

Permit subject to national security direction?	NO	Site and permit ref no:	AWE Sites: EPR/QB3535DR and EPR/PP3790SZ		
Name of site/facility	AWE Aldermaston & AWE Burghfield		Operator/permit holder	AWE plc	
Officer	Stuart Parr & Stewart Carey-Hodges	Date	9 to 11 July 2014	Area/office	Thames West/Wallingford
Activity	Nuclear site		Event type:	<input type="checkbox"/> Routine <input type="checkbox"/> Incident response <input checked="" type="checkbox"/> Other	
Assessment type:	<input checked="" type="checkbox"/> Site inspection	<input type="checkbox"/> Audit	<input type="checkbox"/> Check monitoring/sampling	<input type="checkbox"/> Report/data review	<input checked="" type="checkbox"/> Procedure review
Site life status:	<input checked="" type="checkbox"/> Operational	<input type="checkbox"/> Pre-operational	<input type="checkbox"/> Post-operational		
What part(s) of the permit were assessed?	1.1 General management				
Report recipient(s)	AWE RICC Office, F6.1, Aldermaston				
Report delivery method	<input type="checkbox"/> Copy left on site	<input type="checkbox"/> Posted	<input checked="" type="checkbox"/> E-mailed	<input type="checkbox"/> Faxed	Date: 11/08/14

Items carried forward from previous visit:

As part of this inspection we also followed-up on an issue raised during an inspection visit in October 2013 concerning the accumulation of radioactive waste in an operational laboratory. We observed that good progress had been made since our last visit (see below).

Report:

This RASCAR is an initial report and further work is to be undertaken following the inspection reviewing documents and information before a full assessment of AWE's Radioactive Waste Management Arrangements (RWMAs) can be delivered. A further RASCAR will be issued at this point summarising our findings.

As part of the Environment Agency's (EA) Themed Inspection Programme, we conducted a series of interviews with the Site Director, senior managers and facility staff to assess compliance with those parts of the permit relevant to RWMAs. Prior to the inspection we requested that AWE send us relevant documents that made-up their RWMAs. We were sent 7 documents but throughout the inspection it was apparent that these 7 documents were only a small fraction AWE's RWMAs. AWE did provide us with a more comprehensive scope of their RWMAs during the inspection. In discussion with relevant AWE personnel it became clear that the initial submission of information was not a whole company response and that resourcing had been a limiting factor in preparing for the inspection.

AWE employ a wide range of specialists to support their RWMAs however there are currently a number of baseline posts vacant, such as; Head of Environment, Radioactive Waste Specialists and Waste Officers. As a temporary measure existing staff have been covering these roles and we have not been informed of any significant environmental events whilst these baseline posts have been vacant. Nevertheless, AWE is required to manage their use of radioactive substances using "sufficient and competent persons" (permit condition 1.1.1(b)). In 2012 the EA placed an Improvement Condition on AWE to develop and use a baseline for resourcing environmental compliance roles in order to help AWE understand the personnel required for compliance with their environmental permits. On this basis we have raised a non-compliance against c1.1.1(b) of EPR/QB3535DR: AWE do not have adequate numbers of personnel in post to ensure compliance with the permit (see p.3 for categorisation).

The inspection focused on AWE's strategic planning for management of all wastes, and radioactive waste in particular, in an integrated way. We used a combination of techniques during the inspection: document review, interview of key personnel and visits to a range of facilities at AWE Aldermaston. We identified a range of good practices during the inspection, such as:

- AWE has developed an Integrated Waste Strategy that addresses all waste types, e.g. radioactive, hazardous and conventional wastes. The strategy includes actions for improvement and has been successfully used since its introduction in 2007 to improve waste management practices at AWE.
- Development and implementation of an effective waste service which includes waste process maps, designated waste route owners, access to technical specialists for facilities and a helpdesk service for access to information and services for waste producers.
- Development of corporate Best Available Techniques documents covering sentencing routes, aqueous waste and radioactive waste characterisation.

