Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
---|---
BAE-1 | Consideration might be given to using the crew as part of the wider site emergency response.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
The presence of the submarine crew on site provides an opportunity to consider their use within the wider site emergency response arrangements.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
Potentially enhanced support to emergency response. This should be considered during review of the emergency response arrangements as part of the Periodic Review of Safety (PRS).

4 Progress to date
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
The finding is not considered to be closed at this time.

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 For non-closed findings, key milestones and programme
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
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<tr>
<td>BAE-2</td>
<td>The scenario with sea levels beyond the design basis and/or a tsunami beyond the design basis, resulting in an energetic wave at the Wet Dock Quay, should be analysed more rigorously. This should include the implications for a submarine moored at the Wet Dock Quay.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - No

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Analysis of a combination of these beyond design basis scenarios is not considered appropriate. This recommendation has not kept the context of the Stress Test in mind, whereby fault scenarios were invented to test emergency arrangement resilience.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - Addressing the issue would not add value to the safety case.

4. **Progress to date**
   - Complete.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Considered to be closed.

6. **If the finding is not closed, plans for closure including justification of timescales**

7. **For non-closed findings, key milestones and programme**
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</thead>
<tbody>
<tr>
<td>BAE-3</td>
<td>The linkage between safety case accident sequences and emergency planning could be strengthened.</td>
</tr>
</tbody>
</table>

1 **Does the Submitting Body agree with the finding?**
Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**
This should be considered during review of the safety case.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**
Robust linkage between accident sequences and emergency planning.

4 **Progress to date**
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**
The finding is not considered to be closed at this time.

6 **If the finding is not closed, plans for closure including justification of timescales**
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to
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</tbody>
</table>

Be drafted by Q4 2012.
Boat 3 Phase 7 activities currently forecast for mid 2014.
BAE-4 Multiple accidents involving nuclear fuel at the Barrow site cannot be ruled out.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
The current safety case justifies the multiple cores on site. However this needs further consideration when looking at the overlap of Astute and Successor programmes.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
This should be considered during review of the safety case for to ensure that changes to the planned scope of activities can be justified.

4 Progress to date
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
The finding is not considered to be closed at this time.

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 For non-closed findings, key milestones and programme
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
BAE-5

A scenario, in which a radiological consequence has already happened, should be more closely studied and taken into account in the Emergency Arrangements.

1 Does the Submitting Body agree with the finding?
   Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
   This recommendation is one that will be considered further, although the credibility of anything more than local consequence might be challenged. If necessary

3 What is the desired functional outcome and what will be achieved by addressing the issue?
   This should be considered during review of the safety case and emergency arrangements. If necessary this would then be considered within emergency response arrangements.

4 Progress to date
   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
   The finding is not considered to be closed at this time.

6 If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility
### 7 For non-closed findings, key milestones and programme

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</tr>
<tr>
<td>BAE-6</td>
<td>Consider the need for a schedule in a known, secure but accessible, location to inform personnel of the means by which installed water, electrical and gas services, etc, to the DDH can be isolated, and the locations of such means.</td>
<td></td>
</tr>
</tbody>
</table>

1 **Does the Submitting Body agree with the finding?**

Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**

The need for this schedule should be considered within emergency response arrangements to

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**

This should be considered during review of the emergency arrangements with a view to identifying what services need to be isolated and how this can be achieved. This includes identifying a known secure place for the schedule.

4 **Progress to date**

The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**

The finding is not considered to be closed at this time.

6 **If the finding is not closed, plans for closure including justification of timescales**

As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
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<tbody>
<tr>
<td>BAE-7</td>
<td>Consider the means of establishing the status of the plant in a damaged and unsafe location, eg monitoring the plant from some distance to forewarn of an incipient criticality accident, if advances in technology can provide this.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Remote plant monitoring is already in place but consideration should be given to the 'hardness' of the remote monitoring and/or extending it further away from the submarine.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - The adequacy and potential limitations of remote monitoring to be understood and considered appropriately within the Site’s emergency arrangements.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   - Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
BAE-8 Consider the means of gaining access to a severely damaged building (eg the DDH), with concomitant requirements for lighting, shoring, etc.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   Access arrangements should be considered for a severely damaged site.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   This should be considered during review of the emergency arrangements to provide an understanding of potential limitations and whether it is necessary to include appropriate contingency plans.

4. Progress to date
   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   The finding is not considered to be closed at this time.

6. If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. For non-closed findings, key milestones and programme

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Security Classification | Submitting body/Licensee | Issue Control
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No Marking Required | BAESM | 26th June 2012
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
### Recommendation / Consideration / STF No.

| BAESM | "Consider the means of safeguarding against a slowly developing criticality accident, which is easily and quickly applied." |

---

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Consider the need to further review slowly developing criticality accident scenarios.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - The adequacy of consideration of slowly developing criticality scenarios should be reviewed in the context of the emergency arrangements to provide an understanding of potential limitations and whether it is necessary to include appropriate contingency plans.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
     - Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

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### For non-closed findings, key milestones and programme
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
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<tbody>
<tr>
<td>BAE-10</td>
<td>Consider the availability, identification and training of personnel to carry out the above.</td>
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</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Consider the need to further review slowly developing criticality accident scenarios and any requirements for personnel.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This should be considered during review of the safety case.
     
     The adequacy of consideration of slowly developing criticality scenarios should be reviewed in the context of the emergency arrangements to provide an understanding of potential limitations and whether it is necessary to include appropriate contingency plans including personnel.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
     
     Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility.
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<td><strong>7</strong></td>
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<tr>
<td>BAE-11</td>
<td>A scenario at the Wet Dock Quay, involving drainage of the Dock system, should be more closely studied, within a broader accident management coverage.</td>
<td></td>
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</table>

1 **Does the Submitting Body agree with the finding?**
No

2 **How does this apply to the Submitting Body? Describe the level of relevance**
The scenarios, at the WDQ, involving drainage of the Dock system have been assessed within the site safety case and the submarine has been justified for high and dry scenarios with no reliance on site services given tides that will continue to provide an ultimate heat sink.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**

4 **Progress to date**
Site safety case has provided justification for this scenario.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**
Complete

6 **If the finding is not closed, plans for closure including justification of timescales**
Not Applicable

7 **For non-closed findings, key milestones and programme**
Not Applicable
The existence, location and use of the ‘high and dry’ provisions, including portable diesel-powered pumps and hoses, to augment seawater services to a submarine at the Wet Dock Quay, need to be made known to all relevant personnel.

1 Does the Submitting Body agree with the finding?
In part. The submarine is not dependent on site facilities for high and dry provisions. Nevertheless it is worth considering the adequacy of schedules that are in a known location detailing all relevant emergency response equipment locations and their potential role in the emergency arrangements.

2 How does this apply to the Submitting Body? Describe the level of relevance
The awareness of emergency equipment, by relevant personnel, needs to be considered

3 What is the desired functional outcome and what will be achieved by addressing the issue?
This should be considered during review of the emergency arrangements to ensure that there are schedules in a known location detailing all relevant emergency response equipment locations and their potential role.

4 Progress to date
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
The finding is not considered to be closed at this time.

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility
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### 7 For non-closed findings, key milestones and programme

PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
---|---
BAE-13 | The existence, location and use of any other existing or new emergency provisions for a submarine at the Wet Dock Quay need to be made known to all relevant personnel.

1 **Does the Submitting Body agree with the finding?**
Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**
The awareness of emergency provisions for a submarine at the WDQ, by relevant personnel, needs to be considered.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**
This should be considered during review of the emergency arrangements to ensure that there are schedules in a known location detailing all relevant emergency response equipment locations and their potential role.

4 **Progress to date**
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**
The finding is not considered to be closed at this time.

6 **If the finding is not closed, plans for closure including justification of timescales**
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
--- | ---
BAE-14 | Consider the need to store all this emergency equipment in a known, secure but accessible location.

1 **Does the Submitting Body agree with the finding?**
Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**
Accessible storage of emergency equipment needs to be considered.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**
This should be considered during review of the emergency arrangements to ensure that emergency response equipment locations are known, secure and accessible.

