

**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			
Date	04/12/2025	Time in	09:00	Out	17:00
What parts of the permit were assessed	1.1.1 General Management, 2.3.4, 2.3.5 Operating Techniques, 3.1.1 Disposals of Radioactive Wastes				
Assessment	Report/data review	National security direction?		No	
Recipient's name/position	Environmental Support Group Head				
Officer's name	Robert Rigler Gillingham, Themis Kantara	Date issued		12/02/2026	

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	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	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	N	
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	N	
	3. Maintenance records	A	
	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

Introduction

On 1st November 2024 the Environment Agency (EA) were informed by EDF Energy Nuclear Generation Limited (EDF) of an issue identified in one of the ancillary HVAC ductwork systems leading into the main unit vent stack at Sizewell B power station (SZB). A routine inspection carried out by site staff on the condition of a part of the Auxiliary Building roof, identified that a section of ductwork, approximately 2 inches across, had corroded through and the pressurised airflow going through the ducting was escaping. This section of ducting is downstream of the HEPA filtration abatement, on the positive side of the fans before joining the stack with all the other HVAC systems, prior to their monitoring of the final discharge.

Upon notification of the issue, the EA reviewed the information provided and issued RASCAR XB3539DH/0553024^[1] assessing the permit compliance implications. Non-compliances were identified against 3 permit conditions:

1.1.1 (a), 2.3.5 and 3.1.1:

1.1.1 The operator shall manage and operate the activities:

(a) In accordance with a written management system that is sufficient to achieve compliance with the conditions of this permit

2.3.5 The operator shall check, at an appropriate frequency, the effectiveness and maintenance of systems, equipment and procedures provided to meet the requirements of conditions 2.3.1, 2.3.2 and 2.3.3

3.1.1 Subject to condition 3.1.4 there shall be no disposals of radioactive waste except of the types of radioactive waste and by the disposal routes specified in schedule 3

All 3 non-compliances were categorised as CCS3 under the EA's Compliance Classification Scheme and in response to those we issued a warning letter to EDF.

EA Actions and Recommendations

Actions

Pursuant to the investigation by EDF and subsequent review by the EA, the following actions were issued to rectify the non-compliances identified:

ACTION 300425/01: EDF to fully repair the section of the corroded pipework and return the ductwork to high standard (Completed November 2024).

ACTION 300425/02: EDF to create a new routine to carry out inspection and reporting of roof ductwork outlining areas of focus (Completed March 2025).

These actions have been confirmed as completed in RASCAR XB3539DH/0553024^[1], returning EDF to a state of compliance with regards to the specified non-compliances.

Recommendations

The EA also outlined five regulatory recommendations relating to the implementation of Operational Experience (OPEX) and future ductwork inspections to minimise future potential non-compliances. The recommendations and any actions taken with respect to them are recorded below, including the current regulatory position on their resolution status:

Recommendation 300425/01: EDF to describe how it has responded to environmental / compliance learning (including EA observations, recommendations and actions) relating to stack corrosion and inspections from the wider EDF fleet (e.g. RASCARs CAR-HEY-24-002 Monitoring Programme and CAR-HEY2-24-003 Aux Boiler Stack Corrosion).

The Environmental Support Group Head (ESGH) confirmed via email^[2] on 14/11/2025 that SZB responded to a Routine Evaluation Process (REVL), a mandatory instruction to carry out a particular assessment issued by EDF corporate. The REVL mandated a repeat of the plant walkdown and condition assessment carried out at Dungeness B (DNB) at all stations in the fleet. The walkdown at DNB was undertaken at the EA's request, prompted by the duct corrosion event at SZB, and identified unacceptable plant conditions necessitating remediation. The available learning from the DNB inspection was shared and the REVL provided a consistent format for recording the fleetwide inspections of equipment that could be comparably affected. The results of the REVL conducted at each site are then shared between sites and EDF corporate.

A copy of the completed REVL report at SZB (assessment number 1425000)^[3] was provided to the EA for review on 14/11/2025. Although a recent inspection had been completed at SZB (which identified the duct corrosion event prompting the REVL) another walkdown was carried out in a consistent manner to the other stations because as noted in the scope of the REVL: *Although reference should be made to recent inspections already carried out, the OPEX from SZB and DNB indicates that existing inspection and maintenance regimes may not be fully effective.* The REVL report references the prior work carried out in response to the duct corrosion event and the mandated walkdown undertaken by both Environmental Support and System Health Engineers. It records that *'the material condition of the GF system extract ductwork – particularly the area adjacent to the failure site- has been significantly improved and that the current plant condition is judged to score 'Acceptable – 1'.* The report also describes the additional training requirements implemented that are discussed in the response to recommendation 300425/03 below.

We note the conclusions of the Sizewell B REVL and based on the information provided by the site, this recommendation is considered resolved.

Recommendation 300425/02: EDF to describe how it shares environmental/compliance learning from Sizewell B with EDF corporate.

During an inspection focusing on environmental events classification, detailed in RASCAR XB3539DH/0580162^[4] EDF explained that the duct corrosion event at SZB was raised at the ESGH forum; used to exchange learning across the fleet with input from the corporate engineering function. OPEX from the event was shared with other sites and at the request of the EA, a plant walkdown of similar ductwork was conducted at DNB, which identified plant to be in *unacceptable material condition requiring attention.* The findings from both sites prompted the institution of the REVL discussed in the response to recommendation 300425/01 above, the results of which from SZB were communicated back to the EDF corporate and the wider fleet.

