



ONR-NGO meeting

Wednesday 30 November 2016 – CIWEM Venue, London

Attendees

Dr David Lowry	Nuclear Waste Advisory Associates
Frank Boulton	Medact
Jo Brown	Parents Concerned about Hinkley
Mike Taylor	Together Against Sizewell C (formerly CANE)
Peter Burt	Nuclear Information Service
Phil Davies	Nuclear Waste Advisory Associates
Andy Blowers	Blackwater Against New Nuclear
Sean Morris	Nuclear Free Local Authorities
Rita Holmes	Hunterston SSG Chair
Ian Ralls	Friends of the Earth Nuclear Network
Trish Whitham	Nuclear Information Service
Geoff Betsworth	Cumbria Trust
Rod Donnington-Smith	Cumbria Trust
David Cullen	Nuclear Information Service
Allan Jeffery	Stop Hinkley
Sue Aubrey	Stop Hinkley
John Busby -	Advisor to Stop Hinkley
Adrienne Kelbie	ONR Chief Executive
Dr Richard Savage	ONR Chief Nuclear Inspector
Dr Mina Golshan	ONR Programme Director – Sellafield, Decommissioning, Fuel and Waste
Adrian Freer	ONR Deputy Chief Inspector - Security
Dan Grice	ONR Director of Communications and Insight
Ana Gomez-Cobo	ONR Superintending Inspector - GDA
William Turner	ONR Professional Lead for Nuclear Liabilities Regulation
Julie Wareing	ONR Communications Manager
Daniel Jones	ONR Communications Officer

Introduction and update from ONR on NGO engagement

Dan Grice welcomed NGOs to the meeting and thanked them for giving up time to join us. He provided an overview of his first five months in ONR, emphasising the importance in engaging with stakeholders including NGOs. He thanked the working group (Pete Wilkinson, Peter Burt, Sean Morris and Ruth Balogh) for their contributions to two meetings held in July and August, which provided valuable insight into previous engagement. He outlined the agreed approach to the meeting, which would be more informal to enable thorough discussion of the priority issues identified by NGOs. There would be no discussion on the governance of the meeting, which has previously detracted from constructive discussion and debate.

David Lowry referred to notes from the working group meeting of 22 August and questioned if ONR had made a decision on paying NGOs for their contribution to meetings. Dan Grice advised that ONR charges industry directly for the regulation it applies, and therefore, there may need to be some consultation before any agreement could be reached. David Lowry expressed his disappointment to ONR's response.

It was highlighted at an early stage of the meeting that an invite should be extended to the environment agencies. This was re-iterated throughout the meeting and ONR agreed to consider future joint working in relation to stakeholder engagement on relevant topics.

Emerging Issues

There were three emerging issues put forward for discussion in advance of the meeting.

- 1) David Lowry asked ONR to comment on the Independent article from November 2015 which stated that ONR has a duty to regard business growth.

Richard Savage clearly stated that ONR is an independent regulator with a duty to enforce the law – it does not have a duty to regard business growth per se. He provided an overview of the Regulators' Code which states that 'Regulators should carry out their activities in a way that supports those they regulate to comply and grow', emphasising the compliance element. It is ONR's duty to uphold the law and hold the industry to account for safety and security.

- 2) Andy Blowers asked ONR for information in relation to the Generic Design Assessment (GDA) of the UK HPR1000 reactor design, specifically in relation to site licencing at Bradwell. He was particularly interested in the proposals for the site, including number of reactors, spent fuel management and cooling water arrangements. He raised concern that ONR may be coming under political and commercial pressure and that the public are not engaged in the process and there is not enough information available.

Ana Gomez-Cobo provided an overview of our role in GDA and site licencing for new power stations, including:

- Process and timescales;
- GDA entry criteria;
- Areas of interest;
- Project update on UK HPR1000;

ONR and the Environment Agency have not received a request from Government to undertake GDA but expect to do so shortly. The regulators have engaged with GNS, the proposed Requesting Party (RP) for the reactor design and are satisfied that it is ready to commence GDA.

In response to NGO questions, Ana confirmed that all documents from the RP would be supplied in English and that they would be required to comply with FOI legislation.

NGOs called for more information and expressed disappointment that there has been little engagement with local people around Bradwell, emphasising that the openness and transparency of the GDA process needs to be clearly relayed to GNS. There is a risk that with little information, suspicion can turn into hostility from local communities.

Dan Grice expressed ONR's commitment to openness and transparency and agreed that as with all GDAs, ONR would be publishing information on its website when the assessment starts.

In response to NGO enquiries, Richard and Ana explained that site selection for new nuclear and the decision on the reactor technology entering the GDA process is a

matter for government. They also explained that the conclusion of the GDA process alone does not give permission for construction. Before a new nuclear power station can be built and operated the operator must obtain a number of key site specific permissions from regulators and Government. These include a nuclear site licence and relevant consents from ONR, environmental permits from the Environment Agency or Natural Resources Wales and planning permission from Government. In both the licensing process and environmental permitting, we also assess the capability of the operator and the potential impacts at the specific site.

Phil Davies suggested that the GDA comments process should be anonymised so that there is no transfer of personal data to RPs. We advised that comments can be made through ONR under the current process and if requested these comments could be anonymised before sending on to the RP.

