



**Amendment to AWE approved LC35 arrangements 2018**

**Approval of Licensee Arrangements Under LC35(4) (Decommissioning) and Withdrawal  
of Existing LC35(3) Approvals**

Project Assessment Report ONR-OFD-PAR-17-016  
Revision 0  
[09/04/2018]

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## EXECUTIVE SUMMARY

### Amendment to AWE approved LC35 arrangements 2018

#### Permission Requested

In accordance with the requirements of LC35(4), the licensee has requested ONR's Approval to amend parts of its arrangements that have been previously formally approved by ONR in accordance with LC35(3).

#### Background

Atomic Weapons Establishment Plc. (AWE) is the licensee for the Aldermaston and Burghfield nuclear licensed sites. AWE's arrangements to comply with Site Licence Condition 35 (LC35) were approved by ONR in 2009 as the final stage in moving from a regime of approving decommissioning plans to a regime of flexible permissioning. The approved arrangements were further amended in 2014 to include a requirement for AWE to produce a Quinquennial Review (QQR) submission and an Annual Review of Nuclear Liabilities (ARNL).

AWE now considers that producing a stand-alone QQR submission duplicates the contents of the ARNL, and it intends to no longer produce a separate QQR submission. AWE has proposed an amendment to its approved LC35 arrangements to reflect this.

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

Within this assessment ONR have:

- Considered whether AWE's proposal is compatible with the licensee and regulators continuing to meet the expectations of UK government policy for oversight of the decommissioning strategy for Aldermaston and Burghfield.
- Ensured AWE's proposal allows continued compliance with LC35.
- Checked that AWE's proposal was made under its own change management arrangements for management system documents.
- Consulted with the Environment Agency and Defence Nuclear Safety Regulator.

This assessment covers specific amendments to AWE's approved LC35 arrangements which revises how the licensee will report on its decommissioning strategy. During this assessment AWE's current decommissioning strategy or plans for compliance against LC35 have not been reviewed.

#### Matters arising from ONR's work

ONR is content to approve AWE's proposals without the need for further scrutiny or the raising of any formal Regulatory Issues.

#### Conclusions

AWE's proposed amendments to its approved arrangements for compliance with LC35 will remove duplicated effort in producing a stand-alone QQR submission, while allowing ONR to continue to fulfil its responsibilities under UK government policy for decommissioning strategies on nuclear licensed sites.

AWE's proposed update to its approved arrangements for compliance with LC35 still requires the production of facility-specific detailed decommissioning plans in line with an up-to-date decommissioning strategy. Key activities are captured in a Hold Point Control Plan agreed with ONR and monitored through the Regulatory Interface Meeting structure. The proposed arrangements will allow AWE to meet ONR's expectations and remain compliant with LC35.

ONR judge that it is appropriate to continue to formally Approve AWE's LC35 arrangements at the present time. However, once the underlying intent of ONR Regulatory Issue 6063 has been met (thus providing evidence of the licensee's commitment to delivery of

decommissioning tasks) , the next time AWE's LC35 arrangements are updated thereafter, consideration should be given to removing the need for formal ONR Approval.

### **Recommendations**

I recommend that the amendments proposed by AWE should be approved by ONR under LC35(4).

The Superintending Inspector should sign this Project Assessment Report:

- To confirm support for the technical and regulatory arguments that justify issuing of Licence Instruments 537 and 536.
- Approving its release for publication, after redaction where relevant.

The Operating Facilities Divisional Director should:

- Sign Aldermaston Licence Instrument 537 and Burghfield Licence Instrument 536 for Approval of licensee arrangements under LC35.
- Withdraw existing LC35(3) approvals under Licence Instrument 529 for the Aldermaston Site and Licence Instrument 530 for the Burghfield Site.

## LIST OF ABBREVIATIONS

AC	Authorisation Condition
ALARP	As low as reasonably practicable
ARNL	Annual Review of Nuclear Liabilities
AWE	Atomic Weapons Establishment Plc.
DDP(s)	Detailed Decommissioning Plan(s)
DMP	Decommissioning Management Plan
DNSR	Defence Nuclear Safety Regulator
EA	Environment Agency
HOW2	(Office for Nuclear Regulation) Business Management System
HPCP(s)	Hold Point Control Plan(s)
IWS	Integrated Waste Strategy
LC(s)	Licence Condition(s)
LI(s)	Licence Instrument(s)
ONR	Office for Nuclear Regulation
PAR	Project Assessment Report
QQR	Quinquennial Review
RIM(s)	Regulatory Interface Meeting(s)
RWMC	Radioactive Waste Management Case

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## 1 PERMISSION REQUESTED

1. The licensee has requested ONR's Approval under Licence Condition 35(4) for an amendment to its arrangements for decommissioning [Ref.1,2].

