

From: Richard.Powell@rwe.com <Richard.Powell@rwe.com>
Sent: 03 October 2019 11:32
To: Parr, Elizabeth <Elizabeth.Parr@cyfoethnaturiolcymru.gov.uk>
Cc: Leahey, Antony <Antony.Leahey@cyfoethnaturiolcymru.gov.uk>
Subject: RP3133LD Aberthaw Power Stn closure MCERTS-MAINTAINING COMPLIANCE - Audit Report ok for Public Register access

Liz

That's ok no issues from our side with publishing this on register.

Rich

From: Parr, Elizabeth [<mailto:Elizabeth.Parr@cyfoethnaturiolcymru.gov.uk>]
Sent: 03 October 2019 09:37
To: Powell, Richard
Cc: Leahey, Antony
Subject: RP3133LD Aberthaw Power Stn closure MCERTS-MAINTAINING COMPLIANCE - Audit Report ok for Public Register access?

Good morning Richard,

We intend to upload the attached documents as 'Public Register', however the 16E22369-7 RA Final Audit Report has 'Confidential' on pages 1-12.

I would be grateful if you could please confirm that there are no objections to the disclosure status of the above document being 'Public Register'.

Regards

Liz

Liz Parr

Cymorth Technegol Rheoleiddio Diwydiant a Gwastraff y De-ddwyrain / SE Industry & Waste

Regulation Technical Support

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Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.

Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay

AUDIT REPORT*MCERTS for the self-monitoring of flow***CONFIDENTIAL**

Audit report Ref:	16E22369.007
Consent/Permit No.	RP3133LD
Date of Assessment	27th February 2019

CSA
GROUPsira
CERTIFICATION**Operator (auditee)** *RWE Plc***Operator representative**

Name:	<i>Richard Powell</i>	Tel:	<i>01446 753230 07825 453965</i>
Title:	<i>Station Chemist</i>	email:	

Operator Address

*RWE Plc
Aberthaw Power Station
The Leys
Nr Barry
Vale of Glamorgan
CF62 4ZW*

Scope of audit

Minimum Requirements for the Self-Monitoring of Flow

Version 4.0

Pre-assessment	Initial assessment		Surveillance		Re-assessment ✓	
Site Inspection Service Provider	Inspector	Survey Date	Report No.	Pass / Fail	Certificate No.	Expiry Date
Critical Flow Systems	C Coris	22/10/14	CFS/RRN/4038	Pass	ME14 4015 Rev 2	22/10/19

Recommendations*[delete where applicable]***Next audit due...***[indicate where applicable]**accept MS (management system)**12 months, 24 months, Other (specify) February 2020**maintain acceptance of MS**12 months, 24 months, Other (specify)**Refuse acceptance/withdraw acceptance**Cancel certificate and notify Environment Agency**Auditor recommendations are subject to review by Sira Certification Service who has veto power regarding all recommendations***Auditor**




Signed

Operator

Signed to accept recommendations

Sira

Signed

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Consent/Permit No.	RP3133LD	
Date of Assessment	27th February 2019	

Impartiality Declaration

I confirm that neither I nor my organisation has had any consultancy or other relationship that could result in a conflict of interest with the above company within the last two years, other than activities conducted under the direction of Sira Certification, and will notify Sira Certification if this situation should change.

Signature		Date	27 th February 2019
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1 SUMMARY REPORT

Summary *an overview of compliance of the management system with the MCERTS requirements*

This was a recertification audit that examined each area covered by clauses 4.4 to 4.16 of the Minimum Requirements for the Self-Monitoring of Flow.

The Operator generates electricity from coal and uses sea water for flue gas desulphurisation and cooling. The Operator is required to report total CW discharge as well as FGD absorber flow. It should be noted that FGD feed is taken from a point AFTER the cooling water pumps and is returned to the cooling water stream prior to discharge. FDG flow has not been considered to fall under MCERTS requirements to date but the Operator is now requested to confirm this situation with NRW prior to the forthcoming MCERTS Site Inspection.

Measurement of total CW discharge is based on the differential pressure across the cooling water pumps based on the JEP methodology. Separate pressure transducers are fitted to the suction and discharge of each pump.

