



ONR GUIDE			
GUIDANCE ON THE PURPOSE, SCOPE AND QUALITY OF A TRANSPORT SECURITY STATEMENT			
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1. PURPOSE AND SCOPE

- 1.1. This Technical Assessment Guide (TAG) contains guidance to advise and inform Security Inspectors in the Office for Nuclear Regulation in the exercise of their regulatory judgement. It aims to provide general advice and guidance to ONR staff on how to assess the adequacy of an approved carrier's Transport Security Statement (TSS) and the arrangements for their production (see paragraphs 6 to 10) and management. It does not set out how ONR regulates these arrangements, or provide examples of the detailed information that a TSS should contain.
- 1.2. The term 'approved carrier' mentioned throughout this guide is used to define limited companies subject to regulation, as defined in the Nuclear Industries Security Regulations (NISR) 2003 (References 1, 2 and 3).
- 1.3. As this guide will be used by ONR security inspectors to consider the adequacy of an approved carrier's TSS, it indicates to approved carriers and other stakeholders the standards that ONR expects. It is intended that this guide will influence what areas are covered in TSSs. The guide does not prescribe the detail or the depth that needs to be addressed; these remain the responsibility of the approved carrier and will be dependent upon the specifics of each TSS.
- 1.4. Appendixes 2 & 3 provide guidance on TSS content for a Class A and B carriers.

2. RELATIONSHIP TO RELEVANT LEGISLATION

- 2.1. Regulations 13 to 16 of the Nuclear Industry Security Regulations 2003 (as amended) (hereafter referred to as the Regulations) require carriers who wish to undertake the transport of Category I/II and III Nuclear Material (NM), as defined in Schedule 1 of the Regulations, to submit an application for approved Class A or B carrier status to the Secretary of State together with a TSS.

3. RELATIONSHIP TO LICENCE AND OTHER RELEVANT LEGISLATION

- 3.1. The amended Convention on the Physical Protection of Nuclear Material (CPPNM) is binding on the United Kingdom, and whilst the amended convention has been ratified by the UK, it is yet to come into force. Once in place it will also be binding on the UK. INFCIRC/225/Revision 5 sets out objectives for a states physical protection regime and these are:

- To protect against unauthorised removal of nuclear material.
- To locate and recover missing nuclear material.
- To protect against sabotage.
- To mitigate or minimize the effects of sabotage.

In the UK, these responsibilities may be summarised as follows:

- a. HMG provides the national policy, strategy, legislative arrangements and regulatory framework and establishes the regulatory body/competent authority;
- b. dutyholders have prime responsibility for nuclear security; and

- c. ONR, the established regulatory body, is responsible for independently assessing the dutyholders arrangements to ensure that they comply with nuclear security regulations and are effective.
- 3.2. For the purposes of this guidance the 'dutyholders' are approved carriers, the 'security plan' is the TSS, and the 'competent authority' is the ONR CNS Programme.
- 3.3. The IAEA document INFCIRC/225 Revision 5 (Reference 4) states at paragraph 6.6 that physical protection against unauthorised removal during transport should encompass, as far as reasonably practical in accordance with the graded approach, the following principles:
 - a. Minimising the time in transport.
 - b. Minimising the number and duration of transfers from one conveyance to another.
 - c. Protecting the material in transport and temporary storage commensurate with the category of material.
 - d. Avoiding the use of predictable movement schedules.
 - e. Requiring the predetermination of trustworthiness of individuals involved during transport of nuclear materials.
 - f. Limiting advance knowledge of transport information to the minimum number of persons necessary.
 - g. Implementing appropriate passive and/or active physical security measures appropriate to the design basis threat.
 - h. Using routes which avoid areas of natural disaster, civil disorder or with a known threat.
 - i. Ensuring the packages and/or conveyances are not left unattended for any longer than is absolutely necessary.
- 3.4. In addition to the above, consideration should also be given to protecting the movement against acts of sabotage.
- 3.5. The 'threat assessment/design basis threat' is detailed in the extant version of the Nuclear Industries Malicious Capabilities Planning Assumptions (NIMCA)¹ document (Reference 5)
- 3.6. The HMG Security Policy Framework (SPF) (Reference 7) is an objective setting framework that the whole of the civil nuclear industry will work to for the protection of Sensitive Nuclear Information (SNI) and the employment of appropriate personnel security controls on and off nuclear premises. It is supplemented by two ONR publications, the Civil Nuclear Information Security Standard and the Civil Nuclear Personnel Security Standard.
- 3.7. The NISR 2003 Classification Policy (Reference 8) indicates those categories of SNI that require protection and the level of protective marking to be applied.

