

NRS

**Nuclear Restoration
Services**

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Trawsfynydd Deposit for Recovery Permit Application

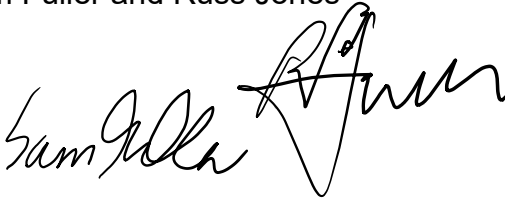
Environment Management System Summary

June 2026

Trawsfynydd Deposit for Recovery Permit Application – EMS Summary

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1.0 Introduction

Nuclear Restoration Services Ltd (NRS) is preparing an Environmental Permit (EP) application to authorise the Deposit of Waste for Recovery (DfR) in the improvement and extension of a Recycled Concrete Aggregate (RCA) laydown area for reactor dismantling at the Trawsfynydd Nuclear Power Station (the Site). The site houses a twin reactor power station currently undergoing decommissioning. It is located on a 15.5 hectare (ha) site in Eryri National Park, within the Meirionnydd area of Gwynedd, North Wales, LL41 4DT.

This Environment Management System (EMS) summary has been prepared in support of the EP application.

2.0 EMS Summary

At the highest level, document PD-010 (Management System, see **Appendix 1**) provides a summary of the NRS management system. An extract from PD-010 detailing the structure of the management system is shown below (figure 1). The management system takes an integrated, process-based approach in which several processes are identified that address all the activities required to deliver the company mission while complying with the necessary legal, governance and contractual obligations.

APPENDIX D: MANAGEMENT SYSTEM HIERARCHY AND COMPLIANCE

DOCUMENT HIERARCHY

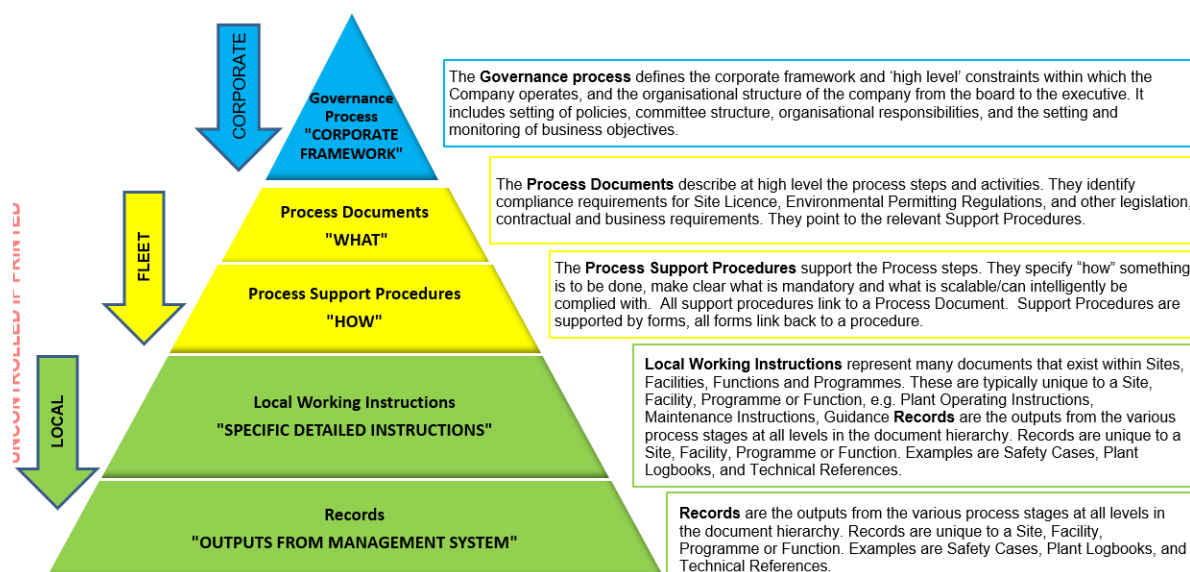


Figure 1 Management system hierarchy and compliance

A key supporting process document which assures compliance with specific regards to EMS requirements is PD-012 (Environmental Management). This describes the controls necessary for an effective environmental management system. The environmental management system is embedded throughout the Integrated Management System (IMS) across many of the common processes. PD-012 also provides a compliance matrix against the requirements of BS EN ISO 14001:2015, and the management system is certified to this standard (see **Appendix 3**). The overall objective is to identify, control and improve, as appropriate, the impact of our activities in the following key areas, whilst ensuring compliance with relevant legal and other requirements:

- Releases to air.
- Releases to water.
- Land quality.
- Waste management.
- Resource use.
- Biodiversity and heritage.
- Transport.

