



Imperial College

Licence Condition 11 Emergency Arrangements

Approval of the Revised Imperial College Emergency Plan made under LC11.

Project Assessment Report ONR-SDFW-PAR-18-002
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EXECUTIVE SUMMARY

Title

Approval of the Revised Imperial College LC 11 Arrangements.

Permission Requested

This project assessment report relates to a request from Imperial College for an approval of amendments to the Imperial College Emergency Plan made under Licence Condition (LC) 11(1) of nuclear site licence 7B.

Background

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 Imperial College Consort reactor was a 100kW research reactor. The reactor was built in 1965 and continued to operate until 2012, following which it commenced decommissioning. The reactor fuel has been removed from the reactor and dispatched from the site. The majority of radioactive waste has been removed from the reactor and dispatched from the site, such that the remaining radiological hazard at the site is now very low.

Nevertheless, it is a condition of the 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 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, in order 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 2003.

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 a reduction in the number of staff on call and a change to the back-up Emergency Control Centre, which are commensurate with the reduced risk and hazard on the site.

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 LC 11(1).

Recommendation

I recommend approval should be granted under Licence Condition 11(3) allowing Imperial College to make the requested amendments to the Imperial College Reactor Centre Emergency Plan and that Licence Instrument 506 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. Imperial College, London (the licensee) has requested the Office for Nuclear Regulation's (ONR's) "Approval" under Licence Condition 11(3) for its proposed changes to the Imperial College, London Emergency Arrangements - Principles [Ref 1]. This revision is documented as the "Imperial College, Emergency Arrangements - Principles Issue 9 January 2018" [Ref 2].
2. The licensee currently has approved Emergency Arrangements - Principles [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 (NSC) has been informed of the revision of the Emergency Arrangements - Principles. Due to the minor nature of the changes the licensee's arrangements do not require the revised Emergency Arrangements - Principles to be formally presented to the NSC.

2 BACKGROUND

4. The licensee has undertaken a periodic review of its Imperial College, London Emergency Arrangements - Principles.
5. From this review, the licensee has identified changes it considers to be necessary. As required by LC 11(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

6. In my assessment of the proposed emergency plan, I have considered the differences between the proposed emergency plan [Ref 2] and the extant emergency plan [Ref 3].
7. The revised plan incorporates a minor reduction in the number of staff on the call-out rota, commensurate with the reduced nuclear risk and hazard at the site, and a change of location for the Emergency Control Centre.
8. The proposed changes to the plan have completed the licensee's governance process. The licensee's NSC has 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.
9. The Environment Agency (EA) has been informed of the proposed approval of the Grove Centre Emergency Plan and confirmed that they have no objections to the approval being issued. [Ref 4].
10. The licensee has continued to achieve an adequate performance when demonstrating the Imperial College, London Emergency Arrangements - Principles aspects of the LC11 emergency arrangements, the most recent example being at the emergency exercise observed by ONR on 19 November 2016. [Ref 5].
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. I have drafted Licence Instrument (LI) 506 in response to the licensee's request for the approval of the Imperial College, London Emergency Arrangements - Principles 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 the Treasury Solicitor's Department.
13. Although not directly related to the request for approval of the Imperial College, London Emergency Arrangements - Principles, ONR has previously concluded, following an assessment, that Imperial College, London 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's emergency arrangements.

4 MATTERS ARISING FROM ONR'S WORK

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

5 CONCLUSIONS

15. I am satisfied that the revised emergency plan introduces only minor changes to the extant arrangements, and that my assessment judged these changes are appropriate.
16. The licensee has continued to successfully demonstrate the implementation of the Imperial College, London Emergency Arrangements - Principles.
17. Finally, I conclude that the proposed amendments could be implemented by granting an approval under LC 11(3).

6 RECOMMENDATIONS

18. I recommend that the proposed amendments to the Imperial College, London Emergency Arrangements – Principles be approved under Licence Condition 11(3) and that Licence Instrument 506 be issued to implement this.

7 REFERENCES

1. Imperial College, London: Letter from Imperial College, London request for Approval of the revised Imperial College, London Emergency Arrangements - Principles, Issue 9 May 2018 2018. (TRIM Record 2018/187751).
2. Emergency Arrangements - Principles, referenced ICRC SD 650 Issue 9", dated January 2018. (TRIM Record 2018/219478).
3. Imperial College, London: Emergency Arrangements - Principles Issue 9, January 2018. (TRIM Record 2018/219478).
4. Imperial College, London: Emergency Arrangements - Principles Issue 5, January 2018. (TRIM Record 2018/225765).
5. Confirmation from EA that they have no objections to the issue of the approval. (Trim Record 2018/223385).
6. Intervention Record: ONR-SDFW-IR-16-149 Imperial College, LC11 Compliance Inspection of Level 1 emergency exercise [REDACTED] (TRIM Record 2016/73373).
7. Confirmation from ONR Civil Nuclear Security that they have no objections to the issue of the approval. (TRIM Record 2018/223398).