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Office for Nuclear Regulation

An agency of HSE

Civil Nuclear Reactor Programme

**NNB GenCo Licence Condition 36 – Organisational Capability Compliance
Arrangements**

Assessment Report: ONR-CNRP-AR-12-098

Revision 1

28 December 2012

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ASSESSMENT REPORT

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ASSESSMENT REPORT

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EXECUTIVE SUMMARY

Background

NNB Generation Company Ltd (NNB GenCo) has applied for a nuclear site licence to install and operate a twin EPR nuclear power reactor at Hinkley Point C (HPC) in Somerset. Before granting a nuclear site licence, the Office for Nuclear Regulation (ONR) must be satisfied that NNB GenCo has adequate management structures, capability and resources (organisational capability) to discharge the obligations associated with holding a nuclear site licence.

As part of ONR's assessment of this application, a review of the prospective licensee's organisational capability has been conducted in accordance with paragraph 98 of ONR's publication 'Licensing Nuclear Installations'. This paragraph states that *'ONR will seek an assurance that the applicant has suitable and sufficient organisational structure, resources and competencies to lead and manage for safety effectively by applying Safety Assessment Principles MS1 to MS4 on "leadership and management for safety" and the suite of supporting documents set out on the ONR website. The licensee will also need to demonstrate that its management system and arrangements for complying with the site licence conditions are adequate and that they are being implemented effectively before the licence is granted'*. Assessment report ONR-CNRP-AR-12-100 'NNB GenCo Organisational Capability Arrangements – Workstreams 12 to 15' addresses how NNB GenCo's arrangements meet the specific requirements of a licensable organisation as set out in paragraphs 65 to 69, 72 to 83 and 98 of Licensing Nuclear Installations.

This assessment informs a judgement on whether or not a nuclear site licence should be granted to NNB GenCo to construct, commission and operate a power reactor at Hinkley Point C (HPC). It considers the adequacy of NNB GenCo's arrangements to meet the requirements of Licence Condition 36 'Organisational Capability', and their implementation for the stage of development that NNB GenCo has reached at this point. It is recognised that the arrangements will continue to evolve as the project proceeds, and continuing ONR interaction with NNB GenCo is anticipated to gain assurance that the arrangements remain fit for purpose and that they are implemented effectively. NNB GenCo has concluded its own Self Assessment and Independent Assessment Challenge and Oversight assessment of its Licence Condition 36 arrangements and the findings from these assessments have informed ONR's assessment.

Assessment and inspection work carried out by ONR

The assessment has been informed by a number of working level meetings over the last three years plus a targeted intervention which took place in December 2011, and concluded with a working level meeting in June 2012 to verify the Licence Condition 36 'compliance thread'. The working level meetings provided a forum for dialogue, for influencing the development of NNB GenCo's Licence Condition 36 organisational capability arrangements, and for monitoring progress with development of the arrangements.

NNB GenCo was able to demonstrate via the working level meetings that its arrangements for compliance with Licence Condition 36 in respect of providing and maintaining adequate financial and human resources, and control of changes to its organisational structure which may affect safety, have the essential elements for demonstrating organisational capability as defined in Safety Assessment Principle MS.2 'Capable Organisation' and Technical Assessment Guides T/AST/048, and T/AST/065, and the international standard GS-R-3 'The Management System for Facilities and Activities'. The ongoing dialogue ONR and NNB GenCo have had in support of this workstream over the last three years has yielded positive benefits in terms of the approach adopted by NNB GenCo and the design of the arrangements.

The intervention focussed on NNB GenCo's arrangements to control any change to its organisation structure or resources which may affect safety. It included structured discussions with a sample of

members of staff undertaking nuclear safety significant roles from various parts of NNB GenCo's organisation to test their understanding of those roles. Since NNB GenCo's arrangements were at an early stage of implementation in December 2011, working level meetings were held in February and June 2012 to review updates to the nuclear baseline, resourcing strategy and management of change documentation, to clarify progress with implementation of the management of change arrangements, and to review compliance against specific clauses of Licence Condition 36.

The HPC project is in its early phases and the arrangements are still being refined and developed. NNB GenCo has made significant progress and has established the key attributes of arrangements to manage organisational capability. It was clear from the attitudes of staff involved in the working level meetings, during the Licence Condition 36 intervention in December 2011 and the evidence of senior management support that there is an ongoing forward momentum within the company to continue with positive development of the arrangements.

The HPC project lifecycle has a number of key phases such as design, construction, commissioning, operation, shutdown and decommissioning. The Licence Condition 36 compliance arrangements will need to be robust and flexible enough to manage organisational capability during each of these phases. During the design, construction and commissioning phases, NNB GenCo will need sufficient, competent staff to act as an 'intelligent customer' for the products and services it commissions and receives from its supply chain and the organisational capability arrangements will need to support this. The focus will shift during commissioning and into operations to a requirement for competent operational staff. ONR will continue to monitor the development of these arrangements as the project progresses.

Matters arising from ONR's work

NNB GenCo commendably took a decision to implement its arrangements for Licence Condition 36 in advance of licence granting. Although experience has been gained, the arrangements are still evolving and implementation is at an early stage. ONR will need to monitor the ongoing development and implementation of the arrangements.

Conclusions

This report presents the findings of ONR's assessment of NNB GenCo's arrangements for Licence Condition 36 'Organisational Capability'.

I am satisfied that NNB GenCo's arrangements for Licence Condition 36 have adequately addressed the expectations of relevant standards. The arrangements and implementation are still evolving, but outstanding issues have been recognised and there is a strong forward momentum within the company to carry this development forward. This gives me confidence they are sufficiently well advanced for this stage of the project.

Recommendations

My recommendations are as follows:

- NNB GenCo's arrangements for compliance with Licence Condition 36, and implementation of these arrangements, should be considered adequate to support a decision by ONR to grant a nuclear site licence for Hinkley Point C.
- ONR should continue to monitor and influence the development of NNB GenCo's organisational capability arrangements.

LIST OF ABBREVIATIONS

BMS	Business Management System
CM	Company Manual
GDA	Generic Design Assessment
HPC	Hinkley Point C
HR	Human Resources
HSE	Health and Safety Executive
IA	Independent Assessment
IACO	Independent Assessment Challenge and Oversight
IAEA	International Atomic Energy Agency
IC	Intelligent Customer
IMS	Integrated Management System
INSAG	International Nuclear Safety Group
LC	Licence Condition
LNI	ONR guide 'Licensing Nuclear Installations'
MOC	Management of Change
MOCC	Management of Change Committee
MP	Management Prospectus
MR	Management Review
NB	Nuclear Baseline
NNB GenCo	NNB Generation Company Limited
NNB HoldCo	NNB Holding Company Limited
NSL	Nuclear Site Licence
ONR	Office for Nuclear Regulation (an agency of HSE)
PAR	Project Assessment Report
RS	Resource Strategy
SA	Self Assessment
SAP	Safety Assessment Principle(s) (HSE)
SQEP	Suitably Qualified and Experienced (persons)
TAG	Technical Assessment Guide(s) (ONR)
TOR	Terms of Reference

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Annex 1: Working level meetings and interventions to discuss LC 36 compliance arrangements.

