



ONR GUIDE			
<b>LC9 INSTRUCTIONS TO PERSONS ON SITE</b>			
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#### TABLE OF CONTENTS

1	INTRODUCTION .....	2
2	PURPOSE AND SCOPE .....	2
3	LICENCE CONDITION 9 INSTRUCTIONS TO PERSONS ON SITE .....	2
4	PURPOSE OF LICENCE CONDITION 9 .....	2
5	GUIDANCE ON ARRANGEMENTS FOR LICENCE CONDITION 9.....	3
6	GUIDANCE ON INSPECTION OF ARRANGEMENTS .....	3
7	GUIDANCE ON INSPECTION OF IMPLEMENTATION OF ARRANGEMENTS .....	4
8	OTHER SOURCES OF INFORMATION .....	5

## **1 INTRODUCTION**

- 1.1 Many of the licence conditions attached to the standard nuclear site licence require, or imply, that licensees 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 licensees' 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 This guidance is for use by all inspectors in ONR. Its purpose is to facilitate a consistent approach to LC 9 compliance inspections and to provide assistance to inspectors while carrying out their duties in this area. The guidance should not be regarded as either comprehensive or mandatory.
- 2.2 The guidance provided is split into four main elements:
- 1) Purpose of the Licence Condition (LC)
  - 2) Guidance on arrangements for LC 9.
  - 3) Guidance on inspection of arrangements
  - 4) Guidance on inspection of implementation of arrangements.

## **3 LICENCE CONDITION 9 - INSTRUCTIONS TO PERSONS ON SITE**

- 3.1 The licensee shall ensure that every person authorised to be on the site receives adequate instructions (to the extent that this is necessary having regard to the circumstances of that person being on the site) as regards the risks and hazards associated with the plant and its operation, the precautions to be observed in connection therewith and the action to be taken in the event of an accident or emergency on the site.

## **4 PURPOSE OF LICENCE CONDITION 9**

- 4.1 The purpose of this condition is to ensure that the licensee provides all people on the site with sufficient information about the risks and hazards (including security if appropriate) associated with the plant and its operation to enable them to take appropriate precautions and to respond adequately and without delay to an incident or emergency situation. The condition is an additional requirement to sections 2(2)(c) and 3(3) of Health and Safety at Work etc. Act 1974, Regulation 10 of the Management of Health & Safety at Work Regulations 1999, and Regulation 14(a) of the Ionising Radiation Regulations 1999. The licensee should in particular ensure instructions are given to new staff, contractors and visitors. Compliance with these requirements may be verified by consideration of the formal system for instruction and local checks on its implementation by the site inspector.

## **5 GUIDANCE ON ARRANGEMENTS FOR LICENCE CONDITION 9**

- 5.1 Licence Condition 9 is subtly different from other licence conditions, in that it does not require a licensee to make adequate arrangements. A licensee may not, therefore, have explicitly identified arrangements in compliance with Licence Condition 9. A licensee is required to ensure that the requirements of LC 9 are met and suitable written procedures should be produced to demonstrate compliance with this condition. These may be explicitly identified elsewhere in compliance with other licence conditions and training requirements.
- 5.2 The following list provides ONR's views on what the licensee's procedures might be expected to contain to comply with LC 9. The list is neither exclusive nor exhaustive and will be subject to review and revision in light of operational experience. If licensees have generic model(s) for arrangements then it is for the site to justify any deviation from the model(s). [Note: not all licensees use generic models].
- 5.3 Procedures should be provided to ensure compliance with LC 9.
- 5.4 Procedures shall address the LC requirements.
- 5.5 Procedures should be readily available and should be extant, signed by an appropriate senior manager and controlled under a system compliant with the requirements of LC17.
- 5.6 The procedures should note that the requirements of this condition supplement the requirements of sections 2(2)(c) and 3(3) of the Health and Safety at Work etc. Act 1974, Regulation 10 of the Management of Health & Safety at Work Regulations 1999, and regulation 14(a) of the Ionising Radiation Regulations 1999.
- 5.7 The procedures should ensure that all persons on the site have been given appropriate instruction on the risks, hazards and responses necessary, during normal operations and potential accident or emergencies. The procedures should address any precautions that need to be observed in the event of any accident or emergency situation.
- 5.8 The procedures should ensure that instructions are given to new staff, contractors and visitors and that refresher training is also given at appropriate intervals.
- 5.9 The procedures should ensure that authorised casual visitors who do not meet normal training requirements are accompanied when on the site.
- 5.10 The procedures should ensure that records of relevant training are made, controlled and kept under the arrangements made for LC 6.