4 **Progress to date**
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**
The finding is not considered to be closed at this time.

6 **If the finding is not closed, plans for closure including justification of timescales**
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the
Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
--- | ---
BAE-15 | Consider means of moving emergency support equipment, post event.

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Post event movement of emergency equipment needs to be considered.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This should be considered during review of the emergency arrangements to ensure that the ability to move equipment is possible post event.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
   - PRS basis document will provide the scope and plan for addressing the
Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
### Recommendation / Consideration / STF No.

| BAE-16 | Consider the identification and training of personnel to carry out the above. |

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1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Identification and training of personnel to carry out post-event movement of emergency equipment needs to be considered.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This should be considered during review of the emergency arrangements to ensure that the ability to move equipment and be capable of operating it is possible post event.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   
   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
### Recommendation /  
**Consideration / STF No.**  

| Recommendation /  
**Consideration / STF No.** | Recommendation /  
**Consideration / Stress Test Finding Text** |
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<tbody>
<tr>
<td>BAE-17</td>
<td>The Wet Dock Quay itself may be damaged by the seismic event. This will prevent access to/egress from the submarine until an alternative route is set up.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**  
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**  
   Access arrangements should be considered for a severely damaged WDQ.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**  
   This should be considered during review of the emergency arrangements to ensure that the potential limitations on access/egress of Wet Dock Quay is considered.

4. **Progress to date**  
   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.  
   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**  
   The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**  
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the
Fukushima recommendations and findings. The basis document is expected to
be drafted by Q4 2012.
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<tr>
<td>BAE-18</td>
<td>Implications of the above scenario include major damage to the Barrow Dock system and perhaps failure of the Michaelson Road Bridge. Thus, it may not be possible to move the submarine for some considerable time. Any specific procedures for dealing with this scenario should recognise this.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - The existing site safety case recognises the limitations that might be imposed on the submarine and recognises the justification for a high and dry case. Given the limited scope of reactor operation on site there is no dependence on overside services before a safe state is achieved where natural heat loss exceeds levels of decay heat.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - Not applicable.

4. **Progress to date**
   - Already addressed by the existing site safety case.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Complete

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not Applicable

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
--- | ---
BAE-19 | The effect of loss of dock water on the Fast Leak Drill (following a LOCA), as currently specified, should be assessed.

1. **Does the Submitting Body agree with the finding?**
   - Potentially

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - This loss of dock water scenario, at the WDQ, needs to be reviewed.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - To confirm the adequacy of the site safety case assessment for this potential fault.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   - Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
   - PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to
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be drafted by Q4 2012.
Boat 3 Phase 7 activities currently forecast for mid 2014.
1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
EMIT of emergency equipment by SQEP personnel needs to be considered.

3 What is the desired functional outcome and what will be achieved by addressing
the issue?
To confirm that adequate arrangements are in place to identify relevant
equipment, appropriate EMIT and SQEP.

4 Progress to date
The PRS basis document is currently being drafted, which will set the scope and
plan for its delivery. This will include the need for timely consideration of the
recommendations and findings to consider any Fukushima learning
implementation opportunities for Boat 3 Phase 7 activities onwards, including
Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process
for sentencing issues either for further action/implementation or deciding that no
further work is required.

5 Is the finding considered closed by the Submitting body and if so the justification
for closure?
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6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for
consideration of the Stress Test findings as part of the Periodic Review of Safety
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not finish until 2016 we intend to undertake the Fukushima work on timescales
which allowed us to consider any Fukushima learning implementation
opportunities for Boat 3 Phase 7 activities onwards, including Successor facility
related work.

7 For non-closed findings, key milestones and programme
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<tr>
<td>BAE-21</td>
<td>Consider the possibility of hardening buildings required by the Emergency Arrangements against environmental hazards and the provision of communications equipment that could operate after such hazards.</td>
</tr>
</tbody>
</table>

1 **Does the Submitting Body agree with the finding?**

   Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**

   The need for hardened buildings and robust communications systems should be considered in the context of potential severe damage to the site.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**

   To understand the adequacy of current building and communication equipment and consider hardening buildings and provision of communications equipment.

4 **Progress to date**

   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**

   The finding is not considered to be closed at this time.

6 **If the finding is not closed, plans for closure including justification of timescales**

   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
BAE-22 Consider recognising, in the Emergency Arrangements and emergency plans, the potential environment on and off site, in which the arrangements and plans are to be used.

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**Recommendation / Consideration / Stress Test Finding Text**

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<td>BAE-22</td>
<td>Consider recognising, in the Emergency Arrangements and emergency plans, the potential environment on and off site, in which the arrangements and plans are to be used.</td>
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1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - The need to recognise the potential environment should be considered after severe damage to the site.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - To provide an understanding of the potential limitations due to the post accident on and off site environment. This should be considered during review of the emergency arrangements.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   - Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
--- | ---
BAE-23 | Consider how non-essential personnel will know that they should evacuate the site and how they can evacuate the site, if local structures and facilities, including road bridges and street lighting, are damaged.

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - The ability to notify and evacuate personnel should be considered after severe damage to the site.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - To provide an understanding of the potential limitations on evacuation and communication with non-essential personnel due to the post-accident on and off-site environment. This should be considered during review of the emergency arrangements.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility-related work.
   - Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility-related work.

7. **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

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<tr>
<td>BAE-24</td>
<td>Consider how the appropriate personnel on site will know when not to expect guidance via the Emergency Arrangements and how they will be managed instead.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
The ability to notify and manage essential personnel should be considered after severe damage to the site.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
To provide an understanding of the potential limitations on management of essential personnel due to the post accident on site environment. This should be considered during review of the emergency arrangements.

4. Progress to date
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
The finding is not considered to be closed at this time.

6. If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. For non-closed findings, key milestones and programme
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PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

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<tr>
<td>BAE-25</td>
<td>Consider how site personnel will communicate with each other (and off-site) if telephone systems (including mobile phone networks) have been damaged. It is noted that the submarine at the Wet Dock Quay will have very effective communication systems, but these will have a limited possible audience, which will not include personnel on site.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   
   The ability to communicate between essential personnel (on and off site) should be considered after severe damage to the site.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   
   To provide an understanding of the potential limitations on communications due to the post accident on site environment. This should be considered during review of the emergency arrangements.

4. **Progress to date**
   
   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   
   The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
### 7 For non-closed findings, key milestones and programme

<p>| PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012. | Boat 3 Phase 7 activities currently forecast for mid 2014. |</p>
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<tr>
<td>BAE-26</td>
<td>Consider the skills that will be needed to respond to the particular situation developing on the site and whether such skills are readily available.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Skill profiles of essential response personnel need to be considered in relation to potential developing emergencies.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - An understanding of potential roles, competency requirements and available SQEP to support the emergency arrangements. This should be considered during review of the safety case and emergency arrangements.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   - Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

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   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
BAE-27
Recognise that personnel who are suitably qualified and experienced in the activity being undertaken at the time of the hazard, and in the safety issues associated with the activity, may be injured by damage caused by the initiating event.

1 **Does the Submitting Body agree with the finding?**
Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**
Availability of essential response personnel needs to be considered in relation to casualties resulting from an initiating event.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**
That the potential for injury of SQEP personnel is considered in the context of being able to support the emergency arrangements.

4 **Progress to date**
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**
The finding is not considered to be closed at this time.

6 **If the finding is not closed, plans for closure including justification of timescales**
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**
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Boat 3 Phase 7 activities currently forecast for mid 2014.
### Recommendation / Consideration / STF No.

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<td>BAE-28</td>
<td>Recognise that the seismic event may also damage office buildings on site, so that other informed personnel may not be immediately available.</td>
</tr>
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</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - The non-availability of essential personnel should be considered after severe damage to the site.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - That the potential for injury of essential personnel is considered in the context of being able to support the emergency arrangements.

4. **Progress to date**
   - The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
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5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
BAE-29 The plan to prevent a criticality accident may require ingress into a damaged, unlit building (eg the DDH, collapsed, unlit but on fire), with significant personnel safety implications, exacerbated by the possibility of a seismic aftershock. What guidance will be available to make the best decision.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
Guidance for essential personnel to access damaged facilities, to undertake vital emergency activities, should be considered.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
This should be considered during review of the emergency arrangements.