Understanding and commitment appear to remain sound although the extended period since the last internal MCERTS audit is a point of concern. (The last Sira audit identified improvement in the area of internal audits following previously identified problems). This is an important area and carries the risk of an increased Sira audit frequency if thorough and effective corrective action is not evident at the next Sira audit.

The following permit is in place: Natural Resources Wales: RP3133LD variation 14. The permit requires monthly reporting (without limit) of monthly average daily value and the total monthly volume of FGD inlet flow. (outflow from this process joins the cooling water discharge at W2). W1 is an occasional portable pumped discharge point for surface water, with reporting taking place as and when this point is used.

CW discharge volume is not required to be reported but is used for calculation of various mass emissions.

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**2 AUDIT DATA****Audit team members***Graham Cutler – SIRA Associate***Interviewed Operator representative(s) (auditee)**

<i>Area</i>	<i>Name</i>	<i>Title / Job Function</i>
Management	Richard Powell	Station Chemist
Maintenance	Jason Allen	Instrument Supervisor

Areas sampled*Indicate the areas sampled during the audit.*

Requirement	ADR Ref
4.4 Quality/Environmental policy	✓
4.5 Management responsibilities	✓
4.6 Documentation	✓
4.7 Operating procedures	✓
4.8 Document control	01 Minor
4.9 Equipment inventory	02 Obs
4.10 Maintenance	✓
4.11 Commissioning	✓
4.12 Site changes	✓
4.13 Verification	03 Minor
4.14 Data treatment	04 Obs
4.15 Corrective actions	✓
4.16 Internal audits	05 Minor

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3 AUDIT DETAIL REPORT	ADR No:	01
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Indicate Para No. of Standard for each ADR 4.4 4.5 4.6 4.7 **4.8** 4.9 4.10 4.11 4.12 4.13 4.14 4.15 4.16

Description	Category	Major Minor Observation
<p>4.8.1 Authorising and maintaining management system documentation shall be the responsibility of designated competent personnel.</p> <p>4.8.2 Controlled documentation shall not be amended without the authorisation of designated competent personnel or their appointed deputies.</p> <p><i>LP/BAA/0000 – Documentation Management Procedure (issue 1, May 2015) states that the Commercial Operations Manager is responsible for authorising local environmental procedures such as LP/ENV/1039. However this position no longer exists.</i></p>		

Auditor <i>Sign</i> 	Operator <i>sign</i>
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PROPOSED CORRECTIVE ACTION <i>(to be entered if agreed after discussion during audit)</i> Procedure to be reviewed and updated.

Auditor <i>Sign</i> 	Operator <i>sign</i>
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CSA
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CERTIFICATION**3 AUDIT DETAIL REPORT****ADR No:****02**

Indicate Para No. of Standard for each ADR 4.4 4.5 4.6 4.7 4.8 **4.9** 4.10 4.11 4.12 4.13 4.14 4.15 4.16

Description**Category**~~Major~~~~Minor~~

Observation

4.9.1 A list of major items of equipment and the location of each shall be maintained (a major item is defined as equipment that is critical to the validity of flow monitoring for example, the sensor and electronics).

4.9.2 Equipment records shall be kept for each major item. The records shall contain details of the equipment, its unique identifying code and any relevant calibration and maintenance requirements.

In view of the large number of pressure transducers utilised it would be beneficial for auditing purposes if the Operator were to generate a schedule listing all of their serial numbers.

Auditor

Sign

Operator




sign

PROPOSED CORRECTIVE ACTION (to be entered if agreed after discussion during audit)**Auditor**

Sign

Operator

sign

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3 AUDIT DETAIL REPORT	ADR No:	03
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Indicate Para No. of Standard for each ADR 4.4 4.5 4.6 4.7 4.8 4.9 4.10 4.11 4.12 **4.13** 4.14 4.15 4.16