- Implementation of a powerful waste database which not only stores information but is also integral to the provision of waste services, e.g. waste collection only with characterisation data and BAT assessment registered in the database.
- Long term planning for decommissioning and waste liabilities through the Quinquennial Review (QQR) process and development of an Optimised Estate Development Plan and Estate Major Investment Plan.
- A corporate Sustainability Plan containing high level actions and performance measures.
- Good interaction with long term decommissioning contractors leading to innovations in decommissioning, waste management and minimisation.
- Where available, Waste Officers and Waste Supervisor roles providing good in-facility support with training, tool box talks, process surveillance, etc.
- Robust assessment of Best Available Techniques for in-facility waste streams with input from waste specialists and governance provided by the Waste Assessment Steering Group (WASG).
- Retention of construction Site Waste Management Plans within corporate arrangements for project delivery despite no legal requirement for these plans anymore.

There are opportunities for improvements, including:

- More effective use of the environmental baseline to manage key resources and ensure resilience against permit condition 1.1.1(b).
- Strengthen links between various strategies and plans to give a more coherent direction to waste management.
- Provide clearer direction for waste management strategy in the medium term including performance monitoring indicators.
- Use available data to strengthen medium term planning.
- Recognise internal and external risks to waste management activities, e.g. LLWR re-permitting.
- More stakeholder engagement in future iterations of the IWS.

On a side note from the focus of the main inspection theme, we visited an operational laboratory facility and noted that it had made good progress with managing its accumulated radioactive wastes which had been raised as a concern previously during an inspection visit in October 2013. However, on our visit to the Hydrodynamics Area facilities, currently going through a re-kit, the house keeping in this area was generally below the standard expected on a nuclear site, for example, bags of waste being found in corners, oil bund being used to store flexible pipes, unsecured ladders and drums of unknown provenance in the area.

Recommendations

1. EA to arrange an intervention with AWE to examine how the operator will ensure that sufficient competent persons are to be put in place and meet the requirements of the environmental baseline.
2. AWE to improve its strategic planning in the medium term for waste management, making use of data already available, taking account of internal and external risks.

Compliance assessment summary

Key to completion: A = Assessed/assessed in part (no evidence of non-compliance) NA = Not applicable		1, 2, 3 or 4 = CCS categories 1 - 4 N = Not assessed					Conditions breached
a) Permitted activities	<input type="checkbox"/> 1 <input type="checkbox"/> N						Not assessed
b) Infrastructure	<input type="checkbox"/> 1 <input type="checkbox"/> N	<input type="checkbox"/> 2 <input type="checkbox"/> N	<input type="checkbox"/> 3 <input type="checkbox"/> N	<input type="checkbox"/> 4 <input type="checkbox"/> N	<input type="checkbox"/> 5 <input type="checkbox"/> N		Not assessed
c) General management	<input type="checkbox"/> 1 <input type="checkbox"/> 4	<input type="checkbox"/> 2 <input type="checkbox"/> A	<input type="checkbox"/> 3 <input type="checkbox"/> N	<input type="checkbox"/> 4 <input type="checkbox"/> A			1.1.1(b)
d) Incident management	<input type="checkbox"/> 1 <input type="checkbox"/> N	<input type="checkbox"/> 2 <input type="checkbox"/> N					Not assessed
e) Emissions	<input type="checkbox"/> 1 <input type="checkbox"/> N	<input type="checkbox"/> 2 <input type="checkbox"/> N	<input type="checkbox"/> 3 <input type="checkbox"/> N	<input type="checkbox"/> 4 <input type="checkbox"/> N	<input type="checkbox"/> 5 <input type="checkbox"/> N		Not assessed
f) Amenity	<input type="checkbox"/> 1 <input type="checkbox"/> NA	<input type="checkbox"/> 2 <input type="checkbox"/> NA	<input type="checkbox"/> 3 <input type="checkbox"/> NA	<input type="checkbox"/> 4 <input type="checkbox"/> NA	<input type="checkbox"/> 5 <input type="checkbox"/> NA		Not applicable
g) Monitoring and records, maintenance and reporting	<input type="checkbox"/> 1 <input type="checkbox"/> N	<input type="checkbox"/> 2 <input type="checkbox"/> A	<input type="checkbox"/> 3 <input type="checkbox"/> N	<input type="checkbox"/> 4 <input type="checkbox"/> N			None identified
h) Resource efficiency	<input type="checkbox"/> 1 <input type="checkbox"/> N	<input type="checkbox"/> 2 <input type="checkbox"/> NA					Not assessed

The breaches indicated above may constitute one or more offences. You should take immediate action to rectify each breach and return to compliance. You should prevent any repetition of the breaches. Breaches of conditions as indicated above can result in criminal prosecutions and/or suspension or revocation of a permit.

