



**Emergency Arrangements**

**Approval of the revised Sellafield and Windscale Sites Emergency Plan**

Project Assessment Report ONR-SEL-PAR-15-012  
Revision 1  
April 2016

© Office for Nuclear Regulation, 2016

If you wish to reuse this information visit [www.onr.org.uk/copyright](http://www.onr.org.uk/copyright) for details.

Published 04/16

*For published documents, the electronic copy on the ONR website remains the most current publicly available version and copying or printing renders this document uncontrolled.*

## EXECUTIVE SUMMARY

### Approval of the revised Sellafield and Windscale Sites Emergency Plan

#### Permission Requested

Sellafield Limited, the licensee, has submitted a written request to the Office for Nuclear Regulation (ONR) for approval of revisions to their site Emergency Plan (covering both the Sellafield and Windscale licensed sites) in accordance with arrangements made under Licence Condition 11 (LC11).

#### Background

Licence Condition 11 (LC11), Emergency Arrangements, requires the licensee to make and implement adequate arrangement for dealing with any accident or emergency arising on the site and their effects. In order to comply with this requirement, Sellafield Limited issues an Emergency Plan, which summarises the response scheme applying to emergencies on either of the two licenced sites at Sellafield.

ONR has previously approved the current issue of this Emergency Plan using our powers under LC11(2). As such, by virtue of LC11(3), should any part of that Plan be revised, the document will require re-approval by ONR, prior to implementation of those revised arrangements

Subsequent to a recent Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPPIR) submission to ONR, Sellafield Limited have proposed a number of amendments to their Emergency Plan. These changes are designed to ensure consistency in definitions, as well as making provision for bringing the emergency management organisation to a higher state of readiness for minor incidents that could foreseeably escalate into a Site Incident

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

I commissioned a specialist assessment of the licensee's proposed revisions to their Emergency Plan, focussing on the proposed revisions. I confirm, based on this assessment and my own review work that the proposed revisions meet the requirements of ONR's guidance and appear to be appropriate.

#### Matters arising from ONR's work

There are no matters arising from ONR's assessment.

#### Conclusions

The proposed revisions to the Emergency Plan, submitted by Sellafield Limited, have been approved by the Sellafield Security and Resilience Steering Committee, and noted by the site Nuclear Safety Committee.

I consider that the arrangements, as stated at the proposed revised Emergency Plan, are adequate to satisfy the requirements of Licence Condition 11.

#### Recommendation

I recommend that ONR should approve, under Licence Condition 11(3), the revised Emergency Plan for the Sellafield and Windscale licensed sites by the issue of Licence Instrument No. 892.

## LIST OF ABBREVIATIONS

CCC	Cumbria County Council
EP&R	Emergency Preparedness and Response
ONR	Office for Nuclear Regulation
REPPIR	Radiation (Emergency Preparedness and Public Information) Regulations

## TABLE OF CONTENTS

1	PERMISSION REQUESTED.....	6
2	BACKGROUND.....	6
3	ASSESSMENT AND INSPECTION WORK CARRIED OUT BY ONR IN CONSIDERATION OF THIS REQUEST .....	6
4	MATTERS ARISING FROM ONR'S WORK.....	7
5	CONCLUSIONS .....	7
6	RECOMMENDATIONS .....	7
7	REFERENCES .....	8

## 1 PERMISSION REQUESTED

1. Sellafield Limited, the licensee, has written to the Office for Nuclear Regulation (ONR), requesting approval of revisions to their site Emergency Plan, Issue 15, April 2015 [Ref.1].

## 2 BACKGROUND

2. Licence Condition 11 (LC11), Emergency Arrangements, requires the licensee to make and implement adequate arrangement for dealing with any accident or emergency arising on the site and their effects. In order to comply with this requirement, Sellafield Limited issues an Emergency Plan, which summarises the response scheme applying to emergencies on either of the two licenced sites at Sellafield.
3. ONR has previously approved the current issue of this Emergency Plan using our powers under LC11(2). As such, by virtue of LC11(3), should any part of that Plan be revised, the document will require re-approval by ONR, prior to implementation of those revised arrangements.
4. Subsequent to a recent Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR) submission to ONR, Sellafield Limited have proposed a number of amendments to their Emergency Plan. These changes are designed to ensure consistency in definitions, as well as making provision for bringing the emergency management organisation to a higher state of readiness for minor incidents that could foreseeably escalate into a Site Incident.

