issues were also closed.

In reaching this decision, ONR noted that the licensee implemented the required improvements within agreed timescales and provided appropriate evidence to demonstrate compliance with the Improvement Notice requirements.

Maintenance of compliance by EDF Energy prior to site relicensing

During the site visit conducted in February 2026, ONR sampled activities undertaken by EDF Energy to maintain an adequately competent organisation to safely conduct planned operations and reasonably foreseeable events.

Inspectors examined the licensee's arrangements for managing identified competence shortfalls up to the point of transfer.

Based on the evidence sampled, ONR concluded that the arrangements implemented by the licensee adequately managed risks associated with competence shortfalls and supported the safe conduct of licensed activities.

Preparations for site transfer from EDF Energy to NRS

During site visits conducted in February and March 2026, ONR sampled activities undertaken by EDF Energy and NRS in preparation for the Hunterston B site transfer.

Inspectors examined activities to establish workforce competence against NRS standards following transfer.

Based on the areas sampled, ONR judged that:

- EDF Energy and NRS had jointly established an adequate, prioritised development plan for all site personnel; and
- NRS had undertaken an appropriate vulnerability assessment and established suitable controls to ensure that safety-related activities would continue to be undertaken by suitably competent personnel following site relicensing.

Relicensing of Hunterston B and site transfer to NRS

The relicensing of the Hunterston B nuclear site to NRS and associated revocation of EDF Energy's NSL underpinned the transfer of the site between duty holders and represented a significant regulatory milestone. ONR undertook a proportionate assessment of NRS's capability to assume responsibility for licensed activities and to meet the obligations of a nuclear site licensee. ONR's assessment supported the granting of a new NSL to NRS and revoking EDF Energy's NSL with effect from 1 April 2026.

On 18 March 2026, the Chief Nuclear Inspector visited Hunterston B to sign the NRS NSL (NSL Sc.19) and the revocation documentation for EDF Energy's NSL (NSL Sc.13). Both actions took effect on 1 April 2026.

Capability of the post-transfer organisation

During the June 2026 site visit, ONR inspected the capability of Hunterston B's organisation, including contractor arrangements, to control and supervise safety-related activities.

ONR judged that the licensee:

- has implemented arrangements which provide an adequate organisational capability to undertake current decommissioning and operational activities safely;
- has established appropriate development plans to maintain organisational capability for foreseeable future needs;
- adequately controls and supervises safety-related activities undertaken by both employees and contractors; and
- understands and appropriately manages risks associated with organisational capability shortfalls.

Handover of site security inspector responsibilities

ONR's security inspector undertook a routine site visit on 11 March as part of the planned transfer of inspection responsibilities. The visit included discussions with site personnel regarding current security arrangements and performance of the Physical Protection System. No matters of regulatory concern were identified.

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.

ONR did not identify any non-routine matters or events during the reporting period that required significant regulatory intervention or enforcement action.

4. Regulatory activity

We may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions (LCs), 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’ (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an enforcement notice.

During the reporting period ONR undertook regulatory actions associated with the relicensing of the Hunterston B site from EDF Energy to NRS. A new NSL was

granted to NRS, and EDF Energy's NSL was revoked with effect from 1 April 2026. Associated with the new NSL, ONR issued a Licence Instrument (LI) relating to Nuclear Safety Committee Terms of Reference under LC13(2)

ONR also issued Improvement Notice ONR-IN-1267 relating to the management and control of a 415 V electrical cable. Subsequently, this IN was closed following satisfactory implementation of corrective actions.

Table 1: Regulatory documents issued by ONR during this period

Date	Type	Reference	Description
1 Apr 2026	NSL	NSL Sc. 19	Grant of Hunterston B Nuclear Site Licence to NRS
1 Apr 2026	LI	LI-578	Approval of Nuclear Safety Committee Terms of Reference under LC13(2)
1 Apr 2026	NSL Revocation	NSL Sc. 13	Revocation of EDF Energy Hunterston B Nuclear Site Licence
27 Jan 2026	IN	IN-1267	Improvement Notice relating to management and control of a 415 V electrical cable

Reports detailing the above regulatory decisions can be found on our website.

5. News from ONR

For the latest news and information from us, please read and subscribe to our regular email newsletter 'ONR News' at https://www.onr.org.uk/news/newsletter/.

6. Contacts

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References

There are no sources in the current document.

Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

For the future of our environment

Hunterston Site Stakeholders Group SEPA Update- Hunterston B

August 2026

If you would like this document in an accessible format, such as large print, audio recording or braille, please contact SEPA by emailing equalities@sepa.org.uk

Regulation

Environmental Authorisations (Scotland) Regulations 2018 (EASR)- radioactive substances activities

We have continued communication with the site throughout the period, including formal weekly call-downs with the site's Environmental Safety Group as well as monthly updates from the NRS internal regulator for the site. We have also attended routine meetings with corporate NRS, ONR and EA on strategic issues, including transfer of the AGR fleet to NRS and decommissioning.

On 18 June 2026, the site inspector visited the site to discuss the proposed outcome of the aqueous variation application determination. The opportunity was also taken to receive an update on several on-going issues, including the refurbishment of the active drains and the investigation into the non-radioactive leak in the 39" Outfall. On 24 June 2026, SEPA attended the site's semi-annual Regulatory Periodic Performance Review meeting via Teams.

The site was inspected on 22 July 2026. The focus of the inspection was to establish the status of decommissioning work across the site over the next year, to inspect the site's radioactive waste management plan and to monitor progress on the on-going refurbishments of the Radiochemistry Laboratory. No new contraventions were found and the non-compliance regarding the Radiochemistry Laboratory was closed out. The visit was also used to gather information on the non-radioactive acid waste misconsignment event described below and the progress of the on-going work to identify and remediate the oil leak into the 39" Outfall line.

The site applied to SEPA on 31 January 2024 to vary its EASR radioactive substances permit to remove the minimum aqueous discharge flow rate ($7m^3/s$) and tidal window requirements (one hour after high tide to one hour before low tide) whilst keeping the same discharge point in the Firth of Clyde. SEPA has determined the application and is minded to grant the requests. In addition, SEPA intends to issue a consolidated radioactive substances permit to improve transparency of the compliance requirements. At the time of writing, SEPA has formally consulted the site on the proposed changes. The deadline for issuing the determination has been formally extended to 31 December 2026.

EASR industrial activities

This permit covers the non-radioactive emissions from the emergency diesel generators, auxiliary boilers and waste oil burner.

SEPA continues to monitor the minor leak of non-radioactive biodegradable oil from an oil-filled cable which services a transformer on site to ensure it is having no significant environmental impact.

EASR water activities

These activities comprise one water abstraction registration and five non-radioactive discharge authorisations (cooling water, sewage and surface water).

SEPA continues to monitor the site's investigation into, and improvements made as a result of, the small leak of non-radioactive oil into the 39" Outfall line, which is the main surface water drainage line for the site. The leak has resulted in an intermittent sheen in the outfall which is removed by the two polishing lagoons before it enters the environment.

Fluorinated Greenhouse Gase Emissions (F-Gas)

Please note, this legislation is not included in EASR.

There have been no other issues relating to the station's F-Gas usage since the last scheduled SSG meeting.

Environmental Events

SEPA was notified of a misconsignment of non-radioactive sulphuric acid waste which occurred on 25 June 2026. The concentration of acid in the tanker was calculated instead of directly sampled due to the difficulties in obtaining a sample, but when it arrived at its destination, the acid's concentration was found to be greater than that allowed by the destination site's permit. The acid waste was then consigned to another treatment site which could accept that concentration of acid. Whilst the acid waste was always under appropriate control, the consignment was not accurately described as required by s34 of the Environmental Protection Act 1990 (the Duty of Care). The site has conducted an investigation into the event and SEPA is monitoring progress.

Radioactivity in Food & the Environment (RIFE)

RIFE is a collaborative report on work carried out by SEPA, the other UK environment agencies, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and the environment. The RIFE reports aim to provide an in-depth assessment of radioactivity in food and the environment in the UK and the public's exposure to radiation, including in the vicinity of Hunterston B. The RIFE report incorporates the results from the analysis of a wide range of samples and key information on local habits to demonstrate both that food remains safe and that the public's exposure to ionising radiation is within legal limits.

The latest edition (RIFE 30) covering 2024 has been published and can be obtained from SEPA's website along with previous year's reports. RIFE 30 reports that the total dose for the representative person (most exposed) around the Hunterston site, which includes both Hunterston A and Hunterston B, for 2024 was 0.006 millisieverts, which is well below the legal annual dose limit of one millisievert as set out in paragraph 26, Schedule 8 of EASR18.

Scottish Pollutant Release Inventory (SPRI)

The Scottish Pollutant Release Inventory (SPRI) is a publicly accessible electronic database of releases of pollutants to all environmental media and transfers of non-radioactive waste. We intend that, as far as practicable, SPRI be the principle means by which information on Scottish pollutant releases and non-radioactive waste transfers is collected and made public. Wherever possible, such information will be collected and presented by this one system. The data for 2024, including that from Hunterston A and B, have been published and are available on SEPA's current beta website under "*Topics/Environmental data and reporting/SPRI*".