Description	Category	Major Minor Observation
<p>4.13.1 The Operator shall undertake appropriate verification between MCERTS inspections over the entire certification period, to ensure that the flow monitoring equipment is operating satisfactorily.</p> <p>4.13.2 Verification shall include at least one of the following methods:</p> <ul style="list-style-type: none"> • Calibration (i.e. in a calibration laboratory) • Comparison with a secondary device, drop test or gravimetric calibration • Reference plate checks (for open channel flowmeters) <p>4.13.3 Where the above methods are not possible, an alternative method is permitted. Any alternative method shall be agreed in writing with the MCERTS Inspector.</p> <p>However, verification of the data path is not currently carried out.</p>		

Auditor <i>Sign</i> 	Operator <i>sign</i>
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PROPOSED CORRECTIVE ACTION <i>(to be entered if agreed after discussion during audit)</i> Verification of the data path to be included in the verification process at an appropriate frequency.

Auditor <i>Sign</i> 	Operator <i>sign</i>
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3 AUDIT DETAIL REPORT	ADR No:	04
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Indicate Para No. of Standard for each ADR 4.4 4.5 4.6 4.7 4.8 4.9 4.10 4.11 4.12 4.13 **4.14** 4.15 4.16

Description

Category

~~Major~~

~~Minor~~

Observation

4.14.1 Where applicable, procedures for data treatment shall be included in the management system. The Operator's management system shall define the maximum acceptable data treatment/telemetry error.

4.14.2 The management system auditor is not required to carry out data treatment/telemetry verification measurements, but is required to ensure that:

- the appropriate checks are specified in the Operator's operating procedures,
- the procedures are being implemented in a timely and appropriate manner,
- the results are being recorded and analysed, and,
- that these are included in the overall assessment of the total uncertainty.

FGD flow has no discharge limit, and constitutes a proportion of the measured flow through the CW pumps. It has not been considered as falling under MCERTs requirements and the associated flow meters were not included in the last MCERTs site inspection. However the Operator is requested to obtain confirmation from NRW that this remains the case prior to the impending MCERTs site inspection.

Auditor

Sign

S. Cuth

Operator

sign

PROPOSED CORRECTIVE ACTION *(to be entered if agreed after discussion during audit)*




Auditor

Sign

S. Cuth

Operator

sign

AUDIT REPORT <i>MCERTS for the self-monitoring of flow</i> CONFIDENTIAL		  
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3 AUDIT DETAIL REPORT	ADR No:	05
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Indicate Para No. of Standard for each ADR 4.4 4.5 4.6 4.7 4.8 4.9 4.10 4.11 4.12 4.13 4.14 4.15 **4.16**

Description	Category	<input type="radio"/> Major <input type="radio"/> Minor <input type="radio"/> Observation
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4.16.1 Internal audits shall be performed according to a defined schedule to verify that operations continue to comply with the requirements of the management system and with the current version of this MCERTS standard. It is the responsibility of the designated competent person to plan and organise such audits. They shall be carried out by trained personnel who are operationally independent of the activity to be audited. Personnel shall not audit their own activities, except when it can be demonstrated that it will be effective.

4.16.2 The audit findings and any corrective actions arising from them shall be recorded. The Operator shall ensure that corrective action is implemented in a timely manner.




No internal MCERTS audit has been carried out since April 2016.
It is important that internal MCERTS audits have a good understanding of MCERTS requirements and specific MCERTS training for such auditors is strongly recommended.
The Operator is reminded of the need for internal audits to examine BOTH the effectiveness of the MCERTS operating procedures AND examine the MCERTS management system against clauses 4.4 to 4.16 of the "Minimum Requirements". Audit records need to demonstrate a thorough and effective process.

Auditor <i>sign</i> 	Operator <i>Sign</i>
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PROPOSED CORRECTIVE ACTION *(to be entered if agreed after discussion during audit)*

Action to be planned and implemented that will ensure that MCERTS internal audits are completed in a timelier manner.
 Consideration to be given to the other points raised.

