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| ONR Site Report  Urenco UK Ltd. (UUK) – Capenhurst site |



ONR Site Report

Urenco UK Ltd. (UUK) - Capenhurst site

Report for period: 1 April – 30 June 2024

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Approved by: DFW Delivery Lead

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

Site inspectors from ONR usually attend Capenhurst 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

ONR carried out inspections on the following dates during the reporting period 1 April – 30 June 2024:

17 May;

28-29 May; and

12 June.

# Routine Matters

## Inspections

ONR inspections are undertaken as part of the process for monitoring compliance with:

* the Energy Act 2013;
* regulations made under the Energy Act 2013, for example the Nuclear Industries Security Regulations 2003 and the Nuclear Safeguards (EU Exit) Regulations 2019;
* the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
* 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), etc.

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 legal compliance. 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 ONR inspections of the Capenhurst site covered:

* A safety walkdown of an enrichment plant currently in outage.

Members of the public, who would like further information on ONR’s inspection activities during the reporting period, can view site intervention reports at [Publication search | Office for Nuclear Regulation (onr.org.uk.)](https://www.onr.org.uk./publications/publication-search/?type=inspectionRecordPublication) 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

Site inspectors continue to conduct formal quarterly reviews of the site’s progress in delivering a number of agreed improvement activities. Topics include:

* Capenhurst’s asset management arrangements.
* Refurbishment works for the site-wide fire fighting main.
* UUK’s organisational structure, with respect to maintaining compliance with the Construction (Design and Management) Regulations 2015. A Level 3 Regulatory Issue that ONR had previously raised on this topic has now been closed.
* Inspection of UUK’s amended transport management system, as required under improvement notice ONR-IN-23-009, served by ONR in February 2024. The improvement notice and associated Level 2 Regulatory Issue were complied with and subsequently closed in this reporting period (see also Seciton 4).

UUK is proposing to change its organisational structure later this year, implementing a site-wide transformation programme known as ‘One Capenhurst.’ ONR is regulating this change under Licence Condition 36: Organisational Capability; and throughout this quarter has continued to engage with UUK to discuss their progress with the change and ONR’s regulatory expectations; this included a day on site on 23 May 2024 with one of ONR’s leadership and management for safety specialist inspectors. Towards the end of June 2024 ONR started to receive final versions of documents comprising UUK’s suite of management of change proposals underpinning ‘One Capenhurst’.

ONR has also been engaging with UUK on their strategy and plans for the development of a new facility to produce high assay low enriched uranium (HALEU) and their approach to managing an inventory of legacy material comprising one of the byproducts of uranium enrichment, called uranium hexafluoride tails (or HEX tails for short); a project known as the legacy tails separation facility (LTSF).

ONR’s nominated site inspector for Capenhurst, and the Chief Nuclear Inspector attended a safety day on the site on 9 May 2024, meeting with the site’s employees and supply chain partners, to promote the importance of maintaining robust health and safety standards.

Site inspectors hold periodic meetings with safety representatives to support their function of representing employees and receiving information on matters affecting their health, safety, and welfare at work. ONR’s nominated site inspector for the Capenhurst site conducted such a meeting on 25 June 2024.

# Non-Routine Matters

Licensees are required to have arrangements in place 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.

Within this period, the Capenhurst site reported the following safety events to ONR:

* On the 22March 2024, during a practical training exercise, an air hose connected to a pressurised nitrogen cylinder failed. The resulting loud noise caused ear irritation and pain to two course delegates. Both received medical attention and one delegate reported persistent hearing issues. The licensee is undertaking its own investigation into the incident; it does not meet ONR’s investigation criteria. ONR was content with the dutyholder’s initial response to the event and will monitor their progress with putting the appropriate corrective actions in place, to prevent a reccurence.
* On the 25April 2024 an inspection of a building where de-planting works had recently commenced, revealed residues containing uranium had been stored in the wrong size containers, in a configuration which is not part of the facility’s criticality safety case. All de-planting operations within the facility were immediately halted, the area made secure, and specialist advice and guidance provided by the site’s safety case team. ONR was content with the dutyholder’s initial response to the event. It does not meet ONR’s investigation criteria and the risk of a criticality arising from the event was established to be low. However, the incident represents an erosion of defence-in-depth. The licensee is undertaking its own root cause investigation into the event.
* On the 26April 2024 the crane in the Cylinder Handling Facility was struck by a cylinder, causing some damage to its grapple. Personnel were within the crane’s exclusion zone, in breach of the facility’s safety case. Immediately following the event, the cylinder involved was inspected and confirmed to be undamaged. The crane was taken out of service, work suspended in the area pending an initial investigation, and plans put in place for a third party inspection of the crane. ONR was content with the dutyholder’s initial response to the event. Although the incident involved an empty cylinder, it was the second to be reported to ONR in as many days, involving the breach of safety case operating limits and conditions. ONR has noted an adverse trend across the site, with respect to procedural non-adherence. This is being followed up and closely monitored by ONR’s nominated site inspector. A Level 4 Regulatory Issue has been raised.

Throughout this period ONR has continued to investigate the incident that occurred at the Tails Management Facility (TMF) on 5February 2024, involving a container of uranium powder. ONR considers there was no signifcant risk to members of the public as a result of the event. ONR will report on the outcome of the investigation at the appropriate time.

In June 2024, ONR also conducted an investigation into an event that happened at TMF on 22 May 2024. During work to return a gas scrubber to service following maintenance activities, a quantity of diluted hydrofluoric acid was inadvertently discharged from a pipe. Although no workers were harmed, the incident had the potential to have more serious consequences if they had been directly exposed to the acid. ONR was content with the dutyholder’s initial response to the event, and is considering the most appropriate course of regulatory action, consistent with ONR’s Enforcement Policy Statement.

# 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. In addition, inspectors may take a range of enforcement actions, including issuing an enforcement notice. Within this period, ONR has:

* Conducted a “holding to account meeting” with members of the senior leadership team from UUK, Urenco ChemPlants Ltd. (UCP) and Urenco Nuclear Stewardship Ltd. (UNS), to discuss shortfalls from ONR’s fire safety inspection conducted on 5-6 February 2024 and subsquent enforcement letter (ONR-EL-23-054).
* In February 2024, ONR served an improvement notice (ONR-IN-23-009) on UUK for contravening Regulation 5 of The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG09). UUK had until 31 May 2024 to comply with the improvement notice. During this period ONR has undertaken a compliance inspection at the Capenhurst Site and UUK has submitted new/amended management system documentation. ONR has concluded UUK has satisfactorily complied with the improvement notice. <https://onr.org.uk/news/all-news/2024/06/urenco-uk-ltd-complies-with-transport-improvement-notice/>

Under the Control of Major Accident Hazards (COMAH) Regulations 2015, ONR has concluded its review of the site’s 5-year review of its COMAH Safety Report. ONR did not identify any significant deficiencies; however, there are some shortfalls which ONR is seeking to be addressed using a planned programme of themed inspections and ‘revision plan items’.

Under Licence Condition 11: On-site Emergency Arrangements, UUK is proposing to make changes to its on-site emergency plan. The changes and a revised on-site emergency plan have been submitted to ONR for review. In accordance with UUK’s licence condition compliance arrangements, they have requested ONR’s ‘Approval’ of the updated on-site emergency plan, and withdrawal of ONR’s ‘Approval’ of the previous version of the same. ONR has continued work to assess the proposed changes.

# News from ONR

For the latest news and information from ONR, please read and subscribe to our regular email newsletter ‘ONR News’ at [Latest news | Office for Nuclear Regulation (onr.org.uk)](https://www.onr.org.uk/news/).

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