



Site Stakeholder Group

Hunterston Site Stakeholder Group

Notice of the Seventy - ninth Meeting

The next meeting of the Hunterston Site Stakeholder Group will be held:
Thursday, 5 March 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 Report – Daniel Smith

ONR Report – Tanya MacLeod

SEPA Report – Melanie Hayes

Members Question and Answer Session Public Forum

15.00 Update from Scottish Government

Diane Hamilton

15.10 Update from NDA

(not attending)

15.20 NRS Corporate Update

Bill Hamilton

Members Question and Answer Session Public Forum

15.30

Any Other Business

DATE OF NEXT MEETING 10 JUNE

OFFICIAL



**MINUTES OF THE MEETING OF THE
HUNTERSTON SITE STAKEHOLDER GROUP (SSG)
HELD VIRTUALLY
THURSDAY 4 DECEMBER 2025**

Attendance/Apologies list

Attendance

Ms Rita Holmes	Fairlie CC (Chair)
Mr Stuart McGhie	Hunterston B Union REP (Vice Chair)

Operators and Officers

Mr Daniel Smith	Site Director (Hunterston A)
Mr Andy Dalling	Site Director (Hunterston B)
Mr Stewart Ballantine	SEPA (Site Inspector, Hunterston A)
Ms Melanie Hayes	SEPA (Site Inspector, Hunterston A)
Mr Peter Hughes	ONR (Site Inspector, Hunterston A)
Mr Tim Saunders	ONR (Site Inspector, Hunterston B)
Ms Cathryn Pritchard	Secretariat (Hunterston SSG)
Ms Claire Aitken	Secretariat (Hunterston SSG)
Mr John Hulme	NRS
Mr Alistair Walker	NRS
Ms Lizzie Bailey	NRS
Mr James Craig	NRS
Mr Bill Hamilton	External Affairs Director, NRS
Ms Diane Hamilton	Scottish Government

In Attendance

Mr Graham Wallace	Cumbrae CC
Mr Ken Macintosh	Largs CC
Mr Graeme Buckley	West Kilbride CC
Mr Scott McKenzie	North Ayrshire CC
Ms Lesley Jeffreys	Ayrshire Civil Contingencies Team
Cllr Eleanor Collier	North Ayrshire CC
Mr Angus Cochran-Patrick	Hunterston Estate
Ms Louise Martin	Scottish Councils' Committee on Radioactive Substances (SCORRS)
Mr Alan Holden	Member of the public
Mr Barry Wilson	
Mr Gilles Madan	Minute Taker

Public

Apologies

Mr Keith Hammond	SEPA
Ms Mair Jones	NRS Socio-Economics Lead
Ms Aileen Craig	North Ayrshire Council
Ms Fiona McCall	EDF

OFFICIAL

OFFICIAL

Mr David Wallace
Ms Isy Agnew
Mr Willie Jack

NDA (Stakeholder Lead Scotland)
Skelmorlie CC
NFU

1. CHAIR'S OPENING REMARKS AND DECLARATIONS OF INTEREST

The Chair opened the meeting at 13.30. Apologies were noted from Keith Hammond, Mair Jones, Aileen Craig, Fiona McCall, David Wallace, Isy Agnew and Willie Jack.

The Chair noted that David Wallace was retiring, and that he had done an excellent job over the years. David Wallace had been 'exceptional' in his enthusiasm, and had supported the SSG, the Scottish Sites Group, the Chapelcross and Dounreay sites, and the Cross-Party Group on nuclear at Holyrood. He had also become a good friend to many.

No interests were declared.

2. CHAIR AND VICE CHAIR UPDATES AND CORRESPONDENCE

The Chair expressed gratitude to David Wallace of NDA, who was retiring at the end of the month.

The Chair stated that, since the last SSG in September, she and Stuart McGhie had continued to be in contact with both site directors, as well as the Chairs and Vice Chairs of the other sites online. Various meetings had taken place. A strategy 5 webinar had taken place on 5 September, and a cross-party meeting on civil nuclear had taken place on 22 September. An NGO/NDA meeting had taken place in London on 8 October. The virtual stakeholder summit had taken place on 3 November. On 14 November the SSG Chairs and Vice Chairs had had a Teams meeting. A Teams meeting with Rob Fletcher, the chief executive of NRS, would take place on 12 December.

On 25 November, the Committee on Radioactive Waste Management had visited both sites; members had commented on how much they had enjoyed seeing a decommissioning site that had not just been in care and maintenance. Excellent presentations had been seen from both site directors. Members had spoken to project teams during the visit and had been able to access one of the reactor buildings. The A reactor was loaded from below, rather than above. The facilities at B station were good, considering that it was no longer producing electricity. It was good that HNA would not be going into care and maintenance but would continue to decommission.

The Nuclear Taskforce Report had been made public. Before the Taskforce had completed its report, it had met with a group of UK NGOs to discuss its role, its purpose, and to assure the NGOs that it was not trying to erode regulatory standards. However, no input from SEPA had been provided; the explanation provided had been that it was a devolved matter, but ON Regulations applied to the whole of the UK, not just England and Wales. The EA, ONR and other nuclear industry individuals had been asked to give evidence, but despite the issue being about regulations applicable to the UK as a whole, Scotland appeared not to have been invited to contribute.

In matters related to radiation, it appeared that SEPA often took the lead rather than the EA. The question was whether the issue was about easing regulations around SMRs and the Geological Disposal Facility, which were currently only proposed for England and Wales, not Scotland. The Taskforce had stated that it was also about decommissioning, not new build.

Regulators should review numerical targets in their guidance to align with government definitions of tolerability and international standards. The Government should define tolerability of risk for the nuclear sector, considering modern risk interpretations and societal demand for nuclear outputs. Revised dose targets should reflect what society deemed acceptable, and align with international standards and non-nuclear applications. There is no

OFFICIAL

accepted safe level of exposure to radiation. Women and girls were twice as susceptible to radiation as men. The limit was 20ms for nuclear workers and 1ms for the public.

3. ACTIONS AND APPROVAL OF PREVIOUS MINUTES

Claire Aitken reported that both actions from the previous meeting had been completed.

Angus Cochran Patrick proposed that the minutes of the previous meeting be approved. Stuart McGhie seconded the motion. The minutes of the previous meeting were approved as a true and accurate representation of the meeting.