Auditor <i>sign</i> 	Operator <i>Sign</i>
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4 AUDIT NARRATIVE




information relevant to the audit which is not already included herein

Colour Code: Non-conformance (major) (minor) Observation Satisfactory




4.4 Quality/Environmental policy	<p>This organisation has ISO 14001 certification with LRQA (UKAS 001). The certificate in place expires in January 2021. As required by that standard the policy statement includes a commitment to legal compliance. The policy statement is dated 2nd August 2018 and is signed by the Head of RWE UK and other board members.</p>
4.5 Management responsibilities	<p>The MCERTS responsible person continues to be Richard Powell and his responsibilities in respect of the MCERTS management system are defined in LP/ENV/1039 – Control of Emissions to Water. Richard now reports to the Performance & Commercial Section Head, who reports to the Production Manager. Discussion with Richard indicates that the MCERTS understanding of these persons is adequate based on their understanding and involvement with environmental issues, other environmental legislation, and their involvement in the Engineering Modification process.</p> <p>The Maintenance function is involved with the practical requirements of MCERTS and has received detailed environmental awareness training based on an in-house video and test questions.</p> <p>In response to the finding of the last Sira audit in this area the Assistant Chemist (Daniel Jenkins) who may deputise for Richard received MCERTS awareness training from Sira on 9th May 2017. (Cert no. CSA-SIRA.OPTR.2017.0056).</p>
4.6 Documentation	<p>A documented EMS is in place and within that system LP/ENV/1039 – Control of Emissions to Water addresses MCERTS requirements. This document is now at version 8 and soon to be issued as version 9. The changes since the last Sira audit were reviewed and cover new pH limits under a permit variation, operation of site surface water drain valves, and personnel changes. (Surface water discharge from site does not fall under MCERTS requirements).</p>
4.7 Operating procedures	<p>In addition to the above procedure particular MCERTS related tasks exist in the PRISM maintenance management system. These, and other procedures are referenced below where relevant. The absence or inadequacy of any documented procedure is covered in this report under the section to which it relates.</p>
4.8 Document control	<p>LP/BAA/0000 – Documentation Management Procedure (issue 1, May 2015) refers and states that the Commercial Operations Manager is responsible for authorising local environmental procedures such as LP/ENV/1039. However this position no longer exists. ADR 01 REFERS.</p> <p>The Doc Tracker (electronic) system is used to control the review and updating of procedures. This system appears to ensure that changes to relevant MCERTS related documents require appropriate input from the MCERTS Responsible Person.</p>
4.9 Equipment inventory	<p>The flow monitoring equipment comprises pressure transducers on the suction and discharge of each of the cooling water pumps. The pressure difference across each pump is used to determine flow. A computerised maintenance system (PRISM) is in place, which includes the flow monitoring equipment. The pressure transducers cannot be accessed without scaffolding and can only be removed for checking during an outage.</p> <p>In response to the findings in this area at the last Sira audit the serial numbers of the equipment in use were checked on the 20th July 2018 and substantial differences were found between the serial numbers as found and those quoted at</p>

