



PROJECT ASSESSMENT REPORT			
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Project:	Amendment to the preface to the Hunterston B Plant Maintenance Schedule		
Site:	Hunterston B		
Title:	Request for Agreement under LC 28(7) for extensions to intervals controlled in accordance with arrangements specified in the preface to the Hunterston B Plant Maintenance Schedule		
Licence Instrument No: (if applicable)	Agreement, LI 551		
Nuclear Site Licence No:	Sc.13		
Licence Condition:	LC 28(7)		

Document Acceptance and Approval for Issue / Publication

Role	Name	Position	Signature	Date
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Reviewer	[REDACTED]	Principal Inspector		22 12 2015
Accepted by ¹	[REDACTED]	Superintending Inspector		22 12 2015
Approval for publication ²	[REDACTED]	Superintending Inspector		22 12 2015

Revision History

¹ Acceptance of the PAR to allow release of LI

² Approval is for publication on ONR web-site, after redaction where relevant

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Scottish Environment Protection Agency	[REDACTED] – Hunterston B Site Inspector	22 12 2015
Licensee	[REDACTED] – Station Director, Hunterston B Power Station	22 12 2015



Amendment to the preface to the Hunterston B Plant Maintenance Schedule

Request for Agreement under LC 28(7) for extensions to intervals controlled in accordance with arrangements specified in the preface to the Hunterston B plant maintenance schedule

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EXECUTIVE SUMMARY

Title

Request for agreement under Licence Condition (LC) 28(7) for extensions to intervals controlled in accordance with arrangements specified in the preface to the Hunterston B plant maintenance schedule.

Permission Requested

EDF Energy Nuclear Generation Ltd (NGL) have written to ONR requesting agreement under LC 28(7) for extensions to intervals controlled in accordance with the arrangements specified in the MITS preface revision 005.

Background

Nuclear site LC 28(4) requires the licensee to provide for the preparation of a plant maintenance schedule for each plant. The schedule identifies the examination, inspection, maintenance and testing necessary to meet the requirements of the safety case. ONR published guidance states it is ONR's current practice in respect of power reactor sites to specify a high-level section of the plant maintenance schedule, often termed the preface, be submitted for approval. Once approved no further alteration or amendment can be made to any approved part of any plant maintenance schedule unless ONR has approved it under LC 28 (5). The maintenance schedule preface also provides an opportunity for ONR to issue a LC 28(7) agreement to extension to maintenance intervals that are controlled in accordance with the preface.

Hunterston B have written to ONR seeking agreement under LC 28(7) for extensions to intervals controlled in accordance with the arrangements specified in the recently amended MITS 5A - Preface. This Project Assessment Report (PAR) considers the request for agreement to extension to intervals controlled in accordance with the arrangements specified in the approved MITS 5A – preface revision 005.

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

From the assessment work undertaken in relation to this application, I am satisfied that:

- The requirements of ONR site inspection and enforcement guidance have been met;
- The proposed amendment retains equivalent information to maintenance schedule preface documents at other sites operated by the licensee and approved by ONR; and
- The proposed amendment retains suitable controls for the extension of intervals in the plant maintenance schedule.

ONR has confirmed by inspection that the controlling engineering change methodology upon which the preface relies to control changes to the intervals has not changed significantly since 2004. The licensee's controls are listed in the preface and include consideration by the Nuclear Safety Committee, documentation control in accordance with LC 6, the control of modifications in accordance with LC 22 and changes to routines under the control of the MITS Review Panel.

Matters arising from ONR's work

ONR has approved revision 005 of the Hunterston B MITS 5A – Preface under Licence Instrument 550 dated 22 December 2015.

I judge that the Hunterston B amended preface along with the arrangements to control extension to intervals specified in the maintenance schedule have been adequately produced.

I have drafted Licence Instrument 551 for agreement to extension to the intervals specified in the approved preface under LC 28(7).

Conclusions

I am content with the arrangements to control extension to the intervals specified in accordance with the approved MITS 5A - preface revision 005 at Hunterston B Power Station and therefore Licence Instrument 551 should be issued.

Recommendations

I recommend that the Superintending Inspector:

- Should sign this PAR to confirm support for the technical and regulatory arguments that justify issuing of Licence Instrument 551.
- Should sign this PAR approving its release for publication, after redaction where relevant.
- Who is authorised to act on behalf of ONR, should sign Licence Instrument 551 granting agreement for extensions to intervals controlled in accordance with the Hunterston B Power Station MITS 5A - preface revision 005.

LIST OF ABBREVIATIONS

EMIT	Examination Maintenance Inspection and Testing
HOW2	(Office for Nuclear Regulation) Business Management System
LC	Licence Condition
MITS	Maintenance Inspection and Test Schedule
NGL	EDF Energy Nuclear Generation Limited
NSC	Nuclear Safety Committee
ONR	Office for Nuclear Regulation
PAR	Project Assessment Report
PMS	Plant Maintenance schedule

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1 PERMISSION REQUESTED

1. EDF Energy Nuclear Generation Ltd (NGL) have written ^[1], ^[2] to ONR requesting agreement under LC 28(7) for extensions to intervals controlled in accordance with the arrangements specified in the MITS Preface Revision 005.