4. HUNTERSTON B SITE REPORTS

Hunterston B Site Report

Andy Dalling presented his report.

Hunterston B was now a decommissioning site and had achieved fuel free in April. Between April and the end of September many arrangements had been changed to allow them to be proportionate to a site that no longer had fuel on it. Emergency arrangements and security arrangements had changed. The Civil Nuclear Constabulary (CNC) was no longer on site. The headcount totalled 246, which was the agreed organisational structure. Safety remained the overriding priority.

The second main activity on site was transfer. The intention was that the Hunterston B site and its licence would transfer to NRS on 1 April, subject to a licence application and permit transfers that were being assessed. The project was on track to be completed by 1 April. There was now an NRS IT infrastructure on the B site.

The aim was to progress the decommissioning journey. Work was ongoing with NRS so that the plans were followed on after April. A joined-up approach outlined the decommissioning plan, which would carry on through the transfer. Cladding was being replaced on the top half of the reactor, which was a like-for-like replacement. The fish farm site had been cleared, and some office buildings were being demolished.

New infrastructure would aid to facilitate decommissioning, such as waste facilities. The alternative active effluent discharge line was a shared discharge between A site and B site, and permit variations were being assessed. The report contained language around modelling, but that would be pipework modelling, not plume modelling.

Harm performance was excellent; tier 1 and tier 2 KPIs were still zero. Some near misses had been seen in the period; an electrical cable had been made up inappropriately that could have given rise to exposure to 415 volts. A root cause investigation was ongoing. Rad safety, environmental safety and emergency preparedness were in good shape. A demonstration had taken place around the level one emergency preparedness arrangements. Staff turnover was at a normal level. Donations had been made in the local area.

ONR Report

Tim Saunders presented his report.

The limited site attendance reflected a significantly reduced hazard on site, as well as the fact that the site needed to have headroom to implement and embed its fuel-free arrangements that had been permissioned earlier on the year. The one inspection that had been conducted reflected the positive progress that the site had made and continued to make.

The inspection had been a joint ONR/SEPA inspection to verify that the dangerous substance inventory had been reduced below the threshold for the Control of Major Accident Hazards (COMAH) regulations. The inspection had been successful in demonstrating that the

OFFICIAL

approach was appropriate. The inventory had been reduced below the lower threshold, and the residual risk was being adequately controlled.

The ONR had been active in engaging with NRS and NGL in terms of the preparations for the site transfer. NRS was on track for a successful transfer on 1 April. Since the reporting period, the site had successfully demonstrated the implementation of its fuel-free arrangements for both emergency planning the site security plan.

ONR had received the final report for the Nuclear Regulatory Task Force (NRTF) and was actively developing its action plan to respond to it. The report did not contain any unforeseen issues. On 10 November, the director for the Sellafield Decommissioning Fuel and Waste Directorate had changed, but that had no material impact on the emphasis and the tone of the inspection.

SEPA Report

Stuart Ballantine presented the report.

The transfer paperwork and applications were on track to be done and prepared in time. From 1 December, Paul Dale would be chief regulator for SEPA and would retain oversight of the radioactive substances unit as part of that role.

Questions & Answers

Angus Cochran Patrick asked if the discharge line would go into the cooling water (CW) outfall or a separate drainage water outfall. Andy Dalling explained that it would use the existing cooling water outfall. The start and end points of the discharge would be exactly the same. The permit aimed to increase the velocity, which was being assessed.

The Chair asked for the difference between operational waste and the waste that would go into the old laundry. Andy Dalling explained that the difference related to the level of radioactivity. The DWPF would take low-level waste and the risings around the pond would be for higher-active waste.

The Chair asked for an explanation of Transfer of Undertakings (Protection of Employment) (TUPE). Andy Dalling explained that it related to the protection of employees when one company took over another.

The Chair asked if a laying-down area would be needed for materials to be placed on when the turbine hall was demolished. Andy Dalling said this level of detail had not yet been examined, but the aim was to recycle and reuse as much of the equipment and materials as possible. The laying-down would be done within the site. It was likely that a commercial agreement would be entered into. The land that was required for decommissioning would transfer to NRS.

The Chair asked if ISO 45001 was the same as the BEG specifications. Andy Dalling explained that the latter was the company specifications within EDF, which ensured compliance with ISO 45001. Regular audits took place around whether the specifications were being complied with.

The Chair asked if Daniel Smith and Andy Dalling would be named as holders of the waster permits in April. Stewart Ballantine confirmed that an individual could hold the permits. Any holder would need to pass the fit and proper persons test.

The Chair asked what the Guinness pot was. Andy Dalling explained that the Guinness pot helped with anti-foaming of the CW outfall.

The Chair asked if anything else needed to be mentioned around the rate of discharge. Melanie Hayes explained that the modelling had determined that there was no cause for concern for swimmers close to the discharge point.

OFFICIAL

OFFICIAL

The Chair asked what would happen to the 11 diesel generators. Andy Dalling explained that one would be used for emergency lighting. The waste burner had not been used, and there was no intention to use it.

5. HUNTERSTON A SITE REPORTS

Hunterston A Site Report

Daniel Smith presented his report.

Business planning sessions had been carried out earlier in the year. An engagement day had taken place at Hunterston B, related to supporting it with its preparation to move to NRS. The roadshow had visited West Kilbride, Largs and Saltcoats.

The Mutually Agreed Voluntary Exit Scheme had been launched, which allowed staff to exit if they wished and if it met the requirements of the business. The scheme was completely optional and allowed staff to express their interest in leaving the business with a financial package. The scheme had originally been offered to personal contract holders in September and had been extended to all NRS staff. The scheme would close on 10 December. All applications would be reviewed on a case-by-case basis. The number of applications that had been received was not high.

Many site visits had taken place, the most recent of which had been by the Committee of Radioactive Waste Management. Safety performance was strong. Recordable/treatable injuries in the period totalled zero, as did the lost-time accident rate. The site had gone 15 months since the last medical treatment event or lost-time accident. A slips, trips and falls campaign was ongoing.

