

OFFICIAL

<b>ONR NGO Forum – 26 June 2020</b>	
Title	Update on ONR Regulatory Assurance Review of Nuclear Safety Directive implementation, March 2020
From	ONR Policy & Communications
Date	Issued – 19 June 2020
Status	For information

## **1. Purpose**

- 1.1 To update the ONR NGO Forum on our internal review as to how effective our implementation of the Euratom Nuclear Safety Directive (NSD) has been.

## **2. Background**

- 2.1 At the October 2018 ONR NGO Forum meeting, attendees were given an overview of the Nuclear Safety Directive and the requirements it placed upon ONR. Please note that the NSD only applies to civil nuclear sites. You can find the slides on [our website](#).
- 2.2 Since that time, we have through our Regulatory Assurance function\* examined how far our governance, processes and control framework have supported the implementation, as intended. At the time of implementation, we clearly set out on our website the actions [we took to address requirements](#).
- 2.3 *\*You can find details about our Regulatory Assurance function in our [2019/20 Corporate Plan](#), p80, and in our [Annual Report and Accounts 2018/19](#), pp. 101-103*

## **3. Review outcomes**

- 3.1 The review, conducted in 2019, provided assurance that we had amended our processes and guidance to accommodate the NSD requirements, as documented on our website. It did though suggest some adjustments to the accompanying guidance for inspectors to clarify the legal obligations to ensure all necessary nuclear safety information covering a site's operation and its regulation is published and/or made available through other routes (such as Site Stakeholder Groups and Local Liaison Committees and our regulatory reports to those groups).
- 3.2 The updated guidance forms one of our Technical Inspection Guides and can be found on our website – [NS-COM-IN-001 Revision 8](#).

## **4 Further consideration and next steps**

- 4.1 This Regulatory Assurance Review examined process and governance in the context of legal obligations upon us as ONR. It also acknowledged that the NSD is written according to the European Union principle of subsidiarity, in that detailed decisions should be taken at member state level where they will have their effect.

- 4.2 The NSD uses generic wording such as 'necessary information', without providing a detailed definition of which specific information must be shared. The interpretation of what constitutes 'necessary information' is left to individual member states.
- 4.3 Recognising that UK licensees could interpret the words 'necessary information' in a range of manners, the Safety Directors Forum (SDF) has committed to develop UK guidance to explain 'what good looks like' in terms of making the 'necessary information' available to nuclear workers and members of the public. We are supporting this industry approach, and continue to monitor progress.
- 4.4 This Regulatory Review predated the development of our draft 2025 Strategy, and therefore did not explicitly consider our ambition to further strengthen public trust in us by being an exemplar of transparency through local and national engagement and by proactive publication of accessible information.
- 4.5 We've had lots of feedback from NGOs and local community groups to inform this aspect of our work, and as we commence our new strategy period in April, we'd like, subject to agreement with the Forum co-chairs, to explore with NGO colleagues how ONR can further improve its openness and transparency, including how we engage with SSGs/LLCs, at our next Forum meeting.