Mr Keith Hammond

Radioactive Substances Specialist/Speisealach Stuthan Reidio-beo

12/08/2026

Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

For the future of our environment

Hunterston Site Stakeholders Group SEPA Update Hunterston A

September 2026

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Regulation

Environmental Authorisations (Scotland) Regulations 2018 (EASR)- radioactive substances

Engagement with the site continued throughout the period since the last SSG in March, including formal bi-monthly and weekly update meetings. Routine discussions with Hunterston A on site issues, and the corporate NRS team on strategic issues have also continued.

Updates to ongoing situations below are in bold.

Site Inspections

One site visit has been undertaken since the last SSG meeting.

Inspection 11 June 2026

SEPA attended site to complete a compliance inspection of the Hunterston A site laboratory as they start to return to service. No compliance issues were found.

Permit Variation Applications

Aqueous Discharge Variation Application

NRS applied to SEPA on 28 February 2024 to vary its EASR permit to remove the minimum aqueous discharge flow rate (7m3 /s) and tidal window requirements (one hour after high tide to one hour before low tide) whilst keeping the same discharge point. The further information requested from the station, including a short-term release dose assessment to a swimmer during a discharge, was provided in June 2024, and the application has been deemed Duly Made.

Update March 2026 – SEPA has requested the full outputs of the PC CREAM and GoldSIM models submitted with the application to verify the conclusions presented. We expect to determine the variation application by 1 August 2026.

Update September 2026 - The determination is ongoing.

SILWE Discharge/ Site gaseous discharge increase variation application – **update September 2026**

SEPA received an EASR permit variation application from NRS HNA on Monday 21st August 2023. This application is primarily for the operation of the SILWE plant, which requires a permit variation in order to include the SILWE gaseous discharge stack within the site permit. In addition, the permit variation requests an increase to the site gaseous discharge limits due to the operation of this new facility as well as other imminent work on the site. Note that SEPA will consider the encapsulation of bunker 1 wastes only at this time due to the ongoing discussions around the appropriateness of the characterisation of the bunker wastes. The timely encapsulation of bunker 1 wastes is deemed necessary by ONR and is outlined in the Joint Statement provided to NRS HNA by ONR and SEPA last year.

Update March 2025 – Ongoing. Public Consultation closed. No representations were made, and the application will be determined in due course.

Update March 2026 – NRS have written to SEPA and asked for the application to be determined prior to the end of July 2026. SEPA will make every attempt to accommodate this should workloads allow.

Update June 2026 - NRS requested that the determination date be amended to 31 July 2026 in place of 31 October 2026. SEPA wrote to NRS on 20 April 2026 to make them aware that we are unable to accommodate the change in date to 31 July 2026 and consider the date of 31 October 2026 to be realistic and achievable, however SEPA will employ best endeavours to provide a determination prior to the determination date.

Update September 2026 – the determination is ongoing

Other EASR Regulatory Topics

Regulatory Notice

SEPA served NRS Hunterston A with a Regulatory Notice on 12th November 2024 requiring it to immediately cease use of the onsite laboratory for the purposes of demonstrating compliance with the site EASR permit. SEPA took this decision following the review of NRS internal investigation into shortcomings at the laboratory regarding acceptance into service and use of equipment, failure to follow or have in place adequate processes and procedures to achieve compliance and potential shortfalls in staff training. NRS have taken steps to put in place alternative laboratory arrangements to underpin its demonstration of compliance with the site permit whilst the Regulatory Notice is in effect.

Update March 2025 – due to the site receiving the regulatory notice, subsequently necessitating the use of alternative lab resource for the analysis of the samples to provide the statutory discharge reporting to SEPA, the site requested an ongoing extension to the dates for the month discharge returns. SEPA agreed to a rolling 3 month extension to the provision of the monthly returns.

Update March 2026 – SEPA continue to liaise with the site regarding the onsite laboratory and attended site in January to be presented with evidence to allow the labs to return to service.

Update June 2026 – On the 25 March 2026 SEPA wrote to NRS withdrawing Regulatory Notice RN/2024/002. SEPA inspected the documentation provided by NRS as evidence of completion of the steps required by the regulatory notice. SEPA believed the documentation provided by NRS demonstrated compliance with the steps required by the regulatory notice.

The outcome of SEPA's investigation with regards to enforcement will be available in due course.

