

Office for Nuclear Regulation (ONR) Site Report for HINKLEY POINT C

Report for period 1 January 2018 – 31 March 2018

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are published on the ONR website (<http://www.onr.org.uk/lhc/>).

TABLE OF CONTENTS

| | | |
|---|--------------------------|---|
| 1 | INSPECTIONS..... | 3 |
| 2 | ROUTINE MATTERS..... | 3 |
| 3 | NON-ROUTINE MATTERS..... | 5 |
| 4 | REGULATORY ACTIVITY..... | 5 |
| 5 | NEWS FROM ONR..... | 5 |
| | CONTACTS..... | 6 |

1 INSPECTIONS

The ONR nominated site inspector and/or other ONR specialist inspectors including ONR warranted Health and Safety Executive Construction Division inspectors made inspections on the following dates during the quarter at the Hinkley Point C construction site:

- 24 January 2018
- 07 – 09 February 2018
- 13 – 14 February 2018
- 05 March 2018
- 20 March 2018

2 ROUTINE MATTERS

2.1 Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the Energy Act 2013;
- the Health and Safety at Work Act 1974 (HSWA74); and
- regulations made under HSWA74, for example the Ionising Radiations Regulations 1999 (IRR99) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).
- the Regulatory Reform (Fire Safety) Order 2005
- the Nuclear Industries Security Regulations 2003

ONR has implemented a programme of intervention to:

- secure ONR's regulation of the construction and installation of two UK EPR™ reactor units by NNB GenCo (HPC) Ltd.;
- ensure that NNB GenCo (HPC) Ltd. is complying with its legal responsibilities;
- conduct theme focused interventions and cross-theme team inspections aimed at gathering evidence to form a judgement on the on-going development of NNB GenCo (HPC) Ltd.'s competence and capability and the effectiveness of its management arrangements for the controlling procurement, design and manufacture;
- inform ONR's judgement on the adequacy of NNB GenCo (HPC) Ltd.'s site construction related compliance arrangements to support ONR's permissioning decisions in relation to start of pumping station construction and first nuclear island concrete.

In this period, routine site inspections covering the following Licence Conditions (LCs) were performed:

- LC02 – Marking the site boundary
- LC08 – Warning notices
- LC19 – Construction or installation of new plant
- LC26 – Control and supervision of operations
- LC28 – Examination, inspection, maintenance and testing

As NNB GenCo (HPC) Ltd.'s construction activity increases at the HPC site, ONR's site interventions will have an increasing focus on NNB's ability to adequately control construction at the HPC site in accordance with NNB GenCo (HPC) Ltd.'s justified design.

For LCs 02, 19 and 26, ONR judged that NNB GenCo (HPC) Ltd. had adequately implemented its licence compliance arrangements with only minor areas for improvement being identified.

For LC08 (ONR judged that an inspection rating of AMBER (Seek improvement) was appropriate. This was because whilst NNB GenCo (HPC) Ltd. had developed broadly adequate compliance arrangements its implementation was found to be inconsistent. ONR raised an associated regulatory issue to capture this finding and ensure appropriate regulatory oversight.

For LC28, ONR judged that an inspection rating of AMBER (Seek improvement) was appropriate. This was because there were a number of areas where NNB GenCo (HPC) Ltd.'s implementation of its arrangements for preservation and maintenance during the construction phase had fallen behind project requirements and will require enhanced attention to secure the necessary improvements. The site inspector has raised an associated regulatory issue to capture this finding and ensure appropriate regulatory oversight.

As previously reported, in addition to ONR's routine site inspection programme ONR carried out a Chief Nuclear Inspector's (CNI) inspection examining the adequacy of NNB GenCo (HPC) Ltd.'s supply chain management.

ONR's activities were carried out in October and November 2017 over four sites:

- Areva's Creusot Forge,
- NNB GenCo (HPC) Ltd.'s Delivery and Command Centre in Bristol,
- Hinkley Point C construction site, and
- NNB GenCo (HPC) Ltd.'s Engineering Command Centre in Paris.