Another key supporting process document is PD-026 (Waste Management) which specifically describes the key processes required for compliant waste management, both radioactive and non-radioactive waste. An important requirement of PD-026 is that each site is required to produce a Waste Management Compliance Matrix (F-318) which specifically maps company-wide and site level procedures/documents to the relevant waste regulatory regime compliance requirements. An extract from F-318 can be found in **Appendix 2**. The compliance matrix for Trawsfynydd has been updated to incorporate the compliance requirements for the Deposit for Recovery permit. Key supporting site-level documentation, identified in the matrix, will be reviewed and updated prior to the commencement of any permitted activities to ensure the permit requirements are fully incorporated. A Construction Environmental Management Plan (CEMP) was also prepared in support of the planning application, this document is included in **Appendix 4** and will form part of the suite of procedures in managing the DfR activity. The management system ensures that all activities will be undertaken in accordance with Technically Competent Management (TCM) requirements. NRS is in the process of upskilling relevant personnel, if this is not achieved in time, arrangements will be put in place to ensure cover from a third-party Certificate of Technical Competence holder, such that TCM compliance is assured.

A more detailed summary of the NRS management system, can be found in **Appendix 5** (Company Manual M-023: Introduction to the Safety, Security & Environment Management Prospectus).

The specific measures for waste acceptance have been outlined in **Appendix 6**. Live site procedures referred to in **Appendix 2** (F-318) will be updated prior to the commencement of operations to incorporate the measures in **Appendix 6**.



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APPENDIX ONE: PD-010

[Link to PD-10 in NRS Company Management System](#)



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APPENDIX TWO: F-318

[Link to F-318 in NRS Company Management System](#)



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APPENDIX THREE: LRQA CERTIFICATION



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APPENDIX FOUR: CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN

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APPENDIX FIVE: M-023: INTRODUCTION TO THE SAFETY, SECURITY & ENVIRONMENT MANAGEMENT PROSPECTUS

APPENDIX SIX: KEY CONTROL MEASURES FOR WASTE ACCEPTANCE

1. Purpose

To ensure that only suitable waste types which meet the conditions of the DfR permit and Waste Recovery Plan are accepted within the DfR permit boundary. Since wastes are being produced from the demolition of a nuclear facility, we should assume this to be land that has or may have been contaminated by previous use. Therefore, as the producer, NRS must demonstrate that the risk of contamination is low, before wastes are accepted within the permitted area.

The waste is being generated from the Reactor Building Height Reduction (RBHR) project, which is taking place nearby and within the same Nuclear Licensed Site.

Once in the permitted area, wastes will be stockpiled for a period before being crushed and screened. The outputs of crushing and screening will be tested to confirm their suitability to be deposited in a recovery activity. This recovery activity is the extension and improvement of the RCA laydown area.

The results of the pre-acceptance, basic characterisation, and verification testing will be maintained as part of the requirements for record keeping.

This procedure, and associated waste transfer and acceptance form (TRAWS-F915-DFR), outlines the steps for:

- Pre-acceptance
- Basic characterisation and compliance testing
- Verification testing
- Dealing with non-conforming wastes
- Record keeping

This procedure draws on requirements and advice within the following guidelines:

- [How to comply with your environmental permit](#) - see page 41
- [Natural Resources Wales / Prepare a management system for a deposit of waste for recovery activity](#) – Waste acceptance procedures
- [Technical Guidance WM3: Guidance on the classification and assessment of waste](#)
- [2003/33/EC: Council Decision of 19 December 2002 establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC](#) (subsequently referred to as the Council Decision)
- [Environment Agency Dispose of Waste to Landfill Guidance](#)

2. Scope

Applies to **ALL** waste received within the RCA laydown area permit boundary in Drawing **TRA-3210-LA-42970-01-SA** submitted with this application.

