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| ONR Site Report  EDF Energy – Hunterston B |



ONR Site Report

EDF Energy - Hunterston B

Report for period: 1 July – 30 November 2023

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Approved by: Delivery Lead Operating Reactors

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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 Hunterston Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR 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 ONR.

Contents

[1. Inspections 4](#_Toc124509190)

[2. Routine Matters 4](#_Toc124509191)

[3. Non-Routine Matters 7](#_Toc124509192)

[4. Regulatory Activity 8](#_Toc124509193)

[5. News from ONR 9](#_Toc124509194)

[6. Contacts 9](#_Toc124509195)

# Inspections

## Date(s) of Inspection

The ONR site inspector and specialist inspectors made inspections on the following dates during the report period 1 July – 30 November 2023:

25 - 27 July

15 - 17, 24 August

5 - 6 September

25 October

1 - 2, 14 - 15 November

The ONR site security inspector made inspections on the following dates:

25 - 27 July

17 - 18 October

# Routine Matters

## 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, routine inspections of Hunterston B covered the following:

* Emergency Arrangements
* Fuel Route
* Management of Change
* Operational Records

**Emergency Arrangements**

On the 26 July 2023, ONR safety and security 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 Licence Condition 11 and the Nuclear Industries Security Regulations (NISR) 2003 Regulation 4. As with all exercises, some learning opportunities were identified – in this case better use of available resources and the recording of key decisions.

The station is proposing to optimise the on-site emergency arrangements post defueling of reactor 3 to reflect the reducing hazard on the site. This will require a formal approval from ONR. In advance of this request ONR inspectors evaluated a “proof of concept” exercise on the 6 September 2023. This exercise successfully demonstrated that the proposed removal of the defueled reactor desk engineer, a chemist and a response engineer from the on-call emergency rota did not affect the ability to deliver an effective emergency response required under Licence Condition 11.

In addition to attending the proof of concept exercise ONR inspectors also attended site on the 15 November 2023 to review the station’s readiness to implement the optimised defueling emergency arrangements. This review sampled the documentation associated with this proposal and included the:-

•         quality plans.

•         emergency handbook and supporting document updates.

•         emergency role holders and their training status.

•         associated safety justifications

•         lessons learned during training and proof of concept exercise.

Some additional work was identified which needs to be completed prior to ONR granting approval of the revised emergency plan. This was accepted by the station who are working to complete this.

As part of the optimisation of the emergency arrangements on site the station has also reviewed the safety case documents and identified the associated fault sequences relevant to a defueling station. These have then been used to identify an appropriate exercise matrix for future years training. ONR inspectors reviewed the exercise matrix on site on the 14 November 2023 and judged that it met the legal requirement for compliance with LC11 - emergency arrangements.

**Fuel Route**

On the 15 and 16 of August 2023 ONR inspectors undertook a system based inspection of the fuel route to judge the adequacy of the implementation of the safety case for the Hunterston B fuel route.

This intervention sampled the training records of a number of fuel route operators, the adherence to the written operating instructions and identified limits and conditions as well as the maintenance of the key safety mechanisms.

From the areas sampled ONR judged that Hunterston B had adequately implemented the off-load depressurised defueling safety case for the fuel route. A number of minor shortfalls were identified during the inspection relating to record keeping and plant condition.  These were accepted by the station and will be followed up by the ONR site inspector.

**Management of Change**

ONR specialist inspectors carried out an organisational capability inspection on the 24 August 2023 to review the proposed organisational changes to reflect the reduction in workload following the defueling of reactor 3.

Some of these proposed changes involve the reduction in the on-call emergency rota discussed above. The station is also proposing to make reductions in the operations department.  ONR placed a regulatory hold point on these changes.

Following this inspection ONR judged that Hunterston B had made an adequate justification for the planned reductions in staff following the completion of reactor 3 being defueled and has released the regulatory hold point.

**Operational Records**

On the 1 November 2023, ONR inspectors carried out an inspection of the operational records associated with the defueling of reactor 3. The inspection sampled the quality plans and records collated by the station to demonstrate that all the fuel elements had been removed from reactor 3.

From the sample inspected, ONR judged that Hunterston B had followed their quality plans and produced suitable and sufficient operational records to demonstrate that the fuel from the channels inspected had been removed. One regulatory issue was raised regarding the adequacy of the storage of these records which the station had recognised and are in the process of addressing. Notwithstanding this, ONR judged that Hunterston B had met the legal requirement for compliance with LC25 – operational records.

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](http://www.onr.org.uk./intervention-records) on our website [www.onr.org.uk](http://www.onr.org.uk).

Should you have any queries regarding our inspection activities, please email [contact@onr.gov.uk](mailto:contact@onr.gov.uk).

# 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.

# 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.

**Table 1: Licence Instruments and Enforcement Notices Issued by ONR during this period.**

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| --- | --- | --- | --- |
| Date | Type | Ref. No. | Description |
|  |  |  |  |
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Reports detailing the above regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

# News from ONR

For the latest news and information from ONR, please read and subscribe to our regular email newsletter ‘ONR News’ at [www.onr.org.uk/onrnews](http://www.onr.org.uk/onrnews).

# Contacts

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