4 Progress to date
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
The finding is not considered to be closed at this time.

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 For non-closed findings, key milestones and programme
PRS basis document will provide the scope and plan for addressing the
Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
--- | ---
BAE-30 | Recognise that BAE personnel off site, who may be needed on site, will not be available or even in communication with the site for some time and may have other priorities.

1 **Does the Submitting Body agree with the finding?**
Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**
Delayed or non-attendance of essential staff, following an emergency cascade call-out should be considered.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**
This should be considered during review of the emergency arrangements.

4 **Progress to date**
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**
The finding is not considered to be closed at this time.

6 **If the finding is not closed, plans for closure including justification of timescales**
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**
PRS basis document will provide the scope and plan for addressing the
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Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
### Recommendation / Consideration / STF No.  

| BAE-31 | Recognise that Local Authority and specialist technical resources from off site will not be available or even in communication with the site for some time. The Local Authority will anyway have other priorities. |

1. **Does the Submitting Body agree with the finding?**  
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**  
   Non-attendance of off-site technical personnel, following an emergency cascade call-out should be considered.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**  
   This should be considered during review of the emergency arrangements.

4. **Progress to date**  
   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   
   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**  
   The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**  
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**  
   PRS basis document will provide the scope and plan for addressing the
Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
Boat 3 Phase 7 activities currently forecast for mid 2014.
1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
Complication of off-site emergency measures, due to the initiating hazard, should be considered.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
This should be considered during review of the emergency arrangements.

4 Progress to date
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
The finding is not considered to be closed at this time.

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 For non-closed findings, key milestones and programme
PRS basis document will provide the scope and plan for addressing the
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Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
Boat 3 Phase 7 activities currently forecast for mid 2014.
All nuclear site licensees should give appropriate and consistent priority to completing Periodic Safety Reviews (PSR) to the required standards and timescales, and to implementing identified reasonably practicable plant improvements.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM are currently producing their Basis Document for their PRS to be submitted in 2015.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   The planned PSR should be appropriately prioritised and delivered to the required standards and timescales.

4. Progress to date
   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   The finding is not considered to be closed at this time.

6. If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. For non-closed findings, key milestones and programme
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
**Security Classification**
No Marking Required

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<tr>
<td>FR-2</td>
<td>The UK nuclear industry should ensure that structures, systems and components needed for managing and controlling actions in response to an accident, including plant control rooms, on-site emergency control centres and off-site emergency centres, are adequately protected against hazards that could affect several simultaneously.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   Yes noting that the advice of the NRPA and DNSR is to be sought as part of the PRS process.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   It is relevant to understand the simultaneous resilience of structures, systems and components required for managing and controlling post accident response.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   This should be considered during review of the merits of further assessment of SSC for robustness against extreme hazards. The opportunity to engage with other licensees/authorisees, particularly within the Submarine Enterprise will be explored given that there is likely to be common considerations.

4. **Progress to date**
   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   The finding is not considered to be closed at this time.

6. **If the finding is not closed, plans for closure including justification of timescales**
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility...
related work.

7 For non-closed findings, key milestones and programme

PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
Recommendation / Consideration / Stress Test Finding Text

FR-3

Structures, systems and components needed for managing and controlling actions in response to an accident, including plant control rooms, on site emergency control centres and off site emergency centres, should be capable of operating adequately in the conditions, and for the duration, for which they could be needed, including possible severe accident conditions.

1 Does the Submitting Body agree with the finding?
Yes noting that the advice of the NRPA and DNSR is to be sought as part of the PRS process.

2 How does this apply to the Submitting Body? Describe the level of relevance
BAESM need to engage with the NRPA and DNSR to consider the merits of further assessment of SSC for managing and controlling actions in response to an accident, including plant control rooms, on site emergency control centres and off site emergency centres, which should be capable of operating adequately in the conditions, and for the duration, for which they could be needed, including possible severe accident conditions..

3 What is the desired functional outcome and what will be achieved by addressing the issue?
This should be considered during review of the merits of further assessment of SSC for robustness against extreme hazards. The opportunity to engage with other licensees/authorisees, particularly within the Submarine Enterprise will be explored given that there is likely to be common considerations.

4 Progress to date
The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
The finding is not considered to be closed at this time.

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for
consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**

PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
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<td>FR-5</td>
<td>The relevant Government departments in England, Wales and Scotland should examine the adequacy of the existing system of planning controls for commercial and residential developments off the nuclear licensed site.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - An issue that will be monitored to understand any implications from the considerations from government departments with respect to off-site developments, which might be relevant to Site arrangements.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This is essentially a matter for national government departments, however the output from any considerations needs to be considered for relevance to site arrangements.

4. **Progress to date**
   - Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - BAE Systems are not the submitting body but will monitor any conclusions from the relevant government departments. If within suitable timescales this will be incorporated into the ongoing Periodic Review of Safety where appropriate to so do.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
--- | ---
FR-7 | The Government should review the adequacy of arrangements for environmental dose measurements and for predicting dispersion and public doses and environmental impacts, and to ensure that adequate up to date information is available to support decisions on emergency countermeasures.

| 1 | Does the Submitting Body agree with the finding? | Yes. |
| 2 | How does this apply to the Submitting Body? Describe the level of relevance | As presented BAE Systems Marine Limited will await and consider advise from the relevant Government Departments. Additionally BAE Systems Marine Limited are currently awaiting a determination on their REPPIR submission, which consistent with the site safety case provides pessimistic prediction of reasonably foreseeable dose consequences dominated by gamma shine as opposed to fission product release. This reflects the specific nature of NRP commissioning activities. An opportunity does exist to consider how safety case assessment of source terms might be linked to requirements for emergency plans. |
| 3 | What is the desired functional outcome and what will be achieved by addressing the issue? | This is essentially a matter for the national government. |
| 4 | Progress to date | The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work. Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required. The opportunity to include outputs from Nuclear Industry considerations and conclusions will be included accordingly. |
| 5 | Is the finding considered closed by the Submitting body and if so the justification for closure? | The finding is not considered to be closed at this time. |
| 6 | If the finding is not closed, plans for closure including justification of timescales | |
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

### 7 For non-closed findings, key milestones and programme

PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
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<tr>
<td>FR-8</td>
<td>The Government should consider ensuring that the legislation for the new statutory body requires ONR to be open and transparent about its decision-making, so that it may clearly demonstrate to stakeholders its effective independence from bodies or organisations concerned with the promotion or utilisation of nuclear energy.</td>
</tr>
</tbody>
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1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Not a direct action for BAESM.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This is essentially a matter for government legislation with respect to ONR independent decision-making. However it is expected that ONR engage with the Defence Industry as well as Nuclear Power Generators with respect to its approach to consistent and proportionate decision making and effective independence.

4. **Progress to date**
   - Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Whilst not an issue that BAE Systems can resolve it is expected that the relevant government departments will engage and seek buy in to the intended way forward..

6. **If the finding is not closed, plans for closure including justification of timescales**
   - ONR to advise.

7. **For non-closed findings, key milestones and programme**
   - ONR to advise.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
--- | ---
FR-9 | The UK Government, nuclear industry and ONR should support international efforts to improve the process of review and implementation of IAEA and other relevant nuclear safety standards and initiatives in the light of the Fukushima-1 (Fukushima Dai-ichi) accident.

1. Does the Submitting Body agree with the finding?
   Yes, subject to engagement and agreement of the Nuclear Reactor Plant Authorisee for submarine related considerations.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAE Systems Marine Limited is engaging with other Licensees/Authorisees in respect of Fukushima recommendations and will integrate these into the ongoing Periodic Review of Safety, including any timely conclusions reached by the UK Government, nuclear industry or ONR.
   Specifically with respect to the naval reactor plant, the licensee will seek the advice of the Nuclear Reactor Plant Authorisee and Defence Nuclear Safety Regulator.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   BAESM will continue to support international efforts to review standards and initiatives.

4. Progress to date
   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   The finding is not considered to be closed at this time.

