



GE Healthcare Limited

Licence Condition 11 Emergency Arrangements

**Approval of the amended GE Healthcare Limited Grove Centre Emergency Plan made
under LC11.**

Project Assessment Report ONR-SDFW-PAR-16-045
Revision 0
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EXECUTIVE SUMMARY

Title

Approval of the amended GE Healthcare Limited Grove Centre Emergency Plan made under LC11.

Permission Requested

This project assessment report relates to a request from GE Healthcare Ltd for an approval of amendments to the GE Healthcare Limited Grove Centre Emergency Plan made under Licence Condition (LC) 11(1) of nuclear site licence 32A.

Background

The GE Healthcare UK Limited Grove Centre develops and produces diagnostic imaging pharmaceuticals for use in the detection, diagnosis and management of diseases. Radioactive waste is also stored at the site.

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

The implementation of these arrangements is aimed at reducing to an acceptably low level both the chance of an accident or emergency that might lead to the release of radioactivity, and the subsequent size of any release. Nevertheless, it is a condition of each nuclear site licence that there shall be arrangements for dealing with an accident or emergency.

The Emergency Plan is a key document in these arrangements and ensures that necessary actions will be implemented to protect workers and the public from the effects of an accident or emergency in the unlikely event that it should occur. Due to its importance, ONR may approve the Emergency Plan to ensure that any subsequent changes are assessed for adequacy by ONR.

The licensee has carried out a routine periodic review of its Emergency Plan and identified some changes it considers to be necessary. As required by LC 11(3), the licensee has written to ONR to request approval of its amended emergency arrangements so that it can incorporate them into its Emergency 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 amendments to the licensee's Emergency Plan. The extant emergency plan was reviewed and approved in 2009.

I have assessed the differences between the proposed new plan and the existing approved plan, informed by ONR guidance on Emergency Arrangements. The principal change to the plan is to clarify the role of the Grove Centre emergency organisation, with respect to an emergency at the GE Healthcare Cardiff nuclear licensed site.

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 2015.

Matters arising from ONR's work

There are no matters arising from this Project Assessment Report (PAR).

Conclusions

I am satisfied that the proposed amendments to the Emergency Plan are minor and that the amended plan meets ONR guidance on Emergency Arrangements. Therefore, I conclude that it satisfies the requirements of LC11(1).

Recommendation

I recommend that an approval should be granted under Licence Condition 11(3) allowing GE Healthcare Limited to make the requested amendments to its Grove Centre Emergency Plan and that Licence Instrument 507 be issued to implement them.

LIST OF ABBREVIATIONS

ONR	Office for Nuclear Regulation
LC	Licence Condition
TIG	Technical Inspection Guide (ONR)
EA	Environment Agency
NSC	Nuclear Safety Committee
REPPIR	Radiation (Emergency Preparedness and Public Information) Regulations

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1 PERMISSION REQUESTED

1. GE Healthcare 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 GE Healthcare Limited Grove Centre Emergency Plan [Ref 1]. This revision is documented as the "Grove Centre Emergency Plan Issue 5 February 2017" [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 amendments to the plan have been subject to the licensee's due governance process and its Nuclear Safety Committee has been informed of the revision of the Emergency Plan. Due to the minor nature of the changes the licensee's arrangements do not require the revised Emergency Plan to be formally presented to the NSC [Ref 4].

2 BACKGROUND

4. The licensee has undertaken a periodic review of its GE Healthcare Limited Grove Centre Emergency Plan.
5. The revised plan incorporates the requirement to establish the Grove Centre emergency organisation for a Cardiff nuclear licensed site emergency.
6. 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

7. In my assessment of the proposed emergency plan, I have considered the differences between the extant emergency plan [Ref 3] and the proposed emergency plan [Ref 2].
8. The revised plan incorporates the requirement to establish the Grove Centre emergency organisation for a Cardiff nuclear licensed site emergency, removes the location of the ECC from the plan, and strengthens the link with security arrangements.
9. The proposed changes to the plan have completed the licensee's governance process. The licensee's nuclear safety committee (NSC) have been informed of the changes. However, as the changes are only minor, the licensee's arrangements do not require the revised plan to be formally presented to the NSC [Ref 4].
10. The licensee has continued to achieve an adequate performance when demonstrating the Grove Centre Emergency Plan aspects of the LC11 emergency arrangements, the most recent example being at the emergency exercise observed by ONR on 15th September 2015. [Ref 5]. The new emergency plan will be observed on 11 October 2017.
11. I have consulted with ONR Civil Nuclear Security concerning the proposed approval of the revised Emergency Plan. I have obtained confirmation that they have no objections to the approval being issued [Ref 6].
12. The Environment Agency (EA) has been informed of the proposed approval of the Grove Centre Emergency Plan. However, due to the minor nature of the amendments no formal consultation has been undertaken.

13. I have drafted Licence Instrument (LI) 507 in response to the licensee's request for the approval of the GE Healthcare Limited Grove Centre 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.
14. Although not directly related to the request for approval of the Grove Centre Emergency Plan, ONR has previously concluded, following an assessment, that GE Healthcare Limited had presented an adequate justification that it did not require an off-site emergency plan under REPPIR. This assessment work is outside the scope of this permissioning request; however the review does inform the overall ONR consideration of the adequacy of the site emergency arrangements.

4 MATTERS ARISING FROM ONR'S WORK

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

5 CONCLUSIONS

16. I am satisfied that the revised emergency plan introduces only minor changes to the extant arrangements, and that my assessment judged these changes were adequate.
17. The licensee has continued to successfully demonstrate the implementation of the GE Healthcare Limited Grove Centre Emergency Plan.
18. Finally, I conclude that the proposed amendments could be implemented by granting an approval under LC 11(3).

6 RECOMMENDATIONS

19. I recommend that the proposed amendments to the GE Healthcare Limited Grove Centre Emergency Plan be approved under Licence Condition 11(3) and that Licence Instrument 507 be issued to implement this.

REFERENCES

1. GE Healthcare Limited F:WPDOCS:2017:19927:MB:TKG ONR/569/A/R, letter from GE Healthcare Ltd. request for Approval of the revised Grove Centre Emergency Plan, 6th February 2017. (TRIM reference 2017/103680).
2. GE Healthcare Limited Grove Centre Emergency Plan February 2017. (TRIM reference 2017/103680).
3. GE Healthcare Limited Grove Centre Emergency Plan June 2009. (TRIM reference 2014/380348).
4. Email exchange between ONR and the licensee concerning presentation of the revised Emergency Plan to the NSC (TRIM reference 2017/121874).
5. Intervention Record: ONR-DFW-IR-15-083 GE Healthcare Ltd, The Grove Centre, Amersham, LC11 Compliance Inspection of Level 1 emergency exercise 'Falcon' (TRIM reference 2015/352846).
6. Confirmation from ONR Civil Nuclear Security that they have no objections to the issue of the approval. (TRIM reference 2017/136372).