Work was ongoing around environmental management. A significant amount of work had been done on the chemistry lab, including a complete refurbishment and training for lab staff. Procedures and practices had been examined, and resources within the lab had been significantly improved. The resilience across the wider radiological and environmental management department had also improved. The Environmental Safety Action Team (ESAT) had been set up, which proactively examined any potential environmental risk. Training had been delivered to leaders on site, using experience from B Station, to make sure that people on site understood their role and the impact they could have on environmental safety and the environmental permit. All environmentally significant plants on site had been labelled.

Security was being proactively managed, with no major findings from audits and inspections. A security demonstration exercise had been successfully completed in September. Work was ongoing to remove old cabins and fencing.

The Solid Intermediate-Level Waste Encapsulation Plant (SILWE) would take the waste packages for solid waste and encapsulate them. The process was in its commissioning phase. The present programme for active commissioning showed the end of July 2026 into early August 2026, but work would take place with the SEPA team with regarding obtaining a permit.

Regarding waste performance, the target was for 63.5 tonnes of high-active waste retrieved, and as of last week the total was 39 tonnes. 18 drums had been stored. The capacity of the waste plant had been doubled. 9.82 tonnes of metallic waste had been consigned from the site. The target of 20.5 cubic metres of legacy waste had almost been completed. Work was ongoing to decommission the plant systems.

In the last year, NRS had provided almost £79,000 of funding to support communities close to Hunterston. Prestwick Tennis and Fitness had received £10,000 from NRS funding towards the construction of a new padel court.

ONR Report

Peter Hughes presented his report.

OFFICIAL

OFFICIAL

A safety culture inspection had taken place, which had found that the site was demonstrating strong indications of possessing a healthy safety culture. An enforcement notice against Altrad had been served, following the forklift truck drop load incident. All actions resulting from that enforcement letter had been completed.

A series of workshops had been held to determine how the ONR regulated Hunterston A going forward. The focus would be on the areas of biggest risk and hazard, so it would decrease the number of licensed conditions inspections.

SEPA Report

Melanie Hayes presented her report.

Regarding Hunterston A getting the regulatory notice lifted and being able to use the labs again, the site would be providing SEPA with a presentation on the work it had undertaken in order to meet the steps within the regulatory notice. The 2024 Radioactivity in Food and the Environment (RIFE) report had been published; the total dose for a representative person was 0.0006 millisieverts, which was consistent with previous years, and significantly below the legal annual dose limit of 1 millisievert.

Questions & Answers

The Chair asked if the millisievert limit would stay at 10. Daniel Smith explained that the EDF limit was 10 and the legal limit was 20. However, the trigger point was one millisievert. The dose rates of all classified workers were closely monitored.

The Chair asked if the security exercise had been witnessed by ONR. Daniel Smith confirmed that was correct. Details of the plan could not be shared as it could compromise the security plan.

The Chair asked if water abstractions were regularly done from the site. Andy Dalling explained that it would be routine discharges in line with the environmental permit.

The Chair asked if active commissioning of the encapsulation plant would be completed by summer 2026. Daniel Smith explained that the plan was for SILWE to encapsulate the solid waste packages. The plan was a re-baseline plan, following changes in 2024. Setting to Work 2 would prove that a waste package could be encapsulated. The next step of the process would be to take any feedback, examine potential issues or defects, and then move into inactive commissioning. Inactive commissioning would commence in January and would run through to May. The plan for inactive commissioning was to test every part of the system with no waste, and then to prove that packages could be encapsulated at all eight stations. Following completion of the inactive commissioning phase, the active commissioning phase would take place.

The Chair asked if there was a plan for every discharge route. Daniel Smith explained that the bunkers were being cleaned and would be demolished at an appropriate time. The plan was to decommission the pond building within the next decade.

6. UPDATE FROM SCOTTISH GOVERNMENT

Diane Hamilton presented her report.

The majority of the work around the Higher Activity Waste Policy Review (HWAPR) would be completed after the election, but work was ongoing. Work was also ongoing around the Environmental Impact Assessment. The Higher Activity Waste in Scotland Strategy Implementation Group (HAWSSIG) meeting would take place in 2026, with a date to be confirmed.

Questions & Answers

Claire Aitken asked if the secondment would go ahead. Diane Hamilton explained that the business case had been agreed, and the proposal was with HR. Discussions would take place with NDA and NRS to see if they were still interested.

The Chair asked if the HWAPR would go to public consultation. Diane Hamilton confirmed that it would be, but Ministers had instructed that nothing could be done until after the election.

7. UPDATE FROM NDA

The NDA report had been received. No questions were raised.

8. NRS CORPORATE UPDATE

Bill Hamilton presented his report.

The next SSG meeting would contain a presentation on the community roadshows, the focus groups and the feedback that had been received.

9. ANY OTHER BUSINESS

Lesley Jeffreys explained that Hunterston B's incident response exercise had been due to take place in November 2025 but a six-month extension had been requested. The exercise would now take place on 13 May 2026, and its purpose was to inform people about the changes to what the emergency services could and could not do at a nuclear station without permission.

The Chair noted that the emergency services needed to be aware that there were two Hunterston Sites and two separate roundabouts. The northern roundabout was for Hunterston Peel ports, and the southern roundabout was for access to Hunterston A and Hunterston B nuclear sites. Ms Jeffreys confirmed that the emergency services were now aware of this. Hunterston A had been confirmed as coming out of "REPPIR" so a revised plan was needed.

Louise Martin reported that SCORRS had had two meetings in 2025, most recently in November. Over 20 representatives from local authorities in Scotland had attended. Funding had been received for a further 12 months to provide secretariat support to the committee. Three committee meetings would be held in 2026.

Claire Aitken asked if all of the council's local authorities sat on SCORRS. Louise Martin explained that they did not. The authorities that did not sit on SCORRS were currently holding an elected member appointment, in order to encourage them to do so.

The Chair asked if somebody from North Ayrshire Council could sit on SCORRS. Scott McKenzie stated that the issue was being addressed. Louise Martin added that North Ayrshire Council had asked for more information about how SCORRS operated.

Claire Aitken asked if SSG could write to the Head of Democratic Service on the matter.