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1 INTRODUCTION

1.1 Background

1 NNB Generation Company Ltd (NNB GenCo) has applied for a nuclear site licence to install and operate a twin EPR nuclear power reactor at Hinkley Point C in Somerset. As part of ONR's assessment of this application, a review of the prospective licensee's arrangements for compliance with the conditions to be attached to the nuclear site licence has been conducted.

2 This report presents the findings of the assessment of NNB GenCo's compliance arrangements for Licence Condition 36 (LC 36) 'Organisational Capability'. Relevant documentation was provided by NNB GenCo to support a series of working level meetings over the last three years and the intervention undertaken in December 2011. Assessment was undertaken in accordance with the requirements of the Office for Nuclear Regulation (ONR) procedure AST/003 (Ref. 1). The ONR Safety Assessment Principles (SAPs) (Ref. 2), together with supporting Technical Assessment Guides (TAGs) (Ref. 3 and 4), have been used as the basis for this assessment.

1.2 Scope

3 The scope of this report covers the adequacy of NNB GenCo's arrangements for compliance with the requirements of LC 36 prior to drafting of ONR's Project Assessment Report (PAR) for licensing. The assessment has been undertaken before NNB GenCo's arrangements are fully developed but at a point when sufficient progress has been made to be able to assess their adequacy for this stage of the project. This assessment has been undertaken following a Self Assessment and an Independent Assessment Challenge and Oversight assessment of the LC 36 arrangements by NNB GenCo.

1.3 Methodology

4 The methodology for the assessment follows ONR BMS document AST/003, Permissioning Reports (Ref. 1), in relation to mechanics of assessment within the Office for Nuclear Regulation (ONR).

5 This assessment has focussed on the arrangements for compliance with the requirements of Licence Condition 36 "Organisational Capability". The assessment considers the process and documented procedures for the management of organisational capability.

2 ASSESSMENT STRATEGY

6 The assessment strategy for NNB GenCo's arrangements for complying with LC 36 'Organisational Capability' is set out in this section and has been undertaken in line with the licensing workstreams as agreed between ONR and NNB GenCo. It identifies the scope of the assessment and the standards and criteria that have been applied. The essential aim of the strategy was to seek assurance that NNB GenCo has adequate arrangements to discharge the obligations associated with holding a nuclear site licence at the point when the licence is granted as required under LC 36, and that it has credible plans for maintaining and continuing to maintain its organisational capability post-licence granting.

7 I have engaged with NNB GenCo through a series of working level meetings to discuss the arrangements NNB GenCo has been developing to comply with the requirements of LC 36. NNB GenCo's Head of Organisational Capability, reporting to the Human Resources Director has been the NNB GenCo workstream lead.

8 I have used the working level meetings to influence the development and monitor the implementation of NNB GenCo's LC 36 arrangements. These meetings were supplemented by a proportionate and targeted intervention which included structured discussions with a sample of staff undertaken as part of an ONR intervention to assess the effectiveness of implementation of NNB GenCo's arrangements for LC 36 as part of the licensing process. Working level meetings were held in February and June 2012 to review updates to the nuclear baseline, resourcing strategy and management of change (MOC) documentation, to clarify progress with implementation of the MOC arrangements, and to review compliance against specific clauses of LC 36. The reports of the working level meetings and the intervention are listed in Annex 1.

2.1 Standards and Criteria

9 The relevant standards and criteria adopted within this assessment are principally the Safety Assessment Principles (SAPs), (Ref. 2), internal ONR Technical Assessment Guides (TAGs), (Refs. 3 and 4), relevant national and international standards and relevant good practice informed from existing practices adopted on UK nuclear licensed sites. The key SAPs and relevant TAGs are detailed within this section. National and international standards and guidance have been referenced where appropriate within the assessment report. Relevant good practice, where applicable, has also been cited within the body of the assessment.

2.1.1 Safety Assessment Principles

10 The key SAP MS.2 'Capable Organisation' applied within the assessment is included within Table 1 of this report. This SAP refers to an organisation needing adequate human resources, the organisation structure and baseline staffing levels being based on appropriate organisational design principles, and changes to the organisation needing systematic evaluation to ensure that they do not adversely affect nuclear safety management capabilities.

11 Technical Assessment Guides

12 The following Technical Assessment Guides have been used as part of this assessment (Refs. 3 and 4):

- T/AST/048 – Issue 3 Organisational Capability.
- T/AST/065 – Issue 1 Function and Content of a Nuclear Baseline.

2.1.2 National and International Standards and Guidance

13 The following international standard has been used as part of this assessment (Ref. 5):

- IAEA GS-R-3 The Management System for Facilities and Activities.

14 Technical Assessment Guides T/AST/048, T/AST/065 and T/AST/072 incorporate the key aspects of GS-R-3.

2.2 Use of Technical Support Contractors

15 No supporting contractors were used.

2.3 Integration with other Assessment Topics

16 NNB GenCo must have arrangements in place to confirm that staff are suitably qualified and experienced (SQEP) to perform duties which may affect the safety of operations, and that those staff have received suitable training. Since these requirements support the requirement to provide and maintain adequate human resources under LC 36, NNB GenCo's LC 36 arrangements have been assessed in conjunction with LC 12 'Duly Authorised and Other Suitably Qualified and Experienced Persons', and LC 10 'Training'.

2.4 Out-of-scope Items

17 This assessment focuses specifically on NNB GenCo's arrangements for compliance with LC 36 as defined in NNB-OSL-PRO-000046 'Nuclear Site Licence Compliance Matrix: HPC'. It does not address the wider organisational capability requirements as set out in paragraphs 65 to 69, 72 to 83 and 98 of 'Licensing Nuclear Installations' (Ref. 6). Assessment of the adequacy of arrangements required by that document is considered in ONR-CNRP-AR-12-100 'NNB GenCo Organisational Capability Arrangements Workstreams 12 - 15'.

3 LICENSEE'S SAFETY CASE

18 NNB GenCo has not provided its compliance arrangements for LC 36 'Organisational Capability' as a formal safety case; rather they have been presented as a suite of documentation to support the working level meetings held over the last three years. Documentation considered during this assessment is identified in Annex 2.

4 ONR ASSESSMENT

19 This assessment has been carried out in accordance with ONR procedure AST/003, Permissioning Reports (Ref. 1).

4.1 Scope of Assessment Undertaken

20 The aim of ONR's assessment is to gain assurance that NNB GenCo's arrangements for securing and maintaining an organisational capability under licence condition 36 are adequate for this stage of the project, and that the arrangements will continue to develop as the project progresses. The assessment has focussed specifically on NNB GenCo's arrangements for compliance with LC 36(1), LC 36(2) and LC 36(5).

