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| ONR GUIDE  |   |  |             |
| <b>LC 6 Documents, records, authorities and certificates</b> |   |  |             |
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## **1 INTRODUCTION**

- 1.1 Many of the licence conditions attached to the standard nuclear site licence require, or imply, that Duty-holders should make arrangements to comply with regulatory obligations under the conditions. ONR inspects compliance with licence conditions, and also with the arrangements made under them, to judge the suitability of the arrangements made and the adequacy of their implementation. Most of the standard licence conditions are goal-setting, and do not prescribe in detail what the Duty-holders' arrangements should contain; this is the responsibility of the duty-holder who remains responsible for safety. To support inspectors undertaking compliance inspection, ONR produces a suite of guides to assist inspectors to make regulatory judgements and decisions in relation to the adequacy of compliance, and the safety of activities on the site. This inspection guide is one of the suite of documents provided by ONR for this purpose.

## **2 PURPOSE AND SCOPE**

- 2.1 The purpose of this guidance is to facilitate a consistent approach to LC 6 compliance inspection and to provide assistance to inspectors carrying out their duties in this area. The guidance provides a framework for these inspection activities and should not be regarded as either exhaustive or mandatory.
- 2.2 The guidance is for use by all Nuclear Inspectors in ONR. It does not indicate when or to what extent LC 6 inspections should be carried out as these matters are covered in individual facility inspection plans.
- 2.3 Inspectors may also take account of relevant requirements in The Nuclear Safeguards (EU Exit) Regulations 2019 (NSR19) and the associated ONR Guidance for Nuclear Material Accountancy, Control and Safeguards (ONMACS). Guidance on the safeguards-relevant aspects of LC 6 inspection is provided in the Safeguards Appendix of this document.
- 2.4 The guidance provided is split into three main elements:
- 1) Purpose of the Licence Condition.
  - 2) Guidance on the arrangements for LC 6.
  - 3) Guidance on inspection of arrangements for LC 6 and their implementation.

## **3 LICENCE CONDITION 6: DOCUMENTS, RECORDS, AUTHORITIES AND CERTIFICATES**

6 (1). The licensee shall make adequate records to demonstrate compliance with any of the conditions attached to this licence.

6 (2). Without prejudice to any other requirements of the conditions attached to licence the licensee shall make and implement adequate arrangements to ensure that every document required, every record made, every authority, consent or approval granted and every direction or certificate issued in pursuance of the conditions attached to this licence is preserved for 30 years or such other periods as ONR may approve.

6 (3). The licensee shall submit to ONR for approval such part or parts of the aforesaid arrangements as ONR may specify.

6 (4). The licensee shall ensure that once approved no alteration or amendment is made to the approved arrangements unless ONR has approved such alteration or amendment.

6 (5). The licensee shall furnish to ONR copies of any such document, record, authority or certificate as ONR may specify.

It should be noted that LC 5 (3) additionally requires that, for nuclear matter “.stolen, lost, jettisoned or abandoned”, the record be preserved for a period of 50 years from the date of the theft, loss, jettisoning or abandoning.

#### **4 PURPOSE OF LICENCE CONDITION 6**

4.1 Compliance with this condition ensures that the Duty-holder makes and holds adequate records for a suitable period to demonstrate historical compliance with licence conditions, thus ensuring:

- That an up to date record of the issue, change or withdrawal of licence instruments is available at all times,
- that safety documentation is available at all times,
- that design and construction information is available throughout the life cycle of the plant,
- that operational records are available, for instance, to assist investigations in the event of an accident or incident, or for ascertaining details of historic operations when considering changes to the use of a facility,
- operational records are available for the statutory number of years after cessation of operations for the purpose of assisting any claims for damage to health as a result of exposure to ionising radiation (see LC 25).

#### **5 GUIDANCE ON ARRANGEMENTS FOR LC 6**

5.1 The requirement for adequate records is a general one covering every licence condition. The ONR Inspector will in the course of inspections against the other licence conditions check records relevant to those licence conditions. Therefore, the guidance set out in this document should be considered when carrying out other such inspections.

5.2 The record arrangements should be documented within the Duty-holder's management system, and clearly stated in the site licence compliance arrangements (which address the requirements of each of the licence conditions). The arrangements should be readily available and remain current, be authorised by an appropriate senior manager and be controlled under the quality management system to comply with the requirements of LC17.

5.3 It is likely that the Duty-holder's procedure(s) setting out these arrangements will also address the requirements for LC 25, 'Operational records': the guidance set out in NS-INSP-GD-025 is therefore pertinent and should be referred to when carrying out inspections of LC 6 arrangements.

