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Dungeness A Emergency Arrangements
Approval of the revised Dungeness A Emergency Arrangements

Project Assessment Report ONR-DFW.-PAR-15-008
Revision 0
10 Sept 2015

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Published Sept 2015

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EXECUTIVE SUMMARY

Approval of the revised Dungeness A site Accident and Emergency Arrangements

Permission Requested

Magnox Ltd (the licensee) has written to the Office for Nuclear Regulation (ONR) requesting approval of proposed changes to the Dungeness A site accident and emergency arrangements.

Background

Magnox Dungeness A site is in the process of decommissioning, and was verified fuel free in 2012. Consequently most of the nuclear hazard has now been removed.

The licensee has previously demonstrated to ONR's satisfaction that a radiation emergency as defined by the Radiation Emergency Preparedness and Public Information Regulations (REPPiR) Regulation 2(1) is no longer reasonably foreseeable, and consequently the requirements for an Operators emergency plan and off-site emergency plan are no longer required by REPPiR (Regulations 7 and 9).

ONR has previously approved the removal of the off-site plan, and the licensee now intends to revise its arrangements by replacing the Operators Emergency Plan with an emergency arrangements document. This will comply with the Ionising Radiation Regulations (IRR99) and Licence Condition 11 which remain legal requirements.

As required by LC11 (3), the licensee has written to ONR to request approval of revised Dungeness A emergency arrangements.

Assessment and inspection work carried out by ONR in consideration of this request

I have assessed the licensee's request and I am satisfied that the requirement for an on-site plan under REPPiR Regulation 7 no longer applies because a radiation emergency is no longer reasonably foreseeable.

I have assessed the differences between the proposed arrangements and the existing approved plan. The key changes from the current approved emergency plan are:

Documented Arrangements

The revised arrangements are structured for sites where there is reduced routine operational activity, but where additional varied decommissioning tasks are undertaken periodically. The basis of the proposed arrangements is that tasks are risk assessed and contingency plans will be documented where foreseeable accidents are identified. Generic contingency plans have been developed to cover all reasonably foreseeable events from routine operations, and additional specific contingency plans will be developed as required for decommissioning projects.

Emergency Organisation

The site's emergency organisation has been extensively revised to reflect the proposed simplified arrangements. Key changes include:

- The Duty Emergency Controller (DEC) role is removed from the new arrangements. The Shift Leader will now command and control the site's emergency response.
- The Shift Leader will now be supported by a Duty Manager. This will be a senior manager, who will be contactable 24 hours per day to help arrange additional

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resources or company support. Health Physics advice will also be available 24 hours per day.

- The sites Minimum Manning will remain at 4 persons, but this changes from 1 Shift Lead, 2 Technicians and 1 Security to 1 Shift Lead, 1 Shift Technician and 2 Security.
- There is a reduction in the number of on-call duty roles to reflect the response times demanded by foreseeable events now the site has defueled.

Emergency Facilities

The existing infrastructure of Emergency Control Centre (ECC), Access Control Point (ACP) and Forward Control Point (FCP) will no longer be maintained – These will be replaced by a flexible system of incident centres and remote alarm outstations positioned at various locations on the site. Each of these will be capable of acting as an incident command centre.

The site has installed improved remote communications systems which relay alarm signals from the control panels to handheld units. The handheld units can also be used to make announcements directly over the site intercom system and support direct radio contact between shift personnel. This will enable the Shift Lead to control incidents from any location on site.

Responder times

Due to the reduced need for immediate site response and more conventional nature of foreseeable incidents, external emergency services will become the primary responders for most incidents on the site. Additional site staff are expected to attend on a 'best endeavours' basis.

I have assessed the revised arrangements against the requirements of Licence Condition 11 as defined in ONR's inspection guide (NS-INSP-GD-011), the Ionising Radiation Regulations (IRR99), and ONR's emergency arrangements strategy paper for decommissioning sites (ONR-DFW-PAR-15-004).

The assessment of the licensee's submission has been completed in consultation with ONR Emergency Preparedness and Response (EP&R) specialists and ONR inspectors, following which a number of comments were made against the revised arrangements. This included:

- Improved clarity and detail requested on a number of aspects of the documented arrangements within the licensee's submission.
- Development of an updated Contingency handbook was requested, to replace the previous emergency Handbook, which contains additional detail on the practical arrangements, facilities and roles to support a response.
- Provision of Accredited Health Physics advice.