21 ONR and NNB GenCo have been engaged in a series of working level meetings (see Annex 1) to discuss the development and adequacy of NNB GenCo's arrangements based on the requirements and guidance identified in sub sections 2.1 and 2.2 of this report.

4.2 Assessment

22 This assessment is based primarily on the documentation presented during a series of working level meetings with NNB GenCo carried out over the last three years (see Annex 2), a review of NNB GenCo's implementation of the LC 36 arrangements, and an LC 36 intervention which was undertaken on 14 and 15 December 2011.

23 The intervention focussed on NNB GenCo's arrangements to control any change to its organisational structure or resources which may affect safety. It included structured discussions with a sample of members of staff undertaking nuclear safety significant roles from various parts of NNB GenCo's organisation. The discussions provided ONR with an opportunity to test understanding of the nuclear baseline with a sample of NNB GenCo nuclear baseline role holders.

24 Since NNB GenCo's arrangements were at an early stage of implementation in December 2011, working level meetings were held in February and June 2012 to review updates to the nuclear baseline, resourcing strategy and management of change (MOC) documentation, to clarify progress with implementation of the MOC arrangements, and to review compliance against specific clauses of LC 36. A further working level meeting was held on 29 June 2012 to complete the review.

25 The assessment focussed on the adequacy of NNB GenCo's financial and human resources to ensure the safe operation of the HPC site in accordance with LC 36(1), and arrangements to control any change to NNB GenCo's organisational structure or resources which may affect safety as set out in the Management Prospectus, Company Manual, Nuclear Baseline and MOC procedures extant at the time of the assessment (see Annex 2) in accordance with LC 36(2). NNB-OSL-PRO-000046 'Nuclear Site Licence Compliance Matrix: HPC' sets out NNB GenCo's arrangements for compliance with LC 36.

4.2.1 Adequacy of Financial Resources - LC 36(1)

26 Article 6(5) of the Nuclear Safety Directorate 2009/71/Euratom requires member states to ensure that licensees are required to provide and maintain adequate financial and human resources to fulfil their obligations in respect of nuclear safety. In order to ensure that this requirement was fully transposed in Great Britain, LC 36 was changed in July 2011 to introduce a revised LC 36(1) which requires licensees to provide and maintain adequate financial and human resources to ensure safe operations of the nuclear licensed site.

NNB GenCo's arrangements to meet this requirement are set out in paragraphs 27 and 28 of this report.

27 NNB GenCo is a wholly-owned subsidiary of NNB Holding Company Limited (NNB HoldCo). NNB HoldCo is a joint venture held 80% by EDF Energy Holdings Limited, and 20% by Centrica through its subsidiary GB Gas Holdings Limited. NNB GenCo is structured to have sole responsibility for licensed activity related to the design, construction, commissioning, operation and eventual decommissioning of UK EPRs. NNB GenCo's Company Manual (see Annex 2) provided with its nuclear site licence application (Refs. 9 and 10) describes in detail the way in which the organisation is governed.

28 With regard to the requirement to provide and maintain adequate financial resources, ONR has identified a number of expectations of licensees which are described in Annex 5 of Technical Assessment Guide T/AST/048 Issue 3 Organisational Capability (Ref. 3). NNB-OSL-PRO-000046 'Nuclear Site Licence Compliance Matrix identifies that NNB GenCo's Management Prospectus and Company Manual (see Annex 2) describe NNB GenCo's arrangements for compliance with LC 36(1). My assessment of NNB GenCo's arrangements against the expectations set out in the Technical Assessment Guide is as follows:

- ONR's expectation is that the licensee should understand the hazards and risks of its undertakings and is operating in accordance with its safety case and is complying with the licence conditions;
 - NNB GenCo arrangements to meet this expectation have been assessed in the reports ONR-CNRP-AR-12-053 'Hinkley Point C - Safety Report for Licensing' and ONR-CNRP-AR-12-129 'NNB GenCo Hinkley Point C, Nuclear Site Licensing, Licence Condition Arrangements', NNB GenCo's understanding of the hazards and risks, and licence condition compliance arrangements have been confirmed as adequate for nuclear site licence granting in these reports.
- ONR's expectation is that the licensee is reducing risk so far as is reasonably practicable, and implementing improvements in a timely manner where these are identified as ALARP;
 - Safety related improvements to meet this expectation have been identified as part of the Generic Design Assessment (GDA) process (Ref. 11) and these will be incorporated into the HPC design. ONR's interactions with NNB GenCo via technical workstream meetings and assessments across all technical areas give confidence that NNB GenCo has been identifying, and acting on, improvements to arrangements and resources.
- ONR's expectation is that the licensee is maintaining adequate nuclear baseline resource and implementing its arrangements for managing organisational change set out under LC 36(2).
 - NNB GenCo's arrangements to meet this expectation have been assessed in section 4.2.2 of this report and assessment report ONR-CNRP-AR-12-100 'NNB GenCo Organisational Capability Arrangements Workstreams 12 - 15'. NNB GenCo's arrangements have been confirmed as adequate for nuclear site licence granting.

- ONR's expectation is that the licensee has assessed what financial resources are necessary to continue to meet those needs.
 - NNB GenCo's business planning and investment process is described in the Management Prospectus (see Annex 2). That process provides financial forecasts for the business programme and monitors performance against objectives and forecasts.
 - NNB GenCo's governance arrangements to oversee this process are described in the Company Manual (see Annex 2). An important part of the governance arrangements is the Investment Committee which has a remit to ensure that capital expenditure is in line with the UK EPR investment case.
 - NNB GenCo's arrangements to meet this expectation have been assessed in the report ONR-CNRP-AR-12-100 'NNB GenCo Organisational Capability Arrangements Workstreams 12 – 15' and NNB GenCo's arrangements have been confirmed as adequate for nuclear site licence granting.
- ONR's expectation is that the licensee has, and is maintaining, or has in place arrangements to obtain the necessary financial resources.
 - ONR has sought confirmation from NNB GenCo that, as the licensee, it will have adequate financial resources to ensure the safe operation of the HPC licensed site, noting that its budget is controlled via the arrangements described in paragraph 28 above. NNB GenCo has provided the following assurances:
 - Paragraph 24, sub-section 2.1.1 of NNB-OSL-REP-00005 'Management Prospectus' Draft 0.3 of Issue 2 states that 'adequate financial resources will be made available to NNB GenCo by its shareholders to enable NNB GenCo to fulfil its NSL (nuclear site licence), other safety obligations and maintain an organisation with appropriate skills and experience'.
 - Email Heptonstall to Reiersen dated 06 September 2012 'Modification to Company Manual for LC 36(1)' (see TRIM 2012/350384) proposes a text change for section 8 of the Company Manual (see Annex 2) which states that 'whilst certain financial and commercial responsibilities are reserved to the NNB Holding Company Board, NNB GenCo has the sole responsibility for the conduct of all licensed and permitted activity and processes for requesting and approving funding must be sufficient to allow the discharge of this responsibility. The NNB Shareholders Agreement supports this requirement'.
 - It is also pertinent to note that ONR has approached the Department for Energy and Climate Change (DECC) for an assurance regarding NNB GenCo's financial standing in accordance with paragraph 118 of the ONR publication 'Licensing Nuclear Installations' (Ref. 6) (see email Reiersen to Higson dated 6 July 2012, TRIM 2012/269625). DECC's response is considered in the report CNRP-AR-12-109 'Licensing and Legal Sub-Project Assessment Report. DECC assurance on financial standing provides a basis for confidence that, at the point of licensing, NNB GenCo has access to sufficient funding to discharge its obligations as a nuclear site licence holder.
- ONR's expectation is that the licensee has relevant records which are being retained in accordance with LC 6.