¹ Only available to Class A carriers

4. ADVICE TO INSPECTORS

- 4.1. The judgement of ONR Security Inspectors is required in deciding whether to approve a TSS. An administrative process for this is included in the ONR How2 management system. However, the key features detailed at Section 6 below should be found in all TSSs.
- 4.2. It should be remembered that the approved TSS will form the basis for compliance inspection activities by ONR Security Inspectors.

5. TRANSPORT SECURITY STATEMENT

- 5.1. For ONR security regulatory purposes, a TSS should align with the appropriate Appendix to this document and include the key features below.

6. KEY FEATURES OF A TRANSPORT SECURITY STATEMENT

- 6.1. A good TSS should include nine key features, which are summarised below. Subsequent sections of this guide translate these key features into more specific points. The TSS should be:

Complete – It should be evident from the TSS that the dutyholder has followed the Model Format and has provided as much detail as necessary without ‘padding’ the document. The over-arching principles of the model format should be clearly defined and the dutyholder should have contingency plans in place that recognise potential threats to the security of a move and has adequate protection in place to counter theft or sabotage.

Clear - The TSS should be a clear statement as to the security processes and procedures that need to be followed and complied with to prevent or mitigate any unauthorised removal or sabotage of NM or compromise of SNI. It needs to be readily accessible as well as understandable. It should be possible to read through the document in a logical and coherent manner in order to understand the approved carrier intentions. Clarity needs to extend to the correct referencing of supporting information. It is important that the basis for the information portrayed in the TSS is evident to all users, including the Regulator.

Rational - The TSS should be reasonable and sensible. It should provide cogent, cohesive and logical processes and procedures that support the operational act of moving NM. This includes the arguments in support of claims that risks have been reduced so far as is reasonably practicable.

Accurate - The TSS should accurately reflect the 'as is' state of the, equipment, processes and procedures.

Appropriate – The TSS should be fit for purpose and having aligned itself in principle to the model format, not include any superfluous content.

Current - The TSS must be reviewed, revised and updated to ensure it remains current, concise and relevant. The content of a TSS may change if the approved carrier changes their business model or elects to bid for business that necessitates their becoming a Category A approved carrier.

Forward looking - The TSS should demonstrate that the dutyholder has considered the TSS throughout a defined lifetime.

7. STRUCTURE AND APPLICATION OF THE TRANSPORT SECURITY STATEMENT

- 7.1. The dutyholder should produce a TSS based on transport specific considerations, which includes all relevant information necessary to show security arrangements are adequate. They should provide evidence that their processes and procedures are as secure as is reasonably practicable. The application of the requirements identified in the TSS should result in:
- a. an effective and proportionate statement;
 - b. a clear specification for the purpose, standards and expectations of each element in the TSS;
 - c. identified ways to monitor and test the security statement to ensure each element functions to the required specification or standard;
 - d. the production of operating and maintenance instructions, including contingency plans, to sustain the integrity of the security statement;
 - e. clearly defined training requirements, and the qualifications needed for specific roles and posts identified within the TSS; and
 - f. an effective system of review to ensure any significant issue that arises is considered promptly to allow for continuous improvement of security statement.

8. CONTENT OF A TRANSPORT SECURITY STATEMENT

- 8.1. A TSS is intended to demonstrate that the approved carrier has taken into account all relevant issues when planning the security of their planned movements. It should identify key protective security assets, the capability and resilience of security equipment, the competence of those specifying, installing, operating and maintaining the security system, and of those providing a response to any relevant malicious capabilities given in the NIMCA document². The contents of a TSS are detailed further in Appendices 2 & 3 and should typically include:
- a. Full company details including contact details for senior managers with responsibility for implementing policy.
 - b. Full contact details for the security point of contact, their nominated deputy and responsible persons at any other site involved in the transport of NM.
 - c. Company practices and management responsibilities for security procedures.
 - d. Company practices and management responsibilities for security training. Details of the training to be given to persons with direct responsibility for the security of NM (drivers and ship's crew, security staff etc.). Annual refresher training should be given and a record kept of attendance.
 - e. Audit of all policies and procedures within the TSS.
 - f. Acknowledgement that ONR may audit all aspects of the TSS and any supporting documents or records.