Discussions were held with the licensee, which resulted in an agreement to address these comments made by ONR in the documented arrangements.

The licensee has now addressed all of the comments and incorporated these as changes into updated arrangements. The licensee has resubmitted these updated arrangements at issue 2 for ONR approval. I have reviewed the resubmission and verified that all of ONR's previous comments have been addressed by the new arrangements.

The licensee has undertaken a comprehensive programme of local and site wide exercises to ensure staff are familiar with the new arrangements and can respond effectively. The licensee

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has demonstrated the proposed arrangements to a team of ONR inspectors, and ONR judged this to be an adequate demonstration of the proposed arrangements. This provides confidence that the licensee retains the capability to respond to incidents on the site.

Matters arising from ONR's work

There are no matters outstanding from ONR's assessment.

Conclusions

I am satisfied that this revision to the emergency plan is justified as the licensee has demonstrated that a nuclear emergency is no longer reasonably foreseeable, and the revised emergency arrangements are structured proportionately to the hazards remaining on the decommissioning site.

I am satisfied that the licensee's revised proposals meet the requirements of the Licence Conditions (LC's) and Ionising Radiation Regulations (IRR99), and are in compliance with ONR's guidance, as defined in the LC11 inspection guide (NS-INSP-GD-011) and ONR emergency arrangements strategy paper (ONR-DFW-PAR-15-004).

The licensee has successfully demonstrated the proposed arrangements, which ONR considered to be an adequate demonstration of the licensee's arrangements.

I consider that the proposed emergency arrangements continue to provide a suitable overview of the licensee's arrangements in their entirety and contains sufficient detail to enable the licensee to safely deal with an on-site emergency should the need arise.

Recommendation

I recommend that:

- Licence instrument 510 be issued for site licence number 94 to approve DNA Emergency arrangements DNA/ACC/EMER Issue 2, Dungeness A Site Accident and Emergency arrangements, dated July 2015.
- ONR thereby withdraw LI509 and the approval of DNA EM HBK Section 1.0 DD Issue 3, Magnox Limited Dungeness A Site Emergency Plan dated April 2014.

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LIST OF ABBREVIATIONS

ACP	Access Control Point
ALARP	As low as reasonably practicable
BSL	Basic Safety level (in SAPs)
BSO	Basic Safety Objective (in SAPs)
CNS	Civil Nuclear Security (ONR)
DAP	Duly Authorised Person
DEC	Duty Emergency Controller
ECC	Emergency Control Centre
FCP	Forward Control Point
HOW2	(Office for Nuclear Regulation) Business Management System
HSE	The Health and Safety Executive
IAEA	The International Atomic Energy Agency
IRR	Ionising Radiation Regulations
LC	Licence Condition
NDA	Nuclear Decommissioning Authority
ONR	Office for Nuclear Regulation
PCER	Pre-construction Environment Report
PCSR	Pre-construction Safety Report
PSA	Probabilistic Safety Assessment
PSR	Preliminary Safety Report
REPPIR	Radiation Emergency Preparedness and Public Information Regulations
RGP	Relevant Good Practice
SAP	Safety Assessment Principle(s)
SFAIRP	So far as is reasonably practicable
SSC	Structure, System and Component
TAG	Technical Assessment Guide (ONR)

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PERMISSION REQUESTED

1. Magnox Ltd (The Licensee) has requested ONR's 'Agreement' under Licence Condition 11(3) for its proposed changes to the Dungeness A site emergency arrangements [1]. This revision is documented in issue 2 of the Accident and Emergency Arrangements [2].
2. The licensee currently has an emergency plan [3], which is at issue 3. Licence Condition (LC) 11(3) requires the licensee (Magnox Limited) to ensure that no alteration or amendment is made to an approved emergency plan unless the Office for Nuclear Regulation (ONR) approves that alteration or amendment. This report presents the basis for ONR approval of the licensee's proposed new arrangements.
3. The proposed changes to the plan have been through the licensee's due process and have been endorsed by its nuclear safety committee [4].

