

**Site: Dungeness B**

**Intervention Record No. 172**

**Date: 4 December 2017**

**Site Licence No. 61**

**Title: Dungeness B (EDF Energy Nuclear Generation Ltd), Update on Flask receipt and dispatch improvements and quarterly review of regulatory issues**

**Licence Condition(s): Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (CDG) 2009**

**Quarter: 3**

## **1 EXECUTIVE SUMMARY**

### **1.1 Purpose of Intervention**

1. This was a planned inspection at EDF Energy Nuclear Generation Ltd's (NGL's) Dungeness B power station. It was undertaken as part of the planned intervention strategy for the Operating Facilities Division (OFD) of the Office for Nuclear Regulation (ONR).
2. The work was carried out in-line with the planned inspection programme contained in the Dungeness B Integrated Intervention Strategy (IIS).

### **1.2 Interventions Carried Out by ONR**

3. During this intervention, the following key activities were undertaken:
  - Engagement with Technical Safety Support Manager.
  - Update on Flask receipt and dispatch improvements, including update with Independent Nuclear Assurance (INA).
  - Quarterly update on regulatory issues.

### **1.3 Explanation of Judgement if Safety System Not Judged to be Adequate**

4. No system based inspection undertaken, hence not applicable.

### **1.4 Key Findings, Inspector's Opinions and Reasons for Judgements Made**

5. In November 2017, I conducted an unplanned compliance inspection focussed on the flask receipt and dispatch operations and improvements made since an event in May 2017. Based upon the observations made during November's inspection, I judged that the station's management arrangements as required by Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (CDG) 2009 were not suitable and sufficient.
6. Post inspection, the station director embargoed flask movements and a fully resourced improvement plan was implemented to address the shortfalls in the managements arrangements. This includes oversight and governance from the Operational Safety Review Committee and independent assurance through INA concurrence.

7. In light of the above, I therefore undertook a follow up inspection, during which I;
- Discussed progress against the station's improvement plan. I confirmed that the station has completed a human factors review and in conjunction with this review, it has revised its documentation which is currently awaiting verification and validation.
  - Reviewed the training material and confirmed it covers the use and limitations of the irradiated transport flask. In particular, safety design features of the lid assembly.
  - Conducted a plant walk down and observed that work to improve plant condition is underway. Noting that further work is planned prior to re-commencing flask movements.
8. I am of the opinion that improvements are being made to the work environment, the operational controls and the training. Oversight and independent assurance is being undertaken to ensure that shortfalls in the management arrangements are addressed sufficiently.
9. I also undertook routine engagements with the station and the independent nuclear assurance team to discuss operational performance including recent events. I judge that the station is taking the appropriate action to management performance and investigate events. No significant nuclear safety concerns were raised during these discussions.
10. I undertook a quarterly review of regulatory issues and discussed progress on a selection with the station leads. The information received will be used to update ONR's regulatory issues, no significant safety concerns were raised during these discussions and progress is being made in the majority of areas. One historic regulatory issue relating to maintenance compliance requires further clarity on the current remaining shortfall and will be followed up prior to the next quarterly review.
11. This intervention was performed in line with ONR's guidance requirements (as described in our technical inspection guides, which can be found at [www.onr.org.uk/operational/tech\\_insp\\_guides/index.htm](http://www.onr.org.uk/operational/tech_insp_guides/index.htm)) in the areas inspected.

## **1.5 Conclusion of Intervention**

12. I am of the opinion that improvements are being made to the work environment, the operational controls (including measuring and test equipment and documented instructions) and the training. These actions are addressing shortfalls in the management arrangements supporting compliance with CDG 2009. Recognising that the improvements have not been implemented in full, I have assigned an IIS Rating of AMBER illustrating that improvement has been made since the last inspection in November.