Environment Agency	**RSR Compliance Assessment Report** (Environmental Permitting Regulations)	Report ID: XB3539DH/0590341

This form will report compliance with your permit as determined by an Environment Agency officer

Site	Sizewell B Power Station	Permit Ref	XB3539DH		
Operator/ Permit holder	EDF Energy Nuclear Generation Limited	Site Ref	XB3539DH		
Date	14/01/2026	Time in	09:00	Out	17:00
What parts of the permit were assessed	1.1 General Management, 2.3 Operating Techniques, 4.1 Records				
Assessment	Report/data review	National security direction?	No		
Recipient's name/position	Environmental Support Group Head				
Officer's name	Robert Rigler Gillingham	Date issued	19/01/2026		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations (EPR). A detailed explanation and any action you may need to take are given in the Detailed Assessment of Compliance (section 2) and the Actions (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit Conditions and Compliance Summary				**Condition(s) breached**
a) Permitted activities	**1**. Specified by permit	N		
b) Infrastructure	**1.** Engineering for prevention & control of pollution	A		
	2. Closure & decommissioning	N		
	3. Site drainage engineering (clean & foul)	N		
	4. Containment of stored materials	A		
	5. Plant and equipment	A		
c) General management	**1**. Staff competency/ training	A		
	2. Management system & operating procedures	A		
	3. Materials acceptance	N		
	4. Storage handling, labelling, segregation	A		
d) Incident management	**1**. Site security	N		
	2. Accident, emergency & incident planning	N		
e) Emissions	**1.** Air	N		
	2. Land & Groundwater	N		
	3. Surface water	N		
	4. Sewer	N		
	5. Waste	N		
f) Amenity	**1 to 5**	N/A		
g) Monitoring and records, maintenance and reporting	**1**. Monitoring of emissions & environment	N		
	2. Records of activity, site diary, journal & events	A		
	3. Maintenance records	N		
	4. Reporting & notification	N		
h) Resource efficiency	**1**. Efficient use of raw materials	N		
	2. Energy	N/A		

KEY: **C1, C2, C3, C4** = CCS breach category **(* suspended scores are marked with an asterisk),**
A = Assessed (no evidence of non-compliance), **N** = Not assessed, **NA** = Not Applicable

Number of breaches recorded	0
If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response	

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review', details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with exemption conditions
- details of any multiple non-compliances
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice
- a reference to photos taken

In order to comply with its Radioactive Substances Regulation (RSR) environmental permit, an operator must use best available techniques (BAT) to minimise the activity of radioactive waste produced and disposed of to the environment. Disposals and discharges must also remain within permitted limits and be in a form and manner as to minimise the radiological effects on the environment and members of the public in line with the ALARA principle.

Following a site inspection on 25/03/25, we issued a series of recommendations relevant to solid radioactive waste management practices and Radioactive Waste Management Cases (RWMCs) operated by EDF Energy Nuclear Generation Limited (EDF) at Sizewell B (SZB) as part of RASCAR XB3539DH/0555257[1]:
Recommendation 250325/01: EDF to demonstrate how they ensure that site-specific RWMCs at Sizewell B remain up to date in accordance with '*The management of higher activity radioactive waste on nuclear licensed sites'* Guidance 2021.
Recommendation 250325/02: EDF to demonstrate how BEG/SPEC/SHE/ENV/042/01 company standard is implemented at Sizewell B.
Recommendation 250325/03: EDF to demonstrate how BAT documents remain up to date as new disposal routes and technologies come to market.

Through subsequent engagement with the operator, the EA have established the following:

Recommendation 250325/01

In response to this recommendation, the operator provided a copy of the company specification *HAW Radioactive Waste Management Case (RWMC*) BEG/SPEC/SHE/ENVI/041/04[2]. This document details the governance arrangements and delegation of responsibilities to ensure the RWMCs are appropriately maintained, including placing responsibility for reviews of RWMCs on the Environmental Support Group Head (ESGH) at each EDF site.

The operator explained during a Keep In Touch meeting (KIT) that this specification was produced and issued centrally and that the corporate team also lead on the production and reviews of all RWMCs across the fleet. We seek confirmation that the ESGH has appropriate control over the production and reviews of RWMCs if they are produced and reviewed by the corporate function.

During the site inspection the operator stated that there is no fixed review period for RWMCs, but that these are 'live' documents and reviewed as necessary. However, section 4.2.3 of BEG/SPEC/SHE/ENVI/041/04 states requirements for major and minor reviews of all site RWMCs every 6 and 3 years respectively.

The engagement process regarding RWMCs between the site and corporate environmental teams was subsequently discussed. It was confirmed in both KITs between the operator and the EA and follow up emails from the operator that the suitability of radioactive waste management strategies in general are regularly reviewed in agreement between the site and corporate teams, through interactions such as a

6-monthly *Radwaste Management and Decommissioning Review Group Forum* incorporating stakeholders from both the corporate function and site[3][4].

The RWMC for ILW resins NFL/REP/0129/SZB/14[5] was considered. Last revised in 2018, the operator confirmed there have been minimal changes in the circumstances impacting the document and that the strategy for managing higher activity waste resin has not changed since the RWMC was last revised[4].