1 BACKGROUND

4. Magnox Dungeness A site is in the process of decommissioning, and was verified fuel free in 2012. Consequently most of the nuclear hazard has now been removed.
5. After defueling had been completed the licensee provided ONR with a revised Report of Assessment (RoA) [7Error! Reference source not found.], as required by the Radiation Emergency Preparedness and Public Information Regulations (REPPiR) Regulation 5(1) and 6(4) [5]. This RoA concluded that it is not reasonably foreseeable that a member of the public could be exposed to a dose in excess of 5 mSv as a result of a radiation emergency.
6. Following assessment [6], ONR agreed that a radiation emergency as defined by REPPiR Regulation 2(1) is no longer reasonably foreseeable at Dungeness A [8], and consequently the requirements for an Operators emergency plan and off-site emergency plan are no longer required by REPPiR (Regulations 7 and 9).
7. In 2014 ONR approved a revision to the Licensees emergency plan which removed the requirement and capability to deal with an off-site nuclear emergency (Regulation 9, REPPiR). [9].
8. The licensee now intends to further revise its arrangements by replacing the Operators Emergency Plan, which is no longer required under REPPiR Regulation 7, with an emergency arrangements document to comply with the Ionising Radiation Regulations (IRR99) and Licence Condition 11 requirements.
9. As required by LC11 (3), the licensee has written to ONR to request approval of its revised emergency arrangements. [1]

2 ASSESSMENT AND INSPECTION WORK CARRIED OUT BY ONR IN CONSIDERATION OF THIS REQUEST

10. I have assessed the licensees request and previous submissions and correspondence. I am satisfied that the requirement for an on-site plan under REPPiR Regulation 7 no longer applies because a radiation emergency is no longer reasonably foreseeable.
11. The requirements of the Licence Conditions and the Ionising Radiation Regulations (IRRs) do still apply however. These require the licensee to make and implement adequate arrangements to deal with incidents on site and to prepare contingency plans for reasonably foreseeable radiation accidents.

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12. In my assessment of the proposed emergency plan I have considered the differences between the extant plan [3] and proposed arrangements [2]. I have confirmed that the proposed arrangements are compliant with the requirements of ONR guidance [11] [11]. I have also considered the licensee's performance in the recent demonstration exercise [12].

2.1 KEY CHANGES TO EXISTING ARRANGEMENTS

13. The key changes from the current approved emergency plan are:

14. Documented Arrangements

- The revised arrangements are structured for sites where there is reduced routine activity, but where additional varied decommissioning tasks are carried out at certain times, which will require specific additional response capability. The basis of the proposed arrangements is that tasks are risk assessed and where foreseeable accidents are identified that require actions to mitigate their effects or reduce harm to the public, workers and environment, then contingency plans will be documented, resourced, equipped and rehearsed as required.
 - A generic set of contingency plans have been developed which cover all reasonably foreseeable events on the site from the quiescent plant or routine operations.
 - The radiation accident contingency plans have been drawn up in compliance with the Ionizing Radiation Regulations 1999. Conventional Accident Contingency Plans have also been drawn up to sit within the common arrangements.
 - Where additional plans are required by site specific tasks or risk assessment, further contingency plans may be produced by the task owners (for example as projects carry out tasks where no contingency plan exists).

15. Emergency Organisation

- The site emergency organisation has been extensively revised to reflect the proposed simplified arrangements. Of particular note is the comparison of Section 2.9 in the old plan and section 4 in the newer document showing the removal of the standby team and changes in staffing arrangements.
- The Minimum Manning on site remains at 4 persons, but this is now composed of 1 Shift Lead, 1 Shift Technician and 2 Security guards in the revised arrangements. Previously this was 1 Shift Lead, 2 Shift Technicians and 1 Security Guard in the old plan.
- The Duty Emergency Controller (DEC) role no longer exists in the new arrangements. The Shift Leader (who was previously the initial emergency controller) will now command and control the site throughout the emergency response.
- The Shift Leader will be supported by a Duty Manager. This will be a senior manager, who will be contactable 24/7. The Duty Manager will be a supporting role during the incident (ensuring the Shift Lead has all the company resources they need and supporting on external communications). The Duty Manager will also plan longer term recovery actions. The incident response will eventually be handed over to the duty manager, once the incident has been stabilised, to lead the recovery of plant (eg clean up and return to normal operation).

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- The structure of emergency response roles will change, as ECC and ACP roles are no longer required. Responders and support personnel (such as monitors and undressors) will be available during operational hours (and on best endeavours during silent hours) to support all core tasks and project tasks.
- Personnel will be utilised in their normal daytime operational roles, for which they are already SQEP'd. But will be assigned and routinely tested in relevant roles for emergency arrangements.
- Health Physics advice will be available 24/7.
- The ability for the licensee to call upon emergency services or other external organisations in the event of an emergency remains unchanged.