² Class A carriers

- g. How SPF requirements will be met for security clearance of any personnel under the control of the company who may need unescorted access to NM containers, including drivers, security staff and, where required, appropriate planning and administration staff.
- h. How the company ensures that all staff hold the relevant security clearance prior to commencing work involving NM or protectively marked information.
- i. How persons who have either no clearance or whose security clearance status is unclear are prevented from having unescorted access to NM, information relating to the transport of NM or a loaded vehicle.
- j. How the company achieves the mandatory outcomes of the SPF. This can take the form of a copy of the company information security policy.
- k. How the 'need-to-know' principle will be implemented.
- l. Details of load carriers or vessels used including key control. For all vehicles details are to include security systems used such as alarms, immobilisers etc.
- m. Tracking or monitoring the status and position of the load carrier or vessel including the method and type of tracking equipment and operation of the control station.
- n. Contingency plans for response to incidents while NM is in storage or in transit.
- o. Testing and checking of security equipment on a regular basis.
- p. General arrangements for the transport of NM including:
 - the selection and scheduling of routes.
 - searching of load carriers, prior to commencing a movement and following a stop;
 - use of rest stops and overnight stops;
 - the production of TptSPs; and,
 - the production and communication of Notifications.
- q. Handover/takeover of security responsibility.
- r. Where appropriate, details of procedures to ensure security at transshipment points, such as railheads or ports.
- s. Security instructions. Who is responsible for preparing security instructions and briefings for staff with direct responsibility for protecting NM and how are these promulgated and revised?
- t. Requirements and procedures for the reporting of security incidents during transit.

9. OWNERSHIP, MANAGEMENT AND MAINTENANCE OF TRANSPORT SECURITY STATEMENTS

- 9.1. The approved carrier is legally responsible for the production of a TSS. However, others such as those employees of the approved carrier who have direct responsibility for delivering security should also have 'ownership' of it. This means having an understanding of the TSS, and the limits and conditions derived from it.

10. PRODUCTION, REVISION AND REVIEW OF TRANSPORT SECURITY STATEMENTS

- 10.1. The responsibilities for production, revision, and review of TSSs and overall document control should be clearly defined and detailed in the TSS, as part of compliance arrangements. Suitably qualified and experienced people should discharge these responsibilities. Where the approved carrier itself does not develop all aspects of the TSS and uses contractors for this purpose, at all times the approved carrier must possess (in-house) the technical capability to understand all aspects of the TSS.
- 10.2. It is important that a TSS is kept up to date and periodic reviews of the TSS are undertaken (the frequency of which should be determined by the approved carrier). Significant changes may occur during operations such as modification, incidents, revised lifetime plans, etc. Such changes should be recorded and taken forward as necessary in an updated TSS, which accurately reflects the current situation.
- 10.3. Documentation which no longer forms part of a current TSS, or which has been superseded, should be identified and archived. This information still forms part of the formal historical record, and should remain available for internal reference by the approved carrier and ONR.

11. PEER REVIEW, ASSURANCE AND GOVERNANCE

- 11.1. As part of the production process, a TSS should undergo an internal peer review and be subject to an assurance and governance process by suitably qualified security and operational staff. As part of the approval process for a TSS it is important to ensure that:
- a. where considered necessary, there has been independent verification or advice provided by suitably qualified and experienced staff;
 - b. where there has been other third party involvement there is evidence of their competence to undertake their work and evidence that where they have raised challenges these have addressed and the TSS improved accordingly;
 - c. any evidence available from the approved carrier's internal audit function should confirm that the TSS has been produced in compliance with relevant company procedures for the production of security plans; and
 - d. all key security assumptions are valid and the board member (or equivalent) for security has been briefed on all aspects of the statement and has endorsed the approach used for its production.

12. SUBMISSION OF A TRANSPORT SECURITY STATEMENT

- 12.1. Once completed, approved carriers are expected to submit a TSS to ONR for approval in accordance with NISR 2003. The TSS should justify the processes required to achieve the relevant security objectives in the NORMS document, or explain why another approach is justified. The TSS should describe those measures.

13. ALTERNATIVE ARRANGEMENTS TO MODEL SECURITY STANDARDS

- 13.1. The onus is on the approved carrier to justify any alternative arrangements from the model security standards given in the NORMS document, to achieve the required security objective(s), by producing a proposal for consideration and assessment by ONR. The content and scope of the proposal, and the impact on the TSS will depend on the extent to which an approved carrier is proposing to deviate from the model security standards for protecting NM from theft or sabotage. The TSS should detail the approved carrier's claims for the security regime they propose putting/having in place. It should also provide supporting information to justify how any alternative security measure(s) in the TSS meets the security objectives, together with any further evidence necessary to support their case. As mentioned previously, irrespective of the size or scope of the proposal, it will need to be complete, clear, rational, accurate, objective, appropriate, current and forward-looking.