This inspection was the first CNI inspection to be completed by ONR and included a site inspection element at the HPC site.

ONR has now issued a press release detailing its findings, containing a link to the overarching summary report which can be found at:

<http://news.onr.org.uk/2018/03/themed-inspection-of-hinkley-point-c/>

ONR continues its engagement with the project via site visits and meetings at NNB GenCo (HPC) Ltd.'s office locations across the following themes:

- Design and Safety Case;
- Organisational Capability;
- Conventional Health and safety and fire safety; and
- Security

These inspections are providing ONR with valuable intelligence on the progress NNB GenCo (HPC) Ltd. is making to continue developing its competence and capability to manage the design, procurement and construction of Hinkley Point C.

3 NON-ROUTINE MATTERS

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

During the reporting period no significant non-routine matters were identified.

4 REGULATORY ACTIVITY

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'Licence Instruments', but can take other forms. In addition, inspectors may issue Enforcement Notices to secure improvements to safety.

On the 15 February ONR issued a Specification (Licence Instrument 510) under Licence Condition 19(1) specifying that the licensee shall not commence Receipt of First Major Nuclear Steam Supply System Shipment to Site, without the agreement of the ONR.

Table 1
Licence Instruments and Enforcement Notices Issued by ONR during this period

| Date | Type | Ref No | Description |
|----------|-----------------------------------|--|---|
| 15/02/18 | Licence Instrument: Specification | Nuclear Site Licence No: 97a Licence Instrument No: 510 | "...the licensee shall not commence Receipt of First Major Nuclear Steam Supply System Shipment to Site, without the agreement of the ONR." |

No Enforcement Notices were issued during the period of this report.

Reports detailing regulatory decisions taken at Hinkley point c can be found on the ONR website at <http://www.onr.org.uk/pars>

5 NEWS FROM ONR

In January, ONR received the results of its first external stakeholder survey which was undertaken by YouGov on behalf of ONR. A broad range of stakeholders were invited to participate in an online survey, with 351 responses received. In addition to the online survey, a number of in depth interviews were also completed with stakeholders. While overall the results demonstrate ONR is seen as a high performing organisation with good levels of stakeholder confidence, there are areas where improvements can be made and we will be working with our divisions on those in the coming months. Further details about the survey results can be found in our March 2018 newsletter, available on ONR's website.

In February, ONR held its first webinar following the publication of the 'Guide to enabling regulation in practice.' Chief Nuclear Inspector, Mark Foy and Deputy Chief Inspector, Mike Finnerty, were on hand to answer questions about the guide which has been designed to illustrate working examples of enabling regulation in practice. This is a new channel of communication for ONR and we'll be holding further webinars on different topics over the coming months. If you would like to join future webinars then please get in touch with the ONR Communications team via contact@onr.gov.uk

In March, ONR held the first of two meetings this year with representatives from across the NGO community. Held in Birmingham, the meeting was attended by 15 NGO representatives from eleven different organisations. Topics discussed included: Domestic Safeguards pending the withdrawal of the UK from Euratom; Emergency Planning Arrangements; and the ONR Stakeholder Survey results. The next meeting is scheduled to take place in October 2018. We are keen to increase the number of people engaging with ONR on nuclear safety and security issues and would like to invite members of SSGs and LLCs to join our engagement programme. For more details please get in touch via contact@onr.gov.uk

Insight into ONR's work as an independent regulator of the nuclear industry can be found on the ONR website news centre (<http://news.onr.org.uk>). For the latest news and updates from ONR visit the website and sign up for our e-bulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

CONTACTS

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
website: www.onr.org.uk
email: contact@onr.gov.uk

This document is issued by the Office for Nuclear Regulation (ONR). For further information about ONR, or to report inconsistencies or inaccuracies in this publication please visit <http://www.onr.org.uk/feedback.htm>.

© Office for Nuclear Regulation, 2018

If you wish to reuse this information visit www.onr.org.uk/copyright for details.

Published 01/18

For published documents, the electronic copy on the ONR website remains the most current publicly available version and copying or printing renders this document uncontrolled.