



**Springfields Fuels Limited**

**Approval of the Arrangements for Consideration, or Advice on, Urgent Safety Proposals, relating to the Springfields Environment, Health and Safety Committee.**

**Springfields Fuels Limited. Site Licence Arrangements for Licence Condition 13(12). Arrangements for Consideration, or Advice on, Urgent Safety Proposals. SSI 494, Revision 2 dated February 2019.**

Project Assessment Report ONR-SDFW-PAR-19-004  
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## EXECUTIVE SUMMARY

### **Title**

Approval of the Arrangements for Consideration, or Advice on, Urgent Safety Proposals, for matters normally considered by the Springfields Environment, Health and Safety Committee, SSI 494 Revision 2 dated February 2019.

### **Permission requested**

This project assessment report (PAR) relates to a request from Springfields Fuels Limited for an approval of the arrangements for consideration, or advice on, urgent safety proposals, for matters normally considered by the Springfields Environment, Health and Safety Committee, the licensee's Nuclear Safety and Environment Committee, under Licence Condition (LC) 13 (12) of nuclear site licence 79.

### **Background**

As required under LC 13 the licensee is required to establish a Nuclear Safety Committee (NSC) and to submit to the ONR for approval the arrangements necessary to obtain consideration, or advice on, urgent safety proposals, which would normally be considered by a NSC. In order to comply with this requirement, and following a planned periodic review of its arrangements, Springfields Fuels Limited has produced amended arrangements for urgent safety proposals.

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

ONR has carried out a programme of work which had previously assessed and approved revisions to the urgent safety proposals arrangements. Springfields Fuels Limited has conducted a planned periodic review of these arrangements, proposing minor revisions to the arrangements, including things such as changing the title of the regulator to the Office for Nuclear Regulation (ONR) and presented the revised arrangements to its NSC. The amended arrangements were accepted by the NSC and hence the licensee has applied for ONR approval of the amended arrangements for urgent safety proposals. The ONR site inspector assessed the amended arrangements and ensured that the licensee had correctly followed due process in making a valid application for approval by ONR.

### **Matters arising from ONR's work**

There are no matters arising from this work.

### **Conclusions**

This report presents the findings of the ONR assessment of the licensee's application. The proposed arrangements to obtain consideration of, or advice on, urgent safety proposals, which would normally be considered by a NSC, have been subjected to the licensee's due process and accepted by the NSC chairman. The document has also been assessed by ONR and considered adequate to satisfy the requirements of LC 13 (12).

**Recommendation** I recommend that a person with Delegated Authority within ONR should sign Licence Instrument No. 525 to give approval to the proposed Springfields Fuels Limited Arrangements for Consideration, or Advice on, Urgent Safety Proposals; the document titled Arrangements for Consideration or Advice on Urgent Safety Proposals, SSI 494, Revision 2 dated February 2019.

## LIST OF ABBREVIATIONS

EA	Environment Agency
HOW2	(Office for Nuclear Regulation) Business Management System
HSE	The Health and Safety Executive
LC	Licence Condition
ONR	Office for Nuclear Regulation
NSC	Nuclear Safety Committee
SEHSC	Springfields Environment, Health and Safety Committee

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## **PERMISSION REQUESTED**

1. This report sets out the recommendation following the Office for Nuclear Regulation assessment of the application by Springfields Fuels Limited for a Licence Condition (LC) 13(12) Approval. This relates to the arrangements necessary to obtain consideration of, or advice on, urgent safety proposals (which would normally be considered by a Nuclear Safety Committee), for the Springfields Fuels Limited licensed site. This report recommends the granting of the Approval licence instrument number 525.

## **BACKGROUND**

2. Springfields Fuels Limited periodically reviews licence condition arrangements every three years. Consequently, the arrangements for obtaining consideration, or advice, urgent safety proposals, for matters normally considered by the LC 13 Nuclear Safety Committee (NSC), were recently reviewed and then presented to the nuclear safety committee. A minor change was made to these arrangements, reflecting the change of name of the regulator to the Office for Nuclear Regulation, and the scope of the SSI applicability list was updated in line with the latest SSI template for the site, which has led to the licensee applying to ONR for Approval of the amended arrangements for consideration, or advice on urgent safety proposals, changes which require ONR Approval.
3. The licensee has chosen to include consideration of environmental matters at the NSC, so the committee is termed the Springfields Environment, Health and Safety Committee (SEHSC).

