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ONR GUIDE			
SITE ANNUAL REVIEW MEETINGS			
Document Type:	Nuclear Safety Technical Inspection Guide		
Unique Document ID and Revision No:	NS-INSP-GD-058 Revision 3		
Date Issued:	April 2017	Review Date:	April 2020
Approved by:	M Foy	Head of Specialism, Operational Inspection	
Record Reference:	TRIM Folder 1.1.3.775. (2017/86414)		
Revision commentary:	Routine update		

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1. INTRODUCTION

- 1.1 ONR's Mission is to provide efficient and effective regulation of the nuclear industry, holding it to account on behalf of the public. ONR is an enabling regulator, applying the Government's *Regulator's Code* [Ref 6.1] in areas such as: following the principles of good regulation (see ONR's *Enforcement Policy Statement* [Ref 6.2]); providing simple and straightforward ways to engage with those we regulate and hear their views; ensuring clear information, guidance and advice is available to help those we regulate meet their responsibilities; and ensuring our regulatory approach is transparent. ONR also regulates to ensure nuclear licensees continue to manage their risks in line with evolving relevant good practice, so that these are reduced 'so far as is reasonably practicable' (SFAIRP) and then reviewed through due processes such as ten yearly and interim Periodic Safety Reviews (PSRs) ([Ref 6.3], [Ref 6.4]).
- 1.2 Site Annual Reviews (SARs) provide a set-piece opportunity for periodic senior level engagement between ONR and the licensee. They are a key means through which ONR achieves all these objectives, augmenting routine regulatory activities such as compliance inspections, permissioning and regulation of projects.
- 1.3 This document describes ONR's procedure and guidance for conducting SARs with licensees. Though this procedure has been written as guidance to nuclear safety inspectors, the title of these meetings has been expanded from the former "Annual Review of Safety" (ARoS) to reflect ONR's wider regulatory remit and Regulators' Code requirements on efficient means of engagement. Consequently, where practical, SARs should not be limited to reviewing nuclear safety, but instead should be scoped to cover as broad a range of ONR's regulatory functions as appropriate, providing a "one stop shop" for the licensee through a "One ONR" approach.

2. PURPOSE AND SCOPE

- 2.1 From the licensee's perspective the SAR is a senior level meeting providing a means of:
- a) Reviewing compliance and safety, security & safeguards performance over the preceding period;
 - b) Reviewing the extent to which commitments made at the previous SAR or, start-up meeting (where appropriate), have been met;
 - c) Providing a strategic forward look over the next year, including what the licensee is committing to achieve, What needs to be accelerated and how; and
 - d) Setting out its medium / longer term plans and the challenges that are foreseen.
- 2.2 From ONR's perspective the purpose of the SAR is to:
- a) Provide a set-piece opportunity for formal, senior level regulatory discussions;
 - b) Respond to the matters raised above from the three perspectives highlighted in para 1.1, i.e.
 - i. Holding the licensee to account;
 - ii. Acting as an enabling regulator;

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- iii. Ensuring risks are being managed in line with current relevant good practice
 - c) Raise any other important regulatory matters, particularly where safety (or security) performance has been poor or progress on resolving Regulatory Issues [Ref 6.5] has been slow.
 - d) Acknowledge and encourage the licensee in areas where safety or security performance has been particularly good.
 - e) Set out ONR's strategic regulatory focuses for the site over the coming period (year), and highlighting areas where improvements are expected from the licensee.
 - f) Promote and reinforce regulatory messages being pursued on an industry-wide basis.
- 2.3 SARs should be conducted with all licensees normally on an annual basis. The extent of the review should be commensurate with the magnitude of the hazard and risks presented by the site and the complexity of its operations. For lower hazard sites owned or managed by a single company, combined SARs covering multiple sites should be convened where practical. For complex sites, a series of "feeder" annual reviews conducted at local site inspector level should be arranged, with the key outputs from these reviews fed (as appropriate) into the main site-level SAR.
- 2.4 As already noted, the SAR's scope should be set appropriate to the circumstances of the site, ideally covering all of ONR's functions (nuclear safety, nuclear security, conventional health and safety, radioactive transport and safeguards). ONR's senior level attendance should reflect the meeting's scope. Where practical, the meeting should be held jointly with the relevant environmental regulator and should also include defence nuclear safety regulator where appropriate.
- 2.5 Attending site for the SAR also provides an opportunity for senior ONR staff to meet the site's safety representatives and (where considered appropriate) other worker representatives. Since the topics covered in the SAR (paras 2.1 and 2.2) and the need to avoid overly-large meetings (para 5.6) will normally make it inappropriate for the safety / worker representatives to attend the SAR itself, a separate meeting should be arranged. These meetings should:
- a) Be timed to precede the SAR (in case matters raised need to also be raised at the SAR);
 - b) Enable the safety / worker representatives to raise any concerns or complaints [Ref 6.6]; and
 - c) Provide an opportunity for ONR to share matters of mutual importance in line with our openness and transparency principles.