- 3) David Lowry asked ONR to provide more detail in relation to two security references in the Annual Report and Accounts 2015/16.

In relation to Sellafield “A requirement to improve processes in place for Cyber Security and Information Assurance was identified. A contributory factor in this area was associated with a lack of resources within Sellafield’s CS&IS capability, which the licensee is currently addressing.”

“There are areas where dutyholders’ security arrangements did not meet regulatory expectations.”

Adrian Freer welcomed the opportunity to brief NGO members on security, highlighting a number of points:

- Cyber security is a top priority for government and for ONR;
- ONR considers three aspects of security – physical, personnel and cyber;
- It is a key priority for ONR to align security with safety;
- ONR will introduce Security Assessment Principles (SyAPs) in 2017;
- Industry needs to further embed security through organisational culture;
- A significant amount of work has already been done across industry to enhance security arrangements.
- At Sellafield in particular, the site is subject to a significant security uplift programme, and it has done a considerable amount of work to enhance security measures at the highest priority facilities.
- The second reference in the report ‘did not meet regulatory expectations’ was in relation to timescales and delivery.

Radioactive waste generation and management

Mina Golshan delivered a detailed presentation on the topic of decommissioning and radioactive waste management, explaining the role and scope of ONR’s Sellafield, Decommissioning, Fuel and Waste Programme. The presentation included:

- Overview of ONR’s purposes, legislation and guidance;
- Regulatory approach and key activities;
- Hazard and risk reduction at Sellafield;
- Dounreay materials consolidation;
- Regulating decommissioning of shut-down Magnox reactors and defuelling of Wylfa ;
- Preparing for licensing and regulation of a future geological disposal facility;

NGOs raised questions about the safety of the legacy facilities at Sellafield and the security measures in place. Mina and Adrian acknowledged that the legacy facilities at Sellafield do not meet modern standards and there is a simultaneous need to remove the hazard and risk, whilst ensuring the facilities are safe and secure. Sellafield Ltd has made significant progress in hazard and risk reduction at the legacy ponds and silos, alongside substantial upgrades to security arrangements. Adrian took the opportunity to inform NGOs that he had recently witnessed a successful security emergency exercise at Sellafield, to test the licensee's response to a security incident.

NGOs welcomed the presentation and thanked ONR for providing an open and honest account of its work. The images used in the presentation of the legacy ponds and silos at Sellafield were well received and NGOs called for more openness from licensees in providing real imagery of the sites, rather than glossy brochure photographs.

There was a specific question regarding incidents at sites and how the public are informed. ONR confirmed that all ministerial reportable events are published on its website on a quarterly basis. Incidents may also be referenced in site stakeholder group reports, which are also discussed during meetings.

ACTION – ONR to circulate presentation slides to NGOs Complete

Break-out groups

We took the opportunity to split into three groups to discuss the detail of Mina's presentation and highlight five points for consideration in the feedback and plenary session. The feedback is summarised below:

Current storage arrangements

- Recognition that waste will need to be stored safely on site until a geological disposal facility is available.
- Radioactive Waste Management (RWM) considers and advises on packaging of spent fuel for now and for future waste.
- Storage arrangements need to be considered for the duration of operation, clean-up and for waste generated through new build
- ONR has an ongoing view of arrangements through licensing regime. Licensees have to demonstrate storage arrangements through periodic safety review until the risk is removed.

Geological disposal

There was a lot of interest in the site selection process for a GDF. ONR explained that whilst we take an interest and provide support to the process, it is a matter for the Department for Business, Energy and Industrial Strategy and RWM. Specific points included:

- Concern around the long-term issues of a GDF e.g. impact of climate change
- Decision for site selection should be made on scientific grounds, not political and geology considered before asking for volunteer communities
- There is support from NGOs for near surface storage for certain waste
- Concern that CoRWM statements on nuclear new build wastes are not reflected in current government policy
- Interest in the community consultation process for site selection
- Concern around ability to retrieve waste from a GDF
- Interest in process for transporting waste to GDF

Brexit

- Interest in impact of Brexit on regulatory activity – NGOs requested that this is added to the list of priority topics.
- The UK will still need to take account of international guidance and good practice even when not part of the EU.

ACTION – Add Brexit implications to list of prioritised topics Complete

Skills and training

- Recognition of skills shortage in nuclear industry
- Importance of knowledge management and transfer

ONR explained that it is investing a lot in knowledge management, training and retention of its technical specialists.

Review of meeting

Dan Grice reflected on the meeting and thanked NGOs for their time and constructive discussion and debate. ONR recognised that there may be an opportunity to extend an invitation to other bodies, including the Environment Agency, BEIS and RWM and will discuss this at the next cross-government stakeholder meeting in the New Year.

NGOs provided positive feedback to the meeting, indicating that it was a constructive, useful and honest discussion of important issues with the right level of attendance from ONR.

The work of the working group was recognised and NGOs agreed that the group should continue. ONR agreed that meeting more than once per year is preferable to all.

Post-meeting note – Working group meeting scheduled for 30 January and provisional date for next NGO meeting arranged for 1 June 2017.