The scope of the permitted activity is limited to storage of concrete/brick wastes (crushed to a 6F2 RCA specification) and subsequent recovery of the waste to extend and improve the RCA laydown area (as per the associated application documents).

Pre-cast Concrete Panels (PCCPs) as described in EAN report TRAWS – EAN – 23-005, monolithic concrete and a small quantity of bricks will be received from the RBHR works and

will be stored within the RCA laydown area awaiting processing as a campaign. It is envisaged that processing is likely to take place as two campaigns.

The waste treatment (crushing and screening) activity is covered by a separate Part B Mobile Plant Permit. The storage of wastes for a period prior to crushing and screening is covered under and NWFD2 exemption (see **Figure A6.1** box model below).

The storage of wastes pending treatment and recovery is taking place under a NWFD2 exemption, however because this is located within the permitted area pre-acceptance procedures will be applied. These will ensure suitability of the waste and confirm that there is negligible contamination. See section 4 below for further details.

Basic characterisation in accordance with Appendix D of WM3 guidance will be carried out as detailed in the **Waste Sampling Plan**. Once this has been assessed then the compliance testing and verification testing requirements will be determined.

Any wastes found to be unsuitable during any stage of testing will be managed under a non-conformance procedure. See section 7 below for further details.

The box model in **Figure A6.1** shows a conceptual layout. DfR activities are shown in blue, activities authorised under Part B mobile plant, or excluded under NWFD2, are shown in green. **A detailed schematic with specific locations for each campaign must be in place prior to commencement of each campaign.** This will be confirmed with the RHBR Principal Contractor.