5.4 The arrangements for LC 6 should:

- Identify the records required to demonstrate compliance with licence conditions.
- The specific records detailed in LC 6 (2) (consents, approvals, etc., see above).

- The administrative arrangements for their ownership, collection, storage, storage medium, retrieval, maintenance, retention periods, and disposal.

5.5 This may be achieved by producing a schedule of records. The schedule should detail the type of records to be kept along with their retention periods.

5.6 Further general guidance on managing records is given in NS-TAST-GD-033, 'Licensee management of records'.

## **6 GUIDANCE ON INSPECTION OF ARRANGEMENTS AND THEIR IMPLEMENTATION**

6.1 Guidance on the inspection of the arrangements and their implementation for operational records is covered in NS-INSP-GD-025. This document provides additional guidance on the inspection of the arrangements for other records required by the site licence conditions. Further guidance on retention; storage and archive arrangements is given in NS-TAST-GD-033, 'Licensee management of records'.

6.2 Check that the arrangements allow for ONR's approval under LC 6 (3).

6.3 Check that the types of records required for demonstrating compliance with the site licence conditions are identified. The record schedule should be subject to routine review by the Duty-holder to ensure its on-going suitability (see 5.5 and 6.2 above).

6.4 Check that the records of the issues, changes or withdrawals of licence instruments are up to date and available at all times. The status of any restrictions placed on the Duty-holder's activities by ONR by way of licence instruments should be made known and accessible to personnel controlling these activities.

6.5 Check that relevant correspondence with ONR and other statutory bodies is recorded and retrievable, e.g.: health, safety, environment, waste consignments, etc.

6.6 Check that ONR issues are tracked and records of their progress to close out are adequately maintained.

6.7 Check that the security requirements for access to records and archives are defined and implemented to prevent unauthorised access to sensitive records and / or prevent uncontrolled alteration to records.

6.8 Check that drawing registers are up to date, that current drawings are available and superseded drawings are archived and retrievable. Check that the update of drawings is done timeously (i.e. in response to modifications).

6.9 Most sites will have a record repository / archive facility(ies) where physical records are held pending their final disposition (e.g.: disposed of, transferred to the National Nuclear Record Repository, etc.).

6.10 Where a Duty Holder uses a records repository located off-site (within a commercial storage company's facility for instance) the Inspector should assess the Duty-holder's arrangements for ensuring the retrievability and ongoing suitability of these storage arrangements. The Inspector may accompany the Duty-holder on a periodic audit / check of such facilities

6.11 The record repository will generally contain documentation records (in paper and sometimes microfilm form) but may also contain other types of records such as photographs and radiographs. The checks carried out at the record repository should cover:

- The administrative control of physical records, e.g.: record receipt, registration, indexing, security of and control of access to records, filing and storage, retrieval, issue and return, copying from one media to another (e.g.: scanning, microfilm, etc.), correction of errors and disposition,
- checks carried out by the Duty-holder for deterioration of records,
- the competency of records staff,
- the control of physical conditions under which records are held to minimise their deterioration or damage (temperature, humidity, light, fire protection, etc.).

See NS-TAST-GD-033, 'Licensee management of records'.

6.10 Computer based record systems are used extensively by Duty-holders. Duty holder databases and, increasingly, Cloud based systems, may be used for management system documentation, plant modifications, permits to work, drawings, plant logs, etc. The inspector should check:

- The control of such databases and systems, e.g.: their testing, modifications, read / use / write access control, etc.
- Security against malware, malicious corruption, hacking, etc., for both Duty holder based and Cloud based systems.
- The back-up arrangements, e.g.: frequency, redundancy and diversity; continuity and retrieval arrangements,
- The backup arrangements for records management systems deployed on Cloud infrastructure failover\* to UK based infrastructure. For security purposes it is good practice that both the primary and back-up datacentres are located in the UK. If the inspector finds that this is not the case the inspector should note the arrangements and seek advice from the ONR Civil Nuclear Security Programme - Cyber Security and Information Assurance Team.

*\* Failover is the arrangement whereby a fault with the usual / primary datacentre switches operations over to a redundant datacentre.*

- The Duty-holder's consideration of and provisions for transferring data to new platforms and media as current technology becomes obsolescent.

See NS-TAST-GD-033, 'Licensee management of records'.