Additionally, further information on OPEX sharing processes was provided by the operator during the inspection. EDF described that learning is shared with the OPEX Coordinator and the Business Improvement team. OPEX briefs are entered onto an Operational Learning Database, which lists fleetwide and international learning and can be reviewed by sites. Environmental information and experience is also shared across the EDF fleet through a series of peer groups including the Discharge and Districts Survey, Discharges and Operational Radioactive Waste, and the aforementioned ESGH forum. These groups provide an opportunity for sharing learning, successes, and potential operational threats, which the EA have noted as good practice.

Based on the information provided by the site, this recommendation is considered resolved.

Recommendation 300425/03: EDF to demonstrate its identification and labelling of environmental protection equipment is sufficient, and ensures appropriate consideration / awareness for those working on or nearby the equipment.

With respect to this recommendation the ESGH confirmed to the EA via email on 10/06/25^[5] that EDF understands it is important that personnel involved in specifying maintenance strategies and engineering work packages on plant have a good understanding of the legislative impact of the plant and equipment, including SZB's environmental permit

The ESGH proposed training for the relevant engineers overseeing the corrosion management programme covering importance of the environmentally significant plant, ensuring they are aware of the need to maintain relevant components to the required standard based on the consequences of failure. Following this training the Corrosion Management Programme Owner (CMPO) would review the environmentally sensitive plant areas and ensure that the programme is fit-for-purpose.

The Discharge Standards Lead confirmed via email on 06/11/2025^[6] that the CMPO at Sizewell B received enhanced environmental training on permit compliance implications of their work. Part of the existing Suitably Qualified and Experienced Personnel (SQEP) requirements of the CMPO position includes the requirement to be Corrosion SQEP;

the additional training was similar to that required to be certified as Environmentally SQEP to ensure understanding of the environmental relevance of their responsibilities. It included presentations, system diagrams, an overview of environmental permits and Compilation of Environment Agency Requirements documents (CEARs), a review of the corrosion 'dashboard' and plant walkdowns.

The EA received an email from EDF on 04/12/2025^[7] explaining a number of actions taken by corrosion engineers. Based on the information presented, it is currently unclear to the EA if this constitutes the requirement for the CMPO to review the environmentally sensitive plant areas and that the corrosion management programme is fit-for-purpose as proposed by the ESGH^[5].

To close this recommendation the EA requires confirmation that the CMPO has reviewed the environmentally sensitive plant areas and has ensured that the corrosion management programme is fit-for-purpose. We require that a copy of the programme be available to the EA and that the initial programme review report be submitted to the EA for review. This recommendation remains outstanding. In view of the timescales proposed by SZB^[5], we anticipate being able to review this information in our quarter 1 inspection in the new financial year.

Recommendation 300425/04: EDF to consider physical labelling on environmental protection equipment, to ensure its impact on environmental protection and compliance is immediately recognised by those working on or nearby the equipment.

The email from the ESGH to the EA on 10/06/25 referenced above also states that the operator has considered labelling of equipment and systems with permit compliance implications. EDF's view is that this would not prevent recurrence, as the same process would still be followed whether a plant component had been labelled or not and there would be no difference in the level of oversight provided to a plant component with labelling. Instead the ESGH confirmed that training of the CMPO would be a more appropriate way to prevent reoccurrence of similar events (see recommendation 3000425/03 above for details).

Based on the information provided by the site, EDF have considered physical labelling on environmental protection equipment, but have decided not to progress the option. This recommendation is considered resolved.

Recommendation 300425/05: EDF to complete and report the findings of the inspection of the 'Riser from Decontamination Building to Fuel Building Roof' and the 'Fuel Building 24m Level Roof' areas to the Environment Agency.

With respect to this recommendation, the ESGH confirmed to the EA via email on 14/11/25 that the relevant inspections had taken place^[2]. The output we received declared that *The task was undertaken using an endoscope with no corrosion or thinning of walls observed*. We accept that a visual inspection has taken place using an endoscope, however the EA requires greater detail regarding the suitability of the techniques used to assess all the condition requirements of the ducting and information on the status of the duct. We would also expect this to include an assessment of any actions, if necessary.

To close this recommendation the EA requires the submission of the inspection report for review. This should include justification that the methodology is appropriate and details of any output actions if necessary. This recommendation remains outstanding.

Conclusions

Following the EA's recommendations issued in RASCAR XB3539DH/0553024, EDF have provided sufficient information for the closure of 3 of the 5 recommendations. The evidence provided regarding the REVL process and the various fleetwide peer groups demonstrates sufficient OPEX exchange and responsive behaviour to resolve recommendations 300425/01 and 300425/02. Additionally, EDF provided documentation showing they have considered the proposed labelling in 300425/04 (albeit this is not being actioned at this time), resolving this recommendation.

However, recommendation 300425/03 remains outstanding, pending the supply of the CMPO's report on SZB's corrosion management programme review, and details of the programme itself. The EA also requires more information regarding the inspection referenced in 300425/05, specifically the inspection report, including details of the methodology suitability and the inspection outputs, to resolve this recommendation.

Supporting Documentation

1. Environment Agency RASCAR, XB3539DH/0553024, 17/06/25
2. Email, EDF to EA, 14/11/2025, Subject: REVL report - Stacks & Ductwork
3. EDF Routine Evaluation (REVL) completed at SZB, BEG/FORM/OL/311
4. Environment Agency RASCAR, XB3539DH/0580162, 22/09/2025
5. Email, EDF to EA, 10/06/2025, Subject: FW: Ductwork Corrosion RASCAR action proposal
6. Email, EDF to EA, 06/11/2025, Subject: SZB Environmental Training - Corrosion Programme
7. Email, EDF to EA, 04/12/2025, Subject: EA RASCAR No.XB3539DH/0553024

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.