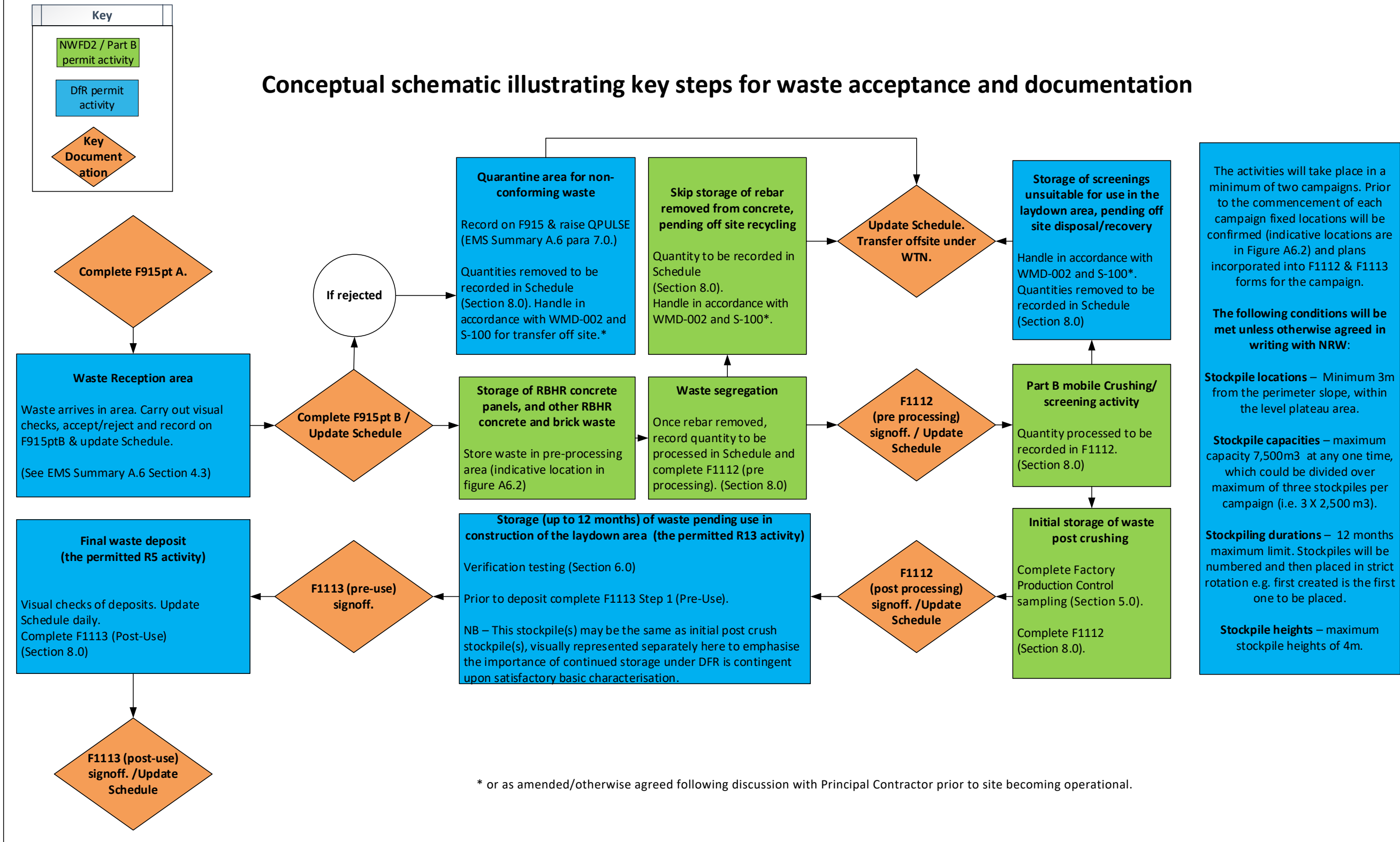


Figure A6.1 Conceptual layout

3. Personnel with Responsibilities for Waste Acceptance Testing

All site operatives are responsible for carrying out the procedure as detailed below.

Any changes that may be required following issue of this document are the responsibility of the Technically Competent Manager to approve and update such that the document is re-issued.

Technically Competent Manager (TCM) – Specific (NRS) role for ensuring compliance with site Deposit for Recovery (DfR) permit. Responsible for ensuring waste acceptance procedures are followed in full.

Waste Engineer (WE) – NRS role. Responsible for assuring that RHBR controlled waste is adequately classified, stored and handed over to the DfR area for recovery.

Waste Supervisor (WS) – Principal contractor or NRS role. Responsible for assuring that RHBR controlled waste is adequately classified, stored and handed over to the DfR area for recovery.

4. Pre-acceptance

All waste brought onto the Trawsfynydd DfR permitted area will be from a single source, the Reactor Building Height Reduction (RBHR) demolition project.

Waste Transfer Notes (WTN) are not required to import demolition wastes into the DfR area, because all the waste is being generated on another part of the Trawsfynydd NLS and is not being transferred to another party. However, records will be kept as described in section 4.3 below.

During processing, any metal rebar will be removed and taken off-site for recycling. This will be done under a WTN and using a suitably licensed waste carrier.

This waste has been characterised prior to the demolition works in accordance with NRS Company Standard S-100 Management of Controlled Wastes, and S-324 Characterisation Management. The presence of hazardous properties, radiological contamination and asbestos, have been assessed. The findings are presented within the following reports:

- 'Pre-demolition of materials assessment against clearance thresholds (TRAWS/L28302/DOC/0154)
- Pre-Construction Information: Trawsfynydd RBHR (TRAWS/L28302/DOC/0032 Issue 2)
- RBHR Awareness of Radiological Requirements (TRAWS/L28302/DOC/080)
- Additional surveys to support Radiological Requirements DOC/0170).

This ensures that the fabric of the reactor buildings is adequately assessed, and areas suspected of contamination (based on visual indicators such as painted surfaces or oil/chemical contamination or based on records pertaining to historic use which may have given rise to contamination) are tested for hazardous properties. Asbestos surveys were also carried out as part of characterisation.

All material has been confirmed as Out of Scope (non-radioactive) and demolition waste will have undergone basic characterisation as described in the **Waste Sampling Plan**.

4.1 Asbestos removal

The procedure for removing Asbestos Containing Material (ACM) from the superstructure of the reactor buildings is outlined below. ACM will be removed before the concrete is transported to the DfR permitted area.

The asbestos cement contribution to the PCCPs has been located and quantified (TRAWS/L28302/DOC/0328) with the relevant sections highlighted in yellow. Asbestos is only present in the sleeves and soffit board, both of which will be removed prior to transport to the DfR area.

The reactor buildings are in a good state of cleanliness following abatement campaigns overall several decades. This has involved the removal of plant-bound and unbound ACMs so far as is reasonably practical. The interior spaces of the reactor buildings are effectively bare rooms, demolition ready and the clearance paperwork is held on the Site Asbestos Register. This work has been catalogued and a summary note has been prepared (TRAWS/L28302/DOC/0252).