We are also aware of the potential update of 4 extant site RWMCs at SZB into a single document covering all of the waste streams on site, in line the statement in section 2 of BEG/SPEC/SHE/ENVI/041/04. The operator explained this was the anticipated (though not confirmed) approach, but that in any case the intention is to update the RWMCs this year; in the case of the ILW resin stream this will include updates covering the completion of the second ILW resin campaign. Likewise, it is noted the document also states “it is important to note that waste stream specific RWMCs remain appropriate during the period of transition to site specific RWMCs”.

This recommendation will remain open while we seek clarification from the EDF corporate environmental team regarding the process for the review of RWMCs:

- EDF to justify if it is appropriate that company specification places responsibility of RWMC reviews on the site ESGHs.
- If the ILW resin RWMC has been reviewed in line with the company specification, we require evidence this is the case as the revision number and issue date of the RWMC have remained unchanged since 2018.

Recommendation 250325/02

Following the inspection clarification was sought regarding how company specification *Joint Radioactive Waste (HAW and LAW) arrangements* BEG/SPEC/SHE/ENVI/042/01[6] is implemented at site level. The operator subsequently explained via email[3] that the processes are defined in the *Solid Radwaste Management Manual* SZB/THTS/014[7], and in the local instruction *Control of Solid Radioactive Waste and Radioactive Waste Oil* SZB/LI/016/007[8], copies of which were provided for review.

In the same email, the operator went on to explain the further governance mechanisms in place, including the 6-monthly *Radwaste Management and Decommissioning Review Group Forum* incorporating stakeholders from both the corporate function and site, site-level governance provided by the *Safety Oversight Delivery Team* and operational level waste management through the *Operational Radwaste Peer Group* at which the environmental team are represented.

Recommendation 250325/03

With respect to our query regarding how the operator keeps BAT documentation up to date with respect to developments in technology and industry practice, EDF provided a company specification *The Application of Best Available Techniques and Best Practicable* Means BEG/SPEC/SHE/ENVI/021[9]. The document describes the company processes for managing new information, including triggers for review and update based on changing available means rather than a fixed review period.

The operator provided several examples of this process being implemented. Initially, an example BAT assessment *BAT / BPM Assessment for Generic Routine Radioactive Wastes* ERO/REP/0210/GEN[10] was provided via email[11], the change log for which shows a review within the prior 2 years to facilitate a new consideration regarding waste stream heterogeneity.

Further to this, the BAT assessment for SZBs zinc acetate injection project *Best Available Techniques Assessment of Strategic Case for Adopting Zinc Injection at Sizewell B Power Station* SZB/THR/194[12] was provided via email[13]. This reflects an operational change primarily for dose restriction for As Low As Reasonably Practicable (ALARP) considerations, but BAT assessment of the potential impact on the waste to be generated was triggered by the prospective adoption of this new technology.

Summary

We have seen sufficient evidence to close out the queries raised in recommendations 250325/02 and 250325/03. Recommendation 250325/01 will remain open pending supply of information regarding management of RWMCs from the EDF corporate environmental team.

Supporting Documentation

1. Environment Agency RASCAR: XB3539DH/0555257
2. EDF company specification: HAW Radioactive Waste Management Case (RWMC), BEG/SPEC/SHE/ENVI/041/04
3. Email, EDF to EA, 20/05/2025, Subject RE: Solid Waste Inspection RASCAR
4. Email, EDF to EA, 14/01/2026, Subject RE: RWMC follow-up and Resin upgrades Engineering Change
5. SZB ILW Resin RWMC: NFL/REP/0129/SZB/14
6. EDF company specification: Joint Radioactive Waste (HAW and LAW) arrangements, BEG/SPEC/SHE/ENVI/042/01
7. SZB Solid Radwaste Management Manual: SZB/THTS/014
8. SZB local instruction: Control of Solid Radioactive Waste and Radioactive Waste Oil, SZB/LI/016/007
9. EDF company specification: The Application of Best Available Techniques and Best Practicable Means, BEG/SPEC/SHE/ENVI/021
10. EDF BAT Assessment: BAT / BPM Assessment for Generic Routine Radioactive Wastes, ERO/REP/0210/GEN
11. Email, EDF to EA, 04/07/2025, Subject RE: Solid Waste Inspection RASCAR
12. SZB BAT Assessment: Best Available Techniques Assessment of Strategic Case for Adopting Zinc Injection at Sizewell B Power Station, SZB/THR/194
13. Email, EDF to EA, 31/12/2026, Subject RE: Zinc Injection BAT & Regulatory update

Section 3- Enforcement Response	**Only one of the boxes below should be ticked**
You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence* and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.	
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	**CCS Category**	**Action Required / Advised**	**Due Date**
See Section 1 above			

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence* and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description
C1	A non-compliance which could have a **major** environmental effect
C2	A non-compliance which could have a **significant** environmental effect
C3	A non-compliance which could have a **minor** environmental effect
C4	A non-compliance which has **no** potential environmental effect

Operational Risk Appraisal (Opra) – Non-compliances do not currently affect RSR Opra scores.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within 20 working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If a permit holder disagrees with the RASCAR form, they should raise their concerns to the officer or team which issued the form. This must be done within 14 calendar days of receipt. If the response does not resolve the issue, a permit holder can request an appeal of the regulatory decision. This request must be made within 28 calendar days of receipt of the response. More details on our regulatory appeals process can be found at https://www.gov.uk/guidance/appeal-a-regulatory-decision-from-the-environment-agency. If the permit holder is still not satisfied, they can make a complaint to the Parliamentary and Health Service Ombudsman. Advice about complaining can be obtained by phoning the Ombudsman's helpline on 0345 015 4033.