3. RESPONSIBILITIES**The Site Inspector**

- 3.1 The (nuclear safety) Site Inspector is responsible for:
- a) Coordinating ONR's preparations for the SAR (e.g. attendance, timing, agendas, comments on the Information Pack, briefings, advising the licensee

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on ONR expectations, liaising with any other regulators attending etc.) and facilitating its smooth running;

- b) Following the SAR, agreeing minutes of the meeting with the licensee and ensuring an adequate auditable trail is made (including writing the Contact Record);
- c) Ensuring the completion of all agreed actions.

ONR Lead Inspector

3.2 The ONR Lead Inspector (normally a Superintending Inspector, see para 3.3 for criteria) is responsible for:

- a) Leading the ONR team at the SAR;
- b) Agreeing the meeting scope (e.g. whether the meeting should be broadened to include matters other than nuclear safety, para 1.3; and the format of the process, paras 5.1 to 5.2);
- c) Ensuring that ONR fields a suitably knowledgeable and experienced team appropriate to the agreed scope.

3.3 The choice of Lead Inspector should reflect the intent of the SAR to be an annual, senior level, set-piece engagement between ONR and the licensee and also take account of the seniority of the licensee's lead for the meeting (normally the licensee's head of site / station director). Normally the Lead Inspector will be the relevant Delivery Lead (i.e. a Superintending Inspector), but where the site's size or hazard potential merit this, the Programme Director should lead the team. At lower hazard sites the Delivery Lead may delegate another inspector (normally the Site Inspector) to lead the team or attend the meeting alone.

4. DEFINITIONS

- a) SAR – Site Annual Review
- b) Site Inspector – the individual appointed by ONR to lead on day-to-day regulatory matters at the site and in this guide, the individual responsible for ONR aspects of the smooth running of the SAR – see para 3.1.
- c) Lead Inspector – see paras 3.2 to 3.3.

5. PROCEDURE

5.1 Figure 1 shows a generic structure for planning and conducting SAR meetings. The structure includes the following elements:

- a) An Information Pack;
- b) A site tour;
- c) A presentation by the licensee based on its own self-reviews;
- d) Agreed meeting notes and actions.
- e) A closure letter