6. If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales.
which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

### 7 For non-closed findings, key milestones and programme

PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
ONR should expand its oversight of nuclear safety-related research to provide a strategic oversight of its availability in the UK as well as the availability of national expertise, in particular that needed to take forward lessons from Fukushima. Part of this will be to ensure that ONR has access to sufficient relevant expertise to fulfil its duties in relation to a major incident anywhere in the world.

1 Does the Submitting Body agree with the finding?
Possibly, however seems to suggest independence to the fact that we provide a safety case and request approval of emergency plans. If this was a report from a subcontractor this would be viewed as a 'bid for work'.

2 How does this apply to the Submitting Body? Describe the level of relevance
The need to learn from experience is recognised and agreed. However there is a need to recognise that there is already adequate if not excellent regulatory framework in place within the UK. Care is needed to recognise that this has established very robust and complete Safety Cases with adequate due process that provides a thorough understanding of Design Basis events and this is well Regulated. Proportionality is required to avoid inappropriate expectations for Beyond Design Basis events – ultimately Fukushima was within the assessed DBA.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
This is essentially a view from ONR as to their vision of strategic oversight of research. It is not for BAE Systems to judge on the relevance of need for this requirement. It is suggested that specific consideration of the NRP requirements be discussed with the NRPA/DNSR.

4 Progress to date
To be advised

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
ONR to advise in conjunction with NRPA/DNSR.

6 If the finding is not closed, plans for closure including justification of timescales
To be advised.

7 For non-closed findings, key milestones and programme
To be advised.
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FR-12 Reports on the progress that has been made in responding to the recommendations in this report should be made available to ONR by June 2012. These should include the status of the plans, together with details of improvements that have been implemented by that time.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM need to report on progress by end June 2012.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   ONR to agree the planned approach for considering all recommendations and findings as part of the ongoing Periodic Review of Safety.

4. Progress to date
   Statement of progress has been provided via presentation of ONR proformas along with a statement of the strategy to consider and sentence all recommendations and findings as part of the Periodic Review of Safety for the Barrow Site.
   The PRS basis document is currently being drafted, which will set the scope and plan for its delivery. This will include the need for timely consideration of the recommendations and findings to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.
   Closure of issues will be confirmed via a clear statement from the PRS process for sentencing issues either for further action/implementation or deciding that no further work is required.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   The expectation for end of June has been met noting comments in Section 6.

6. If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation
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opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 For non-closed findings, key milestones and programme

PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

Boat 3 Phase 7 activities currently forecast for mid 2014.
The Government should approach IAEA, in co-operation with others, to ensure that improved arrangements are in place for the dissemination of timely authoritative information relevant to a nuclear event anywhere in the world.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM will look to understand and benefit from any improved arrangements for dissemination of timely authoritative information relevant to a nuclear event.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   This is essentially a matter for Government. However, BAESM support the development of any improved International arrangements that would benefit the Site’s emergency response.

4. Progress to date
   BAES are engaging with relevant regulatory bodies and government departments to support development of improved arrangements. This includes engagement with Submarine Enterprise partners via a sub group of the Defence Safety Directors Forum and the nuclear industry Safety Directors Forum Fukushima Sub Group.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   An overall view on ‘closure’ is essentially a matter for agreement with the Government.

6. If the finding is not closed, plans for closure including justification of timescales
   Not applicable.

7. For non-closed findings, key milestones and programme
   Not applicable.
IR-2 The Government should consider carrying out a review of the Japanese response to the emergency to identify any lessons for UK public contingency planning for widespread emergencies, taking account of any social, cultural and organisational differences.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
BAES Emergency Plans need to function effectively within the local and national context. BAES is an active participant in the work of the NEPLG.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
This is essentially a matter for Government. However, BAESM supports the development of robust, well-understood and effective emergency response planning, which has clear linkage from industry, through all partner bodies and to Government. We anticipate that the goal of this recommendation is further strengthening of such arrangements in the UK.

4 Progress to date
BAES is fully engaged with the NEPLG, the relevant regulatory bodes and government departments to support the development of improved processes. This includes working with industry to ensure a consistent best practice response across the UK.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
An overall view on ‘closure’ is essentially a matter for the NEPLG. BAES considers that this recommendation may be moved to ‘normal business’ as the required links with the Government are in place and are active.

6 If the finding is not closed, plans for closure including justification of timescales
Not applicable

7 For non-closed findings, key milestones and programme
Not applicable.
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<tr>
<td>IR-3</td>
<td>The Nuclear Emergency Planning Liaison Group should instigate a review of the UK’s national nuclear emergency arrangements in light of the experience of dealing with the prolonged Japanese event.</td>
</tr>
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</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Barrow Site Emergency Plans need to function effectively within the local and national context. BAES is an active participant along with industry partners in the work of the NEPLG.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This is essentially a matter for the NEPLG. However, BAE Systems supports the development of robust, well-understood and effective emergency response planning, which has clear linkage from industry, through all partner bodies and to Government. We anticipate that the goal of this recommendation is further strengthening of such arrangements in the UK.

4. **Progress to date**
   - BAES is fully engaged with the NEPLG, the relevant regulatory bodies and government departments to support the development of improved processes. This includes working with industry to ensure a consistent best practice response across the UK.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - An overall view on ‘closure’ is essentially a matter for Government. BAES considers that this recommendation may be moved to ‘normal business’ as the required links with the Government are in place and are active.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
Both the UK nuclear industry and ONR should consider ways of enhancing the drive to ensure more open, transparent and trusted communications, and relationships, with the public and other stakeholders.

1 **Does the Submitting Body agree with the finding?**
   Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**
   UK nuclear industry and ONR consideration of the adequacy of established lines of communication and stakeholder relationships with a view to improve trust and transparency.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**
   To benefit UK nuclear industry, including BAE Systems, in cooperation with ONR from consideration of the adequacy of established lines of communication and stakeholder relationships with a view to improving trust and transparency.

4 **Progress to date**
   BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for enhancing communications and relationships.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   Not known therefore the finding is not considered to be closed at this time.

6 **If the finding is not closed, plans for closure including justification of timescales**
   Plans for closure need to be discussed and agreed between the UK nuclear industry and ONR.

7 **For non-closed findings, key milestones and programme**
   Key milestones and programme for closure need to be discussed and agreed between the UK nuclear industry and ONR.
Recommendation / Consideration / Stress Test Finding Text

IR-5

Once further detailed information is available and studies are completed, ONR should undertake a formal review of the Safety Assessment Principles to determine whether any additional guidance is necessary in the light of the Fukushima accident, particularly for “cliff edge” effects.

1 Does the Submitting Body agree with the finding?

Yes it is agreed that there is the need to review and consider any additional guidance, however the context of design basis events (Japan versus UK) needs to be considered. This should include adequate consultation with the UK nuclear industry.

2 How does this apply to the Submitting Body? Describe the level of relevance

BAESM would welcome early engagement from ONR with respect to any changes being considered to Safety Assessment Principles or associated guidance.

3 What is the desired functional outcome and what will be achieved by addressing the issue?

The BAE Systems review in light of lessons learnt has not identified any immediate concerns with respect to guidance interpreted from the ONR Safety Assessment Principles. Amendment of the SAPs or associated guidance would need to be assessed to determine the impact on current site arrangements.

4 Progress to date

Not applicable

5 Is the finding considered closed by the Submitting body and if so the justification for closure?

Given that as yet, there has been no consultation on any proposed changes, it is assumed that this recommendation is ongoing.

6 If the finding is not closed, plans for closure including justification of timescales

Not applicable

7 For non-closed findings, key milestones and programme

Not applicable.
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<tr>
<td>IR-6</td>
<td>ONR should consider to what extent long term severe accidents can and should be covered by the programme of emergency exercises overseen by the regulator.</td>
</tr>
</tbody>
</table>

1 **Does the Submitting Body agree with the finding?**  
Yes it is agreed that there is the need to review and consider how long term severe accidents can and should be covered by the programme of emergency exercises. This should include adequate consultation with the UK nuclear industry and consider a proportionate approach based on the nature of individual site activities and associated safety case.