## 2 BACKGROUND

### 2.1 REGULATORY REQUIREMENTS AND EXPECTATIONS

2. UK government policy for decommissioning strategies on nuclear licensed sites (Cm2919) was first issued in 1995 [Ref.3] and updated in 2004 [Ref.4]. The policy expects all UK nuclear licensees to develop and maintain decommissioning strategies for all the sites they are responsible for, taking into account a list of relevant factors.
3. Cm2919 places an expectation upon ONR to review the decommissioning strategy for each UK licensed site. The review, known as the Quinquennial Review (QQR) process is undertaken at least every five years in consultation with the relevant environmental regulator. If alternative and equivalent arrangements are in place, for example ONR's role as a statutory consultee within the Nuclear Decommissioning Authority's strategy governance process, these meet the intention of Cm2919 and no QQR is required.
4. The key purpose of ONR undertaking a review of a licensee's decommissioning strategy (through a QQR or equivalent arrangements) is to provide assurance to government and other stakeholders that the extant strategy is practicable and consistent with existing legislation, government policy, technical knowledge, safety and environmental requirements.
5. LC35 provides an expectation that licensees should have in place:
  - A clearly documented strategy that demonstrates how all redundant, operational and proposed plant can be decommissioned safely at end-of-life. The decommissioning strategy should be reviewed at appropriate intervals and kept up-to-date by the licensee.
  - A decommissioning plan which sets out how each facility will be safely decommissioned, reviewed regularly as decommissioning is delivered with progress against hold points and milestones monitored.
6. ONR's expectations for LC35, including the contents of decommissioning strategies, are provided in:
  - ONR Technical Inspection Guide, LC35 Decommissioning [Ref.5]
  - ONR's Safety Assessment Principles (SAPs) [Ref.6]
  - ONR Technical Assessment Guide, Decommissioning [Ref. 7]

### 2.2 APPROVAL OF AWE ARRANGEMENTS

7. Atomic Weapons Establishment Plc. (AWE) operates from two main locations; corporate arrangements apply at both Aldermaston and Burghfield. AWE holds nuclear site licence No. 77 for the Aldermaston site and 78A for the Burghfield nuclear licensed site.
8. Historically, ONR chose to formally approve AWE's decommissioning plans to hold the licensee to account for delivery of an agreed programme of decommissioning work. It was found that a system of formally approved plans had little flexibility to changing funding, resources and priorities. ONR has found that an approach of flexible permissioning for other AWE activities allows more efficient change management, while retaining an appropriate level of control, risk reduction and regulatory oversight.

9. Therefore Licence Instruments (LIs) were issued in 2009 [Ref.8] to approve AWE's decommissioning arrangements under LC35(3) and move from a regime of approving decommissioning plans to flexible permissioning. The flexible approach was based on Hold Point Control Plans (HPCPs) endorsed at Level 3 Regulatory Interface Meetings (RIMs). Within the approved arrangements, AWE incorporated a section on its monitoring of decommissioning programmes using the HPCPs and RIMs.
10. The approved arrangements were further amended and Approved by ONR in 2014 [Ref.9]. This update:
  - Made no significant change to the arrangements for monitoring the decommissioning programme i.e. included the use of HPCPs and RIMs
  - Included arrangements for production of a QQR submission.
  - Included arrangements for production of an Annual Review of Nuclear Liabilities (ARNL).
11. Existing approval LIs 529 for Aldermaston and 530 for Burghfield cover section 13, paragraphs 39-45 of AWE's LC35 arrangements [Ref.10] relating to monitoring arrangements for decommissioning programmes.
12. AWE now considers that producing a stand-alone QQR submission duplicates the contents of the ARNL, and it intends to no longer produce a separate QQR submission. AWE has proposed an amendment to its approved LC35 arrangements to reflect this.
13. It is AWE's intention to substitute the current approved paragraphs with section 11, paragraphs 31-38 of updated LC35 arrangements [Ref.11]. ONR has therefore been requested to withdraw LI529 granted on Nuclear Site Licence 77 and LI530 granted on Nuclear Site Licence 78a.

