



Springfields Fuels Limited

Licence Condition 11 Emergency Arrangements

Approval of Springfields On-Site Emergency Plan

Project Assessment Report ONR-SDFW-PAR-16-028
Revision 0
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EXECUTIVE SUMMARY

Title

Approval of Springfields On-Site Emergency Plan.

Permission Requested

This project assessment report relates to a request from Springfields Fuels Limited for an approval of the revised On-Site Emergency plan under Licence Condition (LC) 11(3) of nuclear site licence 79.

Background

The siting, design, construction, operation and decommissioning of all civil nuclear sites are subject to the granting of a nuclear site licence by the Office for Nuclear Regulation (ONR). A nuclear site licence is granted only after ONR has fully satisfied itself that the licensee has made an adequate safety case for the site and developed appropriate safety standards.

The implementation of these standards reduces the chance of an accident or emergency that might lead to the release of radioactivity to an acceptably low level. Nevertheless, it is a condition of each nuclear site licence that there shall be arrangements for dealing with an accident or emergency.

The On-Site Emergency Plan is a key document in the description of these arrangements and ensures that necessary actions will be implemented to protect members of the public, site personnel, and the environment from the effects of an accident or emergency in the unlikely event that it should occur.

The licensee has carried out a routine review of its On-Site Emergency Plan. As required by LC 11(3), the licensee has written to ONR to request approval of its revised emergency arrangements that are set out in the plan.

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

ONR has carried out a programme of assessment and approval of previous revisions to the On-Site Emergency Plan. The extant plan was reviewed and approved in 2012.

I have assessed the differences between the proposed new plan and the existing approved plan and I have assessed against the ONR guidance on Emergency Arrangements. The principal changes to the plan are to align with the closure of one of the facilities, which has led to an overall reduction in hazards on the site and the change of security arrangements.

The licensee has continued to achieve adequate performance when demonstrating the On-Site Emergency Plan aspects of the LC11 emergency arrangements, the most recent example being at the emergency exercise observed by ONR on 15th September 2016.

ONR has also carried out an assessment of the licensee's LC11 arrangements. The findings of this assessment were that the arrangements were adequate. Some minor shortfalls were found which the licensee is addressing, none of which would preclude the issue of the requested approval.

Matters arising from ONR's work

There are no matters arising from this project assessment report.

Conclusions

I am satisfied that the revised emergency plan introduces only minor changes to the extant arrangements and that it aligns with ONR's guidance on Emergency Arrangements. Therefore I conclude that it satisfies the requirements of LC11.

Recommendation

I recommend that "Approval" is given under Licence Condition 11(3) for the revised Springfields Fuels Limited On-Site Emergency Plan and that Licence Instrument 523 be issued.

LIST OF ABBREVIATIONS

ONR	Office for Nuclear Regulation
LC	Licence Condition
CNC	Civil Nuclear Constabulary
TIG	Technical Inspection Guide (ONR)
NSSP	Nuclear Site Security Plan
NISR	Nuclear Industry Security Regulations
EA	Environment Agency
COSR	Continued Operations Safety Report
ECC	Emergency Control Centre

TABLE OF CONTENTS

1	PERMISSION REQUESTED	7
2	BACKGROUND	7
3	ASSESSMENT AND INSPECTION WORK CARRIED OUT BY ONR IN CONSIDERATION OF THIS REQUEST	7
4	MATTERS ARISING FROM ONR'S WORK.....	8
5	CONCLUSIONS	9
6	RECOMMENDATIONS.....	9

1 PERMISSION REQUESTED

1. Springfields Fuels Limited (the licensee) has requested the Office for Nuclear Regulation's (ONR's) "Approval" under Licence Condition 11(3) for its proposed changes to the Springfields On-Site Emergency Plan [Ref 1]. This revision is documented as the "Springfields On-Site Emergency Plan October 2015" [Ref 2].
2. The licensee currently has an approved on-site emergency plan [Ref 3]. Licence Condition (LC) 11(3) requires the licensee to ensure that no alteration or amendment is made to an approved emergency plan unless 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 [Ref 4].

2 BACKGROUND

4. As required by its arrangements, the licensee has undertaken a three yearly review of its On-Site Emergency Plan.
5. The licensee has carried out a gap analysis between the requirements of Nuclear Safety Technical Inspection Guide (TIG) (NS-INSP-GD-011 Revision 3) and the revised emergency plan [Ref 5]. This analysis did not highlight any significant shortfalls. (Note: The extant version of the TIG NS-INSP-GD-011 is Revision 4 which was issued in June 2016. The licensee carried out their gap analysis against Revision 3 in October 2015.)
6. The proposed On-Site Emergency Plan was shared with the Emergency Planning Consultative Committee [Ref 8].
7. The site is an upper tier COMAH site. COMAH Regulations 2015 also require an emergency plan. This is adequately addressed by the LC 11 arrangements.
8. As required by LC11 (3), the licensee has written to ONR to request approval of its revised emergency plan [Ref 1].

