



AWE Corporate

**Approval of amendments to the terms of reference of the AWE Nuclear Safety
Committees**

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EXECUTIVE SUMMARY

Approval of Amendments to the Terms of Reference of the AWE Nuclear Safety Committees

Permission Requested

AWE plc, the site license company (the Licensee) that operates the Aldermaston and Burghfield Sites, has requested ONR to approve amended terms of reference of the Nuclear Safety Committees.

Background

The current terms of reference for the AWE Nuclear Safety Committees (NSC) were approved by ONR in 2011 following a comprehensive review by AWE of the functioning of the NSC. Since then, a number of changes to AWE's organisation structure and operational procedures have occurred which affect the terms of reference of the NSC. The request for approval of amended terms of reference addresses these changes and aligns the workings of the NSC with AWE's current organisation structure and operational procedures.

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

ONR has assessed the documents containing the changes to the terms of reference and has discussed the rationale for the changes with the NSC Chairperson.

Matters arising from ONR's work

There are no significant findings from the work that would prevent approving the changes to the terms of reference of the NSC.

Conclusions

The ONR programme of assessment gives sufficient confidence to approve the changes to the terms of reference of the AWE NSC through the issuing of Licence Instruments No. 533 for the Aldermaston Site and Licence Instrument No. 533 for the Burghfield Site, and the withdrawal of Licence Instruments No. 521 (Aldermaston) and 521 (Burghfield).

Recommendation

Licence Instruments No. 533 for the Aldermaston and Burghfield Sites for the approval of amendments to the AWE Nuclear Safety Committees terms of reference should be issued to the Licensee and the current approval under Licence Instruments Number 521 should be withdrawn.

LIST OF ABBREVIATIONS

AWE	Atomic Weapons Establishment
NSC	Nuclear Safety Committee
ONR	Office for Nuclear Regulation
TAG	Technical Assessment Guide (ONR)

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1 PERMISSION REQUESTED

1. The Licensee requested ONR's Approval under Licence Condition 13(3) for amended terms of reference of the AWE Nuclear Safety Committees.

2 BACKGROUND

2. As required by LC13(1) the licensee must establish a nuclear safety committee or committees to which it shall refer for consideration and advice. The current terms of reference for the AWE Nuclear Safety Committees (NSC) were approved by ONR in 2011 following a comprehensive review by AWE of the functioning of the NSC.
3. Since then, there have been a number of changes to AWE's organisation structure and operational procedures that affect the terms of reference of the NSC.
4. An initial request was received from AWE in February 2016 for the approval of amended terms of reference, which address these changes and align the workings of the NSC with AWE's current organisation structure and operational procedures. (Ref. 1). ONR undertook assessment work following this request.
5. Due to the need for AWE to align other related management procedures with DNSR requirements, this request was subsequently withdrawn and further requests received in February 2017 (Ref 2) and March 2017 (Ref. 3).

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

3.1 ONR ASSESSMENT

6. ONR has reviewed the amended NSC ToR as a whole against ONR Assessment Guidance (Ref 9) and considers that the aspects of the ToR not subject to changes have been previously assessed in detail (Ref 5) as meeting relevant requirements of LC13. ONR has therefore focused its assessment on the specific changes from the existing terms of reference (Ref 4) to the NSC TOR submitted in February 2016 (Ref 1). The findings are given below.
7. Key changes and rationale for the changes are:
 - 7.1 Removing conditions that were not in line with current practices, namely, removing the requirement for papers to be submitted 10 days in advance – which is not necessarily current practice in all circumstances and not always practical in the opinion of AWE;
 - 7.2 Changes to reflect current organisational arrangements and structure including:
 - linking the requirement to provide formal consideration and advice to dose levels rather than Cat A and B mods;
 - updating the recipient in AWE of advice from NSC;
 - revising what should be seen by the NSC (following a review) e.g. 1500 Series Arrangements linked to Licence Conditions not currently seen by NSC;
 - 7.3 Clarifying terminology and responsibilities within the NSC including:
 - removing the term 'extraordinary meeting' in order to prevent confusion with urgent safety advice;