During RBHR, ACMs will be further removed in accordance with the Control of Asbestos Regulations 2012 (CAR-12) which is regulated under HSE/ONR. Due cognisance will be given to hazard prominence. It should also be noted that we are not fully demolishing the two reactor buildings. Since we are only demolishing the top portion of each building, the works will be undertaken systematically and methodically in order to prevent building instability or collapse.

So far as is reasonably practicable, ACM removal may occur before building components are cut away and may also be temporarily passivated and removed once components are safely lowered to ground. Thus applying the hierarchy of control and complying with CAR-12 Regulation 7.

The later also covers for a scenario where miscellaneous ACMs are discovered as building components are surgically removed, which is commonplace, given the nature of demolition works.

Equally removal of ACMs bound within the building fabric (e.g. AC sleeves and soffit boards to panels) is more likely to occur once sections are safely recovered to ground level, since removal earlier poses greater risk to workers given pre-weakening and risk of structural collapse. This again is common practice and has been previously carried out on site during previous demolition activities.

Removal of ACMs will be accompanied by certification issued by UKAS accredited independent analyst (as applicable). This certification will take the form of Four Stage Clearances (4SC), Certificates of Cleanliness (CoC) or Statement of Cleanliness (SoC) as applicable.

Within the documentation issued to the principal contractor who will be carrying out the demolition works, NRS has specified the following requirements for asbestos:

- Exposure to asbestos fibres shall be prevented or suitably and sufficiently controlled in accordance with Regulations 11 and 16 of CAR-12.

- A plan of work for demolition should specify that the asbestos is removed prior to the work so far as reasonably practicable (SFARP) unless disproportionate in risk management in accordance with Regulation 7 of CAR-12. With special regard given to Regulation 3 of CAR-12, when applying judgements on reasonable practicality of ACM removal timing, the time, cost and effort involved with conventional removal methods should be suitably and sufficiently balanced against other significant foreseeable hazards.
- All ACM work should be done in accordance with a job specific plan of work (method statement) resulting from a risk assessment in accordance with Regulations 6 and 7 of CAR-12.
- In accordance with guidance (HSG248 HSE Analysts Guide), NRS do not endorse speculative sampling and analysis of dust except in specific circumstances i.e. where the spread of asbestos from a substantial recent release incident is being investigated.
- Recycling and processing of demolition waste arisings with encased ACMs, in particular precast panels and reinforced concrete. The PC shall apply appropriate measures and controls to ensure the compliant segregation of these materials SFARP for pre-processing. Post pre-processing, proportionate checks shall be undertaken prior to relocation to the permitted area.

The process of asbestos clearance is detailed above. ACMs will be removed in accordance with a plan of work compliant with Regulations 6 & 7 of CAR-12.

Clearance will be overseen and documented, on behalf of NRS as the duty holder under CAR-12, by a UKAS accredited independent analyst.

These arrangements are commonplace and have been successfully delivered on site previously.

Asbestos will be segregated, managed by suitably licensed contractors and disposed of at a suitably licensed facility. The same approach has previously been applied to demolition works on the site including the admin/workshop block demo project. The inert demolition waste arisings were subsequently processed under the WRAP inert aggregates protocol for use on site.

4.2 Asbestos Sampling

Comprehensive asbestos sampling has been undertaken for the monolithic concrete blocks to establish the nature and concentration of distribution. Further details are found in the **Waste Sampling Plan**.

4.3 Pre-acceptance control measure

Prior to approval of transfer of any waste to the DfR area, waste must be classified in accordance with WM3 by personnel competent in hazardous waste classification¹, to confirm it consists only of the EWC codes/descriptions listed below, and must exclusively consist of waste from the RBHR project:

¹ WM3 states users should be “competent in hazardous waste and have some knowledge of chemistry to fully utilise all aspects of the guidance”.

