



Cyclife Metals Recycling Facility, Lillyhall

Approval of Amendments to the Cyclife Metals Recycling Facility Emergency Plan

Project Assessment Report ONR-SDFW-PAR-18-043
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EXECUTIVE SUMMARY

Approval of Amendments to the Cyclife Metals Recycling Facility Emergency Plan

Permission Requested

This project assessment report relates to a request from Cyclife UK Ltd (Cyclife) for approval of its amended Emergency Plan made under Licence Condition (LC) 11(1) of nuclear site licence No. 91.

Background

The Cyclife Metals Recycling Facility (MRF) processes and decontaminates metallic wastes within the classification of Low Level Radioactive Waste.

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 for implementation.

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. 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 outlines the necessary actions that 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, it is ONR policy to approve the Emergency Plan, to ensure that any subsequent changes are assessed for adequacy by ONR.

The licensee has reviewed its Emergency Plan in response to a change to its working pattern which was subject to an appropriate Management of Change; this review highlighted the need to amend the Emergency Plan to reflect arrangements necessary for 7-day working. As required by LC 11(3), the licensee has written to ONR to request approval of its revised emergency arrangements 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 amendments to the licensee's Emergency Plan. The extant emergency plan was last fully reviewed and approved in 2017.

Matters arising from ONR's work

There are no matters arising from this project assessment report.

Conclusions

ONR is satisfied that the proposed amendments to the Emergency Plan are minor in nature and that the amended plan meets ONR guidance on Emergency Arrangements. Therefore, ONR concludes that this submission satisfies the requirements of LC11(1).

Recommendation

On the basis of the documentation submitted by Cyclife UK Ltd and ONR's assessment, it is recommended that a person with delegated authority within ONR signs and issues licence instrument number 513, a Licence Condition 11(3) Approval of the Cyclife MRF Emergency Plan and Licence Instrument 510 be withdrawn.

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1 PERMISSION REQUESTED

1. Cyclife UK. Ltd (the licensee) has requested, in line with their arrangements, the Office for Nuclear Regulation's (ONR's) Approval under Licence Condition 11(3) for its proposed changes to the current Cyclife MRF Emergency Plan [1]. This revision is documented as the Cyclife MRF Emergency Plan CYC-800C Revision B [2].
2. The licensee currently has an on-site emergency plan [3], which was approved by ONR in Licence Instrument 510 [4]. 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 was considered by its nuclear safety committee in October 2018 [5].

2 BACKGROUND

4. The licensee has undertaken a change to its organisational structure to increase production capacity in its Metal Recycling Facility (MRF), moving to 7-day working across two 4-day shifts working consecutively. This organisational change was subject to a Management of Change (MoC) case, which the licensee categorised as non-safety significant. However, the MoC identified the need to review of the Emergency Plan to accommodate arrangements for weekend working.
5. As required by LC11 (3), the licensee has written to ONR to request approval of its revised emergency plan [1].

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

6. ONR's assessment of the proposed emergency plan considered the amendments to made to accommodate the change in working pattern.
7. The revised plan incorporates a new role of the Acting Emergency Controller (AEC) who is appointed to provide the initial emergency response during weekend working when no appointed Duty Emergency Controller (DEC) is on site. The AEC is required to notify the on-call DEC who will attend if the incident requires. At this point strategic command passes to the DEC, as per the arrangements for weekday working.
8. This change is considered to be minor since it relates only to arrangements for initiation of an incident and not to the scope of the emergency response organisation or the necessary emergency response actions, which remain the responsibility of the DEC, or relevant emergency service (eg Cumbria Fire and Rescue Service).
9. ONR is content that Cyclife continue to meet the requirements of the guidance on Emergency Arrangements [6] and these minor amendments do not impact nuclear safety.
10. The proposed amendments to the plan have been subject to the licensee's due governance process and were considered at the licensee's 28th NSC on 18 October 2018 [5].
11. The licensee has continued to exercise its LC11 emergency arrangements, the most recent example being at Emergency Exercise ██████ a combined safety and counter terrorism exercise, on 2 October 2018. This exercise was not observed by ONR but a full and comprehensive report of the exercise, learning gained and opportunities for

improvement identified following the exercise was submitted to ONR on 2 January 2019 [7]. In addition, the licensee has exercised both shifts under the revised arrangements for during weekend working to test the new role of the AEC and response of the on-call DEC. The licensee has shared the learning from these exercises [8].

12. ONR Civil Nuclear Security and Safeguards (CNSS) was consulted concerning the proposed approval of the revised Emergency Plan and have confirmed that there are no objections to the approval being issued [9].
13. Given the very minor nature of the amendment, no formal consultation has taken place with the Environment Agency (EA). However, the Site Inspector has informed the EA Nuclear Site Regulator of proposed approval of the Cyclife Emergency Plan [10].
14. Licence Instrument (LI) 513 [11] has been drafted in response to the licensee's request for the approval of the Cyclife Emergency Plan under Licence Condition 11(3). This LI is a routine LI for which a standard approved template is provided within ONR guidance on the Preparation and Issue of Licence Instruments [12], and as such is not required to be reviewed by Government Legal Department..

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 these changes are adequate and acceptable.
17. The licensee has continued to successfully demonstrate the implementation of the Emergency Plan since the last review in 2017.
18. ONR therefore concludes that the proposed amendments should be implemented by granting an approval under LC 11(3).

6 RECOMMENDATIONS

19. On the basis of the documentation submitted by Cyclife UK Ltd and ONR's assessment, it is recommended that:
 - The Head of Decommissioning, Fuel & Waste (DFW) Sub-Division approves this Project Assessment Report.
 - A person with delegated authority within ONR signs and issues licence Instrument number 513, a Licence Condition 11(3) Approval of the Cyclife MRF Emergency Plan CYC-800C Revision B dated December 2018, and Licence Instrument 510 be withdrawn.

7 REFERENCES

- 1 Cyclife letter to ONR, MRF_ONR_0110_OUT_KD, 7 February 2019. 2019/39454.
- 2 MRF Emergency Plan, CYC-800C Revision B, December 2018. 2018/39454.
- 3 MRF Emergency Plan, WM/MRF/008 Revision A, dated October 2016. 2016/494779.
- 4 Licence Instrument 510, LC11(3) Approval, 27 February 2017. 2017/88908.
- 5 Cyclife MRF – Minutes of Nuclear Safety Committee Meeting 28, 18 October 2018. 2019/85675.
- 6 LC 11 – Emergency Arrangements, NS-INSP-GD-011, Revision 5, July 2017. 2017/263535.
- 7 Report on the Cyclife MRF Emergency Exercise [REDACTED] October 2018, TR_MRF_201 Revision D, November 2018. 2019/14426.
- 8 Record of Cyclife MRF Emergency Exercise [REDACTED] 2-3 March 2019. 2019/79684.
- 9 Email to Site Inspector from CNSS regarding Emergency Plan Approval, 18 March 2019. 2019/82928.
- 10 Email from Site Inspector to Environment Agency Site Regulator regarding Emergency Plan Approval, 15 March 2019. 2019/79102.
- 11 Licence Instrument 513, LC11(3) Approval. 2019/78778.
- 12 Preparation and Issue of Licence Instruments, NS-PER-IN-001, Revision 8, January 2017. 2017/8970.