16. Emergency Facilities

- The existing infrastructure of Emergency Control Centre (ECC), Access Control Point (ACP) and Forward Control Point (FCP) will no longer be maintained – These will be replaced by a more flexible system of incident centres and remote alarm outstations positioned at various locations on the site. Each of these are capable of acting as the incident command centre.
- The site has also invested in improved remote communications systems which relay alarm signals to handheld units held by the Shift Leader, which can also be used to make announcements directly over the site intercom system and direct radio contact with other shift personnel. This means the Shift Lead will be able to command and control an incident from any location on site.

17. Responder times

- A number of on-call duty roles were previously contracted to respond within 1 hour to either support the ECC, ACP or incident scene response. However, due to the reduced need for immediate site response and more conventional nature of foreseeable incidents, the external emergency services will become the primary responders for most incidents on site
- There will no longer be any additional on-call responders above the minimum manning. Additional responders will now be expected to attend on a 'best endeavours' basis and will be contactable by phone rather than pager. I have discussed this aspect with the site safety representatives, and they confirmed that they were not concerned over this aspect from a safety perspective as site staff have responded well in the past when not on-call. I am satisfied this is a reasonable change as the required response times for site events no longer require a 1 hour response time, and previous site responses on a best endeavours basis have been adequate even when quicker response times were required.

18. I have assessed the revised arrangements against the requirements of Licence Condition 11 as defined in ONR's inspection guide (NS-INSP-GD-011) [11], the Ionising Radiation Regulations (IRR99), and ONR's emergency arrangements strategy paper for decommissioning sites (ONR-DFW-PAR-15-004) [13]. I consider that it meets the requirements of those documents.

19. Assessment of the licensee's submission has been completed against the Issue 1 of the emergency arrangements document initially submitted for approval, and also against the issue 2 which was subsequently re-submitted to ONR following changes made to address ONR comments. The assessment was carried out in consultation

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with the licensee and including ONR Emergency Preparedness and Response (EP&R) specialists and ONR Safety and Security Inspectors.

20. From ONRs assessment of the 1st issue submitted, a number of comments on the proposed arrangements were raised with the licensee. This included:
- There was a lack of clarity on command and control and responder roles in the new arrangements.
 - Improved clarity was required on the facilities and equipment that will be maintained to support the command and control and implementation of a site response.
 - Accredited Health Physics support which has previously been a dedicated duty role for the site was removed in the 1st issue of the document. This capability has now been added back in through the provision of Accredited Health Physics advice being made available 24 hours per day (which will generally be on-site during operational hours and available by phone at other times).
 - Improved clarity on the arrangements for other emergency response roles and the SQEP arrangements for these. Rather than have personnel trained in specific emergency response roles, the new arrangements will utilise the staff in their existing site roles. Their capability and SQEP to support an emergency response is ensured through regular exercises and drills.
 - Improved detail was required on how incident scene response is managed to stabilise affected plants and casualties, and how this then hands over to the duty manager for longer term recovery.
 - The existing emergency handbook which contained much of the detail on how the response would be managed was removed, and the 1st issue of the document made no reference to additional guidance other than the contingency plans. This left a gap in the overall suite of arrangements and meant the approved document was not a suitable overview of the licensee's arrangements in their entirety. The licensee has now developed a Contingency handbook, which replaces the previous emergency Handbook, and now contains the additional detail on arrangements, facilities and roles to support a response.
21. These points were sent to the licensee (re TRIM: 2015/323695 [18]). Discussions were held with ONR and the licensee which resulted in an agreement to address these comments made by ONR. These have subsequently been addressed in issue 2 of the arrangements submitted to ONR for approval on 4th August 2015. I have reviewed the resubmission and verified that all of ONRs previous comments have been addressed by the document submitted at issue 2.

2.2 OTHER CONSIDERATIONS

22. I considered if an approval was still required for the Dungeness emergency arrangements, and judged that due to the scalable nature of hazards and site activities through decommissioning it is still appropriate to retain regulatory control of the emergency arrangements. This was discussed with ONR colleagues and EP&R specialist inspectors and it was widely agreed that ONR should continue to approve part of the emergency arrangements. This should be reviewed for each subsequent submission to ensure it remains proportionate to approve the arrangements as the hazards continue to reduce on each site.