2 **How does this apply to the Submitting Body? Describe the level of relevance**  
BAESM would welcome early engagement from ONR with respect to the review and any changes being considered to Safety Assessment Principles or associated guidance.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**  
Although not a direct actionee, BAESM will cooperate as required. The Periodic Review of Safety will review the availability of any information relevant to lessons learnt and improving arrangements for emergency response.

4 **Progress to date**  
Not applicable.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**  
Given that as yet, there has been no consultation on any proposed changes, it is assumed that this recommendation is ongoing.

6 **If the finding is not closed, plans for closure including justification of timescales**  
Not applicable.

7 **For non-closed findings, key milestones and programme**  
Not applicable.
<table>
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<tr>
<th>Recommendation / Consideration / Stress Test Finding Text</th>
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<tbody>
<tr>
<td>IR-7</td>
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<tr>
<td>ONR should review the arrangements for regulatory response</td>
</tr>
<tr>
<td>to potential severe accidents in the UK to see whether more</td>
</tr>
<tr>
<td>should be done to prepare for such very remote events.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Potentially, this will depend on ONR review of the arrangements and whether any additional expectations will be placed on UK licensees.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This is essentially a matter for ONR in their review of severe (remote) accident response arrangements.

4. **Progress to date**
   - Not applicable.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Not applicable.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable.

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
**Recommendation / Consideration / STF No.**

**STF No.**

IR-8

**Recommendation / Consideration / Stress Test Finding Text**

The UK nuclear industry should review the dependency of nuclear safety on off site infrastructure in extreme conditions, and consider whether enhancements are necessary to sites’ self sufficiency given for the reliability of the grid under such extreme circumstances.

1. **Does the Submitting Body agree with the finding?**
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   It is relevant to understand the level of dependency on BAESM need to consider the level of self-sufficiency, available under extreme conditions, rather than depend on off-site infrastructure.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   UK industry agreement on the respective levels of self sufficiency, the dependency on off site infrastructure and implementation of necessary enhancements.

4. **Progress to date**
   BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for reviewing the dependency of nuclear safety on off site infrastructure.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   Not considered closed

6. **If the finding is not closed, plans for closure including justification of timescales**
   BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

   This will include any UK industry learning opportunities with respect to site self sufficiency, any dependencies on off site infrastructure and the need for enhancement proportionate to the hazard and assessed risk.

7. **For non-closed findings, key milestones and programme**
   As above.
<table>
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</table>
Once further relevant information becomes available, the UK nuclear industry should review what lessons can be learnt from the comparison of the events at the Fukushima-1 (Fukushima Dai-ichi) and Fukushima-2 (Fukushima Dai-ni) sites.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
It is relevant to understand lessons learnt from comparison of the Fukushima events.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
UK industry review of Fukushima events to enable agreement and implementation of potential improvements to site resilience.

4 Progress to date
BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry review of lessons to be learned.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Not considered closed

6 If the finding is not closed, plans for closure including justification of timescales
BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

7 For non-closed findings, key milestones and programme
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<tbody>
<tr>
<td>IR-10</td>
<td>The UK nuclear industry should initiate a review of flooding studies, including from tsunamis, in light of the Japanese experience, to confirm the design basis and margins for flooding at UK nuclear sites, and whether there is a need to improve further site-specific flood risk assessments as part of the periodic safety review programme, and for any new reactors. This should include sea-level protection.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Further work to confirm the design basis for flooding would need to be reflected in an update of the safety case assessment.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - UK industry to be content that the design basis and margins are appropriate and to update their respective safety cases to establish the adequacy of current provisions and therefore any need for further protection.

4. **Progress to date**
   - BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for reviewing the dependency of nuclear safety on off site infrastructure.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Not considered closed

6. **If the finding is not closed, plans for closure including justification of timescales**
   - BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

   This will include any UK industry learning opportunities with respect to the flooding design basis and margins.

7. **For non-closed findings, key milestones and programme**
   - As above.
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<tr>
<td>IR-11</td>
<td>The UK nuclear industry should ensure that safety cases for new sites for multiple reactors adequately demonstrate the capability for dealing with multiple serious concurrent events induced by extreme off-site hazards.</td>
<td></td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   
   Not relevant, as Barrow is an existing site and does not operate multiple reactors.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   
   Not applicable

4. **Progress to date**
   
   Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   
   Not considered closed

6. **If the finding is not closed, plans for closure including justification of timescales**
   
   Not applicable

7. **For non-closed findings, key milestones and programme**
   
   Not applicable.
<table>
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</thead>
<tbody>
<tr>
<td>IR-12</td>
<td>The UK nuclear industry should ensure the adequacy of any new spent fuel strategies compared with the expectations in the Safety Assessment Principles of passive safety and good engineering practice.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   
   Not relevant to BAESM.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   
   Not relevant to BAESM as spent fuel is not stored on-site.

4. **Progress to date**
   
   Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   
   Not relevant to this site.

6. **If the finding is not closed, plans for closure including justification of timescales**
   
   Not applicable

7. **For non-closed findings, key milestones and programme**
   
   Not applicable.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
--- | ---
IR-13 | The UK nuclear industry should review the plant and site layouts of existing plants and any proposed new designs to ensure that safety systems and their essential supplies and controls have adequate robustness against severe flooding and other extreme external events.

1 **Does the Submitting Body agree with the finding?**
Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**
It is relevant to understand the robustness of plant and site layouts against flooding and extreme external events.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**
To have reviewed any potential plant and site layout vulnerability to severe flooding and other extreme external events and implement any necessary improvements required by the safety case.

4 **Progress to date**
BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for reviewing the dependency of nuclear safety on off site infrastructure.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**
Not considered closed.

6 **If the finding is not closed, plans for closure including justification of timescales**
BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.
This will include any UK industry learning opportunities with respect to the flooding and other extreme external events.

7 **For non-closed findings, key milestones and programme**
As above.
The UK nuclear industry should ensure that the design of new spent fuel ponds close to reactors minimises the need for bottom penetrations and lines that are prone to siphoning faults. Any that are necessary should be as robust to faults as are the ponds themselves.

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<tbody>
<tr>
<td>IR-14</td>
<td>The UK nuclear industry should ensure that the design of new spent fuel ponds close to reactors minimises the need for bottom penetrations and lines that are prone to siphoning faults. Any that are necessary should be as robust to faults as are the ponds themselves.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   - Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   - Not relevant to BAESM. Only new fuel is stored on site and must remain in a dry environment.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   - This is essentially a matter for sites which propose to store spent fuel in ponds.

4. Progress to date
   - Not applicable

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   - Not relevant to this site.

6. If the finding is not closed, plans for closure including justification of timescales
   - Not applicable

7. For non-closed findings, key milestones and programme
   - Not applicable.
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<tbody>
<tr>
<td>IR-15</td>
<td>Once detailed information becomes available on the performance of concrete, other structures and equipment, the UK nuclear industry should consider any implications for improved understanding of the relevant design and analyses.</td>
</tr>
</tbody>
</table>

1 **Does the Submitting Body agree with the finding?**

Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**

It is relevant to understand the performance of structures and equipment to support the analysis of seismic performance of nuclear safety related structures, systems and components.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**

Improved validation of the methods for analysis of seismic performance of nuclear safety related structures, systems and components.

4 **Progress to date**

BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for reviewing the dependency of nuclear safety on off site infrastructure.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**

Not considered closed.

6 **If the finding is not closed, plans for closure including justification of timescales**

BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

7 **For non-closed findings, key milestones and programme**

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<tr>
<td>IR-16</td>
<td>When considering the recommendations in this report the UK nuclear industry should consider them in the light of all extreme hazards, particularly for plant layout and design of safety-related plant.</td>
</tr>
</tbody>
</table>

1 **Does the Submitting Body agree with the finding?**  
Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**  
It is relevant to understand the robustness of plant and site layouts against flooding and extreme external events.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**  
To have reviewed any potential plant and site layout vulnerability to extreme hazards and implement any necessary improvements required by the safety case.

4 **Progress to date**  
BAESM are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum for reviewing the dependency of nuclear safety on off site infrastructure.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**  
Not considered closed.

