REGULATORY OBSERVATION REGULATOR TO COMPLETE		
Date sent:	17th April 2015	
Acknowledgement required by:	11th May 2015	
Agreement of Resolution Plan Required by:	15th May 2015	
Resolution of Regulatory Observation required by:	28th August 2015	
TRIM Ref.:	2015/142944	
Related RQ / RO No. and TRIM Ref. (if any):		
Observation title:	UK ABWR - Operational Experience (OPEX)	
Technical area(s) 1. Internal Hazards 2. Civil Engineering 3. External Hazards 4. PSA 5. Fault Studies 6. Control & Instrumentation 7. Electrical Power Supply 8. Fuel Design 9. Reactor Chemistry 10. Radiation Protection & (Level 3 PSA) 11. Mechanical Engineering 12. Structural Integrity 13. Human Factors 14. MoS & QA 15. Radwaste & Decommissioning 16. Conventional Safety & Decommissioning 17. Security 18. Severe Accident Analysis 19. Fire Safety 20. Project 21. Generic Environmental Permitting	Related technical area(s)	

Regulatory Observation

Summary

This regulatory observation is cross cutting across all ONR disciplines. It is being raised to ensure the Requesting Party's (RPs) safety case submission for the UK ABWR demonstrates adequate consideration to relevant operational experience.

Assessment Observation

It is ONR's judgement that to date the RP has not demonstrated sufficiently how it has considered and taken account of operational experience from BWR plants from around the world including Japan.

ONR acknowledges that the ABWR is an evolutionary design, incorporating a number of engineered features, which are considered improvements to earlier designs. In addition, the ABWR itself has been operational for a number of years.

As part of ONR GDA Step 3 ONR Inspectors plan to consider the two commissioned operational experience reports. The respective technical disciplines' Step 4 assessment plans will set out how each discipline plans to progress the topic.

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ONR considers this regulatory observation to be cross-cutting and of interest to all assessment disciplines.

To undertake a meaningful GDA, ONR wishes to:

- 1. baseline ONR's regulatory knowledge of all BWR and ABWR operational experience across the world;
- 2. provide the RP an opportunity to demonstrate the adequacy and robustness of its ABWR technology; and
- 3. understand how the RP has adequately considered operational experience to reduce risks So Far As Reasonably Practicable (SFAIRP).

Regulatory Expectations

The objective of this Regulatory Observation is for the RP to demonstrate that the UK ABWR considers relevant operational experience from around the world. This will be achieved by the existence of an audit trail.

The RP should generate an appropriate resolution plan which:

- a. defines and scopes the planned activities;
- b. includes a controlled programme identifying: planned activities; deliverables; milestones; timescales and resource requirements; and
- c. identifies progress updates to ONR through the planned GDA engagements.

Regulatory Observation Actions

Action RO-ABWR-0045.A1:

As part of GDA Step 3, the RP, adopting a similar approach to the two reports commissioned by ONR (issued under correspondence REG-HGNE-0079R), should initiate a review of operational experience of the Japanese BWR nuclear power plants.

Action RO-ABWR-0045.A2:

As part of GDA Step 3, the RP should generate and issue a summary/synopsis on how it intends to demonstrate that the UK ABWR design and safety case takes account of Japanese and relevant international operational experience.

Action RO-ABWR-0045.A3:

As part of Step 4, the RP should generate and issue a report that demonstrates how the UK ABWR safety case and design consider relevant operational experience from North America, Europe and Japan. It is expected that this review will:

- on a structure, system or component (SSC) basis, or by grouping of similar SSCs, identify generic themes and trends of relevant operational experience,
- explain any relevance to the UK ABWR; and

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explain how the UK ABWR submission takes account of the operational experience.		
Please note ONR does not expect an "event-by-event" treatment of operational experience.		
REQUESTING PARTY TO COMPLETE		
Actual Acknowledgement date:		
RP stated Resolution Plan agreement date:		