14. SECURITY CULTURE

- 14.1. The TSS should be used as a vehicle to improve security culture and enable staff to be made aware (via provision of appropriate training) of the security significance of the TSS.

15. REFERENCES

1. **Nuclear Industries Security Regulations 2003.** Statutory Instrument 2003 No. 403
2. **Nuclear Industries Security (Amendment) Regulations 2006.** Statutory Instrument 2006 No. 2815
3. **Nuclear Industries Security (Amendment) Regulations 2013** Statutory Instrument 2012 No. 190
4. **IAEA Nuclear Security Series No. 13.** Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities (**INFCIRC/225/Revision 5**). January 2011. www-pub.iaea.org/MTCD/Publications/PDF/Pub1481_web.pdf.
5. **Nuclear Industries Malicious Capabilities Planning Assumptions.** (2012 edition)
6. **National Objectives, Requirements and Model Standards.** April 2014
7. **HMG Security Policy Framework.** .
8. **NISR 2003 Classification Policy** April 2014

16. GLOSSARY AND ABBREVIATIONS

CNISS	Civil Nuclear Information Security Standard
CNS	Civil Nuclear Security
CPNI	Centre for the Protection of National Infrastructure
CPPNM	Convention on the Physical Protection of Nuclear Material
HMG	Her Majesties Government
HSV	High Security Vehicle
NIMCA	Nuclear Industries Malicious Capabilities Planning Assumptions
NISR	Nuclear Industries Security Regulations
NM	Nuclear Material
NORMS	National Objectives, Requirements and Model Standards
ONR	Office for Nuclear Regulation
SNI	Sensitive Nuclear Information
SPF	Security Policy Framework
SyPI	Security Performance Indicator
TAG	Technical Assessment Guide
TptSP	Transport Security Plan
TSS	Transport Security Statement

17. APPENDIX 1: EXTRACT OF REGULATIONS FROM NISR 2003

A definition from Regulation 13(1) and Regulations 14(1) and 14(2) and 16(1-7), 7 and 8 are reproduced below.

Requirement for Category I/II nuclear material and Category III nuclear material to be transported by Duty Holders

- 13.— (1) No person shall transport any Category I/II nuclear material unless—
- (a) he is a carrier who is for the time being approved by the Secretary of State as a Class A carrier to transport Category I/II nuclear material and Category III nuclear material, or
 - (b) he is doing so as an officer or employee of such a carrier.
- (2) No person shall transport any Category III nuclear material unless—
- (a) he is a carrier who is for the time being approved by the Secretary of State as a Class A carrier to transport Category I/II nuclear material and Category III nuclear material,
 - (b) he is a carrier who is for the time being approved by the Secretary of State as a Class B carrier to transport Category III nuclear material, or
 - (c) he is doing so as an officer or employee of a carrier falling within sub-paragraphs (a) or (b).
- (3) If the responsible person in relation to any nuclear premises arranges for the transport of any Category I/II nuclear material or Category III nuclear material to or from the premises, he must ensure that the transport is undertaken by a carrier who is not prohibited under this regulation from transporting the material in question.

Approval of carriers

- 14.— (1) The Secretary of State may approve a carrier as an approved carrier only if she is satisfied that—
- (a) in the case of an approval as a Class A carrier, the carrier transports or proposes to transport Category I/II nuclear material in the course of his business,
 - (b) in the case of an approval as a Class B carrier, the carrier transports or proposes to transport Category III nuclear material in the course of his business,
 - (c) the carrier has provided the Secretary of State with—
 - (i) his telephone number, facsimile number and principal place of business,
 - (ii) the name, address, telephone number and facsimile number of an individual who will accept any written or oral communication from the Secretary of State under these Regulations on behalf of the carrier, and
 - (d) the carrier has submitted a transport security statement under regulation 16 that the Secretary of State has approved (as submitted or with such amendments as she has required), and he will comply with the standards, procedures and arrangements described in the approved transport security statement while he is approved.
- (2) Where a carrier has applied to the Secretary of State for approval as an approved carrier, she must give him notice in writing of her decision and, if she has granted the

application, of the date from which he is approved and whether he is approved as a Class A carrier or as a Class B carrier.

- (3) If the Secretary of State proposes not to approve a carrier as an approved carrier, she must give him written notice of her proposal and of the reasons for it.
- (4) The carrier may make representations to the Secretary of State within 28 days from the date on which the notice under paragraph (3) is given.
- (5) The Secretary of State must take into account any such representations before reaching a decision whether to approve the carrier as an approved carrier.
- (6) If the Secretary of State decides not to approve a carrier as an approved carrier, she must state the reasons for her decision when she gives him notice of the decision under paragraph (2).
- (7) The Secretary of State's approval of a carrier as an approved carrier has effect for the period of five years from the date from which he is approved, unless it is revoked earlier under regulation 15.