Note: If there is a breach, only one of the following will have an 'x' placed in the box as the initial enforcement response.

We will now consider what enforcement action is appropriate.	At present we do not intend to prosecute you for the above offences. However, you are warned that this may change if further relevant information comes to light.	This is a site warning	
		We have given you advice.	<input checked="" type="checkbox"/>

CCS Record number: CCS number will be allocated on final version

Have you used any separate continuation sheets?	No
Signature:	Final RASCAR to be signed.

Notes to the recipient

This compliance report form may highlight non-compliance with your permit or directly applicable legislation as observed by the Environment Agency officer.

This does not relieve the site operator of their responsibility to ensure that they comply with the permit and to prevent pollution of the environment. You are also reminded that:

- you should comply with the conditions of the permit at all times;
- compliance with the permit does not remove your obligation to comply with other legislative provisions which may apply.

Understanding the compliance assessment summary

a) Permitted activities	1	Specified by permit
b) Infrastructure	1	Engineering for prevention and control of emissions
	2	Closure and decommissioning
	3	Site drainage engineering (clean and foul)
	4	Containment of stored materials
	5	Plant and equipment
c) General management	1	Staff competency/training
	2	Management system and operating procedures
	3	Materials acceptance
	4	Storage, handling, labelling and segregation
d) Incident management	1	Site and source security
	2	Accident, emergency and incident planning
e) Emissions	1	Air
	2	Land and groundwater
	3	Surface water
	4	Sewer
	5	Waste
f) Amenity	1	Not applicable
	2	Not applicable
	3	Not applicable
	4	Not applicable
	5	Not applicable
g) Monitoring and records, maintenance and reporting	1	Monitoring of emissions and environment
	2	Records of activity, site diary/journal/ events
	3	Maintenance records
	4	Reporting and notification to the Environment Agency
h) Resource efficiency	1	Efficient use of raw materials and BAT
	2	Not applicable

The term 'permit' for the purposes of this form includes: licences, authorisations and consents.

Understanding your non-compliance scores

Non-compliance findings are classified using our published Compliance Classification Scheme, (CCS).

This scheme categorises breaches of permit conditions based on their potential for environmental impact as shown below. If you wish to discuss further any comments made by the officer on this form, contact your local area office or for more details of the CCS scheme, see the Environment Agency's website or contact your local office.

CCS category	Description
1	A non-compliance which has a potentially major environmental effect
2	A non-compliance which has a potentially significant environmental effect
3	A non-compliance which has a potentially minor environmental effect
4	A non-compliance which has no potential environmental effect

Corrective action

We have various options to ensure that you correct actual or potential non-compliance.

- We may advise on corrective actions, verbally or in writing
- We may require you to take specific actions, by letter or by issuing a notice.
- We may require you to review your procedures or management systems.
- We may change some of the conditions of your permit.
- We may decide to undertake a full review of your permit.

Any breach of a permit is an offence, and we may take legal action:

- We may serve a warning on site or by letter. The officer may complete the site warning declaration on this form. A warning is our minimum enforcement response, however, it does not preclude us taking additional enforcement action including the issue of a formal caution, taking a prosecution and/or service of a notice.
- Depending on the offence, the penalties imposed by a court on prosecution can include substantial fines and even imprisonment.

We have published our Enforcement and prosecution policy which seeks to achieve a consistent approach to enforcement across all our regulated activities.

Operational and Pollution Risk Appraisal (Opra)

Compliance assessment findings may affect your RSR non-nuclear Opra score. This score determines your charge and affects the allocation of our resources to check your compliance with the permit.

Data protection notice

The Environment Agency is responsible for regulating environmental protection, flood defence, water resources and fisheries. It has a duty to discharge its functions to protect and enhance the environment and to promote conservation and recreation. The information provided will be processed by the Environment Agency to fulfill its regulatory and monitoring functions, and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities, emergency services) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s) unless it relates to sealed sources. However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty working days of receipt of the assessment form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter – What can I do if I disagree with the compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line manager, Area Environment Manager or Area Manager. If you wish to raise your dispute further, this can be done through our official Complaints and Commendations procedure. Phone our general enquiry number 08708 506506 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team, alternatively you can send an email to enquiries@environment-agency.gov.uk. If, after following our Complaints and Commendations procedure, you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the Parliamentary Ombudsman phone their helpline on 0845 015 4033.

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