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23. The licensee has undertaken a comprehensive programme of local and site wide exercises to ensure staff are familiar with the new arrangements and can respond effectively. I have reviewed the training programme and the SQEP / training records associated with emergency arrangements and judged these to be adequate.
24. The licensee demonstrated the proposed emergency arrangements to ONR's satisfaction at a series of site exercises on August 2014 [14], May 2015 [15] and June 2015 [16], and through compliance inspections [17]. Although improvements were identified from the first exercise in 2014, the following demonstrations in 2015 showed a marked improvement, and demonstrated that the proposed arrangements are effective, providing confidence that the licensee retains adequate capability to respond to incidents on the site.
25. the licensee had duly consulted the licensee's nuclear safety committee at a meeting on 14 August 2014 [19] [20], the minutes of which were attached to TRIM: 2015/333138 [4],
26. The licensee has consulted with the external 'blue light' emergency services and local authorities through the Emergency Planning Consultative Committee (EPCC). There are no matters outstanding from this consultation.
27. I have reviewed the licensee's lower tier contingency handbook [2] and examples of contingency plans [21] to confirm these contain appropriate detail and are consistent with the revised arrangements. I judged these contain the relevant information expected in terms of response arrangements, roles and training. A number of comments were fed back to the licensee to further improve the document, but as this does not form part of the approved arrangements there is no reason to require these changes to be implemented prior to the issue of the Licence Instrument.
28. The licensee has addressed all of the comments that ONR made against the previous version of the emergency arrangements. I have reassessed the new submission and confirmed that all of ONR's feedback has been addressed, and I therefore consider the arrangements to be adequate.
29. Overall, I was content that the licensee was adequately implementing key elements of the Emergency arrangements, which enabled me to support the provision by ONR of the Approval Licence Instrument.
30. I have drafted the standard licence condition 11(3) Approval Licence Instrument, for the approval of the revised Dungeness Emergency Arrangements and withdrawal of the ONR Approval of the previous Dungeness Emergency Plan. The Licence Instrument complies with the extant ONR guidance for the preparation and issue of such standard Approval Licence Instruments (NS-PER-IN-001) [24].

2.3 SUMMARY

31. Overall I consider the revised emergency arrangements, DNA/ACC/EMER Issue 2 [2], to be a suitable document, which fulfils ONR guidance. I see no reason to withhold approval.

3 MATTERS ARISING FROM ONR'S WORK

32. When updating the document DNA/ACC/EMER to address ONR comments from issue 1, the licensee also added a statement that "*A further reduction of staffing may be introduced... if site activities have diminished to a point where monitoring of plant is no longer required...*". This was not one of the changes discussed with ONR. This purpose of this statement has been discussed with the licensee which has confirmed this is a

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standard statement copied from the generic template in error, but does not apply to the current Dungeness arrangements. The licensee has committed that minimum manning will remain at the 4 defined roles until the site enters Interim Care and Maintenance (currently planned 2019), at which point a further revision will be submitted to ONR for approval before the DAP and Responder roles are removed from the minimum manning.

33. A further revision to the Dungeness A emergency arrangements document (DNA/ACC/EMER) will be submitted in October 2015 to incorporate changes to the provision of an external technical support for the Magnox fleet. The licensee has committed to remove this ambiguous statement on reduced manning at the same time. I am satisfied that for this short time there is no detriment to the statement remaining in the document (as the site will retain water in the ponds throughout this period so minimum manning must remain the same). I therefore do not consider it proportionate to require a resubmission just to remove this statement prior to ONR approval.
34. There are no further matters arising from ONR's assessment.

4 CONCLUSIONS

35. I am satisfied that the revision to the emergency arrangements are justified as the licensee has previously demonstrated to ONR's satisfaction that a nuclear emergency is no longer reasonably foreseeable, and the revised arrangements are structured proportionately to a decommissioning site.
36. The licensee successfully demonstrated the sections of the existing arrangements concerned with on-site nuclear incidents to ONR in May and June 2015.
37. I consider that the proposed emergency arrangements will continue to provide suitable and sufficient detail to enable the licensee to safely deal with an on-site emergency should the need arise.