6 **If the finding is not closed, plans for closure including justification of timescales**  
BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

This will include any UK industry learning opportunities with respect to all extreme hazards.

7 **For non-closed findings, key milestones and programme**  
As above.
IR-17 The UK nuclear industry should undertake further work with the National Grid to establish the robustness and potential unavailability of off-site electrical supplies under severe hazard conditions.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
It is relevant to understand the level of dependency on BAESM need to consider the level of self-sufficiency, available under extreme conditions, rather than depend on off-site electrical supplies.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
To confirm that level of dependency on off site electrical supplies and implementation of necessary enhancements.

4 Progress to date
BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for reviewing the dependency of nuclear safety on off site infrastructure.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Not considered closed.

6 If the finding is not closed, plans for closure including justification of timescales
BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.
This will include any UK industry learning opportunities with respect to site self sufficiency, any dependencies on off site electrical supplies and the need for enhancement proportionate to the hazard and assessed risk.

7 For non-closed findings, key milestones and programme
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<tbody>
<tr>
<td>IR-18</td>
<td>The UK nuclear industry should review any need for the provision of additional, diverse means of providing robust sufficiently long-term independent electrical supplies on sites, reflecting the loss of availability of off-site electrical supplies under severe conditions.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - It is relevant to review on site electrical supplies for availability during severe accident conditions are sufficient.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - UK industry agreement on the respective adequacy of long term on site electrical supplies and implementation of necessary enhancements.

4. **Progress to date**
   - BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for reviewing the dependency of nuclear safety on off site infrastructure.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Not considered closed.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.
   - This will include any UK industry learning opportunities with respect to on site self sufficiency and the need for electrical supply enhancement proportionate to the hazard and assessed risk.

7. **For non-closed findings, key milestones and programme**
   - As above.
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<tbody>
<tr>
<td>IR-19</td>
<td>The UK nuclear industry should review the need for, and if required, the ability to provide longer term coolant supplies to nuclear sites in the UK in the event of a severe off-site disruption, considering whether further on-site supplies or greater off-site capability is needed. This relates to both carbon dioxide and fresh water supplies, and for existing and proposed new plants.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   It is relevant to review longer term coolant supplies for availability during severe accident conditions.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   To confirm that level of dependency on coolant supplies and implementation of necessary enhancements.

4. **Progress to date**
   BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for reviewing the dependency of nuclear safety on off site infrastructure.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   Not considered closed.

6. **If the finding is not closed, plans for closure including justification of timescales**
   BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

   This will include any UK industry learning opportunities with respect to coolant supplies and the need for enhancement proportionate to the hazard and assessed risk.

7. **For non-closed findings, key milestones and programme**
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---|---
IR-20 | The UK nuclear industry should review the site contingency plans for pond water make up under severe accident conditions to see whether they can and should be enhanced given the experience at Fukushima.

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Not relevant to BAESM.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - Not relevant to BAESM as spent fuel is not stored on-site.

4. **Progress to date**
   - Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Not relevant to this site.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
IR-21 The UK nuclear industry should review the ventilation and venting routes for nuclear facilities where significant concentrations of combustible gases may be flowing or accumulating to determine whether more should be done to protect them.

1 Does the Submitting Body agree with the finding?
   Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
   It is relevant to review ventilation of nuclear facilities to avoid accumulation of combustible gases.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
   To review sources of combustible gases and the adequacy of measures to prevent explosion.

4 Progress to date
   BAESM intend to address all the technical issues as part of the Periodic Review of Safety process which has recently commenced production of the Basis Document to define the scope and plan for undertaking the review.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
   Not considered closed.

6 If the finding is not closed, plans for closure including justification of timescales
   BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

7 For non-closed findings, key milestones and programme
   Basis document expected to be drafted by Q4 2012.
IR-22 The UK nuclear industry should review the provision on-site of emergency control, instrumentation and communications in light of the circumstances of the Fukushima accident including long timescales, wide spread on and off-site disruption, and the environment on-site associated with a severe accident.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
It is relevant to review the provision of on-site emergency control, instrumentation and communications for dealing with a long-term severe accident.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
To confirm the adequacy of on-site emergency control, instrumentation and communications for dealing with a long-term severe accident and implementation of necessary enhancements.

4 Progress to date
BAESM intend to address all the technical issues as part of the Periodic Review of Safety process which has recently commenced production of the Basis Document to define the scope and plan for undertaking the review.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Not considered closed.

6 If the finding is not closed, plans for closure including justification of timescales
BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

7 For non-closed findings, key milestones and programme
Basis document expected to be drafted by Q4 2012.
The UK nuclear industry, in conjunction with other organisations as necessary, should review the robustness of necessary off-site communications for severe accidents involving widespread disruption.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM Emergency Plans need to function effectively within the local and national context. Off-site communications are an essential element of the emergency plans.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   Review of the adequacy of the emergency arrangements for off-site communications and the siting of off-site control centres. This is to ensure robust communications between the site and off-site support organisations including the MoD and UK Government. We anticipate that the goal of this recommendation is further strengthening of such arrangements in the UK.

4. Progress to date
   BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) to establish the defence industry consideration of off-site communications for severe events.
   BAESM intend to address all the technical issues as part of the Periodic Review of Safety process which has recently commenced production of the Basis Document to define the scope and plan for undertaking the review.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Not considered closed.

6. If the finding is not closed, plans for closure including justification of timescales
   BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

7. For non-closed findings, key milestones and programme
Basis document expected to be drafted by Q4 2012.
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<tr>
<td>IR-24</td>
<td>The UK nuclear industry should review existing severe accident contingency arrangements and training, giving particular consideration to the physical, organisational, behavioural, emotional and cultural aspects for workers having to take actions on-site, especially over long periods. This should take account of the impact of using contractors for some aspects on-site such as maintenance and their possible response.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   
   BAESM Emergency Plans need to function effectively within the local and national context. Off-site communications are an essential element of the emergency plans.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   
   UK industry to establish whether the severe accident contingency arrangements and training are adequate and implement any necessary improvements.

4. **Progress to date**
   
   BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for reviewing the dependency of nuclear safety on off site infrastructure.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   
   Not considered closed

6. **If the finding is not closed, plans for closure including justification of timescales**
   
   BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work. This will include any UK industry learning opportunities with severe accident contingency arrangements and training.

7. **For non-closed findings, key milestones and programme**
   
   As above.
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</table>
IR-25 The UK nuclear industry should review, and if necessary extend, analysis of accident sequences for long-term severe accidents. This should identify appropriate repair and recovery strategies to the point at which a stable state is achieved, identifying any enhanced requirements for central stocks of equipment and logistical support.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   It is relevant to understand accident sequences to the point of achieving a stable state and the requirements to deliver this within recovery strategies.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   Identification of potential long term accident sequences with potential strategies and implementation of contingency measures necessary for dealing with the situation.

4. Progress to date
   BAES are engaging with Submarine Enterprise partners (co-ordinated by the Enterprise Safety Forum) and the nuclear industry Safety Directors Forum Fukushima Sub Group as means to establish the nuclear industry consideration for reviewing the dependency of nuclear safety on off site infrastructure.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Not considered closed.

6. If the finding is not closed, plans for closure including justification of timescales
   BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Sucessor facility related work.
   This will include any UK industry learning opportunities with respect to long term severe accidents.

7. For non-closed findings, key milestones and programme
   As above.
<table>
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<tr>
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<tbody>
<tr>
<td>STF-1</td>
<td>Licensees should provide ONR with the decision-making process to be applied to their Considerations along with a report which describes the sentencing of all their Considerations. The report will need to demonstrate to ONR that the conclusions reached are appropriate.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - BAESM need to identify how considerations will be sentenced.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - ONR agreement to the sites approach for closure of Considerations.