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

4. Springfields Fuels Limited submitted the application on 18 June 2019. The urgent safety proposals arrangements for the Nuclear Safety Committee and the related SEHSC minutes where the arrangements were considered were attached to a covering application letter (TOONR 132/19 Rev 2). The urgent safety proposals arrangements were defined within the document titled "Arrangements for Consideration or Advice on Urgent Safety Proposals", SSI 494 Revision 2 dated February 2019.
5. The urgent safety proposals arrangements were checked against the requirements of the site licence condition by the site inspector. The site inspector also checked that the licensee had correctly followed due process in making a valid application for the licence instrument, with an acceptable outcome.
6. The LC 13(12) Approval is a standard licence instrument, as set out within the HOW2 NS/PER/IN/001 - Issue 8 document.
7. In accordance with ONR's guidance (IN/001) for the preparation and issue of Licence Instruments) the assessment was made of the licensee's application by the site inspector. The findings of the assessment are set out in sections 3, 4 and 5 of this report.
8. The site safeguards inspector and the site security inspector were both notified by the site inspector (File Ref.: 2019/148734), regarding the proposed approval of the urgent safety proposals arrangements for matters normally considered by the Springfields Environment, Health and Safety Committee. No issues were raised by either the safeguards inspector (File Ref.: 2019/148738) or the security inspector (File Ref.: 2019/157335).

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

9. There are no regulatory issues or concerns remaining from this assessment to prevent my recommendation for Approval of the amended Urgent Safety Proposals arrangements presented by the licensee.
10. However, it is important to note that Springfields Fuels Limited Arrangements for Consideration, or Advice on, Urgent Safety Proposals, endorsed for use by SFL under paper SEHSC/P86, Issue 12, dated February 2016 was not submitted to ONR for Approval in accordance with the requirements set out in Licence Condition 13 (12). The changes made at that time are documented in File Ref.: 2019/185379 (letter 18th June 2019, from [REDACTED] to [REDACTED] Ref.: TOONR 132/19 Rev 2.) and are editorial in nature and contain no material changes that may have required detailed consideration by ONR.

## **CONCLUSIONS**

11. This report presents the findings of the site inspector's assessment of the licensee's application for Approval of the urgent safety proposals arrangements, for matters normally considered by the Springfields Environment, Health and Safety Committee, as defined in the document "Arrangements for Consideration or Advice on Urgent Safety Proposals", SSI 494, Revision 2, dated February 2019, endorsed by paper titled "Arrangements for Consideration, or Advice on, Urgent Safety Proposals", SEHSC/P86 Issue 13, dated February 2019.
12. To conclude, I am satisfied with the claims, arguments and evidence laid down within the licensee's application. The conclusions of the assessment undertaken to review this application by the site inspector is that an LC 13(12) Approval can be issued.

## **RECOMMENDATIONS**

13. I recommend that a person with Delegated Authority within ONR should sign Licence Instrument No. 525 to give approval to the proposed Springfields Fuels Limited Arrangements for Consideration, or Advice on, Urgent Safety Proposals; the document titled Arrangements for Consideration or Advice on Urgent Safety Proposals, SSI 494, Revision 2 dated February 2019.

## REFERENCES

1. *ONR HOW2 Guide - Purpose and Scope of Permissioning - NS-PER-GD-014 Revision 6. November 2016.*
2. *ONR HOW2 Guide - Preparation and Issue of Licence Instruments - NS-PER-IN-001 Revision 8. January 2017.*
3. *Letter from Springfields Fuels Limited to ONR, applying for ONR Approval of the urgent safety proposals arrangements, for matters normally considered by the Springfields Environment, Health and Safety Committee, titled "Nuclear Site Licence 79, Licence Condition 13(12) – Approval of Arrangements for Consideration, or Advice on Urgent Safety Proposals". Attached to the letter was the document titled "SSI 494 Revision 2 - Arrangements for Consideration, or Advice on, Urgent Safety Proposals – dated February 2019". The minutes were filed on to folder 4.5.9170 as document number 2019/185379.*
4. *"Minutes of the 75th meeting of the Springfields Environment, Health and Safety Committee, 12<sup>th</sup> February 2019, attached to letter reference titled "Licence Condition 13 (12) Nuclear Safety Committee", TOONR 132/19, dated 13 May 2019. The minutes were filed on to folder 4.5.9170 as document number 2019/148715.*
5. *Email to ONR Site inspector from the ONR Safeguards inspector, containing confirmation that the ONR Safeguards had no objection to ONR Safety issuing an Approval to the urgent safety proposals arrangements for matters normally considered by the Springfields Environment, Health and Safety Committee and filed on to folder 4.5.9170 as document number 2019/148738.*
6. *Email to ONR Site inspector from the ONR Security inspector, containing confirmation that the ONR Security had no objection to ONR Safety issuing an Approval to the urgent safety proposals arrangements for matters normally considered by the Springfields Environment, Health and Safety Committee and filed on to folder 4.5.9170 as document number 2019/157335.*
7. *Previous Springfields Fuels Limited Licence Condition 13(12) Approval Licence Instrument, for the Urgent Safety Proposals arrangements, Licence Instrument No. 520, dated 15 February 2013. Site licence No. 79. Filed on to TRIM folder 4.4.2.11520 as document reference 2013/70950.*