

# Environment Agency report to the Hinkley Point Site Stakeholder Group.

February 2023

## Introduction

This report covers the Environment Agency's regulation of the Hinkley Point A & B nuclear sites and related issues for the period November 2022 to February 2023.

### Radioactive substances regulation

We regulate radioactive waste disposals to the environment. We do this through environmental permits that contain limits and conditions aimed at minimising wastes and protecting the environment. We also check compliance with these permits by making regular inspections at Hinkley Point A & B.

Regulatory compliance interactions are recorded in Radioactive Substances Compliance Assessment Reports (RASCARs). These summarise the type of work we have undertaken, describe any non-compliance or observations and good practice, and include actions or recommendations from our findings. They are public register records and can be provided on request (please see the 'further information' section at the end of this document to find out how to request public register records - in the link below).

We maintain regular contact with the sites between visits to the sites.

### Hinkley Point A

In January we carried out an inspection of the management system arrangements that govern the operation, maintenance and monitoring of Magnox's gaseous waste systems. This included observation of plant used for the management of gaseous discharges from the site and discharge sampling arrangements. We did not inspect the stacks. We are still preparing our RASCAR however we did not identify any non-compliances within the management system arrangements or during the visual inspection.

We have also reviewed the gaseous (and effluent) discharges for Hinkley Point A. As well as establishing if the discharges are below the compliance limits set by the permit, we also look at the trends within discharge data. Gaseous discharges remain well below permitted limits and trending data indicates stable and predictable

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discharges. We recommended that trend analysis is completed by the site operatives as part of their routine assessments, and we will be reviewing these assessments as part of our routine management

At the Annual Review of Safety Security and Environment (ARoSSE) in August last year we set out our expectations for using information and metrics gathered at the site to inform future decisions. Further discussions on the types of metrics required to monitor environmental aspects at the site including embedding sustainability in project management are taking place. This information will be discussed in future SSG meetings.

We are currently taking the opportunity to introduce a new member of our team to Hinkley point A. We are supporting the site with additional resources to facilitate succession planning.

### **Hinkley Point B**

We continue to hold routine meetings with the Environmental Safety Group (ESG), station management and Independent Nuclear Assurance (INA), in addition to relevant external bodies such as the Office for Nuclear Regulation (ONR). These routine interactions allow us to remain informed of any relevant activities and events at the site of regulatory interest during the defueling period.

We undertook an inspection on the 27th of October on the management of solid radioactive waste. We reviewed compliance with the current permit, particularly looking to ensure that the Best Available Techniques (BAT) are used to minimise both the volume and radioactivity of solid radioactive wastes generated by the station and also looked ahead to initial plans for the management of solid radioactive waste at the start of the decommissioning phase.

Overall, we found that the station had good arrangements in place for the management of current radioactive wastes and were compliant with their environmental permit. We noted the work that the station is undertaking some survey work to ensure the radionuclide fingerprint that they use to consign wastes, would be updated for the defueling period. We noted good practice in the training of Radioactive Waste Advisors (known as Acc. RWEs at EDF) and the use of Operational Experience (OPEX) to drive continuous improvement in the management of radioactive wastes.

We noted some actions and recommendations for some further improvements, this included ensuring that changes to decommissioning plans were updated and reflected in the stations Site Wide Environmental Safety Case (SWESC) and Waste Management Plans (WMPs). These are documents which detail the optimisation of

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radioactive wastes in decommissioning phase and are required by the station permit to be maintained and updated to ensure optimal waste disposals and to eventually allow permits to be revoked at the site end point.

We also undertook an inspection on the 13th of February 2023 on Environmental Management, Leadership and Culture at the station. For this inspection we focused on reviewing the overall management system and the effectiveness of leadership. We also looked at planned changes to the station's management system due to having to adjust for the different phases of the stations life cycle including defueling and the preparations for decommissioning, staff structure and resources to ensure on-going compliance with the stations environmental permits and an effective transfer of the station permits to Magnox Ltd who will be taking over the management of the HPB station decommissioning forward. We are currently still compiling our findings for this inspection and will report in the next SSG report.

## Events and enforcement

### Hinkley point A

We previously advised you of our enforcement response to a number of laboratory events last year during which we agreed an action plan with Magnox. The first of the actions, which comprised an audit of the external laboratory, has been completed. We are satisfied with the outcome of the audit and are working with the site to reduce the potential risk of further non compliances in the laboratory contract.

### Hinkley Point B

We were notified in writing on the 3rd of February that for Quarter 4 2022 milk and herbage samples taken as part of the Environmental Monitoring Program (EMP), the station will not be able to report the results for Sulphur-35, due to the samples not being received by the external laboratory. We are currently reviewing if there are any non-compliances as a result of this notification and will update any findings in the next SSG report.

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Following on from our RASCAR for the proposed changes to the Hinkley Point B Environmental Monitoring Program (EMP), which we reported on in the previous SSG report- we were notified by the station on the 23/12/22 that the calculated discharges in the defueling period on which changes to the EMP were based, aligned with the discharges measured in the defueling period. As a result of the close out of our action to confirm this information- we re-confirmed that we were content for the proposed changes to the EMP to go ahead from the 1<sup>st</sup> of January 2023.

## Discharge reports

The operators at Hinkley Point A and B are required to report liquid and gaseous discharges to the environment to us on a regular basis. We assess these to check compliance with the site permits. The site discharge reports, and our assessments are placed on the public register.

### Hinkley Point A

In addition to our review of gaseous discharges during the inspection in January, we are in the process of carrying out an annual review of all discharges from Hinkley Point A, this includes a review of trends within data. The liquid and gaseous discharges from Hinkley Point A remain within permitted limits.

### Hinkley Point B

The liquid and gaseous discharges from Hinkley Point B were below any notification levels and within permitted limits.

## Environmental impact

Nuclear sites are required to carry out a rigorous environmental monitoring programme (EMP) that requires the operator to monitor and assess the impact of their discharges on the environment.

Additionally, the Environment Agencies and Food Standards Agency carry out independent environmental monitoring around nuclear sites. The results of this work are published in our annual Radioactivity in Food and the Environment (RIFE) report (i). We will continue to follow Government guidelines with Safe Systems of Work in place, with the with regards to our monitoring of the environment and foodstuffs. The 2021 Rife report has now been published here: [RIFE 27 summary: Radioactivity in food and the environment 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/105422/rife-27-summary-radioactivity-in-food-and-the-environment-2021) and the 2022 report is in preparation.

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## Further information

Further information on our role in regulating the use of radioactive substances and related activities on nuclear licensed sites can be found on the Environment Agency section <sup>(i)</sup> of the GOV.UK website.

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The Environment Agency's Lead Regulator for the Hinkley Point A site is Tracy Braithwaite. The Environment Agency's Lead Regulator for the Hinkley Point B site is Victoria Thomas.

Tracy and Victoria are Senior Nuclear Regulators and part of the national Nuclear Regulation Group (South) which is based at the Environment Agency's Wallingford office in Oxfordshire.

The EA's Nuclear Regulators undertake environmental regulation of radioactive substances on nuclear licensed sites in southern England. They work closely with the local Environment Agency teams in those areas as well as external bodies such as the Office for Nuclear Regulation.

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<sup>i</sup> <https://www.gov.uk/monitoring-radioactivity>

<sup>ii</sup> <https://www.gov.uk/government/publications/nuclear-regulation-in-the-environment-agency>