5 RECOMMENDATIONS

38. I recommend that:
- Licence instrument 509 be issued for site licence number 94 to approve DNA Emergency arrangements DNA/ACC/EMER Issue 2, Dungeness A Site Accident and Emergency arrangements, dated July 2015.
 - ONR thereby withdraw LI509 and the approval of DNA EM HBK Section 1.0 DD Issue 3, Magnox Limited Dungeness A Site Emergency Plan dated April 2014.

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6 REFERENCES

1. DNA51596R - Letter from Dungeness A - Request for Approval of Accident and Emergency Arrangements - 4 August 2015. (TRIM reference 2015/310919)
2. DNA/ACC/EMER Issue 2, Magnox Ltd Dungeness A Site Accident and Emergency Arrangements Issue 2, dated July 2015. (TRIM reference 2015/310919)
3. DNA EM HBK Section 1.0 Issue 3, Magnox Ltd Dungeness A Emergency Plan Issue 3, 26th march 2014. (TRIM reference 2014/127932)
4. MXL32228N – Minutes of the Nuclear Safety Committee - Meeting held on 20 August 2014 (TRIM reference 2014/333138)
5. L126 A guide to the Radiation (Emergency Preparedness and Public Information) Regulations 2001. (<http://www.hse.gov.uk/pubns/priced/l126.pdf>)
6. NP/SC 5128 Revision 1 Dungeness 'A': REPPiR Regulation 6(4) Hazard Identification and Risk Evaluation: Report of Assessment. June 2012 (TRIM reference 2012/412855)
7. ONR-CNRP-AR-12-131, Assessment of Dungeness A REPPiR HIRE RoA. 13th March 2013 (TRIM reference 2012/413245)
8. ONR Letter DNA51522R /AT3187, 24th October 2013 (Trim reference 2013/0391167)
9. Dungeness A - Licence Instrument - LI 509 - APPROVAL Granted under Condition 11 (3) of Schedule 2 attached to Nuclear Site Licence No: 94 - 16 July 2014. (Trim reference 2014/294517)
10. Safety Assessment Principles for Nuclear Facilities. 2006 Edition Revision 1. January 2008 (www.hse.gov.uk/nuclear/SAP/SAP2006.pdf)
11. NS-INSP-GD-011 Revision 2 LC 11 – Emergency Arrangements. May 2013 (http://www.hse.gov.uk/nuclear/operational/tech_insp_guides/index.htm)
12. ONR-DFW-IR-15-039 - Dungeness A - Demonstration of revised Emergency Arrangements - 8 to 9 June 2015 (TRIM reference 2015/221424)
13. ONR-DFW-PAR-15-004 Review of ONR's Regulation of Emergency Arrangements at Magnox Reactor Sites - A New Strategy (TRIM reference 2015/161756)
14. IR ONR-DFW-IR-14-124 - Dungeness A - Compliance Inspection Review of Proposed Emergency Arrangements - 12th to 13th August 2014 (TRIM Reference 2014/308349)
15. ONR - CNS - Site - Dungeness A - CT Exercise 27 May 2015 IR Serial No ONR-CNS-IR-031
16. IR ONR-DFW-IR-15-039 - Dungeness A - Demonstration of revised Emergency Arrangements - 8 to 9 June 2015 (TRIM Reference 2015/221424)
17. IR ONR-DFW-IR-15-014 - Compliance Inspections and attendance at SSG - 20-21 April 2015 (TRIM Reference 2015/156351)
18. Dungeness A Emergency Arrangements submission ONR response 1.7.15 (TRIM reference 2015/323695)

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19. Magnox - MXL32227N - Dungeness A - NSC Supporting Papers - NP/SC5241 DUNGENESS A SITE - Proposed change to the Dungeness Emergency plan post REPPiR Regulation 7 (TRIM reference 2015/161756)
20. Magnox - MXL32228N - Dungeness A NSC Supporting Papers - NP/SC 5241 Revision 1 - Proposed Change to the Dungeness Emergency Plan Post REPPiR Regulation 7 – (TRIM reference 2015/333201)
21. Dungeness A Emergency Scheme supporting documents 7.4.15 (TRIM References 2015/16732 & 2015/167340)
22. EP&R feedback on Dungeness A contingency Handbook, 25.8.15 (Trim reference 2015/326198)
23. ONR feedback on Dungeness A contingency Handbook, 2.9.2015 (Trim reference 2015/326199)
24. ONR Instruction – Preparation and Issue of Licence Instruments NS-PER-IN-001 Rev 6. May 2014 (TRIM Reference: 2014/182633)

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