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	<p>the last Sira audit. Detailed discussion and the involvement of Maintenance finally determined that calibration of the pressure transducers involves replacing them with identical spares held in stock on a rotating basis. Thus the serial numbers associated with any particular cooling pump changes every time the pressure transducers are calibrated. However the calibration certificates capture the serial numbers of each pressure transducer fitted.</p> <p>All the pressure transducer serial numbers are of the form N1-E430-9705xxx, where xxx is a 3-digit number. The following serial numbers were in place according to the most recent calibration certificates:</p> <p>CW pump 7: Suction – 806, discharge 361. CW pump 8: Suction – 360, discharge 352. CW pump 9: Suction – 354, discharge 356. CW pump 10: Suction – 358, discharge 352.</p> <p>Other serial numbers identified at previous Sira audits: 359, 353, 355, and 357.</p> <p>In view of the large number of pressure transducers utilised it would be beneficial for auditing purposes if the Operator were to generate a schedule listing all of their serial numbers. ADR 02 REFERS.</p> <p>The permit has a requirement for the continuous monitoring of the flow of seawater through the 3 flue gas desulphurisation units. This is done so as to be able to report the mass emissions of certain chemicals arising from the desulphurisation process. There are no limits associated with this flow, which is taken from, and returned to the cooling water stream. Accordingly this flow comprises a component of the total cooling water flow and is included in its measurement. The electromagnetic flow meters are used for the measurement of this flow, which is deemed to lie outside of MCERTS requirements. However, for completeness, and in case this flow should be deemed to fall under MCERTS requirements in the future the serial numbers of the flow meters are:</p> <p>U7: ABB Magmaster. Sensor: P64276/1/2, Transmitter: P64276/1/2 U8: ABB Magmaster. Sensor: P64276/1/3, Transmitter: P64276/1/3 U9: ABB Magmaster. Sensor: P64276/1/1, Transmitter: P64276/1/1</p>
4.10 Maintenance	<p>The maintenance and calibration of the pressure transducers on the CW pumps can only be carried out when a unit is shut down. The PRISM system flags up the requirement on an annual basis, which is then held until unit downtime permits completion. The last such exercise took place on 20th July 2018 and covered all of the pumps. Previously it occurred in May 2016 in respect of CW pumps 7, 8 and 9, and in December 2016 in respect of CW pumps 10. Connection ports are cleaned during the calibration process.</p> <p>The following calibration certs were examined: Pump 10 outlet, pump 8 inlet, and pump 7 outlet. No adjustment was required to any of the transducers and the records are detailed and provide evidence of an effective process with traceability back to the test equipment used.</p>
4.11 Commissioning	<p>LMI/ENG/4023 - Management of Plant Modifications (issue 5 of 1st October 2013) covers this area and ensures the involvement of the MCERTs Responsible Person should any changes be proposed to the flow monitoring arrangements. No changes have occurred to the flow monitoring equipment since the last Sira audit.</p>
4.12 Site changes	<p>LP/ENV/1039 – Control of Emissions to Water, clause 4.2.3 addresses this requirement. It requires changes that could impact flow monitoring to be reviewed</p>

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	<p>by the MCERTS Responsible Person and for MCERTS requirements to be complied with. It also addresses the requirement for an MCERTS site inspection or documented justification if this is deemed to be not necessary.</p> <p>The Operator again declared that no changes have occurred that could impact flow monitoring since the last Sira audit.</p>
4.13 Verification	<p>Verification of the pressure transducers on the CW pumps is by on-site calibration using dedicated test equipment calibration to national standards.</p> <p>However, this audit identified that verification of the data path (loop checks) is not currently taking place, "as no problems have been identified previously".</p> <p>ADR 03 REFERS</p> <p>Calibration involves replacing the transducers on a pump with different calibrated transducers from stores on a rotating basis. See comments above under Equipment Inventory.</p> <p>As reported above various calibration records were examined and, in response to the comments in the last Sira audit report now include the serial numbers of each pressure transducer fitted to the pumps.</p>
4.14 Data treatment	<p>Flow data is automatically captured by the DCS, which then populates a spread sheet.</p> <p>As reported above FGD flow has no discharge limit, and constitutes a proportion of the measured flow through the CW pumps. It has not been considered as falling under MCERTS requirements and the flow meters were not included in the last MCERTS site inspection. However the Operator is requested to obtain confirmation from NRW that this remains the case prior to the impending MCERTS site inspection.</p> <p>ADR 04 REFERS.</p> <p>The NRW report for November 2018 was viewed and reports the following for W2: CW: 28179921 m3. FGD discharges are reported individually. In respect of unit 7 they were 2481 m3/hour average, 306508 m3 total. The November 2016 submission reported CW: 114355640 m3. FGD discharges are reported individually. In respect of unit 7 they were 18266 m3/hour average, 1222396 m3 total.</p>
4.15 Corrective actions	<p>The means of capture, review and correction of flow monitoring anomalies is based on the Madison reporting system, with the PRISM system also used to drive corrective action. This process appears to be appropriate. The operator again stated that no flow monitoring anomalies had arisen since the last Sira audit.</p>
4.16 Internal audits	<p>The last internal MCERTS audit was carried out in April 2016 and was reported in the last Sira audit report. Wording repeated for completeness, "Previous internal MCERTS audits took place on 13th February 2013 and 8th February 2012. The audit was carried out by Nigel Williams – Performance Section Head, and the record demonstrates an appropriate process that included examination of compliance with the documented procedures as well as compliance of the management system with clauses 4.4 to 4.16 of the Minimum Requirements. Two NCR's are listed, one requiring an update to LP/ENV/1039 – Control of Emissions to Water. However MCERTS awareness training for the internal auditor should be considered." The audit record was again reviewed and is based on a five page detailed checklist that includes the relevant Minimum Requirements.</p> <p>A further MCERTS internal audit has been scheduled for February 2019 and assigned to Mark Jemmett – Section Head Maintenance Department and trained auditor. This audit has not yet been carried out and in any case appears to be</p>