## **6 GUIDANCE ON INSPECTION OF ARRANGEMENTS**

- 6.1 This section of guidance is to assist inspectors in judging the adequacy of the licensee's arrangements. The following list is neither exclusive nor exhaustive and will be subject to review and revision in light of operational experience. It does however, provide a hit list of aspects of LC 9 that can be examined during routine inspections.
- 6.2 Check that procedures are in place to demonstrate compliance with the LC.
- 6.3 Examine the compliance procedures layout and check that they are consistent. Review the procedures to establish validity, whether any changes have been made since the last review and whether the identified responsible persons are correct. Note whether instructions, methods and quality assurance rules claimed in arrangements have been followed and whether any changes have been incorporated and validated.

- 6.4 Check that the procedures ensure all persons on the site receive appropriate instructions during their time on the site. Confirm that they address the differing requirements of new staff, both term and itinerant contractors and visitors as well as suitable refresher training where necessary.
- 6.5 Check that the procedures ensure that the amount of information and approach to induction is commensurate with the hazard and complexity of arrangements and that consideration is also given to whether access is to be unescorted or limited.
- 6.6 Confirm that the procedures require records of relevant training and instruction and check that there is suitable cross reference to and consistency with the arrangements for LC 6, LC 10 & LC 11.

## **7 GUIDANCE ON INSPECTION OF IMPLEMENTATION OF ARRANGEMENTS**

- 7.1 This section of guidance is to assist inspectors in judging the adequacy of the licensee's implementation of their arrangements (i.e. is the licensee doing what their arrangements say they should be). The following list is neither exclusive nor exhaustive and will be subject to review and revision in light of operational experience. It does however, provide a hit list of aspects of LC 9 that can be examined during routine inspections.
- 7.2 Check that a system exists for establishing the necessary instructions for visitors to the site, term and itinerant contractors and employees. The instructions and information should be commensurate with the hazard and complexity of the site and whether access is to be unescorted or limited. Cross check with LC10 procedures that the system for providing such basic induction training to persons coming onto the site as required by LC9 exists in a reasonable form and has satisfactory compliance.
- 7.3 Inspectors may find it helpful to consider the site or facility to be a series of layers with the specific nuclear activity being at the core and site reception/ security / pass office to be the outer layer. A sample inspection may cover one or more of the layers and that the instructions and information is commensurate with the hazard and complexity of the layer.
- 7.4 Confirm that a system exists to provide the licensee with assurances that all visitors to the site, term and itinerant contractors and employees have been issued with the necessary instructions and that it is robust. This is particularly important during periods where there is a significant increase in the workforce (e.g. operational reactor outage).
- 7.5 Check that a sample of people on the site have been given appropriate instructions on the risks and hazards associated with normal site operations and that they are aware of the associated precautions that should be taken.
- 7.6 Check that a sample people on the site have been given appropriate instructions concerning the responses necessary in the event of an accident or emergency. Include staff that only attend the site during silent hours, (e.g. cleaners). Check also that they are aware of the types of alarm in use on the site and the location of relevant muster/assembly points.
- 7.7 Check that a sample of people on the site are aware of: how to navigate the site or facility/ building; event reporting procedures; and behavioural standards/expectations.
- 7.8 Review the records of instructions given to people on the site and confirm that they are being implemented and also compliant with LC6 requirements. Examine a sample of records to establish that recent appointees, contractors or visitors with unescorted access have completed necessary basic induction training.

- 7.9 Select a sample of people with escorted access, such as visitors arriving for a meeting and establish that they are escorted to and from the relevant part of the site in accordance with procedures.
- 7.10 Discuss where necessary with the responsible person identified in the procedures any shortcomings or where improvements may be effected.

## **8 OTHER SOURCES OF INFORMATION**

- 8.1 The inspector should be aware that other regulations contain requirements for appointment of individuals with similar authorities and responsibilities as DAPS & SQEPs. These include the Ionising Radiations Regulations 1999 requirements for Radiological Protection Advisors (RPAs) and Radiological Protection Supervisors (RPSs). The extant approved Nuclear Site Security Plan will describe security arrangements on-site and how they are implemented.