



ONR GUIDE			
<b>LC26 CONTROL AND SUPERVISION OF OPERATIONS</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 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 The purpose of this guidance is to facilitate a consistent approach to LC 26 compliance inspection 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
- 2) Guidance on procedures for LC 26.
- 3) Guidance on inspection of procedures.
- 4) Guidance on inspection of implementation of procedures.

## **3 LICENCE CONDITION 26: CONTROL AND SUPERVISION OF OPERATIONS**

3.1 The licensee shall ensure that no operations are carried out which may affect safety except under the control and supervision of suitably qualified and experienced persons appointed for that purpose by the licensee.

## **4 PURPOSE OF LICENCE CONDITION 26**

4.1 The purpose of this condition is to ensure that all safety related operations are only carried out under the control and supervision of suitably qualified and experienced personnel. The “operations ..... which may affect safety” to which condition 26 applies clearly includes those referred to in condition 23 for which safety cases are required to be produced but, importantly, is more widely drawn to include all “operations” as defined in LC1.

4.2 The Suitably Qualified and Experienced Persons (SQEPs) required to control and supervise all such operations will be identified and appointed. For the control and supervision of operations in appropriate cases (generally those that are most safety significant), Duly Authorised Persons may be appointed under condition 12(2).

## **5 GUIDANCE ON PROCEDURES FOR LC 26**

5.1 This licence condition does not formally require the licensee to make and implement adequate arrangements, but to effectively comply with this condition we would expect the licensee to have established arrangements or procedures which identify the person responsible for ensuring compliance, and the means by which the licence condition is met. Such arrangements or procedures, which will help demonstrate compliance with

the condition also facilitate inspection and enable compliance with this condition to be audited.

- 5.2 The procedures should contain a definition of the terms “control” and “supervision”, and should note that “Control and Supervision” does not mean direct personal contact in all situations, but may be exercised through a combination of direct observation and contact, work instructions and procedures.
- 5.3 The procedures should identify the person(s) responsible for compliance with this condition who should ensure that:
  - (a) operations affecting safety are identified;
  - (b) posts to which persons will be appointed to carry out and supervise operations affecting safety are identified; and
  - (c) persons appointed to control and supervise the operations affecting safety are “suitably qualified and experienced” and for operations that significantly affect safety are appointed in writing as “duly authorised persons” under the arrangements made for LC12.
- 5.4 The procedures should identify the person who has responsibility for reporting non-compliance to ONR.

## **6 GUIDANCE ON INSPECTION OF PROCEDURES FOR LC 26**

- 6.1 Inspect the licensee’s procedures and confirm that they are “in ticket” with the QMS, are up to date and that the identified responsible persons are correct.
- 6.2 Check that the procedures ensure that:
  - (a) operations affecting safety are identified;
  - (b) posts to which persons are appointed to control and supervise operations affecting safety are identified,
  - (c) suitable qualification and experience for each is defined for each post.
  - (d) for operations significantly affecting safety, Duly Authorised Persons (DAPs) are appointed in writing under LC 12 arrangements.
- 6.3 Confirm that the terms are defined such that control and supervision may be exercised through work instructions and procedures supplemented by appropriate direct contact and observation.

## **7 GUIDANCE ON INSPECTION OF IMPLEMENTATION OF PROCEDURES FOR LC 26**

- 7.1 Check with any person identified in the procedures as responsible for ensuring compliance with this LC that they are aware of the role and ask how they discharge the responsibilities of the role. Seek action to remedy any omissions.
- 7.2 Check that operations affecting safety are defined and listed, are current and the list has been subject to periodic review. Satisfy yourself that there are no obvious omissions.

- 7.3 In order to inspect a sample of operations where LC26 control and supervision is required and how it is defined, select a safety case and a sample of supporting Operating Rules, Operating Instructions and/or related Maintenance instructions. Discuss with the responsible person the extent of control and supervision expected. Check that this occurs in practice by observation, by checking records or by discussion with supervisors or operators.
- 7.4 Control and supervision of contractors is a critical safety matter, and is required to be undertaken by licensee staff appointed (or conceivably duly authorised under LC 12) for that purpose. Such control and supervision would normally be undertaken in conjunction with contractors' own supervisory staff. The site should have clear procedures and advice for staff fulfilling this important role and it should be confirmed that these are being followed and that contractors are being adequately controlled and supervised to ensure both nuclear safety and the safety of all personnel.
- 7.5 Check that the arrangements or procedures define posts for the control and supervision of operations and the qualifications and experience required of SQEPs appointed to them. Similarly check posts that require staff to be Duly Authorised Persons (DAPs). Establish that appointments of DAPs under LC12 and SQEPs under LC26 are formal and are recorded.
- 7.6 Check the actual qualifications, experience and training records of a sample of LC 26 appointees and confirm that these match expectations or are otherwise formally accepted as being equivalent.
- 7.7 Examine a sample of operational records and check that they have been completed and signed off; including, where appropriate, countersignatures. Check for clarity, and seek explanation in case of difficulty from the current duty SQEP.
- 7.8 Check understanding of the concepts of control and supervision at the plant level, and how this is carried out on a daily basis. Confirm this by observation and discuss any concerns as to its adequacy with the duty holder or relevant manager.