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	substantially delayed. ADR 05 REFERS. In addition, as pointed out at the last Sira audit it is important that internal MCERTS audits have a good understanding of MCERTS requirements and specific MCERTS training for such auditors should be considered.
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5 CORRECTIVE ACTION REVIEW <i>a review of corrective action resulting from previous Audit Detail Reports raised</i>					
ADR Ref	Requirement	Finding	Response	Evidence	Status
	4.4 Quality/Environmental policy				
01	4.5 Management responsibilities	A graduate chemist is to be appointed as a deputy to the MCERTS Responsible Person in the near future and it is therefore important that this person receives appropriate MCERTS awareness training.	Sira course attended.	Training cert viewed.	Closed
	4.6 Quality manual/Environmental documentation				
	4.7 Operating procedures				
	4.8 Document control				
	4.9 Equipment inventory				
	4.10 Maintenance				
	4.11 Commissioning				
	4.12 Site changes				
	4.13 Verification				
	4.14 Data treatment				
	4.15 Corrective actions				

**sira**

Minimum Requirements for the Self-Monitoring of Flow

Audit Recommendations



Objective

To ensure that MCERTS Management System audit findings are presented and agreed in situations where it is not possible to print a complete audit report before the end of the audit.

Permit holder : <i>RWB Alkhan</i>	Location : <i>Alkhan Power Stn.</i>
Contact: <i>R. Powell</i>	Sira Ref: <i>16E 22369 007</i>
Tel:	Permit No :
Auditor(s) : Graham Cutler	Date/Time: <i>27/2/19 PM.</i>
Audit Stage Pre-assessment Initial assessment Surveillance Re-assessment <input checked="" type="checkbox"/>	

Impartiality Declaration

I confirm that neither I nor my organisation has had any consultancy or other relationship that could result in a conflict of interest with the above company within the last two years, other than activities conducted under the direction of Sira Certification, and will notify Sira Certification if this situation should change.

Signature	<i>S. Cutler</i>	Date	<i>27/2/19</i>
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Issues requiring Corrective Action

Requirement	ADR Ref	Category		
		Major	Minor	Observation
4.4 Quality/Environmental policy				
4.5 Management responsibilities				
4.6 Documentation				
4.7 Operating procedures				
4.8 Document control	<i>01</i>		<input checked="" type="checkbox"/>	
4.9 Equipment inventory	<i>02</i>			<input checked="" type="checkbox"/>
4.10 Maintenance				
4.11 Commissioning				
4.12 Site changes				
4.13 Verification	<i>03</i>		<input checked="" type="checkbox"/>	
4.14 Data treatment	<i>04</i>			<input checked="" type="checkbox"/>
4.15 Corrective actions				
4.16 Internal audits	<i>05</i>		<input checked="" type="checkbox"/>	

Recommendations <i>[delete where applicable]</i>	Next audit due... <i>[indicate where applicable]</i>
<i>accept MS (management system)</i>	<i>12 months, 24 months, Other (specify)</i>
<i>maintain acceptance of MS</i>	<i>12 months, 24 months, Other (specify)</i>
<i>Refuse acceptance/withdraw acceptance</i>	<i>Cancel certificate and notify Environment Agency</i>
<i>Auditor recommendations are subject to review by Sira Certification Service who has veto power regarding all recommendations</i>	

Declaration		Accepted	Not Accepted
I confirm that the report findings are accepted / not accepted			
Name <i>Richard Powell</i>	Title <i>STATION ASSISTANT</i>	Signature <i>R.T. Powell</i>	Date <i>27/2/19</i>