The Chair asked why Scotland had not been invited to contribute to the recent Nuclear Task Force report, as the risks were a UK-wide issue. Peter Hughes explained that the report focused on England and Wales, because a lot of it was a devolved matter and Scotland had its own areas. The report did not just focus on new nuclear, which included SMRs and advanced nuclear, but also examined waste aspects as well. The waste section of the report was focused on the geological disposal facility, which was an England and Wales strategy, rather than a Scottish strategy. The ONR accepted the findings within the report, and would be involved in the recommendations on how they would be implemented going forward. The focus would be on improvements around planning, defence and environmental.

The Chair thanked those present for attending and closed the meeting at 15.31.

OFFICIAL

Next Meeting date: TBC

OFFICIAL

Site Stakeholder Group

Hunterston B Station Director's Report

Period: Nov 2025 to Jan 2026

1. Transfer and Deconstruction

Site Transfer to NRS

EDF and NRS are continuing to work together to deliver the safest, most cost-effective solution for decommissioning the UK's Advanced Gas-cooled Reactor (AGR) fleet, including transfer of the seven sites to NRS after the completion of defueling by EDF.

In the last few months alongside NRS we have given our external and internal regulators confidence that we can safely and compliantly transfer by completing the shadow working activities agreed. The output from this will support the NRS site licence application for the Hunterston B site.

During the period we held another NRS staff engagement day. These sessions provide opportunities for staff to speak to NRS colleagues and find out more about the positions within different departments and the type of work involved. We're also looking forward to welcoming several members of the NRS team on 4 March for our final engagement event ahead of the transfer.

Day 1 preparations are advancing well, and in January we formed an on-site Transfer Working Group to keep everyone informed through weekly updates. The group is tracking all workstreams, sharing progress, and highlighting any issues early so we can deliver a smooth and well managed transfer.

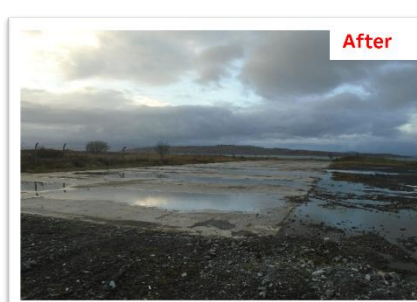
Deconstruction Delivery

During the reporting period we continue to deliver the early stage of the decommissioning plan for our site.

Some highlights for the quarter in terms of delivery have been –

- Cladding replacement of the main B Station building has continued with two thirds of the cladding on the north and south elevations already complete. This work will continue through to the point of transfer.
- Early demolition works have also continued across several small buildings on-site.
- Demolition of the Fish Farm is now complete.
- Preparations are ongoing for starting major decommissioning projects, such as the circulator hall and the turbine hall de-planting.
- The project to deliver the new Active Effluent Discharge Line is progressing well with the concept design phase nearing completion.
- The site's decommissioning plans are now fully aligned with NRS and have been built into the NRS business plan 2026/2027.

Fish Farm



2. Safety and Environment

Station Industrial Safety Performance

Safety performance during the reporting period has been good and our Total Recordable injury Rate (TRIR) sits at 0.

Team monthly safety meetings continue to be a success with topics including winter driving and readiness as well as focusing on slips, trips & falls. The latter topic encouraged reporting of external walkway defects to get these assessed and repaired to reduce risk.

The Industrial Safety team ensured we maintain compliance with ISO 45001 and carried out three compliance evaluations in line with the fleet programme for Q4, these included topics such as Management of Excavations, Fire Safety & Temporary Transportable Accommodation Units.

In the first-half of January 2026 we held our Safe Start campaign where we carried out various forms of engagement with staff and contract partners across the station. This included a week of daily safety messages covering some fundamental topics like setting-to-work and risk assessment and we also joined-up with Occupational Health to prepare and hand-out some wellbeing information at the main turnstiles on the second week. Information leaflets were distributed to personnel as they arrived on site which provided advice on dealing with mental health issues.

Industrial Safety Engineers have actively supported key programme work areas such as the Cooling Water outage which involved some diving operations as well as assessing potential safety issues as they arise during the works. Some other conditions that safety engineers are currently leading or supporting mitigations for are condensation issues within B Station, civil structure issues and glazing defects.

A current focus for the safety team is to do with transfer to NRS and the new NRS governance and processes for conventional safety. The aim is to maintain safety and compliance through the period of transfer from EDF to NRS and capture and action any process gaps appropriately as we move towards and enter NRS. In January the team visited Hunterston A Site to meet the NRS safety and quality team which was a very worthwhile experience. Additional visits are intended prior to transfer.

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, outages and routine operations. 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 (November 2025 - January 2026)		
Planned collective dose	2.5man.mSv	
Actual collective dose	0.664man.mSv	
	Employee	Contract Partner
Total Dose	0.550man.mSv	0.114man.mSv
Average individual dose	0.003mSv	0.001mSv
Highest individual dose	0.056mSv	0.016mSv
Individuals	190	159

Chest X-ray	Transatlantic Flight	CT scan	Average UK annual dose to public	EDF Energy Dose Restriction Level	UK legal dose limit for radiation workers
0.014mSv	0.08mSv	2.0mSv	2.6mSv	10mSv	20mSv

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).

Environmental Safety

There have been no significant environmental events in the period November 2025 to December 2026

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.

The site has been working closely with NRS to plan for the transfers of environmental permits. Transfer applications from EDF to NRS have been submitted to SEPA for the site's water discharge permits and combustion plant permit; these are currently in the final stages of approval ahead of site transfer to NRS.

Radioactive gaseous and aqueous discharges arising from normal plant operations remain at levels well below those authorised by SEPA.

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.

Work to process and package solid low-level wastes has continued in the period, as part of normal operations and consignments have been made to our regular partners.

Emergency Arrangements

There have been no activation or issues with the emergency arrangements at Hunterston B during this reporting period.

During the reporting period, we have concluded our 2025 Q4 exercise season and have undertaken four shift exercises which has allowed our existing role holders and trainees to exercise their roles in conventional hazard-based scenarios. These exercises helped to facilitate our ongoing role succession plan and formal authorisations at the end of the year.

We also completed a Level 1 exercise in November where Hunterston B demonstrated our emergency arrangements to the ONR. This was deemed an 'adequate' demonstration, which is the best rating that can be achieved.

In addition, Hunterston B has also completed a shadow working exercise in conjunction with NRS, which has successfully tested the NRS emergency arrangements ahead of the point of transfer. This focused on testing the notification chain as well as the central support of NRS.