Revocation of approval of carriers

15.— (1) The Secretary of State may revoke the approval of an approved carrier if he has requested that his approval be revoked or on any of the following grounds—

- (a) that—
 - (i) in the case of a Class A carrier, he has ceased to carry on a business as a carrier of Category I/II nuclear material, or
 - (ii) in the case of a Class B carrier, he has ceased to carry on a business as a carrier of Category III nuclear material;
 - (b) that he has failed to comply with any obligation imposed on him under these Regulations;
 - (c) that he has supplied false or misleading information in his application for approval as an approved carrier or has failed to supply information that was material to the application; or
 - (d) that the Secretary of State is of the view that the approval should be revoked in the interests of ensuring the security of the Category I/II nuclear material or Category III nuclear material that the approved carrier might otherwise transport.
- (2) If the Secretary of State proposes to revoke the approval of an approved carrier otherwise than pursuant to a request from him, she must give him written notice of her proposal and of the reasons for it.
 - (3) The approved carrier may make representations to the Secretary of State within 28 days from the date on which the notice under paragraph (2) is given.
 - (4) The Secretary of State must take into account any such representations before reaching a decision whether to revoke the approved carrier's approval.
 - (5) If the Secretary of State decides to revoke the approval of an approved carrier, she must give him written notice of her decision and of the reasons for it.

Transport security statements

- 16.— (1) A carrier applying for approval as a Class A carrier or Class B carrier under regulation 14 must submit with his application a transport security statement for approval by the Secretary of State.
- (2) The transport security statement must describe in writing the standards, procedures and arrangements adopted or to be adopted by the carrier to ensure the security of—
- (a) in the case of a carrier applying for approval as a Class A carrier, any Category I/II nuclear material or Category III nuclear material transported or to be transported by him,
 - (b) in the case of a carrier applying for approval as a Class B carrier, any Category III nuclear material transported or to be transported by him, and
 - (c) in any case, any information which is or comes within his possession or control relating to the security of any nuclear premises or of any Category I/II nuclear material or Category III nuclear material transported or to be transported by him.
- (3) In particular, but without prejudice to the generality of paragraph (2), the statement must describe the standards, procedures and arrangements relating to—
- (a) the investigation and assessment by the Secretary of State of the suitability of relevant personnel of the carrier with a view to ensuring the security of—
 - (i) any Category I/II nuclear material or Category III nuclear material transported or to be transported by the carrier,
 - (ii) any information falling within paragraph (2)(c), and
 - (iii) any nuclear premises to or from which the carrier transports or is to transport any Category I/II nuclear material or Category III nuclear material, and any premises used or to be used for the purpose of the temporary storage of such material during the course of or incidental to its transport,
 - (b) the temporary storage of Category I/II nuclear material or Category III nuclear material during the course of or incidental to its transport, including the security of premises used for such storage, and
 - (c) the steps to be taken by the carrier or any person acting on his behalf if any event of a kind specified in regulation 18(5)(a), (b), (c), (f) or (i) that requires immediate action occurs, and the regular practice of the activities required in connection with those steps.
- (4) The Secretary of State may approve the statement as submitted or with such amendments as she may require.
- (5) An approved carrier may at any time submit to the Secretary of State for approval—
- (a) a fresh transport security statement, or
 - (b) proposals for amending his approved transport security statement.
- (6) The Secretary of State may approve the fresh statement or proposals as submitted or with such amendments as she may require.
- (7) On approving a fresh transport security statement for an approved carrier, the Secretary of State may revoke the approval of the former statement for the approved carrier.

Duties of Duty Holders: general

- 17.— (1) An approved carrier must comply with the standards, procedures and arrangements described in his approved transport security statement.
- (2) An approved carrier must notify the Secretary of State of any change to the information referred to in regulation 14(1)(c)—
- (a) in the case of information referred to in regulation 14(1)(c)(i), within 7 days of the change occurring, and
- (b) in the case of information referred to in regulation 14(1)(c)(ii), no later than the change occurs.
- (3) An approved carrier must ensure that each of his relevant personnel who—
- (a) is specified in his approved transport security statement as requiring investigation and assessment as mentioned in regulation 16(3)(a), or
- (b) falls within a description of persons who are so specified,
- is a person who has been approved by the Secretary of State as being of suitable character and integrity, having regard to the need to ensure the security of the material, information and premises mentioned in regulation 16(3)(a).