4. **Progress to date**
   - All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
   - PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
   - Boat 3 Phase 7 activities currently forecast for mid 2014.
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<tr>
<td>STF-3</td>
<td>Licensees should undertake a further review of the totality of the required actions from operators when they are claimed in mitigation within external hazards safety cases. This should also extend into beyond design basis events as appropriate.</td>
</tr>
</tbody>
</table>

1 **Does the Submitting Body agree with the finding?**

   Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**

   BAESM need to review the totality of operator actions within external hazards safety cases.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**

   To understand the dependency on operator actions within the safety case and vulnerabilities in the event of extreme events.

4 **Progress to date**

   All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**

   Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6 **If the finding is not closed, plans for closure including justification of timescales**

   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**

   PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

   Boat 3 Phase 7 activities currently forecast for mid 2014.
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Recommendation / Consideration / Stress Test Finding Text

| STF-4 | Licensees should undertake a further systematic review of the potential for seismically-induced fire which may disrupt the availability of safety-significant structures, systems and components (SSC) in the seismic safety case and access to plant areas. |

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM need to further review the potential for seismically-induced fire.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   This understand the potential affect of fires following a seismic event in the context of the safety case and associated emergency response.

4. Progress to date
   All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. For non-closed findings, key milestones and programme
   PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
   Boat 3 Phase 7 activities currently forecast for mid 2014.
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</table>
Licensees should further review the margins for all safety-significant structures, systems and components (SSC), including cooling ponds, in a structured systematic and comprehensive manner to understand the beyond design basis sequence of failure and any cliff-edges that apply for all external hazards.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM need to review the margins for all SSC for beyond design basis failures.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   To confirm the adequacy and beyond design basis margins of safety related SSC for all external hazards.

4. Progress to date
   All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. For non-closed findings, key milestones and programme
   PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
   Boat 3 Phase 7 activities currently forecast for mid 2014.
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Licensees should review further the margin to failure of the containment boundary and the point at which containment pressure boundary integrity is lost should be clearly established for the advanced gas cooled reactors (AGR) and Magnox stations.

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<td>Licensees should review further the margin to failure of the containment boundary and the point at which containment pressure boundary integrity is lost should be clearly established for the advanced gas cooled reactors (AGR) and Magnox stations.</td>
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</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Not relevant to BAESM.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This is essentially a matter for NPP licensees, with AGR and Magnox stations.

4. **Progress to date**
   - Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Not relevant to this site.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
Licensees should undertake a more structured and systematic study of the potential for floodwater entry to buildings containing safety-significant structures, systems and components (SSC) from extreme rainfall and/or overtopping of sea defences.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM need to review the potential for flooding on buildings containing SSC.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   To confirm buildings containing SSC that are susceptible to flooding and therefore potential vulnerabilities.

4. Progress to date
   All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. For non-closed findings, key milestones and programme
   PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
   Boat 3 Phase 7 activities currently forecast for mid 2014.
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<tr>
<td>STF-8</td>
<td>Licensees should further investigate the provision of suitable event-qualified connection points to facilitate the reconnection of supplies to essential equipment for beyond design basis events.</td>
<td></td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - BAESM need to review the reconnection of supplies following beyond design basis events.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - To identify the requirements for essential equipment event qualified connection points and their adequacy for beyond design basis events.

4. **Progress to date**
   - All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
   - PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

   Boat 3 Phase 7 activities currently forecast for mid 2014.
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Licensees should further investigate the enhancement of stocks of essential supplies (cooling water, fuel, carbon dioxide, etc.) and extending the autonomy time of support systems (e.g. battery systems) that either provide essential safety functions or support emergency arrangements.

1 **Does the Submitting Body agree with the finding?**
   Yes.

2 **How does this apply to the Submitting Body? Describe the level of relevance**
   BAESM need to review the availability of essential supplies.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**
   To identify any requirements for enhanced socks of essential supplies.

4 **Progress to date**
   All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6 **If the finding is not closed, plans for closure including justification of timescales**
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 **For non-closed findings, key milestones and programme**
   PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
   Boat 3 Phase 7 activities currently forecast for mid 2014.
Licensees should identify safety-significant prime mover-driven generators and pumps that use shared support systems (including batteries, fuel, water and oil) and should consider modifying those prime movers systems to ensure they are capable of being self-sufficient.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM need to review the self-sufficiency of generators and pumps.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   To understand any requirement for self sufficient prime mover-driven generators and pumps to support emergency response.

4. Progress to date
   All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. For non-closed findings, key milestones and programme
   PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
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<tr>
<td>STF-11</td>
<td>Licensees should further consider resilience improvements to equipment associated with the connection of the transmission system to the essential electrical systems (EES) for severe events.</td>
<td></td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   BAESM to consider the resilience improvements connection improvements for essential electrical systems.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   To understand whether resilience improvements are necessary.

4. **Progress to date**
   All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. **If the finding is not closed, plans for closure including justification of timescales**
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
   PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
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<tr>
<td>STF-12</td>
<td>Magnox Ltd should assess the progressive loss of electrical systems on all aspects of the fuel route and address any implications.</td>
<td></td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   
   Not relevant to BAESM.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   
   This is essentially a matter for the Magnox fuel route.

4. **Progress to date**
   
   Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   
   Not relevant to this site.

6. **If the finding is not closed, plans for closure including justification of timescales**
   
   Not applicable

7. **For non-closed findings, key milestones and programme**
   
   Not applicable.
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<tbody>
<tr>
<td>STF-13</td>
<td>Magnox Ltd should demonstrate that all reasonably practical means have been taken to ensure integrity of the fuel within the dry fuel stores in the extremely unlikely event of the natural draft air ducting becoming blocked.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Not relevant to BAESM.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This is essentially a matter for Magnox dry fuel storage.

4. **Progress to date**
   - Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Not relevant to this site.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
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<tr>
<td>STF-14</td>
<td>Licensees should confirm the extent to which resilience enhancements are to be made to existing equipment and systems that are currently installed at nuclear power plants. Information should be provided on the equipment and systems that may be affected and the nature of the resilience enhancements, including interconnectivity with mobile back-up equipment.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   BAESM need to consider whether resilience enhancements are appropriate and identify them accordingly.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   Consideration of the need for resilience enhancements and implementation of any relevant improvements.

4. **Progress to date**
   All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. **If the finding is not closed, plans for closure including justification of timescales**
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
   PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
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<tr>
<td>STF-15</td>
<td>Licensees should complete the various reviews that they have highlighted so that ONR can assess their proposals and associated timescales. These reviews should look in detail at on-site emergency facilities and arrangements, off-site facilities, facilities for remote indication of plant status, communication systems, contents and location of beyond design basis containers and the adequacy of any arrangements necessary to get people and equipment on to and around site under severe accident conditions. Any changes to arrangements and equipment will require appropriate training and exercising.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - BAESM need to complete the various reviews.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - ONR to be content with the approach to BAESM consideration of the reviews.

4. **Progress to date**
   - BAESM consider that these recommendations may be moved to “normal business” and each review undertaken as a “finding” of the planned Periodic Review of Safety.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - “Closure” would be indicated by completion of each PRS finding, which itself may lead to further actions.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - BAESM intend to address all the technical issues as part of the PRS process which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities from Artful PRTs onwards and including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
   - As above.
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STF-16

Licensees should review the symptom-based emergency response guidelines (SBERG) and severe accident guidelines (SAG) taking into account improvements to the understanding of severe accident progression, phenomena and the equipment available to mitigate severe accident. This review should also take into account the fuel route. Once completed, appropriate training and exercising should be arranged.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
BAESM need to review the SBERG and SAG as part of the overall review of emergency arrangements.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
To benefit from the review with implementation of relevant improvements.

4 Progress to date
All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 For non-closed findings, key milestones and programme
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
Boat 3 Phase 7 activities currently forecast for mid 2014.
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<tr>
<td>STF-17</td>
<td>Licensees should further review the systems required to support long-term claims on the pre-stressed concrete pressure vessel containment capability in severe accident conditions.</td>
<td></td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   Not relevant to BAESM.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   This is essentially a matter for licensees with concrete reactor pressure vessels.

4. Progress to date
   Not applicable

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Not relevant to this site.