- NNB GenCo's Company Annual financial Accounts, Investment Approval Papers and Lifecycle Budgets (see Annex 2) are retained as permanent records in accordance with NNB GenCo's arrangements for LC 6 'Documents, Records Authorities and Certificates'.
- NNB GenCo's Nuclear Baseline and Management of Change Register are retained as permanent records in accordance with NNB GenCo's arrangements for LC 6 'Documents, Records Authorities and Certificates'.

29 I consider that the evidence supporting the above criteria provides sufficient confidence that NNB GenCo will provide and maintain adequate financial resources to ensure the safe operation of the HPC nuclear licensed site in accordance with the requirements of LC 36(1).

4.2.2 Adequacy of Human Resources – LC 36(1)

30 NNB GenCo's Management Prospectus (MP) references the Nuclear Baseline (NB) as being the means to demonstrate that it has the organisation, resource and competences needed at this time and is preparing for the capability challenges of the future. NNB-OSL-PRP-000046 'Nuclear Site Licence Compliance Matrix specifically identifies the NB as the document which describes arrangements for compliance with LC 36(1).

31 The NB reinforces the MP by stating that one of a number of purposes that the NB has is to demonstrate that NNB GenCo, as the holder of the nuclear site licence (NSL), has suitable and sufficient organisational structures, resources and competence to be able to reliably and effectively carry out all activities that may impact on nuclear safety.

32 NNB GenCo's NB is built around roles that have the potential to impact on nuclear safety. The nuclear safety responsibilities of a post are then made up of a number of roles that are particular to the individual post holder. NB roles are associated with posts through a nuclear baseline database (NB database). The NB has two parts:

- Part A which is a descriptive section summarising the nuclear organisational profile and analysing the results of the assessment process. This is supported by an appendix that details all NB roles and their associated posts;
- Part B which contains colour coded organisational charts reflecting the nuclear safety significance of posts holding NB roles. Organisation charts are colour coded to reflect the roles associated with the post and the nuclear safety significance.

33 T/AST/065 'Function and Content of a Nuclear Baseline' sets out a number of broad principles which underpin ONR's expectations of a licensee's NB. NNB GenCo's NB has been assessed against the relevant principles in the following sections 4.2.2.1 to 4.2.2.6.

4.2.2.1 Nuclear Baseline Scope

34 ONR's expectations of a NB scope are set out in T/AST/065 section 4.2.1. NNB GenCo's arrangements to meet these expectations are described in the following sections of the NB.

- Part A, Section 2 of the NB sets out the scope of the NB including identification of the activities that have the potential to impact on nuclear safety, the nuclear baseline methodology, and the baseline role philosophy.
- NNB GenCo's identification of roles to be included in the NB was initially subjective, relying on the knowledge, experience and judgement of Heads of Function and other managers. Development of the competency framework under NNB GenCo's

LC 12 compliance arrangements has introduced more rigour to the process of identifying nuclear safety related activities and this has resulted in a stronger underpinning of roles and posts identified in the NB. This is regarded as good practice.

- Part A, Section 3 describes the NNB GenCo organisation, future developments and a description of the various directorates and functions including a description of nuclear safety responsibilities. The organisational design principles which have been used in the development of the NNB GenCo organisation are identified in the document NSL/B/TECH/09/053 'Organisational Design Principles to Support the Development of the Nuclear Baseline' (see Annex 2).
- Part B sets out the organisational structure including corporate functions and HPC site activities. The organisation structure is consistent with the MP and the CM. Posts containing nuclear safety related and intelligent customer roles are clearly identified.

35 My judgement is that that NNB GenCo's NB provides an evidence-based demonstration that it has an organisation structure, staffing levels and competencies in place to enable it to maintain, and remain in control of, nuclear safety throughout the full range of activities identified in the NB in accordance with ONR's expectations as set out in T/AST/065 section 4.2.1, T/AST/072 section 4.6.2 and in accordance with the requirements of LC 36(1).

4.2.2.2 Nuclear Baseline Resource Level and Contractors

36 ONR's expectations of NB resources and use of contractors are set out in T/AST/065 sections 4.2.2 and 4.2.5. NNB GenCo's arrangements to meet these expectations are described in the following sections of the NB.

- Part A, Section 4 provides the context to resource planning. It refers out to the NNB GenCo Resource Strategy (RS) (see Annex 2) as the focus for developing the resource capability in line with the HPC project need. The July 2012 RS update, which has been shared with ONR, provides a forward look at resource requirements in terms of numbers and skills mix in line with project milestones. NNB GenCo's Medium Term Plan enacts the RS and is the formal year on year budgeting mechanism for resource provision.
- Part A, Section 4 also sets out NNB GenCo's approach to meeting its nuclear site licence obligations through a capable team drawing on competent contractors whose skills complement the NNB GenCo licensee organisation.
- Part A, Section 5 provides a NB justification. The overall NB profile is summarised in Table 4 and presented in more detail in Appendix A and Part B. A NB performance summary is provided in Table 5 which identifies the percentage of NB posts and roles filled together with mitigating comments and a vulnerability analysis.

37 NNB GenCo HR has recruitment plans in place to meet resourcing requirements and the plans reflect the prioritised need for filling vacant posts. Recruitment progress is reported to and monitored by the NNB GenCo Board. NNB GenCo HR has been able to demonstrate to ONR that recruitment has largely kept pace with resourcing requirements and in line with the RS. Contingency plans for short term resource shortfalls include the use of contract support and expatriates from EDF Group.

38 My judgement is that NNB GenCo's NB provides an evidence based demonstration that it understands its resource requirements and that it currently has, and will have as the

project progresses, adequate resource levels to be able to reliably and effectively carry out all activities that may impact on nuclear safety in accordance with ONR's expectations as set out in T/AST/065 sections 4.2.2 and 4.2.5, and in accordance with the requirements of LC 36(1).