- clarifying who makes appointments to the NSC;
 - clarifying responsibilities for informing ONR when advice from the NSC is not taken;
 - clarifying the role of NSC in giving advice.
8. ONR discussed with AWE the rationale for using dose levels rather than Categories as the means for defining when formal consideration and advice was required. Dose levels have been used in order to give a level of independence to the NSC as to what it gives advice on. The dose levels are absolute, whereas Categories may be redefined. ONR confirmed that the dose levels being used are consistent with the Categories previously used and that the NSC would therefore provide advice on the same type of changes and modifications. (Ref 12).
9. The changes made meet one of the expectations arising from our inspection of the NSC in December 2014 (Ref 6) with respect to clarifying that the terms of reference do not address arrangements for urgent safety advice under LC13 (11). AWE is working with ONR to address ONR's expectations regarding having suitable arrangements for LC13(11) and this will form part of a separate approval.
10. Following ONR's discussions with the NSC Chair and NSC Secretary (Ref 7), a minor amendment was made to the NSC ToR to remove references to specific role titles that might require a change to the Terms of Reference in the future if the role title changed. This did not result in a new revision number of the NSC Terms of Reference but the date and description were changed to provide an audit trail (Supplement to ESH-MSS-1513 Issue 3 May 2016). (Ref 8)
11. Due to other AWE management procedures needing to be aligned with DNSR requirements, it was necessary to delay issuing final approval in order for the NSC Terms of Reference to remain consistent with both ONR and DNSR arrangements. AWE issued a new request for approval of the NSC TOR in February 2017 (Ref 2). Following a final review by DNSR, additional amendments were necessary which resulted in a further request for approval and renumbered version of the NSC ToR (Ref 3)
12. ONR has confirmed that the findings from the assessment of the ToR received in 2016 (Ref 1) are applicable to the renumbered amended Terms of Reference received in March 2017 (Ref 3) and that the changes made for the purposes of complying with DNSR requirements have not had any impact on the conclusions for ONR.
13. From the discussion above, there are no issues that should prevent ONR from approving the new Terms of Reference.(Ref 3)

3.2 LIAISON WITH OTHER REGULATORS

14. ONR has confirmed DNSR and the Environment Agency are content with the changes to the arrangements for AWE's Nuclear Safety Committees. (Ref 10 and 11)
15. The Environment Agency raised whether the amended Term of Reference should include more information on the rationale for using dose levels as a trigger for advice. ONR considered that this was not necessary given no explanation had been required to explain the meaning of Categories as the trigger for advice in the previous Terms of Reference.

3.3 LICENCE INSTRUMENT

16. One licence instrument is required for each site to approve the Nuclear Safety Committees ToR:

- LI 533: Aldermaston Site Licence Number 77 Licence Instrument for Approval of alteration or amendment to the AWE Nuclear Safety Committee's Terms of Reference. (Ref 13).
- LI 533: Burghfield Site Licence Number 78A Licence Instrument for Approval of alteration or amendment to the AWE Nuclear Safety Committee's Terms of Reference. (Ref 14).

4 MATTERS ARISING FROM ONR'S WORK

17. No issues preventing the issue of the requested Licence Instruments arose from the assessment of the Licensee's submission.

5 CONCLUSIONS

18. This report presents the findings of ONR's assessment of the Licensee's proposal to revise the Terms of Reference of the AWE NSC.
19. To conclude, ONR is broadly satisfied with the approach taken by AWE to review the arrangements of the NSC, the process that has been used to consider the alterations to the arrangements, the evidence provided, and that the resulting changes meet the requirements of LC13.
20. ONR should approve the amended Terms of Reference for the AWE Nuclear Safety Committees and upon approval, withdraw Licence Instrument 521 for the Aldermaston Site and Licence Instrument 521 for the Burghfield Site.

6 RECOMMENDATIONS

21. The Operating Sites Programme Deputy Chief Nuclear Inspector signs Aldermaston Licence Instrument Number 533 and Burghfield Licence Instrument Number 533 and upon approval, withdraw Licence Instrument 521 for the Aldermaston Site and Licence Instrument 521 for the Burghfield Site.

7 REFERENCES

1. Letter from AWE Reference ONR 013-073 February 2016 (Trim Reference 2016/48450)
2. Letter from AWE Reference ONR-013-86 February 2017 (Trim Reference 2017/58464)
3. Letter from AWE Reference ONR-013-88 March 2017 (Trim Reference 2017/115458)
4. AWE Supplement to ESH-MSS-1513 Issue 2 February 2011 Terms of Reference Nuclear Safety Committee (Trim Reference 2011/118379)
5. PAR 04/2011 Approval of Amended Terms of Reference 21 February 2011 (Trim Reference 2011/109244)
6. Intervention Record ONR-DEF-IR-181 December 2014 (Trim Reference 2014/468134)
7. Contact Record. ONR-OPF-CR-16-049 April 2016 (Trim Reference 2016/176296)
8. Email and updated ToR 2016/0244553
9. ONR Guidance. NS-INSP-GD-013-LC13 Nuclear Safety Committee
http://www.onr.org.uk/operational/tech_insp_guides/ns-insp-gd-013.pdf
10. Confirmation email from Environment Agency (Trim Reference 2017/ 87747)
11. Confirmation email from DSNR (Trim Reference 2017/0153204)
12. Emails ONR AWE EA discussion on use of dose limits in ToR (Trim references 2016/244428, 2016/244432)
13. LI533 Aldermaston (Trim Reference 2016/244124)
14. LI533 Burghfield (Trim Reference 2016/244290)