6.11 The inspector should be alert to the use of uncontrolled electronic systems, especially spread sheets. It is not uncommon to find spread sheets being used for storing and generating records on: - effluent and gaseous discharges; waste handling and characterisation; design calculations and design verifications; record indexes, etc. If the inspector finds spread sheets being used to store and / or generate records related to site licence conditions compliance then the inspector should ensure that the spread sheet is configured, controlled and used in a controlled manner.

## 7 FURTHER READING

7.1 NS-TAST-GD-033, 'Licensee management of records'.

7.2 IAEA – GS-G-3.1, 'Application of the Management System for Facilities and Activities' ([http://www-pub.iaea.org/MTCD/publications/PDF/Pub1253\\_web.pdf](http://www-pub.iaea.org/MTCD/publications/PDF/Pub1253_web.pdf))

7.3 Nuclear Quality Knowledge – published by Chartered Quality Institute (see TRIM 2018/215770), <https://www.quality.org/article/cqi-nuclear-special-interest-group-nucsig>

#### 7.4 Standards and Guides

ISO 9001 and GSR Part 2 include basic requirements relating to records. IAEA safety guide GS-G-3.5 includes further guidance on records management practices. The older superseded IAEA publication 50-C/SG-Q Safety Guide Q3 still provides some useful guidance on record retention periods for different types of record. There are other IAEA publications that provide more specific guidance on records management covering topic areas such as decommissioning and waste packaging records.

Useful international and British standards are:

- BS ISO 30301:2019 is an auditable standard for a records management system. This standard is aimed at management records management professionals. It fits well with a process approach and can be readily used with other management system standards such as ISO 9001.
- ISO 15489:2016 is the foundation standard that codifies best practice for records management operations. It is aimed at records management professionals rather than management.
- BS 10008-1:2020 can be used to identify controls to ensure authenticity when converting physical records to electronic format.
- BS ISO/IEC 27001:2013 can be applied to the information security aspects of records management and can be applied more generally to the management of all information assets.
- BS EN 16893: 2018 covers requirements for long term storage of records for an archive facility.

## 8 DEFINITIONS

There are no definitions particular to this document.

## Annex – Safeguards

Many of the expectations for LC 6 arrangements in this guidance are applicable to compliance with NSR19 and expectations within ONMACS [\[link\]](#). The relevance to safeguards stems from records which provide a means of inventory control. Inspectors should note the different definitions of “nuclear matter” above, and “qualifying nuclear material” (QNM). QNM is defined in the Nuclear Safeguards Act 2018 and Nuclear Safeguards (Fissionable Material and Relevant International Agreements) (EU Exit) Regulations 2019 as natural uranium, depleted uranium, uranium enriched to less than 20%, uranium enriched to 20% or above, thorium and plutonium.

For records the link with NSR19 is with regulations 10 and 11, which refer to operating and accounting records respectively. The part of ONMACS of particular relevance to LC 6 is Material Accountancy and Control Expectation (MACE) 8.3 “Records Management”.

There are a number of inspection types carried out by ONR Safeguards that may provide opportunity for joint inspection in which assurance against LC 6 and NSR19 might be gained, if scoped correctly. For example accountancy-focused compliance inspections primarily involve reviewing operating records which underpin nuclear material accountancy. For further guidance on ONR Safeguards inspection please see the Safeguards TIG [\[link\]](#).

The key areas for inspectors to be cognisant of in this TIG are as follows:

6.9 – MACE 8.3 expects that operators have appropriate and effective arrangements to manage and control safeguards documentation and data. MACE 8.3 doesn’t specify the same detail as this TIG. Though there is overlap in what a Safeguards inspector would consider appropriate arrangements and effective management and control of safeguards documentation and data. Meeting the arrangements specified in 6.9 is also likely to meet some of the expectations of MACE 8.3 such as timeliness of retrieval, and traceability of data.

6.10 – The expectations for IT-based systems broadly align with paragraph 6.10. For safeguards, the records management system should be capable of reconstructing the previous five years of material accounts in the event that the system is destroyed or rendered ineffective. ONR Safeguards would expect there to be adequate back-up arrangements to achieve this, as is also required for LC 6 in paragraph 6.10.

6.11 – ONMACS does not specifically mention spread sheet based records; however the operator’s records systems (including spread sheets) will be considered adequate for safeguards if they are appropriate to the Basic Technical Characteristics (BTC) of the particular qualifying nuclear facility, (QNF) as defined in NSR19. Spread sheets may be used as part of the safeguards records system, but ONR Safeguards would still expect them to meet with the expectations of MACE 8.3. In which case, 6.11 in this TIG is in alignment with safeguards expectations.