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

#### **3.1 SCOPE OF ASSESSMENT**

14. This assessment and associated LIs have been produced in line with the following ONR guidance:
- HOW2 process 'Nuclear Safety Permission' [Ref.12]
  - Guidance on production of reports [Ref.13]
  - Preparation and issue of Licence Instruments [Ref.14]
15. The assessment strategy for this Project Assessment Report (PAR) is set out in the associated Decision Record [Ref.15]. For this assessment, effort has been concentrated on:
- Whether AWE's proposal is compatible with the licensee and regulators being able to meet the expectations of UK government policy for oversight of the decommissioning strategy for Aldermaston and Burghfield. See §3.2.
  - Whether AWE's proposal maintains compliance with LC35. See §3.3.
  - Whether AWE's proposal was made under its own change management arrangements for management system documents. See §3.4.
  - Consultation with other regulators; in this case the Environment Agency (EA) and Defence Nuclear Safety Regulator (DNSR). See §3.5.
16. Key documents provided by AWE to inform this assessment were:
- AWE arrangements for compliance with LC35 [Ref.11]
  - AWE Decommissioning strategy [Ref. 16]
  - AWE ARNL 2017 [Ref.17]
17. This assessment covers specific amendments to AWE's approved LC35 arrangements that will revise how the licensee reports on its decommissioning strategy. During this assessment ONR have not reviewed AWE's current decommissioning strategy or plans for compliance against LC35.

#### **3.2 REMOVAL OF SEPARATE QQR SUBMISSION**

18. This section considers whether AWE's proposal is compatible with the licensee and regulators being able to meet the expectations of UK government policy (Cm2919) for oversight of the decommissioning strategy for Aldermaston and Burghfield. Cm2919 places an expectation upon ONR to undertake QQRs at least every five years in consultation with the relevant environmental regulator.
19. AWE's currently approved arrangements under LC35 [Ref.10] commit the licensee to produce:
- A QQR submission to ONR, demonstrating a strategy for decommissioning nuclear facilities that meets government policy, and if fully implemented will remediate all the nuclear liabilities on the Aldermaston and Burghfield sites.
  - An ARNL, which includes a review of the decommissioning strategy.
20. AWE's proposed updated arrangements [Ref.11] will commit the licensee to produce:
- An ARNL, which provides the high-level plan of all AWE decommissioning activities, demonstrates that AWE's overall plans are comprehensive and, if implemented in full, will remediate all the nuclear liabilities on the Aldermaston and Burghfield licensed sites to enable eventual de-licensing.

21. AWE now considers that producing a stand-alone QQR submission duplicates the contents of the ARNL.
22. ONR's guidance on decommissioning provides specific expectations for the QQR process, including the format and content of a QQR submission from a licensee to ONR [Ref.7]. ONR's guidance allows licensees with extensive liabilities to produce an overview document, presenting the corporate strategy, supported by further documentation.
23. ONR have undertaken an assessment of the ARNL [Ref.17] and supporting documentation [Ref.18] against the published guidance. The comparison is set out in Table 1. The assessment shows the contents of the ARNL produced by AWE meets the expectations of a QQR submission. While all the detail is not included in the ARNL it is readily available in the other documents, in line with ONR guidance.
24. ONR judge that should AWE submit the ARNL and supporting decommissioning documentation, ONR would be able to fulfil its responsibilities under Cm2919 to carry out a QQR.

