
Office for Nuclear Regulation

Revised Guidance on Flexible Permissioning

RPC rating: **Validated**

Description of proposal

The assessment outlines how the Office for Nuclear Regulation (ONR) is revising guidance for its inspectors on the issuance of permissions to undertake certain activities on nuclear related sites. The guidance sets out in detail how a permission-issuing strategy must be justified and its scope clearly outlined. The documents also clarify arrangements for the setting of “hold” points and provide guidance for the production of internal reports. The ONR states that this will involve relatively minor changes to existing documents and the introduction of a new template for inspectors’ use.

Revisions to guidance are being undertaken to improve the consistency of application approaches across the ONR; to ensure that the issuance of permissions are proportionate; and to ensure that permission decisions are auditable.

Impacts of proposal

No implementation costs are anticipated in the assessment. The ONR states that there is likely to be no change in the behaviour of licensees. The assessment therefore expects licensees to continue referring to guidance infrequently.

Although no businesses are obliged to read the guidance, licensee staff may still do so. The ONR estimates that two people in each of the 37 bodies that own and operate civil nuclear sites in the UK will do this. Based on RAS guidance, the assessment calculates that the guidance can be read and digested within 2.3 hours. Using ASHE data, the ONR then estimates a wage rate of £47.86 per hour, providing a total cost to business of £8400.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0.0 million. This will be a qualifying regulatory provision that will score under the business impact target.

Quality of submission

The assessment explains sufficiently the rationale behind alterations to guidance given the scale of changes.

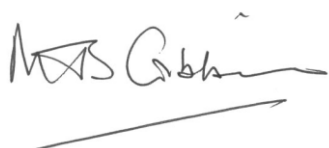
However, the assessment provides no justification for its expectation that two people per organisation will be familiarise themselves with guidance. The assessment would receive greater scrutiny if the cost to business was greater. The assessment would also have benefitted from explanation of terms, such as “hold points”, within the IA. Greater clarity over what the guidance requires would also have been beneficial, for example in outlining what particular activities are permitted on nuclear licensed sites.

Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net direct cost to business (EANDCB)	£0.0 million
Business net present value	£0.0 million

RPC assessment¹

Classification	Qualifying regulatory provision (IN)
EANDCB – RPC validated	£0.0 million
Business impact target score	£0.0 million



Michael Gibbons CBE, Chairman

¹ For reporting purposes, the RPC validates EANDCB and BIT figures to the nearest £100,000