2 BACKGROUND

2. Nuclear site Licence Condition (LC) 28(4) requires the Licensee to provide for the preparation of a plant maintenance schedule (PMS) for each plant. The schedule identifies the examination, inspection, maintenance and testing necessary to meet the requirements of the safety case. ONR published guidance ^[2] states it is ONR's current practice in respect of power reactor sites to specify a high-level section of the plant maintenance schedule, often termed the preface, be submitted for Approval. Once approved no further alteration or amendment can be made to any approved part of any plant maintenance schedule unless ONR has approved it under LC 28 (5). The maintenance schedule preface also provides an opportunity for ONR to issue a LC 28(7) Agreement to extension to maintenance intervals that are controlled in accordance with the preface.
3. Hunterston B have written ^[1], ^[2] to ONR seeking Agreement under LC 28(7) for extensions to intervals controlled in accordance with the arrangements specified in the recently amended MITS 5A - Preface. This Project Assessment Report (PAR) considers the request for agreement to extension to intervals controlled in accordance with the arrangements specified in the approved MITS 5A - Preface Revision 005.

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

4. The original request letter ^[1] was received in March 2014. Due to the time elapsed since it was received, and due to some administrative queries raised regarding its content a further letter ^[2] was received dated 18 December 2015 along with a copy of the Hunterston B power station document titled "Hunterston B Power Station Maintenance Inspection and Test Schedule Preface MITS 5A - Preface Revision 005" ^[4].
5. The document has been assessed and I am satisfied that:
 - The requirements of ONR site inspection and enforcement guidance have been met;
 - The proposed amendment retains equivalent information to maintenance schedule preface documents at other sites operated by the Licensee and approved by ONR; and
 - The proposed amendment retains suitable controls for the extension of intervals in the plant maintenance schedule.
6. ONR has confirmed by inspection that the controlling engineering change methodology upon which the preface relies to control changes to the intervals has not changed significantly since 2004. The Licensee's controls are listed in the preface and include consideration by the Nuclear Safety Committee, documentation control in accordance with LC 6, the control of modifications in accordance with LC 22 and changes to routines under the control of the MITS Review Panel.

4 MATTERS ARISING FROM ONR'S WORK

7. ONR has Approved Revision 005 of the Hunterston B MITS 5A – Preface ^[3] under Licence Instrument 550 dated 22 December 2015.

8. I judge that the Hunterston B amended preface along with the arrangements to control extension to intervals specified in the maintenance schedule have been adequately produced.
9. Following the issue of Licence Instrument 550 it would now be appropriate to issue a Licence Instrument under LC 28(7).
10. I have drafted Licence Instrument 551 for Agreement under LC 28(7) for extensions to intervals controlled in accordance with the arrangements specified in Revision 005 of the Hunterston B MITS 5A - Preface.

5 CONCLUSIONS

11. I have confirmed that the engineering change methodology upon which the preface relies to control changes to the intervals has not changed significantly since 2004. The Licensee's controls are listed in the preface and include consideration by the Nuclear Safety Committee along with the Licensees arrangements to control documentation, modifications and changes to routines.
12. I am content with the arrangements to control extension to the intervals specified in accordance with the Approved MITS 5A - Preface Revision 005 at Hunterston B Power Station based on:
 - MITS 5A - Preface Revision 005 is Approved by Licence Instrument 550.

6 RECOMMENDATIONS

13. I recommend that the Superintending Inspector:
 - Should sign this Project Assessment Report to confirm support for the technical and regulatory arguments that justify issuing of Licence Instrument 551.
 - Should sign this Project Assessment Report approving its release for publication, after redaction where relevant.
 - Who is authorised to act on behalf of ONR, should sign Licence Instrument 551 granting Agreement for extensions to intervals controlled in accordance with the Hunterston B Power Station MITS 5A - Preface Revision 005.

7 REFERENCES

- [1] EDF, *Letter requesting approval of MITS Preface revision 005*, 11 March 2014, TRIM 2014/107359.
- [2] EDF, *Letter requesting approval of MITS Preface revision 005*, 18 December 2015. TRIM 2015/481419.
- [3] ONR, *HOW 2 Guidance: LC28 Examination, Inspection, Maintenance and Testing (EMIT), NS-INSP-GD-028 Revision 3*, May 2013, http://www.onr.org.uk/operational/tech_insp_guides/ns-insp-gd-028.pdf.
- [4] NGL, *Hunterston B MITS 5A - Preface Revision 005*. TRIM 2015/481427.
- [5] ONR, *Licence Instrument 550 – Approval granted under Condition 28 (5) of Nuclear site Licence No. Sc.13*. December 2015. TRIM 2015/400149.