4.2.2.3 Staff Competence

39 ONR's expectations of staff competence are set out in T/AST/065 section 4.2.3. NNB GenCo's arrangements to meet these expectations are described in the following section of the NB:

- Part A, Section 4 references the programme of work to address NNB GenCo's competence needs. This programme of work has been assessed in the report ONR-CNRP-AR-12-096 'Licence Condition 12 – Duly Authorised and other Suitably Qualified and Experienced Persons Compliance Arrangements'. The report recommended that NNB GenCo's management of competence arrangements for LC12 and the implementation of the arrangements should be considered adequate to support a decision by ONR to grant a nuclear site licence for HPC.

40 I held informal discussions with a sample of NNB GenCo staff holding NB roles during the LC36 intervention on 14 and 15 December 2012. A standard question set was used to ensure consistency. The discussions indicated that there was a reasonable knowledge of the purpose of the NB and the nuclear safety aspects of by the NB role holders sampled. NNB GenCo's competency assessment exercise to assess the competence of staff holding nuclear baseline roles was regarded by staff as being good and the exercise assisted role holders to understand their roles.

41 My judgement is that NNB GenCo's arrangements for staff competence meet ONR's expectations set out in T/AST/065 section 4.2.3.

4.2.2.4 Nuclear Safety Governance and Intelligent Customer Capability

42 ONR's expectations of nuclear safety governance and intelligent customer capability are set out in T/AST/065 section 4.2.4. NNB GenCo's arrangements to meet these expectations are described in the following sections of the NB.

- Part A, Section 3 identifies NNB GenCo's nuclear safety governance responsibilities, and governance bodies, functional and individual roles and responsibilities for ensuring and assuring nuclear safety governance.
- Part A, Section 4 provides an overview of NNB GenCo's approach to intelligent customer by ensuring that there is a suitable and sufficient capability in NNB GenCo to understand where and when work is needed, specify requirements to carry out that work, understand and set suitable standards, supervise the work of the contractor, and be able to review, evaluate and act upon the work carried out on its behalf.

43 NNB GenCo's nuclear safety governance and intelligent customer capability have been assessed in the report ONR-CNRP-AR-12-100 'NNB GenCo Organisational Capability Arrangements Workstreams 12 – 15'. The report recommended that NNB GenCo's nuclear safety governance and intelligent customer arrangements should be considered adequate to support a decision by ONR to grant a nuclear site licence for HPC.

44 My judgement is that NNB GenCo's arrangements for nuclear safety governance and intelligent customer meet ONR's expectations as set out in T/AST/065 section 4.2.4.

4.2.2.5 Nuclear Baseline Justification

45 ONR's expectations for justification of the nuclear baseline are set out in T/AST/065 section 4.2.6. NNB GenCo's arrangements to meet these expectations are described in the following sections of the NB:

- Part A, Section 2 identifies NB measures of performance as means of monitoring progress with filling NB posts and roles, assessing the competence of staff fulfilling NB roles, development of the IC capability, and use of contractors. Progress with staff recruitment and filling NB posts and roles is reported to the NNB GenCo Board on a monthly basis.
- Part A, Section 5 provides a vulnerability assessment. It describes the approach using a series of themes and questions to challenge the NB organisation focussing on organisational structure, staff complement, post loading, staff competence, conflicting responsibilities and significance of any gaps. The results have been reported against the NB measures. Individual vulnerabilities have been recorded in NNB GenCo's NB database together with mitigating factors. The database has been shared with ONR. Appendix A of the NB provides a full listing of NB posts, roles and gaps.
- Part A, Section 4 describes NNB GenCo's approach to succession planning. It notes the need to develop contingency arrangements to manage singleton expertise.

46 I consider NNB GenCo's NB indicators to be adequate for the current stage of its development to enable it to demonstrate that the organisation has enough resource at the right time and in line with programme need as set out in T/AST/065 Section 4.2.6.

47 My judgement is that NNB GenCo's measures of performance, vulnerability analysis and approach to succession planning provide evidence that it has systematically looked at its organisation and identified vulnerabilities. It meets ONR's expectations as set out in T/AST/065 section 4.2.6.

4.2.2.6 Nuclear Baseline Process

48 ONR's expectations of a process to derive and manage a NB are set out in T/AST/065 sections 4.2.7 and 4.2.8. NNB GenCo's arrangements to meet these expectations are described in the following sections of the NB:

- Part A, Section 2 describes NNB GenCo's process for a living baseline. The NB is an integral part of the NNB GenCo integrated management system. Procedures NNB-HRE-PRO-000002 'Management of Changes to the Nuclear Baseline' and NNB-HRE-PRO-000001 'Management of Organisational Change (MOC)' have been developed to control the NB and assess the impact of proposed organisational changes.
- Part A, Section 2 identifies criteria for updating the NB and maintaining it as a 'living baseline'. Formal update of the NB parts A and B at key points in the HPC project should ensure that it continues to reflect the full scope of nuclear safety related activities and that resource levels remain appropriate for the nuclear safety related work being carried out.
- Part A, Section 1 notes the key role that the NNB Board and Executive Team have in providing leadership, direction and control of work, in particular in the context of nuclear safety management. The NB has been approved by the NNB GenCo HR Director, Project Director and Safety Director. The NNB GenCo HR Director has

nuclear safety related responsibilities in relation to the processes for resourcing and maintenance of the capability in line with the requirements of LC 36.

- Part A, Section 3 identifies that the NNB GenCo HR Director is the chair of the NNB GenCo Management of Change Committee (MOCC). This committee has a nuclear safety governance role in the MOC process through the approval and monitoring of change proposals. NNB GenCo's HR Directorate has a central role in the development, management and implementation of both the NB and the associated MOC process.

49 I have worked with NNB GenCo over the last three years to influence development of the NB in line with the expectations set out in T/AST/065. The NB considered in this assessment is at version 3 and I have monitored its development and review through successive versions. I have encouraged NNB GenCo to maintain it as a living document.

50 My judgement is that the NB provides an appropriate reference point for NNB GenCo's MOC arrangements which have been assessed in section 4.2.3 of this report. The NB process meets with ONR's expectations as set out in T/AST/065 sections 4.2.7 and 4.2.8.

4.2.3 Arrangements to Control Changes to Organisational Structure or Resources – LC 36(2)

51 T/AST/048 sets out a number of broad principles which underpin ONR's expectations of a licensee's management of change arrangements. NNB GenCo's arrangements have been assessed against the relevant principles in the following sections 4.2.3.1 to 4.2.3.6.

4.2.3.1 Management of Change Arrangements

52 ONR's expectations of a licensee's MOC arrangements are set out in T/AST/048 paragraphs 4.11 to 4.23 and 4.36 to 4.55. NNB GenCo's arrangements to meet these expectations are described below.