List of Waste Codes	Description
17 01	Concrete, Bricks, Tiles and Ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and Ceramics
17 01 07	Mixtures of Concrete, Bricks, Tiles and Ceramics

Prior to the transfer of waste from the RHBR area to the DfR area, **Form TRAWS-F915-DFR Part A (copy included below)** shall be completed which includes confirmation of:

- Unique record sheet identification number.
- Pre-acceptance and radiological clearance info is pre-populated with reference to the characterisation report above. WE or appointed WS to sign-off.
- SIC Code, Waste Owner/Project, PWMP number and Intended recovery operation all pre-populated. WE or appointed WS to sign-off.
- Source and description of the waste including quantity.
- LOW code(s) assigned following classification with WM3. Provide a written description under and tick the appropriate LOW Code; include the volume of material expected to be consigned.
- Insert asbestos clearance number, ACP to sign.
- Part A sign-off by Waste Engineer or Appointed Waste Supervisor.

Prior to the acceptance of any wastes within in the DfR permit boundary a detailed schematic which incorporates specific locations for the activities in Figure A6.1 shall be in place and agreed by the TCM.

Consignments raised in TRAWS-F915-DFR Part A will only be received during normal site operating hours. Each load will be recorded on a spreadsheet known as the 'schedule', under oversight of the TCM or his/her delegate.

The schedule accompanying the F915 will include the date, time and quantity of waste received e.g. number of PCCPs. The metric conversion factors detailed within the Waste Recovery Plan will be used to calculate the tonnages of waste processed for recovery.

The TCM (or delegate) will undertake waste acceptance checks to satisfy themselves that the waste arriving on site for recovery is consistent with that described in TRAWS-F915-DFR part A (pre-acceptance criteria). TCM (or delegate) to Record in TRAWS-F915-DFR Part B (copy included below):

- Circle LoW code for the waste
- Confirm Part A complete
- Enter Date
- Check Part A complete
- Confirm TCM (or delegate's) assessment of quantity, description, and LoW classification consistent with Part A.
- Check for no visual contamination or non-conforming materials.

- Accept or Reject and highlight reason.

If the load does not match pre-acceptance description it should be rejected in accordance with section 7.0 below. If the load is acceptable, it shall be placed in the pre-processing stockpile. Any material or waste otherwise deposited will be subject to site investigation and event reporting procedures.

In the event of any amendments to the characterisation plans, the TCM shall be notified, and where necessary the pre-acceptance arrangements may be reviewed and amended.

A trained operative will visually inspect the vehicle loads for any contaminants before allowing the vehicle to discharge their load within the permitted area. Visual checks on storage capacity will take place throughout the day to ensure that suitable space is available within a stockpile for all incoming wastes.

Visual and olfactory checks will take place before the waste is unloaded and will be undertaken by a trained site operative, to ensure consistency with the information provided in F915 as described above. If it is not possible to inspect the waste prior to unloading, the waste will be inspected immediately after off-loading in the waste reception area.

5. Basic characterisation and compliance checks

To satisfy the requirements of basic characterisation and in accordance with Appendix D of WM3 guidance, **a Waste Sampling Plan has been provided, setting out the number and determinands to provide the necessary analytical results to underpin basic characterisation.**

Samples will also be collected to assess engineering properties to assure the waste meets the equivalent physical requirements of a 6F2 aggregate (FPC testing). These will be detailed in a Quality Manual.

6. Verification testing

The TCM (or delegate) will satisfy themselves that any waste accepted for recovery conforms to the information submitted under Part A of the relevant completed F915 Form. They shall carry out basic visual and olfactory checks both at the point of pre-acceptance and at the point of deposit.

Checks on the paperwork will be in accordance with section 4.3 above and a copy of the completed forms and schedule (as described in section 8 below).

The requirements for verification testing will be determined once the basic characterisation analysis has been completed.

7. Dealing with non-conforming wastes

The risk on non-conformance or rejection is low, given that the demolition wastes are arriving from a single source and will be checked before leaving the RBHR project area.

Criteria for rejection:

- Waste is not on the permitted list.
- Documentation is incomplete or incorrect
- Waste shows signs of contamination or is not as described
- Waste is not suitable for recovery following testing referred to in section 6.0 above and subsequent placement in accordance with the DfR permit.

If documentation checks and visual checks indicate non-conformance, reject the load and instruct the carrier to move it to the quarantine area immediately. The quarantine area is identified on drawing TRA/3210/LA/42973 (**Figure A6.2**) a copy of which is provided below. **The quarantine area will include a covered locked skip, access will be controlled by TCM or delegated person.**

In addition to record keeping requirements below, the event shall be raised on Q-PULSE.

