

Office for Nuclear Regulation (ONR)

Site Report for

Nuclear Waste Services / Low Level Waste Repository (LLWR) Ltd

Report for period 1 April 2022 – 30 September 2022

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed to members for the West Cumbria Sites Stakeholder Group (WCSSG) LLWR Working Group meeting and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend WCSSG LLWR Working 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 ONR.

Table of Contents

1. Inspections	3
2. Routine Matters	3
3. Non-Routine Matters.....	5
4. Regulatory Activity	5
5. News from ONR.....	5
6. Contacts	6

1. Inspections

1.1. Dates of Inspection

ONR's inspectors made inspections on the following dates during the period 1 April 2022 – 30 September 2022

No inspections have been undertaken in the period.

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 LLWR.

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records on our website www.onr.org.uk. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

2.2. Other Work

Throughout this reporting period, ONR's nominated site safety inspector has held regular telephone meetings with LLWR Ltd leadership team representatives to maintain situational awareness of matters related to nuclear safety. No significant issues were highlighted to ONR.

2.2.1 LLWR NWS Integration

NDA created a single waste division called "Nuclear Waste Services" (NWS) on 30 January 2022 as part of NDA's wider One NDA strategy. NWS is a construct that includes LLWR and RWM (Radioactive Waste Management). For now, the two organisations have retained their own Board structures and governance arrangements but with an additional NWS board providing oversight. ONR provided regulatory oversight of the initial change.

Since then NWS has been progressing towards greater integration of the two organisations. NWS has the strategic intent to achieve a single legal entity with a single Board and governance structure by 2024. ONR currently provides regulatory oversight to LLWR via regular meetings.

As a licensee LLWR has been making changes to its organisation using the management of change process under licence condition LC36. It has provided ONR with a view of the proposed changes and ONR has been providing oversight through a series of regular level 4 regulatory interactions. Most of the changes so far have been to develop the support services such as HR and IT. A further change proposal for the Health, Safety, Security, Environmental and Quality (HSSEQ) organisation is anticipated later this year.

ONR continues to undertake working level meetings regarding LLWR's transition into Nuclear Waste Services to monitor the effectiveness of the transition.

2.2.2 Annual Review of Safety Security and the Environment (AROSSE)

The AROSSE for LLWR was held on 8th June 2022, the main topics and conclusions from the meeting were:-

- A lot of work is being undertaken at LLWR making provision for capping of vault 8 and the continuation of LLWR storage at vault 9, the demolition of the magazines and the integration with NWS.
- Accidents and incidents remain low and the risk profile of the site leans towards future environmental evolution and conventional health and safety.
- The review was comprehensive with supporting evidence and commentary.
- The AROSSE was an unbiased and accurate reflection of performance in relation to safeguards.

2.2.3 Waste Acceptance Criteria

ONR is working with EA, LLWR and waste contractors regarding the application of the Environmental Safety Case Waste Acceptance Criteria (WAC) to proposed shipments of LLW to the site.

3. Non-Routine Matters

Licensees are required to have arrangements to respond to non-routine matters and events. ONR 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

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues 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.

No LIs, Enforcement Notices or Enforcement letters were issued during this period.

As reported above in section 2.2, ONR wrote to LLWR Ltd confirming no objections to its proposal for LLWR Ltd to transition into Nuclear Waste Services.

5. News from ONR

For the latest news and information from the Office for Nuclear Regulation, please read and subscribe to our regular email newsletter 'ONR News' at www.onr.org.uk/onrnews

6. Contacts

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