

Categorisation of safety functions and classification of structures, systems and components

Office for Nuclear Regulation

RPC rating: validated

Description of proposal

ONR has produced guidance, primarily for use by inspectors, to inform the assessments of duty holders' arrangements for categorising safety functions and assigning safety system classification objectives to structures, systems and components (SSCs) in accordance with the International Atomic Energy Agency's guidance and relevant International Electrotechnical Commission (IEC) standards.

The guidance addresses a complex topic with links to a number of different Safety Assessment Principles, which are used to guide ONR inspectors' regulatory judgements and recommendations when undertaking technical assessments of nuclear site licensees' safety submissions. The guidance also has a bearing on multiple licence conditions (each nuclear site licence contains a set of 36 standard licence conditions) and links to several other documents.

Under ONR's openness and transparency policy, the guidance has been published on ONR's website. The guidance updates an earlier version to align it with relevant international standards.

The guidance is intended to ensure that ONR's decision making is proportionate, consistent and transparent. It includes an example of categorisation and classification scheme, which ONR inspectors should view as a starting point to inform their assessment of the suitability and sufficiency of the core of the licensee's arrangements. However, this is not a prescribed method and other approaches can be used.

Impacts of proposal

ONR has estimated, based on its duty holder base, that approximately 37 duty holders (large entities that own and operate civil nuclear sites in the UK) will face familiarisation costs.

The guide is 34 pages long, and ONR estimates that it can be read and digested in 3.85 hours, allowing for three full reads of the document. This is based on Regulator Appraisal Subgroup (RAS) Group Guidance, which assumes that an average

reading speed is 200 words per minute and stipulates that three full readings are required for understanding.

ONR anticipates from past experience with this type of guidance that a single representative of each of the 37 sites will voluntarily read the guidance for background information. ONR has applied web analytics to previous placements of new guidance on ONR's website to estimate that one duty holder will also read the document online during the first year after publication.

The cost to industry in the first year is therefore calculated to be:

- 38 readers x 3.85 hours x hourly rate of £47.86 = £7,002.

ONR acknowledges that it is likely that a number of duty holder employees subject to this type of assessment may wish to read the guidance for background information each time they are assessed. However, ONR notes that the behaviour of the regulator and the regulated entities will not be changed; thus ONR does not expect the new guidance to create any additional ongoing costs.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0 million. This will be a qualifying regulatory provision that will score under the Business Impact Target.

Quality of submission

The RPC notes the complexity of the guidance, its links to a number of different Safety Assessment Principles and other safety documents, and its relevance to multiple licence conditions. It would have been useful if ONR had explained more clearly why the RAS Group Guidance standard assumption that three reads would be sufficient for understanding remains appropriate for this guidance.

The RPC also notes that the guidance brings together 'sources of relevant good practice'. Whilst ONR states that the guidance does not present a 'prescribed method and other approaches can be used', it would have been useful if ONR had discussed briefly how it will ensure that duty holders do not consider this good practice to be a new regulatory standard with which they must comply.

It would also have been useful if ONR had explained more clearly why it believes there will be no ongoing costs associated with the guidance. For example, it may be that duty holders carry out preparation before an inspection anyway, and ONR assumes that this guidance will be subsumed into that activity going forward.

Despite these concerns, the RPC is satisfied that ONR's submission is proportionate and fit for purpose, particularly given the very low impact on business and the fact

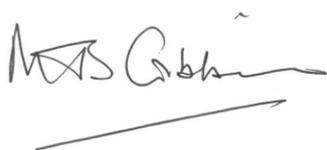
that the guidance is primarily focused on providing clarity and advice to ONR inspectors rather than to businesses,

Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net cost to business (EANCB)	£0 million
Business net present value	£0 million
Societal net present value	£0 million

RPC assessment

Classification	Qualifying regulatory provision (IN)
EANCB – RPC validated ¹	£0 million
Business Impact Target (BIT) Score ¹	£0 million



Michael Gibbons CBE, Chairman

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