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

9. In my assessment of the proposed emergency plan I have considered the differences between the extant plan [Ref 3] and proposed plan [Ref 2].
10. In addition to reformatting and the removal of duplication from the Off-Site Emergency Plan 2015 the only other differences are that the plan has been aligned with the closure of the uranium hexafluoride plant, which has the benefit of reducing the hazard on the site, and a change in the provision of site security arrangements. The site is now guarded by a site guard force rather than the Civil Nuclear Constabulary (CNC). The change of guard force arrangements has been previously assessed by ONR, and confirmation has been provided by ONR Civil Nuclear Security that they are satisfied with the new security arrangements made under the approved Nuclear Site Security Plan in accordance with Nuclear Industries Security Regulations (NISR) [Ref 6].
11. I queried the apparent loss of the position of Engineering Response Supervisor from the Forward Control Point with the licensee. The licensee explained that, rather than send an engineer direct to the Forward Control Point (FCP), the Engineering Controller, in consultation with the Incident Commander, will direct appropriate engineering resource to the appropriate command centre (Emergency Control Centre

or Forward Control Point), and that reflects the practises demonstrated during recent exercises. I am satisfied with the response from the licensee to my query [Ref 7].

12. Springfields Continued Operations Safety Report (COSR) on Emergency Services and Arrangements was issued in March 2016 in support of the LC 11 arrangements. This report, along with associated documents, made a number of recommendations both to enhance equipment required to deliver the emergency plan and to replace existing equipment where necessary. The licensee has confirmed that the following 3 safety significant recommendations have been completed:

- Replace one of the two existing fire engines and update the maintenance schedule
- Borehole water system – put in place appropriate operating instructions to ensure sudden variations in operating pressures are avoided when pumping
- Complete implementation of the web based Rapid Reach system by March 2016, including training and testing

There is one outstanding safety significant recommendation: one toxic release alarm does not alarm on the Emergency Control Centre (ECC) mimic panel. This is due to be resolved by 31/12/2016. I am content with this position.

13. The COSR also made 30 lesser safety significant recommendations. To date 22 have been completed, and the target completion date for the remaining recommendations is 31st December 2016. The licensee has provided an action tracker which gives the current status of all of the recommendations, both safety significant and lesser safety significant. [Ref 12]. I am content with the licensee's response to the recommendations. The reports are filed in Trim folder 4.4.2.17124.
14. ONR has carried out an assessment of the licensee's LC11 arrangements, which are judged to be adequate. Some minor shortfalls were found which the licensee is addressing. In particular, more focus is to be placed on the recovery phase of exercises and emergencies which has recently been demonstrated to ONR, and the Emergency Control Centre has been extended and refurbished to a good standard, the operation of which has been observed by ONR [Ref 9].
15. The licensee has continued to achieve adequate performance when demonstrating the On-Site Emergency Plan aspects of the LC11 emergency arrangements, the most recent example being at the emergency exercise observed by ONR on 15th September 2016. [Ref 9].
16. I have confirmed that the proposed plan aligns with ONR's emergency arrangements guidance [Ref 10].
17. The Environment Agency (EA) was consulted regarding the proposed Approval of the "On-Site Emergency Plan", and confirmed that they had no significant comments to make and have no objection to the Approval of the revised plan. [Ref 11].
18. I have drafted Licence Instrument (LI) 523 in response to the licensee's request for the "Approval of Springfields On-Site Emergency plan" under Licence Condition 11(3). This LI is one of the standard formats given within ONR procedures and so it does not require review by Treasury Solicitor's Department.

4 MATTERS ARISING FROM ONR'S WORK

19. There are no matters arising from this project assessment report.

5 CONCLUSIONS

20. I am satisfied that the revised emergency plan introduces only minor changes to the extant arrangements, and that the assessment that has been carried out demonstrates that these changes are judged to be adequate.
21. The licensee has continued to successfully demonstrate the implementation of the “On-Site Emergency Plan”.
22. Finally, I conclude that a LC 11(3) “Approval” Licence Instrument can be issued.

6 RECOMMENDATIONS

23. I recommend that “Approval” is given under Licence Condition 11(3) for the revised Springfields Fuels Limited On-Site Emergency Plan and that Licence Instrument 523 be issued.

REFERENCES

1. Springfields Fuels Limited TOONR 90/15, Letter from Springfields Fuels Limited request for Approval of the revised Springfields On-Site Emergency Plan, 1 November 2015. (TRIM reference 2015/442310).
2. Springfields On-Site Emergency Plan October 2015. (TRIM reference 2016/461499).
3. Springfields On Site Emergency Plan October 2012. (TRIM reference 2012/401051).
4. Minutes of the 59th Springfields Environment, Health and Safety Committee – Meeting held on 20th October 2015 (TRIM reference 2015/486282).
5. Gap analysis between Nuclear Safety Technical Inspection Guide (NS-INSP-GD-011 Revision 3) and the Springfields On-Site Emergency Plan – compiled by Springfields Fuels Limited in October 2015 (TRIM reference 2015/482364).
6. Confirmation from ONR Civil Nuclear Security on satisfaction of new security arrangements. (TRIM reference 2016/460515).
7. Email queries between ONR and licensee and (TRIM reference 2016/469232).
8. Minutes of 22nd meeting of the Lancashire County Council Emergency Planning Consultative Committee. (TRIM reference 2016/469189).
9. Confirmation of observations of Level One Emergency Exercise “Honister” held on 15th September 2016 and request for a response to the exercise by the end of November 2016. (TRIM reference 2016/374076).
10. Check carried out that the revised On-Site Emergency Plan meets the requirements of the LC 11 Emergency Arrangements Technical Inspection Guide NS-INSP-GD-011 Revision 4. (TRIM reference 2016/461131).
11. Email from [REDACTED] Environment Agency, confirming that he has no significant comments to make on the proposed “On-Site Emergency Plan” and no objection to the Approval of the revised plan. (TRIM reference 2016/460808).
12. Licensee’s action tracker for the COSR on Emergency Services and arrangements March 2016 recommendations. (TRIM reference 2016/464964).