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- 5.2 These elements (and their depth / extent / coverage) should be selected as decided by the Lead Inspector taking account of ONR's regulatory strategy for the site and the extent of other senior level contact with the licensee. Not all elements need be included in every SAR.
- 5.3 The Information Pack provided by the licensee should be a distilled output from its own internal reviews of aspects such as its legal compliance, incident and events, learning from experience, dose levels, safety culture etc. The broad format and content of the Pack should be agreed in advance of the meeting. It is considered good practice for the information pack to be subject to some form of independent review as part of the licensee's internal governance process. This is commonly achieved through being reviewed by the licensee's internal regulator or Nuclear Safety Committee.
- 5.4 One option which several licensees have found useful, has been to structure nuclear safety aspects of their reviews (and consequently their Information Packs) around the 'Framework for Nuclear Safety Performance' developed by a subgroup of the Safety Directors' Forum in consultation with ONR. Figure 2 shows the framework, with further information provided in [Ref 6.7]. One benefit of this approach is that it supports the choice of Key Performance Indicators (KPIs) for inclusion as evidence in the Information Pack since all licensees have already mapped their KPIs against this framework. Typical review meeting agendas structured around this framework are provided in Appendices 1 and 2 (noting that these agendas will need to be expanded in cases where the reviews are not just limited to nuclear safety (e.g. they include nuclear security, conventional health and safety or environmental matters). Other agenda structures are acceptable as suited to the specific site.
- 5.5 An alternative approach adopted for Sellafield, noting the priority for this site to achieve timely high hazard and risk reduction, and taking advantage of the integrated ways of working brought about under the so-called "G6 approach", is for the Information Pack to be restricted to single slides describing review outcomes for eight general topics (see Appendix 3). In this approach, the licensee is still expected to conduct its own reviews by applying an established framework (such as that described above), but to then brigade its outputs into a high level presentation to facilitate the meeting discussions. Use of single overview slides either in place of, or to supplement more detailed Information Packs has also proved to be a successful approach at other sites, particularly in ensuring the SAR retains a high level focus. Such approaches, which are consistent with ONR's sampling philosophy, are supported provided the underpinning review conducted by the licensee is suitably detailed. Over-detailed Information Packs and/or long and complicated licensee presentations should be discouraged.
- 5.6 ONR should provide feedback on the licensee's safety (and where relevant, security) performance over the relevant period. At a minimum this should be a summary of inspection and assessment ratings, highlighting any key findings and overview of progress on resolving Regulatory Issues [Ref 6.5]. The opportunity may also be taken to provide feedback on other performance aspects, such as from ONR's Leadership and Management for Safety Reviews [Ref 6.8].
- 5.7 Attendance at the SAR should be coordinated carefully. Experience suggests that having too many people in attendance can lead to a lack of focus. Numbers attending should be broadly equal between the licensee and the regulators, with the total attendance reflecting the breadth of the topics to be covered and the nature of the site's risks and hazards. Meeting sizes of more than about 15, even for the most complex sites and broadest agendas, are not recommended. Instead, the Lead Inspector should allocate responsibilities within the team to achieve an optimal balance

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between covering the topics adequately and the numbers attending (doubling up as appropriate), and then encourage the licensee to do likewise.

- 5.8 Where the site has an internal regulator, they should contribute to the SAR proactively. The internal regulator should:
- a) Be invited to provide an independent opinion on the licensee's presentation;
 - b) Be in a position to comment on the quality (strengths and weaknesses) of the licensee's underpinning review;
 - c) Provide any advice or opinions after the licensee's presentation but before ONR gives its views.
- 5.9 It is vital that the ONR team is properly prepared before the SAR. In particular each team member should:
- a) Review the Information Pack and prepare their initial feedback response for those aspects where they are leading;
 - b) Review the current status and progress made in regard to all Regulatory Issues at Level 3 and above [Ref 6.5] relevant to these aspects and other safety (or security) performance matters (see para 5.5) and decide what feedback (if any) should be provided;
 - c) Agree lines to take on contentious matters with relevant team colleagues.
- 5.10 The need for a closure letter will depend upon a number of factors, not least the established ways of working in place between ONR and the licensee and whether the agreed minutes provide an accurate reflection of the views of all parties (noting that there will also be a Contact Record, where minor variances can be recorded). Where there are no contentious matters, a closure letter will normally be disproportionate. In other cases, the Lead Inspector should decide whether a formal closure letter is an appropriate means of recording ONR's regulatory expectations compared to alternatives such as raising a Regulatory Issue