### **3.3 DECOMMISSIONING ARRANGEMENTS**

25. This section considers whether AWE's proposal maintains compliance with LC35.

#### **3.3.1 STRATEGIES AND PLANS**

26. Under LC35, ONR expects licensees to have a clear documented strategy that demonstrates how all redundant, operational and proposed plant can be decommissioned safely at end-of-life [Ref.5]. The decommissioning strategy should be reviewed at appropriate intervals and kept up-to-date by the licensee [Ref.6].
27. AWE's currently approved arrangements under LC35 [Ref.10] commit the licensee to produce:
  - A Decommissioning Management Plan (DMP), providing a high-level view of all decommissioning activities for the ensuing period
  - Individual facility Detailed Decommissioning Plans (DDPs), to facilitate completion of each decommissioning project
28. AWE's proposed updated arrangements [Ref.11] will commit the licensee to produce:
  - Individual facility DDPs which facilitate the completion of each decommissioning project.
29. The AWE decommissioning strategy [Ref.16] is high-level, with most detail being contained in the facility specific DDPs. Within the ARNL [Ref.17] AWE provides a review of its nuclear liabilities, including its strategies, progress towards hazard reduction, and estimated costs to remediate the remaining and future liabilities. The decommissioning strategy is updated on a three-yearly basis with the ARNL and facility specific DDPs considered in this update; the 2018 update is currently underway.
30. The proposed arrangements still require the production of facility-specific detailed decommissioning plans in line with an up-to-date decommissioning strategy. ONR judges that the proposed arrangements will allow AWE to meet the requirements of LC35.

#### **3.3.2 MONITORING ARRANGEMENTS FOR DECOMMISSIONING**

31. Under LC35, ONR expects that licensees should develop a decommissioning plan which sets out how each facility will be safely decommissioned [Ref.6] and is reviewed

- regularly as decommissioning progresses, with progress against hold points and milestones monitored [Ref.5].
32. It is AWE's intention to substitute section 13 (paragraphs 39-45) of the existing arrangements [Ref.10] with section 11 (paragraphs 31-38) of the updated arrangements [Ref.11]. Both sections relate to monitoring arrangements for decommissioning programmes.
33. AWE's currently approved arrangements under LC35 [Ref.10] commit the licensee to:
- A HPCP to formally record and define key events (taken from DMPs and DDPs).
  - Inclusion of an event in the HPCP may be agreed with ONR.
  - Potential changes are discussed with regulators and agreed at Level 4 RIMs for internal hold points and Level 3 RIMs for HPCP hold points.
34. AWE's proposed updated arrangements [Ref.11] will commit the licensee to:
- The selection of Hold Points is undertaken in conjunction with Regulators.
  - The Overarching HPCP shall be updated by the respective parties after each Level 3 meeting.
  - Changes shall be discussed and agreed at a Level 3 RIM where required.
  - DDP progress is also monitored at Level 4 RIM to provide early warning of potential changes to the HPCP entries and their significance.
35. ONR judge that the proposed arrangements still require the same level of decommissioning monitoring by the site and oversight from ONR and are set out in a clearer manner in the new arrangements. Key activities captured in the HPCP are subject to the agreement of ONR and monitored through the RIM structure.
36. ONR t judge that the proposed arrangements would allow AWE to meet the requirements of LC35.

### **3.4 DUE PROCESS**

37. The proposed amendments to AWE's arrangements for LC35 will be made under AWE's Changes of Management System Documentation process [Ref.19].
38. ONR met with AWE to discuss the process for changing management system documents [Ref.20,21] and understand what evidence of that process might be available [Ref.22,23].
39. ONR judge that the revised arrangements have been through AWE internal process and have reached the appropriate level of approval, as shown in Table 2.

### **3.5 OTHER REGULATORS' INPUT**

40. The Letter of Understanding between ONR and DNSR commits ONR to utilise inputs from DNSR when making regulatory judgements and considering ALARP issues taking into account the through life safety requirements of the nuclear reactor or nuclear weapon and defence needs [Ref.24].
41. ONR have consulted DNSR on the amendments that AWE has proposed to its approved arrangements for LC35 [Ref.25], which also provide compliance with Authorisation Condition (AC) 35.
42. DNSR has compared the paragraphs in both the original and proposed arrangements and has confirmed that it has no objection to the proposed amendments to support compliance with AC35 [Ref.26].

43. The Memoranda of Understanding between ONR and the EA [Ref.27] commits both the ONR and EA to consult each other at the earliest opportunity, and with the fullest of information, during the process of formal regulatory decision making taking full account of each other's views.
44. ONR have consulted EA on the amendments that AWE has proposed to its approved arrangements for LC35 [Ref.25] and the Environment Agency has confirmed it has no substantive comments on AWE's proposed amendments [Ref. 28].