53 NNB GenCo's arrangements to control changes to organisational structure or resources which may affect safety in accordance with LC 36(2) and LC 36(5) are set out in the procedure NNB-HRE-PRO-000001 'Management of Organisational Change'. The procedure is part of NNB GenCo's integrated management system. The NNB GenCo HR Director is the process owner for this procedure and the arrangements are integrated with HR processes. NNB GenCo shared the draft procedure with ONR in late 2010 and commendably took the decision to introduce the arrangements in early 2011, in advance of licence granting.

54 The procedure sets out the methodology, roles and responsibilities for identifying, preparing, planning, implementing, monitoring and reviewing organisational changes. The MOC process applies to changes that have the potential to impact on nuclear safety and it is applicable to all NNB GenCo organisational functions.

55 NNB GenCo's arrangements include:

- A requirement for an initial screening assessment to be carried out by the change owner to consider the options, benefits and risks associated with the change in order to establish the best option. This meets ONR's expectations as set out in T/AST/048 paragraphs 4.37.
- A method of categorising changes according to nuclear safety significance. This meets with ONR's expectations as set out in T/AST/048 paragraphs 4.37.

- Provision for engaging ONR. This meets with ONR's expectations as set out in T/AST/048 paragraph 4.39.
- A requirement for more significant changes to be subject to a more detailed risk assessment which is documented as part of the change and which is used to inform an implementation plan (IP). The IPs identify activities that must be achieved prior to implementation, timescales for undertaking key activities, appropriate measures to monitor implementation, success factors, and any changes required to the management arrangements. This meets with ONR's expectations as set out in T/AST/048 paragraphs 4.44.

- 56 The LC 36 intervention that I carried out on 14 and 15 December 2011 confirmed that these arrangements are in place, albeit that implementation of the arrangements is still at a relatively early stage. I observed that the arrangements are being used by change owners and monitored and reviewed by the MOCC.
- 57 NNB has identified one significant change to date: NNB-HRE-MCP-000003 'Development of HPC Project Directorate and Associated Additional Posts' (see Annex 2). I reviewed the MOC proposal and was satisfied that NNB GenCo's arrangements had been used to scope, assess, endorse and implement this change.
- 58 NNB GenCo has trained staff to fulfil key roles under the arrangements. These roles are identified in NNB-HRE-PRO-000001. I observed a MOC training workshop on 16 March 2011 and provided feedback to NNB GenCo on the adequacy of the training and suggested some areas for improvement.
- 59 MOC proposals are entered onto the MOC Register NNB-HRE-REG-000001 and given a unique identifier to track the change through the process. I have reviewed the register and I am content that it meets with ONR's expectations for a change register. NNB GenCo's arrangements advise that the MOC register will be maintained as a permanent record. This aspect was not checked against NNB GenCo's LC6 'Documents, Records, Authorities and Certificates' arrangements during the LC36 intervention and it will be checked at a later date.
- 60 My judgement is that NNB GenCo's procedure NNB-HRE-PRO-000001 'Management of Organisational Change' demonstrates that its arrangements are robust, incorporated as part of the IMS and applied to all activities that have the potential to impact on nuclear safety in accordance with ONR's expectations as set out in T/AST/048 paragraphs 4.11 to 4.23 and 4.36 to 4.55 and in accordance with the requirements of LC 36(2). I was able to verify the adequacy of these arrangements during the LC 36 intervention in December 2011.

4.2.3.2 Board Ownership and Support

- 61 ONR's expectations of a licensee's Board ownership and support for the MOC arrangements are set out in T/AST/048 paragraphs 4.24 to 4.30. NNB GenCo's arrangements to meet these expectations are described below.
- 62 Section 5 of NNB GenCo's MP acknowledges that the NB is an integral part of the arrangements that demonstrate that NNB GenCo is an intelligent operator and a capable licensee. It states that the NB is owned by the NNB GenCo HR Director who is a member of the NNB GenCo Board. The NB has been signed off by two Board Directors and the Safety Director. NB performance measures are reported to the Board on a monthly basis. The knowledge of the Board and Executive Team has been enhanced by the recent appointments of a Non-Executive Director with responsibility for nuclear safety and a Safety Director.

- 63 NNB GenCo's MOC arrangements provide for significant changes (Category A*) to be submitted to the NNB GenCo Executive for endorsement and to the NNB GenCo Board for authorisation of the change prior to submission to ONR. The NNB GenCo Board is required to formally approve such changes once ONR's agreement has been confirmed. The NNB GenCo Board was presented with the Category A MOC proposal 'Development of HPC Project Directorate and Associated Additional Posts' for discussion and agreement.
- 64 I held a discussion with the NNB GenCo HR Director on 14 December 2011 as part of the LC 36 intervention and confidence was gained in her level of understanding of the importance of the NB, her role as owner of the NB and Chair of MOC Committee, and the importance of providing and maintaining adequate human resources. She advised that the NNB GenCo resource strategy had been presented to the Board.
- 65 NNB GenCo's MOCC maintains a governance role and monitors the implementation of change proposals. The MOCC terms of reference (TOR) detail its role and responsibilities (see Annex 2). I have reviewed a sample of minutes of MOCC meetings (see Annex 2) and I have been able to confirm that proceedings have been conducted in accordance with the terms of reference.
- 66 Section 1 of the NB acknowledges that the NNB GenCo Board and Executive Team have a part to play in the leadership, direction and control of work, in particular in the context of nuclear safety management. I held discussions with a sample of NNB GenCo Board members as part of the governance intervention in April 2012. The report CR12166 (see TRIM 2012/296551) records the outcome of the discussions and the confidence I gained in NNB GenCo's nuclear safety governance arrangements.
- 67 My judgement is that there is sufficient evidence to demonstrate that the NNB GenCo Board owns and supports the MOC arrangements and is ensuring that they are embedded throughout the organisation in accordance with ONR's expectations as set out in T/AST/048 paragraphs 4.24 to 4.30.

4.2.3.3 Relationship with the Nuclear Baseline

- 68 ONR's expectations of a licensee's MOC arrangements relationship with the NB are set out in T/AST/048 paragraphs 4.31 to 4.35. NNB GenCo's arrangements to meet these expectations are described below.
- 69 NNB GenCo's arrangements to manage changes to the NB are set out in NNB-HRE-PRO-000002 'Management of Changes to the Nuclear Baseline'. The procedure identifies implementation of MOC plans originating from the MOC process, and review and ongoing oversight by the MOCC, including annual review and the effects of cumulative changes on the validity of the NB as being inputs to the NB review process.
- 70 Part A, Section 1 of the NB identifies the expectation that there will be a number of NB updates and that the current update NNB-HRE-ASS-000001 version 3.3 has been conducted in line with the requirements of procedure NNB-HRE-PRO-000002.
- 71 NNB-HRE-PRO-000001 'Management of Organisational Change' procedure refers to the NB and arrangements for maintaining and updating it. Section 4.2.2.6 of this report refers to NNB GenCo's arrangements for maintaining the NB and confirms their acceptability.
- 72 My judgement is that NNB GenCo's management of change arrangements reference the NB and include a process for updating it on a regular basis in accordance with ONR's expectations as set out in T/AST/048 paragraphs 4.31 to 4.35.