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- 6.1 Department for Business Innovation and Skills, Better Regulation Delivery Office: Regulators' Code, April 2014, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf
- 6.2 ONR Enforcement Policy Statement, ONR-ENF-POL-001 Revision 1, April 2014, <http://www.onr.org.uk/documents/2014/enforcement-policy-statement.pdf>
- 6.3 ONR Technical Assessment Guide NS-TAST-GD-050 Revision 4: Periodic Safety Reviews (PSRs), April 2013, http://www.onr.org.uk/operational/tech_asst_guides/ns-tast-gd-050.pdf
- 6.4 ONR Technical Inspection Guide NS-INSP-GD-015 Revision 3: Guidance: LC15 Periodic Review, May 2016, http://www.onr.org.uk/operational/tech_insp_guides/ns-insp-gd-015.pdf
- 6.5 ONR HOW2 Process: Regulatory Issues Management
- 6.6 Appendix 6 of ONR Guide ONR-INSP-GD-064 Revision 2, ONR Inspection Guide, July 2016.
ONR HOW2 Process: Conduct Investigations.
ONR webpage: Health and Safety concerns/whistleblowing and complaints about ONR, <http://www.onr.org.uk/complaints-concerns-whistleblowing.htm>
- 6.7 ONR Instruction ONR-OPEX-IN-002 Revision 3: ONR Inspection and Use of Licensee Safety Performance Indicators (SPIs), February 2013, <http://www.onr.org.uk/operational/inspection/onr-opex-in-002.pdf>
- 6.8 ONR Nuclear Safety Technical Assessment Guide NS-TAST-GD-093, Revision 2, September 2016, http://www.onr.org.uk/operational/tech_asst_guides/ns-tast-gd-093.pdf

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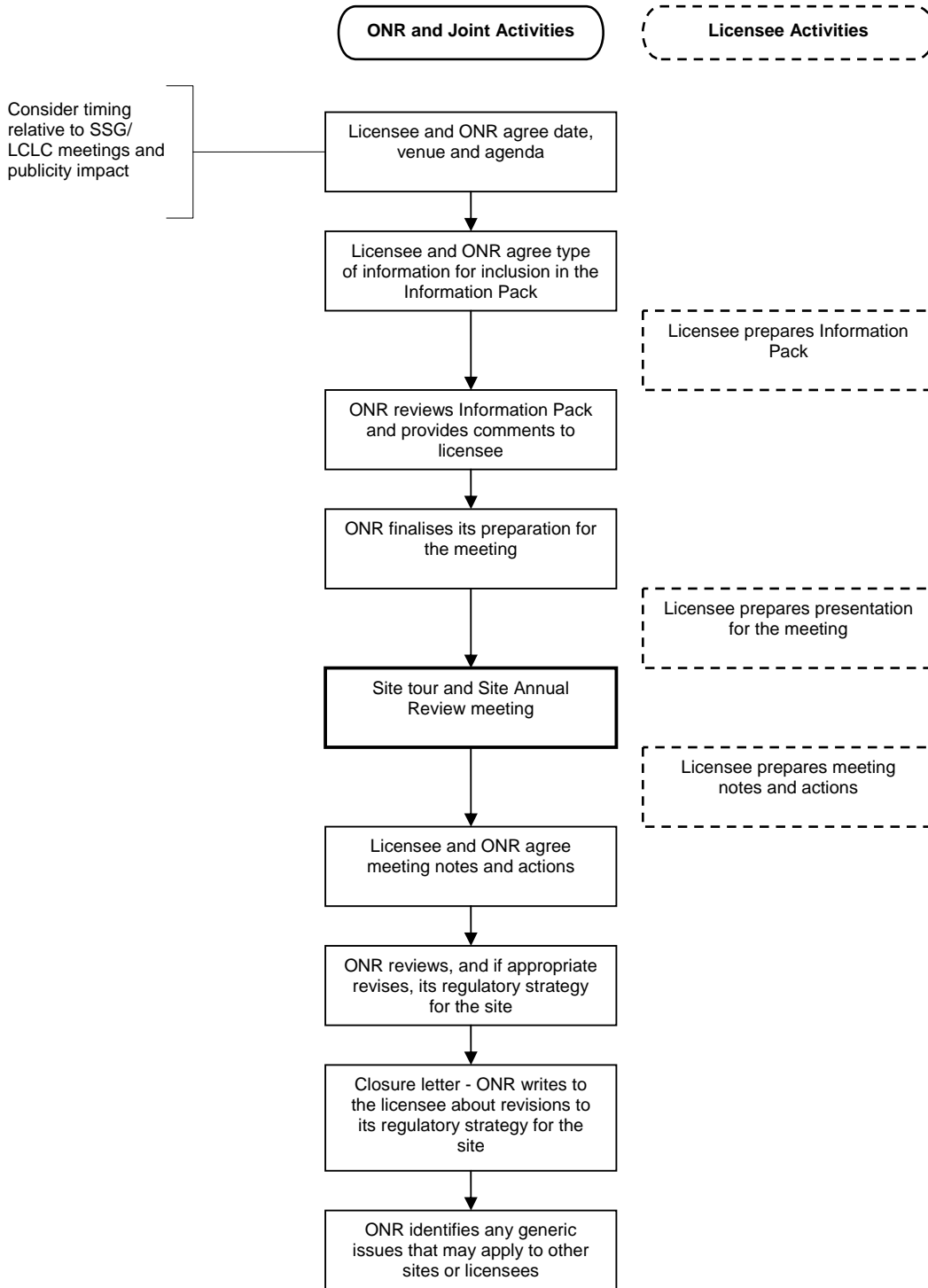