Reports by carriers

- 18.— (1) An approved carrier must report to the Secretary of State any event or matter of a kind specified in paragraph (5) as soon as practicable and in any event within 24 hours of its becoming known to him.
- (2) If it is not reasonably practicable for him to make a written report within that period, he must make the report orally and confirm it in writing within 48 hours of the event or matter becoming known to him.
- (3) In any other case the report must be made in writing.
- (4) The report must specify the nature of the matter or event and, in the case of an event, the date and time it occurred and the apparent reason for it.
- (5) The events and matters are—
- (a) any unauthorised incursion on to, interference with, or other incident affecting the security of any means of conveyance of Category I/II nuclear material or Category III nuclear material during the course of its transport or any attempted or suspected such incursion, interference or incident;
- (b) any unauthorised incursion on to premises where Category I/II nuclear material or Category III nuclear material is being stored temporarily during the course of or incidental to its transport or any attempted or suspected such incursion;
- (c) any incident occurring during the transport of Category I/II nuclear material or Category III nuclear material, or on premises where such material is being stored temporarily during the course of or incidental to its transport, involving an explosive or incendiary device or suspected such device, or a firearm or replica firearm;
- (d) any damage to the means of conveyance of Category I/II nuclear material or Category III nuclear material which might affect the security of that material;

- (e) any damage to any building or equipment on premises where Category I/II nuclear material or Category III nuclear material is being stored temporarily during the course of or incidental to its transport which might affect the security of the material;
- (f) any theft or attempted theft, or any loss or suspected loss, or any unauthorised movement of, or any interference with, Category I/II nuclear material or Category III nuclear material during transport;
- (g) any theft or attempted theft, or any loss or unauthorised disclosure, of information falling within regulation 16(2)(c), or any suspected such theft, loss or disclosure;
- (h) any unauthorised access to any such information or any attempt to gain such access;
- (i) any threat to do anything which would fall within any of sub-paragraphs (a) to (h);
- (j) any failure to comply with any of the standards, procedures and arrangements described in the approved carrier's approved transport security statement or the measures described in any approved transport plan required under regulation 19;
- (k) any other event or matter which might affect the security of—
 - (i) Category I/II nuclear material or Category III nuclear material being transported,
 - (ii) premises where Category I/II nuclear material or Category III nuclear material is being stored temporarily during the course of or incidental to its transport, or
 - (iii) any information falling within regulation 16(2)(c).

Duties relating to particular transports of Category I/II nuclear material

- 19.— (1) No Class A carrier shall transport any Category I/II nuclear material unless a transport plan relating to the particular transport by him has been approved by the Secretary of State.
- (2) No less than one month before the proposed date on which the transport of any Category I/II nuclear material is to begin (whether or not the transport is to be undertaken in stages by more than one carrier), each Class A carrier who is to transport the material must submit a transport plan relating to the transport by him for the approval of the Secretary of State.
 - (3) The transport plan must describe in writing the measures to be adopted to ensure the security of the material during—
 - (a) the course of the transport,
 - (b) the loading or unloading of the material during the course of or incidental to the transport, and
 - (c) any period of temporary storage during the course of or incidental to the transport.
 - (4) The Secretary of State may approve the transport plan as submitted or with such amendments as she may require.
 - (5) Before approving such a plan the Secretary of State must—
 - (a) consult the responsible person in relation to any nuclear premises to or from which the material is to be transported and any other Class A carrier who is to undertake another stage of the transport of the material, and

- (b) consider any representations made by them.
- (6) Each Class A carrier must ensure that any particular transport of Category I/II nuclear material by him conforms to the transport plan approved by the Secretary of State in relation to that transport.
- (7) No less than 7 days before the proposed date on which any Class A carrier is to begin transporting any Category I/II nuclear material, he must give notice in writing to the Secretary of State of the dates on which the transport by him is to begin and end.

Duties relating to particular transports of Category III nuclear material

- 20.—(1) Subject to paragraph (3), no less than 7 days before the proposed date on which any approved carrier is to begin transporting any Category III nuclear material, he must give notice in writing to the Secretary of State of the matters specified in paragraph (2) in relation to the transport by him.
- (2) The matters are—
- (a) the dates on which the transport is to begin and end,
 - (b) the places from which and to which the material is to be transported,
 - (c) the identity of the persons from whom and to whom the material is to be transferred,
 - (d) where all or any part of the transport is to take place outside the United Kingdom, the route of the transport,
 - (e) any places at which the material is to stop temporarily, and
 - (f) where the material is to be transported otherwise than in a closed and locked vehicle, railway compartment or shipping compartment, details of the container to be used to transport the material.
- (3) In exceptional circumstances notice under paragraph (1) may be given less than 7 days before the proposed date on which the approved carrier is to begin transporting the material, but a notice that is so given must specify what the exceptional circumstances are.
- (4) Where an approved carrier gives notice as mentioned in paragraph (3), he must obtain approval from the Secretary of State for the transport of the material by him before he begins transporting it.
- (5) This regulation does not apply to a carrier who transports a vehicle carrying nuclear material on his ship if the driver of the vehicle drives it on and off the ship and remains on the ship during the ship's journey.