4.2.4 Effectiveness Review

- 73 ONR's expectations of a licensee's arrangements to periodically review the effectiveness of its MOC arrangements and for confirmation that changes have been implemented are set out in T/AST/048 paragraphs 4.56 to 4.58. NNB GenCo's arrangements to meet these expectations are described below.
- 74 NNB GenCo's MOC arrangements are subject to regular review through a combination of self-assessment (SA), independent assessment (IA) and management review (MR). The procedures governing these activities are referenced in Annex 2.
- 75 NNB GenCo's HR function carried out a SA against the requirements of procedures NNB-HRE-PRO-000001 and NNB-HRE-PRO-000002 on 9 December 2011. The SA report NNB-HRE-REP-000006 has been shared with me (see Annex 2) and I am satisfied with the quality of the assessment. The findings from the SA are being addressed by NNB GenCo HR.
- 76 NNB GenCo's Independent Assessment Challenge and Oversight (IACO) function has carried out an IA to assess the effectiveness of the HR arrangements. The IA report NNB-OSL-REP-000267 has been shared with me (see Annex 2) and I am satisfied with the quality of the assessment. The findings from the IA are being addressed by NNB GenCo HR.
- 77 NNB GenCo has carried out a post implementation review of the effectiveness of MOC proposal NNB-HRE-MCP-000003 'Development of HPC Project Directorate and Associated Additional Posts' as required by procedure NNB-HRE-PRO-000001. The report NNB-HRE-ANA-000002 has been shared with me (see Annex 2) and I am satisfied with the quality of the review. An implementation plan has been developed by NNB GenCo to address the lessons learned from the review.
- 78 My judgement is that NNB GenCo has adequate arrangements in place to periodically review the effectiveness of its MOC arrangements and changes that have been implemented in accordance with ONR's expectations as set out in T/AST/048 paragraphs 4.56 to 4.58.

4.3 Comparison with Standards, Guidance and Relevant Good Practice

- 79 NNB GenCo's arrangements for Licence Condition 36 Organisational Capability have been assessed against the requirements and of the standards and associated guidance identified in section 2 of this report. Technical Assessment Guides T/AST/048 and T/AST/065 set out ONR's expectations of licensees' organisational capability and management of organisational change arrangements, and NNB's compliance arrangements have been assessed against these TAGs.
- 80 NNB GenCo's organisational capability arrangements are clearly defined and documented. They meet ONR's expectations as set out in T/AST/048 and T/AST/065.

5 CONCLUSIONS AND RECOMENDATIONS

5.1 Conclusions

Summary Remarks

81 NNB Generation Company Ltd (NNB GenCo) has applied for a nuclear site licence to install and operate a twin EPR nuclear power reactor at Hinkley Point C in Somerset. As part of ONR's assessment of this application, a review of the prospective licensee's arrangements for compliance with the conditions to be attached to the nuclear site licence has been conducted.

82 This report presents the findings of ONR's assessment of NNB GenCo's compliance arrangements for Licence Condition 36 Organisational Capability. The assessment considers the arrangements themselves, which are documented in the management prospectus, company manual, nuclear baseline and supporting procedures, the level of implementation up to the end of July 2012, and future development needs. The assessment has been based on the requirements of ONR Technical Assessment Guides T/AST/048 and T/AST/065.

83 The assessment considers the adequacy of NNB GenCo's arrangements, and their implementation, for the stage of development that NNB GenCo has reached at this point. It is recognised that the arrangements will continue to evolve as the project proceeds, and continuing interaction with NNB GenCo is anticipated to gain assurance that the arrangements remain fit for purpose and that they are implemented effectively.

84 The key elements assessed by ONR have been NNB GenCo's arrangements for providing and maintaining adequate financial and human resources to ensure the safe operation of the licensed site, and for controlling any change to its organisational structure or resources which may affect safety. NNB GenCo was able to demonstrate that its arrangements for compliance with LC 36 have the essential elements of a process for:

- Providing and maintaining adequate financial and human resources to ensure the safe operation of the licensed site in accordance with LC 36(1).
- Controlling any change to its organisation structure or resources which may affect safety in accordance with LC 36(2).
- Classification of changes to the organisation structure or resources according to their safety significance and provision of adequate documentation to justify the safety of any proposed change in accordance with LC 36(5).

85 The ongoing dialogue ONR and NNB GenCo have had in support of this workstream over the last three years has yielded positive benefits in terms of the approach adopted by NNB GenCo and the design of the arrangements.

86 The HPC project is in its early phases and the arrangements are still being refined and developed. Implementation is still underway, but NNB GenCo has made significant progress and has established the key attributes of organisational capability arrangements. It was clear from the enthusiasm and attitudes of staff involved in the working level meetings over the last three years, the intervention in December 2011 and the evidence of senior management support that there is an ongoing forward momentum within NNB GenCo to continue with the positive development of its arrangements.

87 The HPC project lifecycle has a number of key phases such as design, construction, commissioning, operation, shutdown and decommissioning. The LC 36 compliance arrangements will need to be robust and flexible enough to cope with the changes to

organisational structures and resourcing requirements during each of these phases. During the design, construction and commissioning phases, NNB GenCo will need sufficient, competent staff to act as an 'intelligent customer' for the products and services it commissions and receives from its supply chain. The focus will shift during commissioning and into operations into a requirement for competent operational staff. ONR will continue to monitor the development of NNB GenCo's organisational capability arrangements as the project progresses.

IIS Rating LC 36 Organisational Capability

88 NNB GenCo has made significant progress over the past three years which has been reflected in the working level meetings supported by the intervention in December 2011. The intervention, reinforced by follow up working level meetings in February and June 2012, confirmed that satisfactory arrangements have been developed albeit the implementation is in its early stages. In recognition of the success that has been achieved and the strong positive forward momentum an **IIS rating of 3 (adequate) is allocated.**

Concluding Remarks

89 NNB GenCo has made significant progress with the development and implementation of its organisational capability arrangements over the last three years. It has designed, documented and substantially implemented adequate arrangements for this stage of the HPC project. There is recognition of the need to review and develop the arrangements as the project progresses. This requirement will increase as the project moves through its phases.

90 During the June 2012 working level meetings, NNB GenCo demonstrated that its arrangements had been satisfactorily implemented together with its commitment to taking into account lessons learned from its own Self Assessment and Independent Assessment Challenge and Oversight assessment. A number of improvements were identified by ONR and NNB GenCo is committed to acting on these.

91 The granting of a site licence will enhance rather than diminish ONR's ability to influence future progress with development of the arrangements. The arrangements are judged to be adequate for this stage of the project and will provide a sound platform for development as the project proceeds.