3. People

The site transitioned to a Decommissioning Organisation, with more than 100 employees being redeployed into new positions within the structure. Following the completion of formal consultation and recruitment, 99% of employee's aspirations have been met.

Further recruitment has occurred which resulted in further employees who were at risk of redundancy securing positions within the Deconstruction Structure.

TUPE Consultation for transferring staff commenced in May 2025 with Trade Unions and continued during the year. The consultation was on measures (expected changes) Nuclear Restoration Services (NRS) envisage making. Consultation has been constructive and positive and is expected to be complete Q1 2026.

Preparing employees for transfer has been a key priority for the site. This has involved ensuring employees have necessary tools, training and information required to ensure a seamless transfer to NRS. A further Engagement Day is planned for 4th March which will be an opportunity for employees to interact with NRS colleagues and for them to further showcase NRS specific systems and processes.

"End of EDF" celebration events to recognise HNB's achievements, say thank you and bid farewell to EDF started in January. HNB teams were given the opportunity to organise an function within their new teams/departments. This allowed the sites new departments to bond and get to know each other better whilst reflecting on their time in EDF. It also served as a celebration of the individual and teams' success on the 50-year anniversary of HNB coming online.

Andy Dalling has held monthly leaders' sessions, discussing topics like the station business plan, people plan and safety evolution. Sessions have been well attended with good engagement from our leadership population and key messages for cascading. This is also an opportunity for leaders and Trade Union representatives to come together and ask questions and share experiences.

4. Sponsorship and Donations

Hunterston B continues to support our local community by providing donations to local groups and charities. Over the reporting period we have made contributions to the following groups:

- North Ayrshire Table Tennis Club
- North Ayrshire Cancer Care
- Largs Academy
- Scottish Football for Rwanda
- Montgomerie Park Primary School
- St Marks Primary School
- Garnock Rugby Club

5. Company Update

£1.2billion investment across 2026-28 to help boost reliability and output

EDF's Nuclear Operations business has published its annual fleet update, a review of 2025 performance and an outline of future developments. 2025 was a milestone year for the UK nuclear sector with the approval of Sizewell C, an important review into regulation of the nuclear sector led by John Fingleton, a Government decision on the future of the Wylfa site and new project proposals announced for the Cottam site (Holtec, EDF, Tritax) and Hartlepool (X Energy, Centrica).

This fleet update is published as EDF's nuclear operations business prepares to recognise its own milestone, the 50th anniversary of when the UK's first Advanced Gas-cooled Reactors started producing zero carbon electricity. Hinkley Point B connected to the grid on 5th February 1976, followed by Hunterston B the next day. Fifty years later, both of those stations are preparing to transfer to the Nuclear Decommissioning Authority (NDA) following the successful completion of defueling, on time and on budget. Hunterston B will be the first to transfer in April 2026.

Dr Mark Hartley, Managing Director of EDF's Nuclear Operations business said: "In November, the UK Government said that the retirement of the AGRs risks leaving a dangerous gap in Britain's low-carbon energy supply. It is our ambition to generate from the remaining AGR stations for as long as it is safe and commercially viable to do so and we will keep their lifetimes under review to assess whether further life extensions can be achieved.

He continued: "Sizewell B had a strong year, operating for 99% of the time and delivering the second highest output in its 30-year history, once again demonstrating the value of nuclear as a stable baseload generator."

Minister for Nuclear, Lord Vallance said: “Nuclear is a vital component of our energy mix, providing clean homegrown power for millions of homes and supporting energy security while employing thousands of people across the country.

That is why it is excellent to see EDF investing in our existing nuclear power stations, and we are driving a new age of nuclear – backing Sizewell C in Suffolk and small modular reactors in North Wales.”

The annual fleet update outlines the UK nuclear fleet’s 2025 generation performance. Output last year was 32.9TWh, 12% lower than in 2024 due primarily to an extended outage at Hartlepool power station. This output represents about 12% of UK electricity demand and is enough to power every home in the UK for more than four months.

Output was over treble the amount originally expected from these stations when EDF acquired the fleet in 2009. The youngest of the Advanced Gas-cooled Reactor stations (Torness and Heysham 2) were originally due to stop generating in 2023 but investment in the fleet so far of £8.6 billion, along with careful stewardship, has enabled four stations to stay online, preventing Sizewell B being left as the UK’s sole generating nuclear station. EDF plans to return output to around 36TWh in 2026 and is due to invest more than £1.2billion over the 2026-28 period.

In September 2025, a further year was added to the forecast lifetimes of Heysham 1 and Hartlepool meaning they are currently due to generate until March 2028.

EDF believes a 20-year life extension for Sizewell B is technically feasible and would provide a reliable, clean source of power to 2055 and beyond. Negotiations are ongoing with the UK Government to agree a long-term price for the power that will enable the required investment to make this extension happen.

You can read EDF’s full UK Nuclear Fleet Stakeholder Update [here](#).

Milestone moment at Somerset powerhouse

Hinkley Point B, the nation’s first operating Advanced Gas cooled Reactor, has entered a new phase of its life as it is confirmed to be fuel free.

Between 1976 and 2022 Hinkley Point B provided so much electricity it could meet the needs of every home from the tip of Cornwall to the top of Gloucestershire, for 33 years.

In August 2022 the power station’s generating life came to an end. Within weeks work started to remove all of the remaining nuclear fuel. The final fuel left the site on Friday, November 28. Today January 12, 2026, the defueling job is officially complete as the Office for Nuclear Regulation confirmed Hinkley Point B was granted Fuel Free Verification status.

Des Uminski, Station Director, said: “This is a huge moment for the Hinkley Point B team. For our first 46 years we focussed on turning out the megawatts for the nation. In 2022 we shifted to turning out the fuel as we emptied our reactors. As of today, our focus is on the full, safe decommissioning of the site.

“I want to thank the teams here at Hinkley B who removed the fuel in just over three years. We knew this would be a challenge – but as usual our staff have risen to it and delivered brilliantly.

“We have had many years to prepare for this moment and the change that it means, but it is still a pivotal point in our site history and for our teams.”

When defueling started in September 2022 Hinkley Point B had to remove 616 stringers of nuclear fuel from the site. The fuel was packaged into specially engineered, transportable fuel flasks which were then moved by rail by Nuclear Transport Solutions (NTS) to Sellafield for safe storage.