6. If the finding is not closed, plans for closure including justification of timescales
   Not applicable

7. For non-closed findings, key milestones and programme
   Not applicable.
| STF-18 | EDF Energy Nuclear Generation Ltd should complete its feasibility study into the installation of filtered containment venting, installation of passive autocatalytic hydrogen recombiners and flexible means of injecting water into the Sizewell B containment. |

1. **Does the Submitting Body agree with the finding?**
   Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   Not relevant to BAESM.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   This is essentially a matter for EDF with respect to Sizewell B containment.

4. **Progress to date**
   Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   Not relevant to this site.

6. **If the finding is not closed, plans for closure including justification of timescales**
   Not applicable

7. **For non-closed findings, key milestones and programme**
   Not applicable.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
--- | ---
STF-19 | Reports on the progress made in addressing the conclusions of the licensees Considerations and the ONR findings should be made available to ONR on the same timescale as that for HM Chief Inspector’s recommendations (June 2012). These should include the status of plans and details of improvements that have been implemented.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
BAESM need to report on progress by end June 2012.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
All proformas completed and submitted to ONR by the end June 2012

4 Progress to date
All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 For non-closed findings, key milestones and programme
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<tr>
<td>STF-20</td>
<td>Sellafield Ltd, AWE, RRMPOL, BAESM, DRDL, RRDL,</td>
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<td>Magnox Ltd and NNB GenCo should provide ONR with the</td>
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<td>decision-making process to be applied to their Considerations</td>
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<td></td>
<td>along with a report which describes the sentencing of all their Considerations. The report will need to demonstrate to ONR that the conclusions reached are appropriate.</td>
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</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - BAESM need to report on the conclusions of each consideration.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - ONR to be content that the decision making process and conclusions reached are appropriate.

4. **Progress to date**
   - All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. **If the finding is not closed, plans for closure including justification of timescales**
   - As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. **For non-closed findings, key milestones and programme**
   - PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
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STF-29

BAESM should consider reviewing whether there are any further options for minimising the potential for physical impacts during a seismic event on radioactive components during construction activities.

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
BAESM need to further review the effect of physical impacts on radioactive components from a seismic event during construction.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
Confirmation that consideration of physical impact on radioactive components is adequate.

4 Progress to date
All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 For non-closed findings, key milestones and programme
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<tr>
<td>STF-30</td>
<td>BAESM should consider reviewing the seismic withstand capability of the dock sills and their impact for events exceeding the 1 in 100 year return period, when the dock walls are predicted to have failed.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - No.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - The dock sills are not a safety related structure and in reality are not significantly higher than the dock bottom. The key dependency is for the tidal effect providing sufficient cooling water.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - Not applicable+

4. **Progress to date**
   - Not applicable

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Not applicable

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable

7. **For non-closed findings, key milestones and programme**
   - Not applicable
1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
BAESM need to consider adequacy of the emergency control centre and options for re-siting if considered necessary.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
To confirm what arrangements are adequate for the control centre as part of the emergency response arrangements.

4 Progress to date
All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6 If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7 For non-closed findings, key milestones and programme
PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.

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<tr>
<td>STF-35</td>
<td>BAESM should consider expanding its proposed assessment of the impact of a credible tsunami, to consider the effects of an earthquake exceeding the design basis earthquake for the plants and consequent flooding exceeding the design basis flood.</td>
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</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   No.

2. How does this apply to the Submitting Body? Describe the level of relevance
   It is not considered appropriate to combine the effects of earthquake and flooding, beyond the design basis, as an earthquake does not generate coincident flooding.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   Not applicable.

4. Progress to date
   Not applicable.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Not applicable.

6. If the finding is not closed, plans for closure including justification of timescales
   Not applicable.

7. For non-closed findings, key milestones and programme
   Not applicable.
| STF-39 | BAESM should consider assessing the rate of water level rise and flow rate of flood waters for the site to determine if there is any erosion of safety margins during a dynamic flood event. |

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<tr>
<td>BAESM need to consider assessing erosion of safety margins during a dynamic flood event.</td>
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<th>3</th>
<th>What is the desired functional outcome and what will be achieved by addressing the issue?</th>
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<tr>
<td>To identify whether there are any dynamic flood events that could erode safety margins.</td>
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<td>As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.</td>
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Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
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STF-44 | BAESM should provide further substantiation of the claim that there is a 1.5m margin of safety beyond the design basis flood event.

1. Does the Submitting Body agree with the finding?
   No.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM do not consider it appropriate substantiate what was an invention for purpose of the stress test as a means of trying to create events that would put a further level of challenge on safety measures and emergency response. This was a consequence based approach and outwith the structured safety case assessment, which requires no such claim to be justified.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   Not applicable

4. Progress to date
   Not applicable

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Not applicable

6. If the finding is not closed, plans for closure including justification of timescales
   Not applicable

7. For non-closed findings, key milestones and programme
   Not applicable
### Recommendation / Consideration / Stress Test Finding Text

| STF-57  | BAESM should consider whether further measures are necessary that may improve the availability of electrical power supplies on site under a full range of fault scenarios. This should include a review of the adequacy of back-up electrical supplies on-site that would support the management and operation of an emergency incident. |

### 1. Does the Submitting Body agree with the finding?
Yes.

### 2. How does this apply to the Submitting Body? Describe the level of relevance
BAESM need to further assess availability of electrical supplies under fault scenarios.

### 3. What is the desired functional outcome and what will be achieved by addressing the issue?
To confirm the adequacy of electrical power supplies for the full range of fault scenarios.

### 4. Progress to date
All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

### 5. Is the finding considered closed by the Submitting body and if so the justification for closure?
Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

### 6. If the finding is not closed, plans for closure including justification of timescales
As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

### 7. For non-closed findings, key milestones and programme
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STF-60

BAESM should consider reviewing the arrangements that ensure suitable systems are always available commensurate with expected levels of decay heat, and that resources (fuel and water) are available onboard and onshore, for replenishment where necessary.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM consider reviewing the arrangements associated with decay heat removal.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   To confirm the adequacy of systems for decay heat removal.

4. Progress to date
   All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

6. If the finding is not closed, plans for closure including justification of timescales
   As explained in the covering letter for the response proformas, the plan for consideration of the Stress Test findings as part of the Periodic Review of Safety (PRS) programme which has recently commenced. Whilst the PRS process will not finish until 2016 we intend to undertake the Fukushima work on timescales which allowed us to consider any Fukushima learning implementation opportunities for Boat 3 Phase 7 activities onwards, including Successor facility related work.

7. For non-closed findings, key milestones and programme
   PRS basis document will provide the scope and plan for addressing the Fukushima recommendations and findings. The basis document is expected to be drafted by Q4 2012.
   Boat 3 Phase 7 activities currently forecast for mid 2014.
STF-94

Recommendation / Consideration / Stress Test Finding Text

Reports on the progress made in addressing the conclusions of the licensees Considerations and the ONR findings should be made available to ONR on the same timescale as that for HM Chief Inspector’s recommendations (June 2012). These should include the status of plans and details of improvements that have been implemented.

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   BAESM need to report on progress by end June 2012.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   All proformas completed and submitted to ONR by the end June 2012

4. Progress to date
   All first-draft proformas completed.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Yes, all submitted.

6. If the finding is not closed, plans for closure including justification of timescales
   Finding closed

7. For non-closed findings, key milestones and programme
   Not applicable
STF-75 All Defence licensees (AWE, RRMPOL, BAESM, DRDL and RRDL) should consider the approach taken by several civilian licensees of using “beyond design basis” containers that contain a range of equipment and materials that could be beneficial when responding to a beyond design basis accident. This finding is of a similar nature to that raised in the ONR National Stress Test Report for UK NPPs (STF-15).

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
BAESM in consultation with Defence industry partners, to consider whether the provision of a container of equipment/materials for use in the event of a beyond design basis accident is appropriate.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
To confirm whether the provision of a container of equipment/materials for use in the event of a beyond design basis accident is appropriate.

4 Progress to date
All Stress Test Findings have been identified for inclusion within the scope of the Periodic Review of Safety (PRS).

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Closure is to be confirmed via site sentencing of all considerations, which is considered to be normal business within the Periodic Review of Safety (PRS).

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7 For non-closed findings, key milestones and programme
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