92 To conclude, I am broadly satisfied that NNB GenCo's compliance arrangements for providing and maintaining adequate financial and human resources to ensure the safe operation of the HPC site, and to control any change to the organisation structure or resources which may affect safety, under LC 36 are addressing the expectations of relevant standards. The arrangements and their implementation are still evolving but outstanding issues have been recognised by NNB GenCo and there is a strong forward momentum within the company to carry this development forward. This gives confidence that the arrangements are sufficiently far advanced for this stage of the project.

5.2 Recommendations

93 My recommendations are as follows.

- NNB GenCo's arrangements for compliance with LC 36 and the implementation of these arrangements should be considered adequate to support a decision by ONR to grant a nuclear site licence for Hinkley Point C.
- ONR should continue to monitor and influence the continued development of NNB GenCo's arrangements.

6 REFERENCES

- 1 *ONR How2 Business Management System. Permissioning Reports. AST/003 Issue 5.* HSE. July 2010. www.hse.gov.uk/nuclear/operational/assessment/index.htm.
- 2 *Safety Assessment Principles for Nuclear Facilities.* 2006 Edition Revision 1. HSE. January 2008. www.hse.gov.uk/nuclear/SAP/SAP2006.pdf.
- 3 T/AST/048 Management of Organisational Change
- 4 T/AST/065 Function and Content of the Nuclear Baseline
- 5 IAEA Safety Standard. The Management System for Facilities and Activities Safety Requirements GS-R-3, July 2006. [International Atomic Energy Agency \(IAEA\)](http://www.iaea.org)
- 6 Licensing Nuclear Installations
<http://www.hse.gov.uk/nuclear/licensing-nuclear-installations.pdf>
- 7 INSAG 18. Managing Change in the Nuclear Industry.
<http://www-ns.iaea.org/committees/insag.asp>
- 8 NNB GenCo Ltd's Application for a Nuclear Site Licence to Install and Operate two EPR Units at Hinkley Point, ONR Intervention Strategy. TRIM 2012/61973.
- 9 Application for a Nuclear Site Licence for Hinkley Point. ONR-HPC-20143R. NNB GenCo. July 2011. TRIM 2011/503357.
- 10 NNB GenCo Nuclear Site Licence Application Dossier. NNB GenCo. July 2011. TRIM 2011/442090.
- 11 EDF and Areva UK EPR Reactor GDA Issues, Resolution Plans and Issue Close-Out Reports.
<http://www.hse.gov.uk/newreactors/2011-gda-issues-epr.htm>

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Table 1

Relevant Safety Assessment Principles considered during the assessment

SAP No.	SAP Title	Description
MS.1	Leadership	This identifies the need for oversight of nuclear safety performance and the key role played by the Board and leadership team.
MS.2	Capable Organisation	This makes reference to an organisation needing adequate human resources, the organisation structure and baseline staffing levels being based on appropriate organisational design principles, and changes to the organisation needing systematic evaluation to ensure that they do not adversely affect nuclear safety management capabilities
MS.3	Decision Making	This identifies the need for decision making to be based on processes that ensure the conflict between nuclear safety and other business goals, including commercial and schedule pressures and external influences, are recognised and resolved.

Annex 1

Working level meetings and interventions to discuss LC 36 compliance arrangements

Date	Location	Topic	TRIM Ref.
21/07/09	Bootle	Organisational Development	2009/301081
26/10/09	Bootle	Organisational Development	2009/460343
19/01/10	London	Organisational Development	2010/22674
21/04/10	London	Organisational Development	2010/311214
14/07/10	London	Organisational Development	2010/328852
25/08/10	London	Human Resources and Communication	2010/444271
21/09/10	London	Nuclear Baseline	2010/533679
27/10/10	London	Nuclear Baseline	2010/567877
02/12/10	London	Nuclear Baseline	2010/637613
16/02/11	Bootle	Nuclear Baseline	2011/145211
16/03/11	London	Management of Change Workshop	2011/217833
06/04/11	Bootle	Nuclear Baseline	2011/272041
08/06/11	London	Nuclear Baseline	2011/371866
13/10/11	London	Nuclear Baseline	2011/602234
16/02/11	Bootle	Nuclear Baseline	2011/145211
06/04/11	Bootle	Nuclear Baseline	2011/272041
08/06/11	London	Nuclear Baseline	2011/371866
13/10/11	London	Nuclear Baseline	2011/602234
20/01/12	Hinkley Point C	Hinkley Point C Site Organisation	2012/162846
28/02/12	London	Organisational Capability	2012/114476
01/06/12	Barnwood	Organisational Capability	2012/346492
29/06/12	Barnwood	LC36 Compliance Thread	2012/311509

Annex 2

Documents considered

Title	Document Number	TRIM Reference
NNB GenCo Nuclear Baseline	NNB-HRE-ASS-000001	
Management Prospectus	NNB-OSL-REP-000054	
Company Manual	NNB-OSL-MAN-000002	
Nuclear Site Licence Compliance Matrix	NNB-OSL-PRP-000046	
Email Heptonstall to Reiersen dated 31/08/12 - Modification to Company Manual for LC36(1)		2012/346529
Email Heptonstall to Reiersen dated 06/09/12 – Arrangements for LC36(1)		2012/350384
Email Reiersen to Higson dated 06/07/12 – NNB Generation company Ltd Application for a Nuclear Site Licence at Hinkley Point C		2012/269625
Management of Organisational Change Procedure	NNB-HRE-PRO-000001	
Management of Changes to the Nuclear Baseline Procedure	NNB-HRE-PRO-000002	
Organisational Design Principles to Support the Development of the Nuclear Baseline	NSL/B/TECH/09/053	
Nuclear Site Licence Compliance Matrix: HPC	NNB-OSL-PRO-000046	
NNB GenCo Organisation Chart 13 July 2012		2012/282590
Management of Change Committee Terms of Reference	NNB-HRE-TOR-000001	
Management of Change Register	NNB-HRE-REG-000001	
Management of Change Committee Minutes	NNB-HRE-MOM-000001 NNB-HRE-MOM-000004 NNB-HRE-MOM-000005 NNB-HRE-MOM-000006	
Management of Change Proposal – Development of HPC Project Directorate and Associated Additional Posts	NNB-HRE-MCP-000003	
Self Assessment Procedure	NNB-OSL-PRO-000026	
Independent Assessment Procedure	NNB-OSL-PRO-000025	
Self Assessment Report – Management of Organisational Change and Nuclear Baseline	NNB-HRE-REP-000006	

Title	Document Number	TRIM Reference
arrangements		
Independent Assessment Report – Effectiveness of HR Arrangements	NNB-OSL-REP-000267	
MOC-Post Implementation Review of NNB-HRE-MCP-000003	NNB-HRE-ANA-000002	
Records retained to demonstrate NNB's financial resources		2012/367658