Hinkley Point C takes another step forward as its second nuclear reactor arrives in Somerset

The twin nuclear power station at Hinkley Point C has taken delivery of its second nuclear reactor. The first arrived in 2023 and is already installed and welded in place on Unit 1 of the power station.

The delivery of the second “reactor pressure vessel” is a major moment for the identical Unit 2. The pressure vessel harnesses nuclear fission to make heat and steam for the world’s largest turbines. Each one will power around 3m homes around the clock. The high strength steel cylinder weighs in at 500-tonnes and is just 13-metres long.

Work on Unit 1 has moved onto the fitting out of pipes, cables and equipment, while Unit 2 is focussed on the completion of its buildings following the successful dome lift in July last year. Thanks to innovation and the experience gained from constructing Unit 1, teams are building Unit 2 20-30% faster, with prefabrication now approaching 60%.

The reactor was shipped from the Framatome Saint Marcel factory in France to Avonmouth Docks in Bristol, before being transported by barge to Combwich Wharf on the River Parrett in Somerset. The final journey was a six hour road trip for four miles by a transporter to the construction site.

6. Contacts

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

Fiona McCall, Senior External Affairs Manager

Tel: 07813 232 347

E-mail: fiona.mccall@edf-energy.com

Nikki Thomson, Communications Advisor

Tel: 01294 826157

E-mail: nikki.thomson@edf-energy.com

ONR Site Report

EDF Energy – Hunterston B

ONR Site Report

EDF Energy - Hunterston B

Report for period: 1 July 2025 to 30 December 2025

Authored by: T Saunders, Nominated Site Inspector

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

Issue: 1

Published: February 2026

Record reference: 2026/4312

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.

Contents

1. Inspections 4

2. Routine matters 4

3. Non-routine matters 6

4. Regulatory activity 7

5. News from ONR 8

6. Contacts 8

References 8

1. Inspections

1.1. Date(s) of inspection

Our site inspector and specialist inspectors made inspections and site visits on the following dates during the report period 1 July 2025 to 30 December 2025:

- 1-5 September 2025
- 15-20 September 2025
- 8-9 October 2025
- 10-13 November 2025
- 17-18 December 2025

Our site security inspector made one inspection during the period 10-13 November 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);
- 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 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, and site visits to Hunterston B covered:

- The Control of Major Accident Hazard (COMAH) Regulations, 2015.
- Preparations for site transfer from ENGL to NRS
- Site Emergency Preparedness

- Implementation of the deconstruction organisation.
- Electrical safety under the Electricity at Work Regulations, 1989

COMAH Inspection – Hunterston B is no longer a COMAH site

The ONR and the Scottish Environmental Protection Agency (SEPA) jointly constitute the COMAH Competent Authority. On 15 July, Hunterston B submitted a COMAH denotification, declaring that their holdings of dangerous substances had decreased below the COMAH lower tier threshold. Our inspectors, with their SEPA counter-part conducted a COMAH inspection on 4 September to review Hunterston B's approach to removing dangerous substances, verify the removal of COMAH-relevant dangerous substances below the lower tier threshold, and review the control of any residual risk. From the areas sampled, the approach taken by Hunterston B to remove dangerous substances was judged to meet the legal requirement for compliance with COMAH regulations, the dangerous substances inventory was judged to be below the lower tier threshold, and the residual risk was judged to be adequately controlled.

Preparations for site transfer from ENGL to NRS

During the site visits in September, October and November, our inspectors observed activities conducted by ENGL to refocus personnel onto the changed on-site hazard profile, and 'shadow working' activities to demonstrate how those arrangements that will change at point of transfer will be implemented. Each of the activities observed was judged to be adequate, which contributes to informing ONR's decision on whether to re-license the site to NRS on 1 April 2026.

Site Emergency Preparedness Demonstration

In this reporting period, ONR agreed to, and issued a Licence Instrument (LI) (LI-576) under Licence Condition (LC) 11 for, the revised emergency plan on 25 July 2025.

On 12 November 2025, ONR inspectors evaluated a demonstration of the station emergency arrangements. The emergency exercise was judged to be an adequate and effective challenge to the emergency response arrangements required under LC 11. As with all exercises, some learning opportunities were identified – in this case, greater familiarity in the use of emergency equipment and in casualty handling for elements of the emergency response teams.

Implementation of the Deconstruction Organisation

On 17 July 2025, ONR agreed to the implementation of, and issued an LI (LI-577) under LC 22 for, the post defuelling safety case.

During the reporting period, the site fully implemented the post defueling safety case, the revised Site Security Plan (SSP) for a fuel free site, and new emergency arrangements for a fuel free site. Following which, the site re-organised to its deconstruction organisation on 30 September.

ONR inspectors reviewed the implementation of the organisational changes on 17 December. Areas of good practice were identified in the Construction Office, with adequate control of work to ensure that only suitably qualified and experienced persons perform any duties which may affect the safety of operations on the site. More widely, however, we identified shortfalls in the management of the organisation and in the management of competence of personnel. We are supporting site in addressing these issues prior to transfer.

Electrical safety under the Electricity at Work Regulations, 1989

On 11 November, Hunterston B reported an electrical safety event to ONR and subsequently site initiated a significant adverse condition investigation.

An electrical safety specialist and the nominated site inspector conducted enquiries into the event and site's response to it on 18 December. These enquiries identified significant shortfalls against the requirements of the Electricity at Work Regulations, 1989. Consequently, ONR will be taking enforcement action in the next reporting period for Hunterston B to demonstrate adequate control of both portable electrical equipment and of work that could impact electrical safety.

2.2. Other work

Our site inspectors attended the SSG on 4 September 2025 and on 4 December 2025.

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' (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an enforcement notice.

- The LIs detailed below were issued to Hunterston B in this reporting period.
- No enforcement notices were issued to Hunterston B in this reporting period.

Table 1: Licence Instruments issued by ONR during this period

Date	Type	Reference	Description
Jul 2025	LI	LI-577	Post Defuelling Safety Case
Jul 25	LI	LI-576	Emergency Arrangements

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

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
website: www.onr.org.uk
email: Contact@onr.gov.uk

This document is issued by ONR. For further information about us, or to report inconsistencies or inaccuracies in this publication please email us via contact@onr.gov.uk.