Review of Characterisation of ILW Bunker Waste - **Update September 2026**

SEPA received an optioneering report from NRS on 28th March 2022 entitled "Review of Options for Managing Waste from The Hunterston A Solid Active Waste Bunkers Given its Status at May 2021 WD/REP/0032/21".

Having initially reviewed the information sent, SEPA considered there needed to be a review of the underpinning characterisation work and whether this is sufficient to underpin the optioneering decisions.

SEPA procured a specialist contractor to review the model and associated work undertaken by NRS with regards to the characterisation of the SAWB waste. The review commenced in December 2022 and SEPA received a final version of the report in June, which was shared with ONR prior to being sent to NRS shortly afterwards.

SEPA, ONR and NRS had a joint meeting to discuss the findings of the report and a way forward on 15th November 2023.

NRS provided SEPA with a high-level scoping document which highlighted work areas required to ensure that an adequate demonstration of BPM is provided for the decisions regarding further characterisation of the bunker wastes.

SEPA received a report in September outlining Assay Options for Solid Active Waste Bunker Boxes and responded with comments to NRS with regards to this work. SEPA await further engagement in due course.

Update September 2025 – SEPA staff had a meeting with NRS to discuss the characterisation of the HNA ILW bunker waste. The meeting was constructive and NRS took on board SEPA comments. SEPA await provision of a report showing the proposed decisions, however NRS showed that they have a forward direction of travel

Update December 2025 – SEPA have been meeting with NRS on a monthly basis to discuss progress with their chosen options for further characterisation of the HNA ILW bunker waste. NRS are expected to report on their findings and recommendations in the near future.

Update March 2026 – NRS reported to SEPA on their findings and recommendations for further characterisation of the HNA ILW bunker waste at the beginning of January 2026. SEPA commended NRS on the work that had been carried out to date. SEPA raised a few points for clarification that NRS have taken away and NRS are due to report back to SEPA in the middle of February 2026.

Update June 2026 – NRS are progressing well with the work streams related to the characterisation of the bunker waste. A waste package weighing and assay campaign is complete. Sampling of identified waste packages should commence in early summer 2026. Reports detailing the results of the different work streams will be forwarded to SEPA when they are complete.

Update September 2026 – NRS shared a presentation with SEPA on the 22nd July 2026 which included the results of the waste package weighing and assay campaign. Sampling of identified waste packages has been set back due to delays in the procurement process but should commence in September 2026 with the full suite of analysis results reported to SEPA at the beginning of 2027.

Other Regulatory Topics

Habits Survey

The Hunterston Habits Survey for 2025 is complete and has been provided to the site.

Fluorinated Greenhouse Gas Emissions (F-Gas)

No events reported over the period.

Environmental Events

N/A

Radioactive Substances Consultations

N/A

Radioactivity in Food and the Environment (RiFE)

RIFE is a collaborative report on work carried out by SEPA, the other UK environment agencies, Food Standards Scotland and Food Standards Agency on the radiological monitoring of food and the environment. The RIFE reports aim to provide an in-depth assessment of radioactivity in food and the environment in the UK and the public's exposure to radiation, including in the vicinity of Hunterston B. The RIFE report incorporates the results from the analysis of a wide range of samples and key information on local habits to demonstrate both that food remains safe and that the public's exposure to ionising radiation is within legal limits.

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Melanie Hayes
Radioactive Substances Specialist,
August 2026

SCOTTISH GOVERNMENT UPDATE TO HUNTERSTON SITE STAKEHOLDER GROUP – 3RD SEPTEMBER 2026

SCOTTISH GOVERNMENT RADIOACTIVE SUBSTANCES AND NUCLEAR DECOMMISSIONING POLICY TEAM

ONR – 9th Joint Convention report

ONR are beginning work on the 9th Joint Convention report to the International Atomic Energy Authority on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management. The team attended a scoping workshop for the report in Liverpool on the 4th of August, ensuring that Scottish Policy and practices are properly reflected in the report.

Hunterston Site Visit

The team will be undertaking a visit to the Hunterston A&B sites. The visit has been organised by UKG as part of the independent NDA review and the team will meet with the lead reviewer to give our views on the NDA. The visit is due to take place on the 26th of August.

Scottish Nuclear Sites Stakeholder Group Meeting (SSSG)

The next SSSG meeting has been scheduled for the 21ST of October 2026 at 2pm. The meeting will be held at Victoria Quay, Edinburgh and via Teams. If you would like to attend the SSSG and are not currently on the distribution list, please contact me via email and I will add you to the list.

Diane Hamilton
Scottish Government