



Springfields Fuels Limited

Approval of Springfields On-Site Emergency Plan

Project Assessment Report ONR-SDFW-PAR-18-040
Revision B
February 2019

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Published: 04/2019

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EXECUTIVE SUMMARY

Approval of Springfields On-Site Emergency Plan.

Permission Requested

This project assessment report relates to a request from Springfields Fuels Limited for an approval of its amended On-Site Emergency plan made under Licence Condition (LC) 11(1) of nuclear site licence No. 79.

Background

Springfields Fuels Ltd (SFL) has provided nuclear fuel fabrication services since the mid-1940s. The site's main activities include manufacture of oxide fuels for advanced gas cooled reactors (AGR) and light water reactors (LWR), processing of residues, decommissioning and demolition of redundant plants and buildings. 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. It is a condition of each nuclear site licence that there shall be arrangements for dealing with an accident or emergency.

The On-Site 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 carried out a routine periodic review of its Emergency Plan and identified some minor 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 arrangements that are 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 2015.

ONR has assessed the differences between the proposed new plan and the existing approved plan, informed by ONR guidance on Emergency Arrangements. The changes were minor in nature, with the principal amendments being the addition and removal of some roles, the clarification on the use of the Occupational Health Department and minor modifications to the site layout. In addition, throughout the period since the last review, the licensee has continued to achieve adequate performance when demonstrating the On-Site Emergency Plan aspects of the LC11 emergency arrangements.

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 On-Site 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 Springfields Fuels Limited and ONR's assessment, it is recommended that a person with delegated authority within ONR signs and issues licence instrument number 524, a Licence Condition 11(3) Approval of the Springfields On-Site Emergency Plan October 2018 and Licence Instrument 523 be withdrawn.

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1 PERMISSION REQUESTED

1. SFL (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 Springfields On-Site Emergency Plan [Ref 1]. This revision is documented as the "Springfields On-Site Emergency Plan October 2018" [Ref 2].
2. The licensee currently has an on-site emergency plan [Ref 3], which was approved by ONR in Licence Instrument 523 [Ref 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 approved via its nuclear safety committee [Ref 5].

2 BACKGROUND

4. The licensee, as required by its arrangements, has undertaken a periodic review of the On-Site Emergency Plan.
5. The revised plan incorporates a number of name changes to organisations and roles and the clarification and minor re-organisation of emergency roles within incident response, scientific and technical advice and communications cells.
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. ONR's assessment of the proposed emergency plan considered the differences between the extant emergency plan [Ref 3] and the proposed emergency plan [Ref 2]. The minor changes are noted below:
 - Addition of Enhanced Drivers;
 - Removal of Emergency Medical Technician (roles subsumed into F&R (Fire & Rescue) capabilities);
 - Reduction in the reliance on the use of the Occupational Health Department as a decontamination/treatment centre, in line with agreed protocols with North West Ambulance Service;
 - Minor modifications to the site layout and Agreed Declarations.
 - Minor editorial changes and general text.
8. These minor changes provide both clarity within the documents and allow for flexibility within the emergency response area. The previous 2015 review of the On-Site Emergency Plan [Ref 6] conducted a full gap analysis against the requirements of the Nuclear Safety Technical Inspection Guide (TIG) (NS-INSP-GD-011) Revision 3. All safety significant recommendations were effectively implemented as a result of this in depth review and ONR is content that SFL continue to meet the requirements of the TIG and these minor amendments do not impact nuclear safety.

9. The proposed amendments to the plan have been subject to the licensee's due governance process and approved by the 74th meeting of the Springfields Environmental, Health and Safety Committee' on 13 November 18 [Ref 5].
10. The licensee has continued to achieve an adequate performance when demonstrating the On-Site Emergency Plan aspects of the LC11 emergency arrangements, the most recent example being at Emergency Exercise ██████████ observed by ONR on 15 September 2016 [Ref 7].
11. In addition to LC11, Springfields Fuels Limited is required to comply with REPPIR 2001. The Hazard Identification and Risk Evaluation (HIRE) report assessed by ONR concluded that there is a potential for a reasonably foreseeable radiation accidents on the Springfields Fuels Limited site that would result in a radiation emergency. Springfields Fuels Limited therefore requires an off-site emergency plan to comply with REPPIR2001, which has been determined by ONR. Once ONR has determined the off-site emergency planning area, the responsible local authority, in this case Lancashire County Council, is required to prepare an off-site emergency plan with the purpose of minimising, so far as is reasonably practicable, radiation exposures to those likely to be affected by such an emergency. The licensee has continued to achieve an adequate performance when demonstrating the Off-Site Emergency Plan aspects of their emergency arrangements, the most recent example being at Emergency Exercise ██████████ observed by ONR on 3 October 2018 [Ref 8].
12. ONR Civil Nuclear Security was consulted concerning the proposed approval of the revised Emergency Plan and have confirmed that they have no objections to the approval being issued [Ref 9].
13. The Environment Agency (EA) has been informed of the proposed approval of the UUK Emergency Plan [Ref 10]. However, due to the minor nature of the amendments no formal consultation has been undertaken.
14. Licence Instrument (LI) 524 [Ref 11] has been drafted in response to the licensee's request for the approval of the SFL On-Site Emergency Plan under Licence Condition 11(3). This LI is one of the approved for use formats given within ONR procedures and as such is not require to be reviewed by Government Legal Department (GLD).

MATTERS ARISING FROM ONR'S WORK

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

4 CONCLUSIONS

16. ONR is satisfied that the revised emergency plan introduces only minor changes to the extant arrangements, and that these changes were adequate and acceptable.
17. The licensee has continued to successfully demonstrate the implementation of the On-Site Emergency Plan since the last review in 2015.
18. ONR therefore concludes that the proposed amendments should be implemented by granting an approval under LC 11(3).

5 RECOMMENDATIONS

19. On the basis of the documentation submitted by Springfields Fuels Limited and ONR's assessment, it is recommended that:
 - The Head of Decommissioning, Fuel & Waste (DFW) Sub-Division approves this PAR.

- A person with delegated authority within ONR signs and issues licence instrument number 524, a Licence Condition 11(3) Approval of the Springfields On-Site Emergency Plan October 2018 and Licence Instrument 523 be withdrawn.

REFERENCES:

1. Request for Approval of On-Site Emergency Plan December 2018 Springfields Fuels Limited: [2019/8592](#) .
2. Springfields On-Site Emergency Plan October 2018: [2019/27824](#).
3. Springfields On-Site Emergency Plan October 2015: [2016/461499](#).
4. SFL LI 523 – Approval of the Springfields On- Site Emergency Plan granted under Licence Condition 11(3): [2016/481256](#).
5. Minutes of 74th Springfields Environment, Health and Safety Committee – Meeting held on 13 November 2018: [2019/27848](#).
6. Approval of On-Site Emergency Plan ONR-SDFW-PAR-16-028 dated 1 December 16: [2016/452865](#).
7. ONR-CNS-IR-17 Revision 0 Ex ██████████ LC11 Emergency Exercise: 2017/351060.
8. ONR-SDFW-CR-18 Revision 0 Ex ██████████ Emergency Exercise: 2019/31200.
9. Nominated Site Security Officer Approval: [2019/27918](#).
10. Environment Agency Site Nuclear Regulator E-mail response: [2019/27923](#).
11. SFL LI 524 – Approval of the Springfields On- Site Emergency Plan granted under Licence Condition 11(3) – unsigned: [2019/8570](#).