If you wish to reuse this information visit <https://www.onr.org.uk/access-to-information/copyright/> for details.

For published documents, the electronic copy on our website remains the most current publicly available version and copying or printing renders this document uncontrolled.

References

There are no sources in the current document.



For the future of our environment

Hunterston Site Stakeholders Group

SEPA Update- Hunterston B

March 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 station throughout the period, including formal weekly call-downs with the station's Environmental Safety Group and corporate Environment Standards and Sustainability Branch as well as monthly updates from the EDF internal regulator on site. We have also attended routine meetings with corporate EDF, NRS, ONR and EA on strategic issues, including transfer to NRS and decommissioning.

The station has been visited twice since the last SSG meeting. On 16 December 2025, SEPA conducted an end-of-year wash-up inspection. The focus of the inspection was progress on on-going issues such as the refurbishment of the Radiochemistry Laboratory and the repairs to the active drains. The opportunity was also taken to get updates on both the landward and seaward aspects of the Alternative Aqueous Effluent Discharge Line (AAEDL) project. No new contraventions were found.

The station was inspected again on 4 February 2026. The focus of the inspection was compliance with the waste transfer elements of the permit as well as monitoring progress on the on-going refurbishments of the Radiochemistry Laboratory and active drains. No new contraventions were found. An update on the AAEDL project was also received.

The station applied to SEPA on 31 January 2024 to vary its EASR permit to remove the minimum aqueous discharge flow rate ($7\text{m}^3/\text{s}$) 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 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.

EDF and NRS have submitted a joint application to transfer the EASR permit for radioactive substances activities from EDF to NRS. We have consulted with ONR, Food Standards Scotland and Scottish Ministers and have not received any contrary comments. We have formally shared

our indicative determination with EDF and NRS that we are minded to grant the transfer subject to a satisfactory outcome of a readiness inspection in March 2026. Please note that there will be no formal public consultation on the transfer application.

EASR industrial activities

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

An application has been received by SEPA to transfer this permit from EDF to NRS. We expect to determine the application before the transfer of the site on 01/04/2026.

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 authorisation and five non-radioactive discharge authorisations (cooling water, sewage, surface water).

Applications have been received by SEPA to transfer these authorisations from EDF to NRS. We have determined the applications for the four main discharge permits and issued notices with effective dates of 01/04/2026. The fifth discharge authorisation has been deemed to be a General Binding Rule-level activity, and the former registration will be revoked.

The water abstraction activity has been deemed a registration-level activity under EASR, and it is anticipated that EDF/NRS will apply to transfer it to NRS once the EASR transition period ends in March 2026.

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

There were no reportable incidents, complaints or non-compliance events affecting SEPA's interests at the station known to have occurred since the last meeting of the SSG at the time of drafting this report.

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

05/02/2026



Office for
Nuclear Regulation

ONR site report

Nuclear Restoration Services – Hunterston A

ONR site report

Nuclear Restoration Services - Hunterston A

Report for period: 1 October – 31 December 2025

Authored by: Nominated Site Inspector

Approved by: Deputy Head of Safety Regulation – Decommissioning, Fuel, and Waste

Issue: 1

Published: January 2026

Record reference: 2026/389

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: www.onr.org.uk/publications/regulatory-reports/site-specific-reports/lcsvg-reports.

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.

Contents

1.	Inspections	4
2.	Routine matters	5
3.	Non-routine matters	6
4.	Regulatory activity	7
5.	News from ONR	8
6.	Contacts	8

1. Inspections

1.1. Date(s) of inspection

Our site inspector made no inspections during the report period 1 October to 31 December 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, there were no routine inspections of Hunterston A.

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, our nominated site safety inspector has held regular telephone meetings with Hunterston A leadership team representatives to maintain situational awareness of matters related to nuclear safety.

Other routine matters discussed during this period included:

- Decommissioning progress on the site;
- Progress on restoring laboratory capability at Hunterston A; and
- Recent site safety matters.

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.

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

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
Website: www.onr.org.uk
Email: contact@onr.gov.uk

This document is issued by ONR. For further information about us, or to report inconsistencies or inaccuracies in this publication, please email contact@onr.gov.uk.

If you wish to reuse this information, please visit www.onr.org.uk/access-to-information/copyright for details.

For published documents, the electronic copy on our website remains the most current publicly available version and copying or printing renders this document uncontrolled.

Hunterston Site

Stakeholders Group

SEPA Update

Hunterston A



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

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

Site Inspections

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

Updates to ongoing situations are in bold.

SEPA Visit 13-14 January 2026

SEPA attended the site to allow NRS to present evidence with regards to the return to service of the HNA labs. SEPA will make a determination as to whether the lab can return to service in due course.

SEPA Site Inspection 28th March 2023 – update March 2026

SEPA undertook an inspection of the process employed by Hunterston A to submit the monthly gaseous discharge returns. The inspection focused specifically on the process for sample receipt in the labs and monthly reporting of the gaseous ‘any other radionuclides’ on the permit, i.e., the particulate alpha and beta.

During the inspections SEPA found that Hunterston A are not reporting the monthly gaseous ‘all other radionuclides’ as per the requirements of Schedule 2: Data Return Requirements of the Environmental Authorisation (Scotland) Regulations 2018.

The site was therefore deemed to be non-compliant with a number of standard conditions of the site EASR permit.

In July SEPA wrote to the site requesting timelines for a return to compliance as well as confirmation of the status of the data provided in previously submitted data returns. The site provided a response on 10th August, and SEPA is in the process of considering the programme supplied by the site and will respond in due course.

The site has been served with an Information Notice to ensure that the timelines provided by the site to address these matters are adhered to. These timelines are for the provision of information SEPA believes is necessary to ensure current and future compliance at the site.

SEPA have varied the Information Notice originally issued to NRS Hunterston A in January of this year following NRS failure to meet a deadline for provision of information specified within the notice. The variation extends the deadline from 31st October to 28th of November for item 2b and 2c of the Notice only, all other outstanding deadlines remain unaltered.