Directions to carriers

- 21.—(1) An approved carrier must comply with any direction given by the Secretary of State for the purpose specified in section 77(1) of the 2001 Act relating to his business as a carrier of Category I/II nuclear material or Category III nuclear material and requiring the approved carrier—
- (a) not to begin a particular proposed transport,
 - (b) to adopt or implement standards, procedures or arrangements specified in the direction and to secure that his officers, employees, contractors and consultants comply with them,

- (c) to submit a fresh transport security statement or amendments of his approved transport security statement,
 - (d) to satisfy the Secretary of State about the continuing or future adequacy of his approved transport security statement, or that he is complying with it,
 - (e) to record or investigate in such manner as is specified in the direction—
 - (i) any event or matter of a kind specified in regulation 18(5), or
 - (ii) any such other event or matter as is specified in the direction,or to report, in such manner as is specified in the direction, to the Secretary of State, or such other person as is so specified, any such other event or matter as is so specified, or
 - (f) to take such steps as the Secretary of State considers necessary to remedy or alleviate the consequences of any contravention of these Regulations.
- (2) Such a direction may impose a requirement to be met—
- (a) within a period specified in the direction, or
 - (b) in the case of a direction under paragraph (1)(d), periodically at such intervals as are specified in the direction.

18. APPENDIX 2: EXAMPLE OF THE TYPE OF INFORMATION FOR INCLUSION IN THE TRANSPORT SECURITY STATEMENT

Introduction

1. This non-protectively marked Appendix provides an example of the type of information that should be included in the TSS. The aim of this appendix is to assist in ensuring that a consistent approach is maintained across the assessment regime. It is also to provide a readily accessible indication, at a non-protectively marked level, of examples of those areas that should be covered within a TSS. It should be noted that in NORMS the model format content below attracts a PM of OFFICIAL-SENSITIVE however in isolation; it would at most attract a marking of OFFICIAL.

2. The onus always lies with the approved carrier to explain, demonstrate and, where appropriate, provide evidence, that the security arrangements detailed in the TSS the result of a detailed analysis of the threat and how the threat can best be mitigated. The typical content set out below should not be considered exhaustive as each TSS will be different and there could be other factors to consider. The details will need to be tailored to the nature of the Category of the NM carried. However, as a minimum you would expect to see included in a TSS:

1 MODEL FORMAT FOR TRANSPORT SECURITY STATEMENT FOR CLASS B CARRIER

1.1 Company Details

- The name, address, telephone, facsimile and e-mail details of the senior officers of the company with overall responsibility for the implementation of policy, e.g. the Chief Executive.
- The name, address, telephone, facsimile and e-mail details for the security point of contact, their nominated deputy and responsible persons at any other site involved in the transport of NM.

1.2 Company Security Policy

- Information on company practices and management responsibilities for security procedures. This can take the form of copies of company security policy statements and security instructions.
- Information on company practices and management responsibilities for security training. This should include an outline of the training to be given to persons with direct responsibility for the security of NM (drivers and ship's crew, security staff etc.). In particular, security staff should be clear as to their legal powers, use of byelaws and action to be taken for threats, incidents and security alerts. Confirmation is to be included that refresher training is given at least annually and that records are kept of attendance.
- The audit regime implemented by the company to ensure that all policies and procedures within the TSS are being adhered to.
- An acknowledgement that ONR may audit all aspects of the TSS.

1.3 Personnel Security

- Show how the requirements of the SPF will be met for security clearance of any personnel under the control of the company who may need unescorted access to NM containers, including drivers, security staff and, where required, appropriate planning and administration staff.
- Detail how the company ensures that all staff hold the relevant security clearance prior to commencing work involving NM or SNI.

- Details should also be given of the procedures in place to ensure that persons who have either no clearance or whose security clearance status is unclear do not have unescorted access to NM, information relating to the transport of NM or a loaded vehicle.