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

5. The key revisions being proposed by Sellafield Limited to their Emergency Plan are in the following areas:
  - Change of the wording for indicating that a Radiation Emergency (as defined under REPPiR) has occurred, to ensure alignment with that guidance, as well as increasing consistency with other UK licensees and external organisations.
  - Modification of the section of the Plan that describes the scope and intent of Cumbria County Council's (CCC) Off Site Emergency Plan for Sellafield, to ensure that Sellafield Limited's Emergency Plan remains consistent with the intent of the wider off-site response.
  - Changes to the description of the Reference Accident (in REPPiR terms, the reasonably foreseeable radiation emergency), to reflect the updated REPPiR submission made by Sellafield Limited in 2013.
  - Inclusion of an 'Operational Alert' site emergency condition, used where an event is not considered to be either a 'Site Incident' or an 'Off Site Nuclear Emergency', but where initiation of all or part of the site emergency organisation is considered appropriate.
  - Changes to reflect recent minor additions and changes within Sellafield Limited's emergency response organisation roles and responsibilities.
6. As part of my assessment, I requested a review of the proposed changes by an ONR inspector within the Emergency Preparedness and Response (EP&R) specialism. Their assessment [Ref. 2] indicated that there were no major issues identified with the changes proposed by Sellafield Limited.

7. A number of minor amendments were proposed by the specialist inspector, many of which were accepted by the licensee and incorporated into the proposed revision [Ref. 3 and Ref. 4]. As part of their assessment of the proposed revision, the specialist inspector has sought the views of an ONR security inspector, to ensure that all matters of security relating to implementation of the site Emergency Plan have been fully considered.
8. The licensee also intends to update this Plan as part of a future document update, following the phased implementation of the arrangements for the Sellafield off-site emergency planning and public information area, which is the responsibility of CCC. I consider that this will be a further opportunity to incorporate any remaining minor amendments, without disproportionate effort on the part of the licensee. My view has been communicated to the licensee [Ref. 5].
9. The specialist inspector has reviewed the subsequent document amendments to the proposed revised Emergency Plan, and is content that no further alterations should be sought at this time [Ref. 6].
10. I have noted that the proposed revisions to the Emergency Plan, submitted by Sellafield Limited, have been approved by the Sellafield Security and Resilience Steering Committee, and noted by the site Nuclear Safety Committee.
11. As part of my assessment, I reviewed ONR's recent consideration of further regulatory action in relation to the resilience of the Sellafield Site to Severe Accident and Beyond Design Basis Events [Ref. 7]. That regulatory decision had been prompted by ONR's concerns regarding the slower than expected pace of delivery for enhancement of the emergency arrangements at site. In my opinion, the matters considered there are not relevant to this regulatory decision.

#### **4 MATTERS ARISING FROM ONR'S WORK**

12. There are no matters arising from my assessment.

#### **5 CONCLUSIONS**

13. I have satisfied myself, through assessment by a specialist inspector, and in accordance with ONR guidance, that the proposed revisions to the Sellafield site Emergency Plan are adequate to satisfy the requirements of Licence Condition 11.

#### **6 RECOMMENDATIONS**

14. I recommend that ONR should approve, under Licence Condition 11(3), the revised Emergency Plan for the Sellafield and Windscale licensed sites by the issue of Licence Instrument No. 892.

## 7 REFERENCES

1. *Formal written request from Sellafield Limited (e-mailed) for approval of revisions to their Emergency Plan, dated 6 November 2015. ONR/15/11712/02.*  
**[TRIM 2015/417431]**
  
2. *ONR-COP-EPR Sellafield. Accepted Review of Sellafield and Windscale Emergency Plan SLM 2.02.03 Issue 15 04/2015.*  
**[TRIM 2015/459797]**
  
3. *Sellafield LC11 Emergency Plan. E-mail from [Name withheld] including tracked changes copy of SLM 2.02.03 Issue 15.*  
**[TRIM 2015/436401]**
  
4. *Sellafield and Windscale Sites Emergency Arrangements Emergency Plan. SLM 2.02.03 Issue 15. 04/2015. Changes incorporated. Not Signed.*  
**[TRIM 2015/436391]**
  
5. *ONR-COP-CR-15 - Review of Comments on the Sellafield Ltd Emergency Plan SLM 2.02.03 Issue 15. – [Name of ONR EP&R specialist inspector withheld] - October 15*  
**[TRIM 2015/366381]**
  
6. *ONR-EPR E-mail to [name withheld] RE: LC11 Emergency Plan 29th October 2015*  
**[TRIM 2015/445559]**
  
7. *ONR-SEL-PAR-15 006 - ONR consideration of further regulatory action in relation to the resilience of the Sellafield Site to Severe Accident and Beyond Design Basis Events – [Name of ONR project inspector withheld] – September 15*  
**[TRIM 2015/320152]**