Update March 2025 - SEPA have varied the Information Notice originally issued to NRS Hunterston A in January 2024 following a request from NRS for an extension to the dates for actions 2b, 2c, 3b, 4a and 4b within the information notice as they were not able to adhere with the dates previously outlined. NRS formally outlined the inability to adhere to this date in letter dated 27 November 2024.

NRS indicated that they will be in a position to submit the required information to meet Actions 2b and 2c by 30 April 2025, Action 3b by 31 May 2025, Actions 4a and 4b by 30 June 2025.

SEPA subsequently varied the Information Notice to the dates requested by NRS Hunterston A.

Update June 2025 – at the time of preparing this report, NRS have provided SEPA with information to close out actions 2b and 2c, which was received prior to the renewed action date of 30 April. SEPA will consider the information provided in due course.

Update September 2025 – SEPA is going through the information provided by the site in order to close out the Information Notice. It is noted that the site has worked hard to meet the revised deadlines. SEPA will provide a response to the site in due course.

Update March 2026 - SEPA has received all of the information the site believe is required by the Information Notice with regards to the discharge returns, and this will be considered in due course.

Permit Variation Applications

Aqueous Discharge Variation Application – Update March 2026

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. The determination is ongoing.

SILWE Discharge/ Site gaseous discharge increase variation application – update March 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.

Other EASR Regulatory Topics

Regulatory Notice – update March 2026

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.

In addition SEPA is in the process of undertaking an investigation and the outcome of this will be available in due course.

Review of Characterisation of ILW Bunker Waste - Update March 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.

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 and Food in 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*".

Melanie Hayes

Radioactive Substances Specialist,

February 2026



NDA Update for
Hunterston A & B SSG
March 2026



Contents

1.0 NDA Stakeholder Update March 2026

**NDA Stakeholder Update**

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

Government Update

An Independent Review of the NDA has been announced by the Department for Energy Security and Net Zero (DESNZ). This review represents an opportunity to ensure the NDA continues to deliver safely, effectively, and transparently on our mission to clean up the UK's civil nuclear legacy.

The review will focus on the following key areas:

- strategic planning and management
- project and programme delivery
- financial management

The objectives are to:

- review NDA's performance, governance, and financial controls, recognising formal governance roles
- challenge current practices and propose bold, value-for-money recommendations to set a new benchmark for NDA's effectiveness
- highlight good practice while identifying areas for improvement to strengthen overall performance

The last formal review was in 2021. This review is expected to report by Autumn 2026 and will be led by Dr Tim Stone CBE, who previously acted as a senior expert adviser to five Secretaries of State and is widely recognised as a global nuclear expert.

The NDA is looking forward to working with Tim and his team, and will do so openly and constructively, reflecting our commitment to continuous improvement.

Engagement priorities

The NDA group put decommissioning at the forefront of the agenda at this year's Nuclear Week in Parliament. Representatives from across the NDA group engaged with MPs and industry figures at the annual event, organised by the Nuclear Industry Association, to highlight progress on key programmes.

Our stakeholder survey was launched on February 9th and will run for 4 weeks. It takes about 10 mins to complete and looks broadly at three key measures: openness and transparency, leadership and trust. Please let us know your views by taking part.



Supporting green energy development

The NDA group is working with CX Power as the strategic developer to support the delivery of the green energy hub masterplan at Chapelcross, a programme set to transform the region. The privately funded, multi-million-pound, net-zero focused development, will generate several hundred high value jobs and attract skills and investment, driving growth in the local economy.

The NDA is investing £1 million to develop the masterplan for a clean energy development on land adjacent to Sellafield, known as Pioneer Park, which will drive long-term economic growth and jobs. The funding will enable local development company BEC to produce a detailed masterplan considering Sellafield's existing requirements.

Supporting economic growth

The NDA has contributed £351,000 funding to support projects under the North Anglesey Sites and Premises programme; a £10.4 million investment package driving economic growth in Amlwch, close to the former Wylfa nuclear power station.

Publications, public service and policy updates

We will coordinate final publication of the Business Plan with the publication of the NDA Strategy 5 around Easter 2026.

Our latest Mission Progress Report, which sets out the progress being made against the mission as well as how much work there is left to do over the next 120-plus years, has been published. Access the seventh iteration of the Report here: [Mission Progress Report 2024/25](#)

The NDA socio-economic report 2024 to 2025 has been published, detailing how and where £14.13 million of direct socio-economic funding has been invested [NDA socio-economic report](#)

Innovation and delivery milestones

A landmark agreement between the NDA and biotech firm Bicycle Therapeutics will see tens of thousands of doses of cutting-edge cancer therapies produced from reprocessed uranium. This uranium was generated by historic processing of spent nuclear reactor fuel.

NRS has permanently switched off the powered ventilation at Wylfa, meaning both Magnox reactors are now "breathing naturally." The systems had maintained dry airflow



and humidity during defueling, enabling the safe removal of 87,890 fuel elements. Their retirement brings environmental benefits and around £130,000 a year in energy savings.

Hinkley Point B in Somerset has been declared fuel free, on time and on budget, marking the second advanced gas-cooled reactor (AGR) defueling milestone achieved by the NDA group and EDF. A total of seven stations will transfer from EDF to the NDA group for decommissioning.

The NDA group has delivered a UK-first nuclear milestone, marking a significant step toward permanently disposing of the nation's plutonium legacy. A can of plutonium residue has been safely processed into a stable waste form for the very first time. This demonstrates the UK's leadership in tackling this complex nuclear challenge.

Sellafield Ltd and the Robotics & AI Collaboration (RAICo) have completed the first trial of a specially designed, patent-pending contamination swabbing tool, mounted on a quadruped robot, in an area containing radioactive material. The trial demonstrates how robotics could support routine health physics activities efficiently while reducing the need for people to enter potentially hazardous environments.

Other group updates

Nuclear Transport Solutions (NTS) and Westinghouse have signed an agreement to co-develop Pegasus, NTS's transport package for High Assay Low Enriched Uranium (HALEU). The deal was signed at the British Embassy in Washington, D.C. Pegasus will enable safe movement of fuel for advanced reactors, vital for clean power and technologies such as AI.

NWS hosted a Ukrainian delegation and international specialists to share expertise on radioactive waste management. The visit strengthened international relationships and supported ongoing work toward a potential Memorandum of Understanding.

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 NRS official at the SSG meeting.



Nuclear
Decommissioning
Authority