#### **4 CONSIDERATION OF THE NEED TO APPROVE LC35 ARRANGEMENTS**

45. Historically, ONR chose to formally approve AWE's decommissioning plans to hold the licensee to account for delivery of an agreed programme of decommissioning work. It was found that a system of formally approved plans had little flexibility to changing funding, resources and priorities. The approach of flexible permissioning for other AWE activities allowed more efficient change management, while retaining an appropriate level of control and risk reduction and regulatory oversight.
46. The majority of the UK's licenced sites do not have approved LC35 arrangements.
47. AWE has a number facilities either redundant or reaching the end of their operational life and has made slow progress with decommissioning. Following an LC35 inspection [Ref.29] Regulatory Issue 6063 was raised to seek further evidence from AWE to demonstrate progressive risk reduction.
48. ONR therefore judge that it is appropriate to continue to formally Approve AWE's LC35 arrangements at the present time. However, once the underlying intent of ONR Regulatory Issue 6063 has been met (thus providing evidence of the licensee's commitment to delivery of decommissioning tasks) , the next time AWE's LC35 arrangements are updated thereafter, consideration should be given to removing the need for formal ONR Approval.

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

49. This assessment did not uncover any shortfalls of such significance to prevent ONR from issuing the requested Licence Instruments.

#### **6 CONCLUSIONS**

50. ONR have undertaken an assessment of the ARNL and supporting documentation against the published guidance. AWE's proposed amendments to its approved arrangements for compliance with LC35 will remove duplicated effort in producing a stand-alone QQR submission while allowing ONR to fulfil its responsibilities under Cm2919.
51. ONR have assessed AWE's proposed amendments against ONR's requirements and expectations for LC35 and decommissioning. AWE's proposed update to its approved arrangements for compliance with LC35 still require the production of a facility specific detailed decommissioning plan in line with an up-to-date decommissioning strategy. Key activities are captured in a HPCP agreed with ONR, and monitored through the RIM structure. The proposed arrangements will allow AWE to meet ONR's expectations and remain compliant with LC35.
52. The proposed amendments have been through AWE internal process and have reached the appropriate level of approval. Neither DNSR nor the EA have any objections to the amendments proposed by AWE.
53. ONR judge that it is appropriate to continue to formally Approve AWE's LC35 arrangements at the present time.

## 7 RECOMMENDATIONS

54. I recommend that the amendments proposed by AWE are approved by ONR under LC35(4).
55. The Superintending Inspector should sign this Project Assessment Report:
- To confirm support for the technical and regulatory arguments that justify issuing of Licence Instruments 537 and 536.
  - Approving its release for publication, after redaction where relevant.
56. The Operating Facilities Divisional Director should:
- Sign Aldermaston Licence Instrument 537 and Burghfield Licence Instrument 536 for Approval of licensee arrangements under LC35.
  - Withdraw existing LC35(3) approvals under Licence Instrument 529 for the Aldermaston Site and Licence Instrument 530 for the Burghfield Site.

## 8 APPENDIX 1 TABLES

Table 1: Comparison of AWE arrangements with ONR guidance on the contents of a QQR submission

ONR expectations for the contents of a QQR submission, taken from the Decommissioning TAG (Ref. 7)	AWE arrangements
Decommissioning objectives and policy	<ul style="list-style-type: none"> <li>- ARNL §3 Nuclear Liabilities - The Strategic Overview</li> <li>- Decommissioning strategy outlines the decommissioning aims and drivers</li> </ul>
Description of decommissioning liabilities	<ul style="list-style-type: none"> <li>- ARNL §6 Facility Decommissioning</li> <li>- Prioritisation methodology [Ref.30]</li> </ul>
Description of preferred strategy (programme, methods, contingency options, end point of decommissioning)	Facility outline or detailed decommissioning plan [Ref. 31,32]
Range of options considered and selection process (including factors taken into account, weighting of factors, the significant assumptions and uncertainties)	Facility outline or detailed decommissioning plan
Justification of timing	<ul style="list-style-type: none"> <li>- Facility outline or detailed decommissioning plan</li> <li>- Deferred decommissioning justification [Ref. 33]</li> </ul>
An appraisal of uncertainties and their impact	Facility outline or detailed decommissioning plan
Consistency with legislation and Government Policy (including a demonstration that decommissioning is being carried out as soon as reasonably practicable and that hazards are being reduced in a progressive and systematic manner)	<ul style="list-style-type: none"> <li>- ARNL§3 Nuclear Liabilities - The Strategic Overview; statement of decommissioning being completed as soon as reasonably practicable</li> <li>- Decommissioning strategy and guidance</li> <li>- Arrangements in management system for compliance with licence conditions.</li> </ul>
Arrangements to ensure safety	Decommissioning safety case [Ref. 34]
The strategy for the management of radioactive waste	<ul style="list-style-type: none"> <li>- ARNL §3 Nuclear Liabilities; summaries of Integrated Waste Strategy (IWS) and Radioactive Waste Management Case (RWMC) for Higher Activity Waste</li> <li>- IWS [Ref.35]</li> <li>- RWMC [Ref. 36]</li> </ul>
Management and remediation of contaminated land	<ul style="list-style-type: none"> <li>- ARNL §3 Nuclear Liabilities; summary of Land Quality Strategy</li> <li>- Land quality strategy [Ref.37]</li> </ul>
Decommissioning methods and technological feasibility	Facility outline or detailed decommissioning plan
Management system and infrastructure for decommissioning	<ul style="list-style-type: none"> <li>- ARNL §4 Organisational structure</li> <li>- LC35 arrangements</li> </ul>
Arrangements for maintenance of records	Decommissioning strategy references arrangements under LC6 and LC25