1.4 Information Security

- Information concerning Category III nuclear operations is required to be handled, stored, transmitted and disposed of under special precautions. This section should show how the company proposes to achieve the requirements of the SPF. This can take the form of a copy of the company information security policy.
- All information relating to movements of NM is to be handled, stored, transmitted and destroyed by the fewest practicable number of people using the 'need-to-know' principle. Details of how this is put into practice are to be included.

1.5 Security of Nuclear Material

- Details of load carriers or vessels used. For closed, locked vehicles, details of locks and how keys are controlled during transport and when not in use. For all vehicles details are to include security systems used such as alarms, immobilisers etc.
- Details of arrangements for tracking or monitoring the status and position of the load carrier or vessel including the method and type of tracking equipment and operation of the control station. This is to be in accordance with Annex B.
- Contingency plans for response to incidents while NM is in storage or in transit. This is to detail the reporting arrangements, to whom reports are to be made and what events are covered.
- Arrangements for testing and checking that security equipment is operational and fit for purpose on a regular basis. This is to include the checking/testing of tracking systems, mobile phones, alarms, immobilisers, locks, CCTV and any other equipment, the failure of which may be detrimental to the security of NM in transit.
- The general arrangements for the transport of NM including:
 - the selection and scheduling of routes. If a carrier only transports NM on a small number of routes between fixed locations, those routes should be detailed;
 - the searching of load carriers, prior to commencing a movement and following a stop;
 - use of rest stops and overnight stops;
 - the production of TptSPs; and,
 - the production and communication of Notifications.
- Handover/takeover of security responsibility. Details of the arrangements and/or procedures for confirming that material has been handed/taken over, including, the determination of authorised persons and the use of documentation.
- Where appropriate, details of procedures to ensure security at transshipment points, such as railheads or ports.
- Security instructions. Who is responsible for preparing security instructions and briefings for staff with direct responsibility for protecting NM and how are these promulgated and revised? Information relating to or a copy of, the security instructions is to be included.
- Requirements and procedures for the reporting of security incidents during transit. This is to detail how and to whom reports are made and must be in accordance with Regulation 18 of the Nuclear Industries Security Regulations.

19. APPENDIX 3: ADDITIONAL GUIDANCE FOR CLASS A CARRIERS

This appendix provides further information applicable to a Class A carrier over and above that detailed in Annex A to Part Four, Chapter 1 of NORMS.

1.1 Company details

To manage security issues within the company it will be necessary to nominate two individuals; a Security Controller to be responsible for all day to day aspects and a Board Level Contact who accepts responsibility for security on behalf of the company and to whom the Security Controller will report. In all except very large companies the Security Controller's task is unlikely to be a full-time one and in smaller companies the roles of the Board Level Contact and the Security Controller are frequently combined. Personnel filling either of these positions are to hold security clearance at a minimum of SC level.

1.2 Information Security

Information concerning Category I & II NM movements, which merit a protective marking of SECRET, is required to be handled, stored, transmitted and disposed of under special precautions, according to the SPF. This section is to show how the company proposes to achieve these requirements. This can take the form of a copy of the company information security policy.

Furthermore, all information relating to movements of Category I & II NM is to be handled, stored, transmitted and destroyed by the fewest practicable number of authorised personnel using the 'need-to-know' principle. Details of how this is put into practice are to be included.

1.3 Security of NM

The majority of the required information relating to the security of Category I and II NM in transit will be included in the appropriate TptSP (model formats for which are at Annex C to Chapter 1); therefore, it will not be necessary to provide full details within the TSS. Those aspects that will be dealt with in detail within the TptSP are to be noted within the TSS; this section, regarding the security of NM, is to detail generic, background and other information that may not appear within the TptSP. Notwithstanding the foregoing, carrier's TSSs are to include full details of the following:

- Management and other procedures to ensure that unescorted access to NM will be restricted to authorised persons with the appropriate security clearance.
- Details (title, address, operating company) for any overnight stopping places and transshipment facilities it is intended to use and security plans for these, where appropriate.
- Details of HSVs, vessels, road and rail load carriers. For closed, locked vehicles, details of locks and how keys are controlled during transport and when not in use. Security information relating to HSV design, construction, security systems and devices should be marked SECRET. Security information relating to other Category II load carriers should be marked OFFICIAL-SENSITIVE.
- Details of arrangements for tracking or monitoring the status and position of the load carrier or vessel, including the type of tracking equipment and operation of control station.
- An outline of training to be given to persons with direct responsibility for the security of NM (drivers, ship's crew, security guards etc). In particular, security guards should be clear as to their legal powers, use of byelaws and action to be taken for threats, incidents and security alerts.