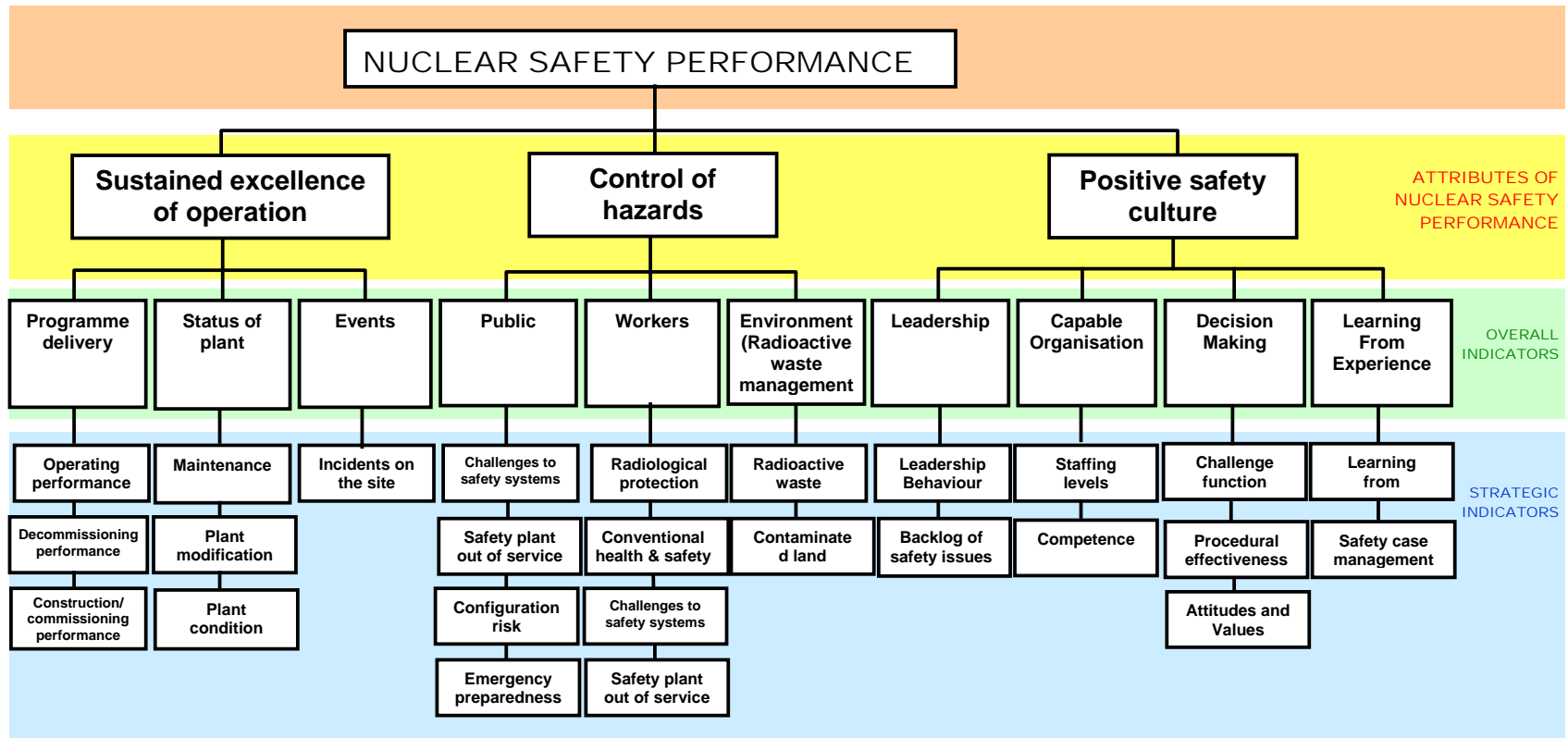
Figure 1: Procedure for Site Annual Review Meetings