Post-acceptance, should any further non-compliant materials be detected, material shall be placed in the quarantine area and an event raised on Q-PULSE. Should such a circumstance arise, all waste acceptance shall cease pending an investigation to confirm why the non-conformance was not detected at the point of delivery, operations shall only resume where the TCM is satisfied that inspection and documentation measures are adequate to prevent recurrence.

Rejected waste shall be sent off-site for recovery or disposal at a suitably licensed facility, as appropriate.

8. Record Keeping

All approvals of transfer and waste acceptance of waste to the DfR area to be kept by the TCM and securely stored within the Waste team filing system.

The data captured on

- TRAWS-F-915-DFR forms,
- Testing specification, along with records relating to processing and deposit campaigns outlined in the Materials Management Plan Records (site forms F1112 and F1113), and
- quantities for off-site transfer of waste produced in the DfR area (i.e. metal rebar and out of spec crusher arisings)

shall be recorded on a spreadsheet (known as the Schedule), held by site Waste Team, to provide an auditable trail of all controlled waste activities occurring within the boundary of the DfR permit.

This data should be reviewed periodically to ensure material quantities and the stockpile storage periods are not approaching limits in the DfR permit.

9. Review

Any modifications to these arrangements may be made as required, subject to TCM confirmation that the revised arrangements conform to the requirements of the guidance referenced in section 1.0. The TRAWS-F915-DFR, F-1112 and F-1113 forms may in future be migrated to a fully digital format and potentially utilising a season-ticket model for recurring waste transfers.

