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| ONR Site Report  NRS Ltd – Dungeness A |



ONR Site Report

NRS Ltd - Dungeness A

**Report for period**: 1 April – 30 June 2024

**Authored by**: ONR Nominated Site Inspector

**Approved by**: Acting Delivery Lead – SDFW Division

**Issue No.:** 1

**Publication Date**: July 2024

**Record Ref. No**.: 2024/30000

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

Site inspectors from ONR usually attend Dungeness 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.

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# Inspections

## Date(s) of inspection

The ONR site inspector made inspections on the following dates during the report period 01 April – 30 June 2024:

10 April

01 May

# 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 Dungeness A covered the following:

* A readiness inspection for the pond skips characterisation project, which covered aspects of LC18 – Radiological Protection, LC23 – Operating Rules, LC24 – Operating Instructions and the Ionising Radiation Regulations 2017 (IRR17).

This readiness inspection, which was rated “amber” under the ONR Inspection Rating Guide, was associated with the regulatory hold-point on the pond skip characterisation project, and was devised to determine the readiness to commence activities associated with the sampling of the pond skips, which are currently stored on site. The inspection concluded that Dungeness A had met my expectations associated with radiological protection (LC18 and IRR17). However, Dungeness A had not adequately developed suitable documents that describe the relevant limits and conditions or operating instructions for the activity. I judged that it was therefore not appropriate to release the regulatory holdpoint associated with this piece of work until these areas have been rectified.

* LC12 – Duly Authorised and Suitably Qualified Personnel and LC28 – Examination, Inspection, Maintenance and Testing

This joint inspection with the Environment Agency, which was rated “green” under the ONR Inspection Rating Guide, was devised to sample Dungeness A's approach to the ongoing requirements of asset care, with respect to changes caused by climate change. The inspection concluded that Dungeness A has a mature set of arrangements for LC12 and 28, and I was content that they are being implemented adequately on site. The site has developed an adequate understanding of the impact that climate change will have on asset care.

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).

## Other work

The site inspector attended site to observe an emergency exercise demonstration, and to meet with members of the site team, and to receive updates on various projects.

# 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.

# 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).

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