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NUCLEAR SAFETY PERFORMANCE INDICATOR FRAMEWORK



* Human performance spans this framework and licensees should be able to describe how this is reflected in their choice of indicators

Figure 2: Framework for Nuclear Safety Performance

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7. APPENDICES

APPENDIX 1 - EXAMPLE SITE ANNUAL REVIEW MEETING AGENDA
(STRUCTURED AROUND THE 'FRAMEWORK FOR NUCLEAR SAFETY PERFORMANCE')

1. **Introductions and Apologies for Absence**
2. **Review of Actions From Last Meeting**
3. **Other Formal Review Meeting Actions (e.g. Start-up Meeting)**
4. **Director / Plant / Site Manager's Report**
Overview and forward look, especially significant plant, structure or staff changes or significant events
Current Safety Initiatives or Strategies
5. **Feedback From Plant Tour**
6. **Sustained Excellence of Operation**
Programme delivery
Status of plant
Events
etc
7. **Control of Hazards**
Public – challenges to safety systems
Public – safety plant out of service
Public – emergency preparedness
Workers – radiological protection
Workers – conventional health and safety
Environment - radioactive waste
etc
8. **Positive Safety Culture**
Leadership
Capable organisation
Decision making
Learning from experience
etc
9. **Stakeholder Engagement**
10. **Correspondence Review**
11. **Review of Actions Agreed or Placed**
12. **A.O.B.**

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APPENDIX 2 – EXAMPLE SITE ANNUAL REVIEW MEETING AGENDA

(In use for an Operating Reactors Licensee)

- 1 Introductions & Apologies**
- 2 Approval of Minutes of Last Meeting** (Review/start-up meeting dd/mm/yy)
- 3 Review of Actions From Last Meeting**
- 4 Station Director’s Overview**
- 5 Feedback From ONR Plant Tour**
- 6 Operational Excellence**
 - Operational summary
 - Operations top ten issues
 - Matters raised by ONR
 - Technical specification performance
 - etc
- 7 Managing the Asset**
 - Investment planning
 - Maintenance performance
 - Safety system reliability and availability
 - Plant modifications
 - etc
- 8 Managing the Organisation**
 - Leadership resilience
 - Training
 - Organisational capability
 - Decision making
 - etc
- 9 Protecting People and the Public**
 - Radiological safety
 - Radioactive material transport
 - Emergency preparedness
 - Industrial safety
 - etc
- 10 Stakeholder Engagement**
- 11 A.O.B.**

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APPENDIX 3 – MEETING STRUCTURE IN USE FOR SELLAFIELD

The meeting should address the following topics:

1. Achieving and maintaining nuclear and radiological safety
2. Timely hazard and risk reduction
3. Emergency planning and resilience
4. Nuclear security
5. Environmental protection
6. Conventional health and safety
7. Radioactive transport safety
8. Safeguards

For each topic, the meeting should consider SL's performance and ambitions in three parts:

1. A look back reviewing compliance and how commitments made at the last Meeting have been delivered;
2. A forward look over the next year – what is SL committing to achieve? What needs to be accelerated and how will this be achieved?
3. A medium term forward look – where is SL heading and what challenges are foreseen?

For each topic, the Information Pack should comprise a single slide providing a suitable overview. Following each SL topical presentation, the SL internal regulator should be invited to provide its comment, after which ONR (or EA for topic 5) will express its opinion.

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