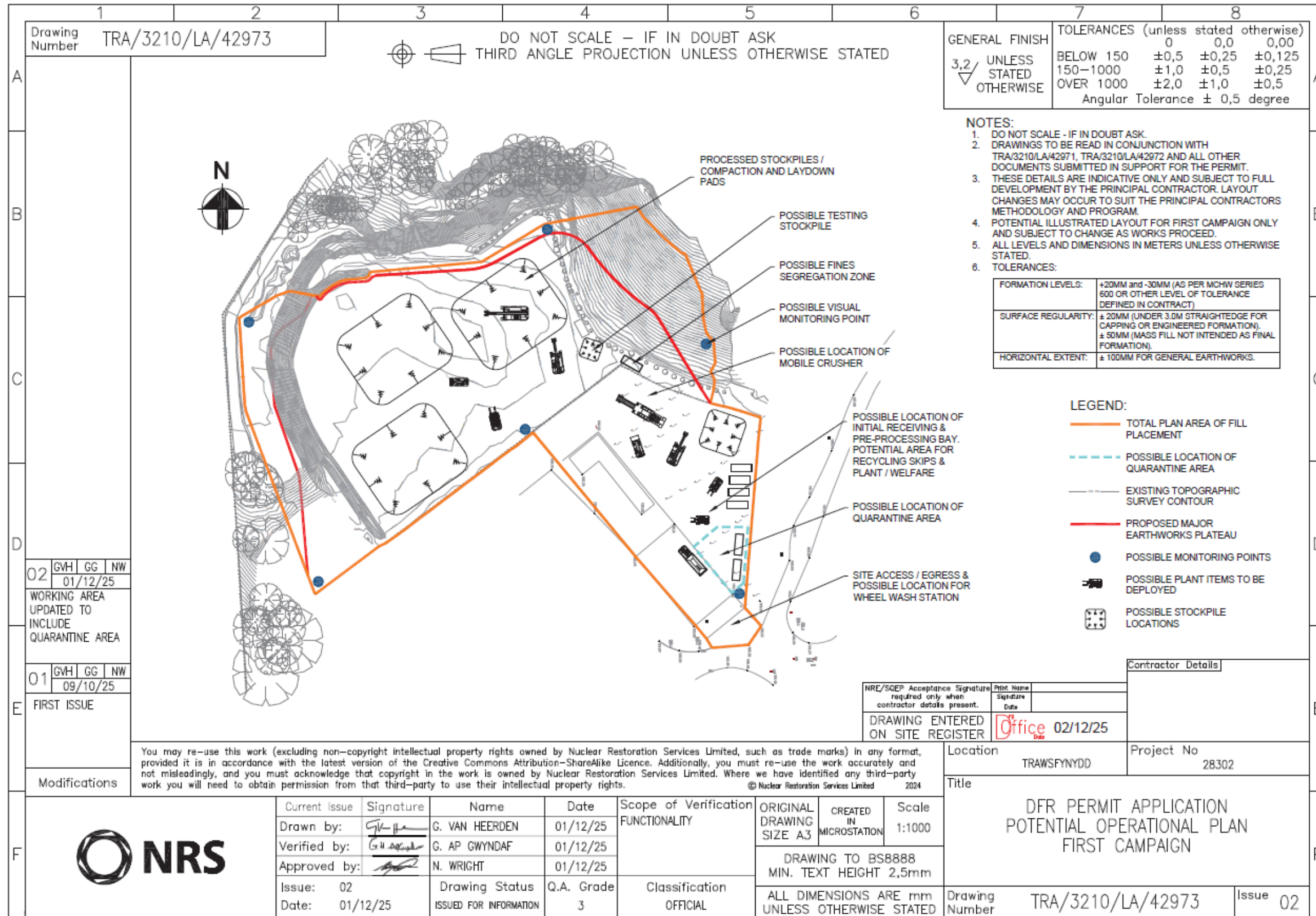


Unique ID:			
PART A To be completed and signed prior to transfer to the DfR area			
Pre-Acceptance: All material characterised in accordance with TRAWS/L28302/DOC/0154 & 0170, and managed in accordance with TRAWS/L28302/DOC/032.			
Radiological Clearance: All Material will consist of clean list items as covered in: TRAWS/L28302/DOC/0190 & 080.		Project Waste Management Plan ref: TRAWS/L28302/PWMP/0804	
SIC Code	WASTE OWNER – Project / Department	INTENDED RECOVERY OPERATION (INERT INFILL/HARDCORE/OTHER) as agreed in PWMP	
96090 Other service activities n.e.c.	RBHR Project NRS Trawsfynydd, Blaenau Ffestiniog, Gwynedd, LL41 4DT	Use in extension and improvement of the North End Laydown area. Rebar to be removed, and waste to be processed to 6F2 prior to final placement.	
WM3 List of Waste (LoW) code (Tick code that applies):		Volume (volumetric calculation with appropriate conversion factor) (m ³ and t)	
☐ 170101 Concrete			
☐ 170102 Brick			
☐ 170103 Tiles and Ceramics			
☐ 170107 Concrete, Bricks, Tiles and Ceramics			
Description: (i.e. Concrete panels, concrete rubble, or brick masonry):			
Confirmation of asbestos clearance. Insert certificate/Reference number:		Asbestos Competent Person (ACP): Print Name: Signature: Date:	
Waste Engineer or appointed Waste Supervisor giving approval: By signing this form I confirm that the information provided on this form is true, accurate and complete. I also confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011, Print Name: Signature: Date:			

Unique ID:					
PART B To be completed and signed upon acceptance of the material into the DfR area.					
Acceptance site: DfR Permit Area [PERMIT NUMBER] , NRS Trawsfynydd, Blaenau Ffestiniog, Gwynedd, LL41 4DT					
Provenance. Circle LoW code	Confirm quantity matches part A (tick)	Date	Waste Acceptance (TCM or appointed person to confirm)	ACCEPT /REJECT (A/R)	Reasons for Rejection (Circle)
170101			Confirm ALL of the following:		Unpermitted EWC code
170102			Part A complete		Documentation incomplete
170103			Description, quantity, origin and EWC code in Part B matches Part A.		Contamination or not as described
170107			Waste visually matches Part A description, and visually no contamination or non-declared materials		Unsuitable for recovery under DFR permit
Comment (if rejected):					
NOTE: If rejected, material must be immediately moved to the designated quarantine area.					
I confirm the waste is accept as having been asbestos cleared, and has been classified and meets the acceptance criteria for storage and recovery in accordance with the <u>DfR Permit</u> . TCM (or appointed person) Print Name: Signed: Date: <u>.....</u>					

Figure A6.2 – Operational Plan

UNLESS OTHERWISE STATED, DRAWING IS UNCONTROLLED IF PRINTED



TRAWS/F966 Issue 4: June 24

UNLESS OTHERWISE STATED, DRAWING IS UNCONTROLLED IF PRINTED