ONR expectations for the contents of a QQR submission, taken from the Decommissioning TAG (Ref. 7)	AWE arrangements
Costing of strategies	<ul style="list-style-type: none"> <li>- ARNL §5 Monetary value escalation</li> <li>- ARNL §7 Annual review cost analysis</li> </ul>
Demonstration of adequate financial provision	<p>Funded is released to AWE on a on the basis of an annualised programme of work submitted to MOD for approval. AWE are currently bidding for funding of Financial Year 19 (FY19) starting in April 2018, which equates to Rolling Wave 3. AWE plc does not own any of the assets/ buildings at AWE and requires MOD's permission to demolish a building.</p>
Progress achieved in implementing the strategy	ARNL§6 Facility Decommissioning

**Table 2: Process for changes to AWE management system documents**

Process step	Evidence
<p>A Request for Change Form (RFC) is completed by the owner. This is the mechanism which starts the process, and records progress through it. A significance level is determined against documented criteria. The owner goes through the regime of review and sign off relevant to the significance of the change, and documents it on the RFC.</p>	<ul style="list-style-type: none"> <li>- RFC-19-07-2017 [Ref.22] was created and classified as a Significant Change.</li> <li>- The review regime is: Stakeholder Assessment, Subject Matter Expert assessment/ review, Peer review, NSC advice. These steps are documented in the RFC.</li> <li>- Final sign off of the RFC will be when the document has been accepted by ONR and formally published on the Management System.</li> </ul>
<p>The change is then presented to the Management System Change Board (MSCB) or Management System Governance Board (MSGB).</p> <p>The MSCB/ MSGB checks the document has been correctly classified, scrutinises evidence that the document has been through the regime and has followed the advice provided.</p> <p>If approved, the document is loaded onto the Management System. A document can also be 'Approved with Conditions'</p>	<ul style="list-style-type: none"> <li>- The change went to the MSGB in late November 2017 [Ref.23]</li> <li>- The significance was uplifted to a Major Change. This has no effect on the review and sign off regime.</li> <li>- The document was 'Approved with Conditions' subject to minor grammatical errors and spelling being corrected, and approval from ONR being gained.</li> <li>- The document has therefore been uploaded to the AWE Management System but won't 'go live' until the required approval is gained.</li> </ul>

## 9 REFERENCES

1 AWE letter, Request for an Amendment to the Approved Decommissioning Arrangements under Licence Condition 35(4) of Schedule 2 Attached to Nuclear Site Licence 77, ONR035-049b, 6<sup>th</sup> December 2017 [2018/18886]

2 AWE letter, Request for an Amendment to the Approved Decommissioning Arrangements under Licence Condition 35(4) of Schedule 2 Attached to Nuclear Site Licence 78a, ONR035-050b, 6<sup>th</sup> December 2017 [2018/18883]

3 UK Government, Review of Radioactive Waste Management Policy, Final Conclusions, Cm2919, July 1995.

4 The Decommissioning of the UK Nuclear Industry's Facilities, 1<sup>st</sup> September 2004 [[the-decommissioning-of-the-uk-nuclear-industrys-facilities](#)]

5 ONR, Nuclear Safety Technical Inspection Guide, LC35 Decommissioning, NS-INSP-GD-035 Revision 4, April 2016

6 ONR Safety Assessment Principles, 2014 [[saps2014](#)]

7 ONR, Nuclear Safety Technical Assessment Guides, Decommissioning, NS-TAST-GD-026, Revision 4, September 2016

8 ONR, Approval of Licensee Arrangements under LC35, Monitoring Arrangements for Decommissioning Programmes, and withdrawal of existing LC35 (3) Approvals, PAR 2008/40, January 2009 [2008/689717]

9 Approval of LC35 arrangements in 2014

- AWE letter, ONR 035-041, Request for an amendment of approved arrangements to be granted under condition 35(4) of Schedule 2 attached to Nuclear Site Licence No. 77, 16<sup>th</sup> October 2014 [2014/387973]
- AWE letter, ONR 035-042, Request for an amendment of approved arrangements to be granted under condition 35(4) of Schedule 2 attached to Nuclear Site Licence No. 78A, 16<sup>th</sup> October 2014, [2014/287966]
- ONR, Approval of Licensee Arrangements under LC35, Monitoring Arrangements for Decommissioning Programmes, and withdrawal of existing LC35(3) Approvals, ONR-PAR-14-026, December 2014 [2014/460704]
- ONR letter, Licence Instrument No. 529 granted under condition 35(4) of Schedule 2 attached to Nuclear Site Licence No. 77, Atomic Weapons Establishment Aldermaston site, ALD 71030N, 7<sup>th</sup> January 2015 [2015/6075]
- Licence Instrument 529, ALD71027N [2014/461099] [signed 2015/140013]
- ONR letter, Licence Instrument No. 530 granted under condition 35(4) of Schedule 2 attached to Nuclear Site Licence No. 78A, Atomic Weapons Establishment Burghfield site, BUR 77285N, 7<sup>th</sup> January 2015 [2015/6082]
- Licence Instrument 530, BUR77284N, [2014/461109] [signed 2015/139994]

10 AWE, Standard for Compliance with Licence Condition 35, Authorisation Condition 35, Decommissioning, Issue 2, September 2014, ESH-MSS-1535 [2018/30325]

11 AWE, Management System Standard, Compliance with Site Licence Condition 35, Authorisation Condition 35, Decommissioning, Issue 6, November 2017, Section number: MSS 1535 [2018/18883, 2018/18886]

12 How2 Process, Nuclear Safety Permissioning [[Permissioning](#)]

13 ONR, ONR Guide, Guidance on Production of Reports, NS-PER-GD-015 (NS-TAST-GD-084), Revision 0, August 2017

14 ONR, Nuclear Safety Permissioning Instruction, Preparation and Issue of Licence Instruments, NS-PER-IN-001, Revision 8, January 2017 [[onr.org.uk/operational/assessment/ns-per-in-001](#)]

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- 15 ONR, Decision Record Part 1, Amendment to AWE approved LC35 arrangements 2018, ONR-OFD-DR-17-015, February 2018 [2018/29606]
  - 16 AWE Decommissioning Strategy, EDMS3/800C7266/B/EP0107, Issue 1, Feb 2015 [2018/89092]
  - 17 AWE, Annual Review of AWE's Nuclear Liabilities 2017, Issue 5, September 2017 [2017/371088]
  - 18 AWE, email to ONR, 8<sup>th</sup> March 2018 [2018/88962]
  - 19 AWE, Change of Management System Documentation, Issue 2, July 2017, AWE/ MAN.Q/21/5552 [2018/39645]
  - 20 ONR, Meetings with AWE Aldermaston, 8<sup>th</sup> -10<sup>th</sup> January 2018, ONR-OFD-CR-17-584 [2018/33076]
  - 21 ONR, LC35 permissioning Level 4 meeting, 17th Jan 2018, ONR-OFD-CR-17-600 [2018/23664]
  - 22 AWE, Request For Change (RFC) Form, Update to Management System Standard 1535 – Decommissioning to Issue 3, RFC-19-07-2017 [2018/39642]
  - 23 AWE, Minutes of Management System Governance Board (MSGB) Meeting No.4, Held on 27/11/2017 [2018/50409]
  - 24 Letter of Understanding between the Office For Nuclear Regulation and the Defence Nuclear Safety Regulator setting out their intentions for coherent, complete and seamless regulation of the Defence Nuclear Programme, 2015 [[onr.org.uk/documents/2015/onr-dnsr-letter-of-understanding](http://onr.org.uk/documents/2015/onr-dnsr-letter-of-understanding)]
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