



URENCO UK (UUK) Limited

Emergency Arrangements

Approval of the amended Urenco UK (UUK) Emergency Plan made under LC11

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EXECUTIVE SUMMARY

Title

Approval of the amended Urenco UK (UUK) Emergency Plan made under LC11.

Permission Requested

This project assessment report relates to a request from UUK Ltd for an approval of amendments to the UUK Emergency Plan made under Licence Condition (LC) 11(1) of nuclear site licence 48E.

Background

UUK is a provider of uranium enrichment services to the world's nuclear energy industry. 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. Nevertheless, 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 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 some minor changes it considers to be necessary. As required by LC 11(3) and in compliance with their arrangements the licensee has written to ONR to request approval of the proposed changes to be incorporated into the revised 'on site' UUK Emergency Plan at Capenhurst.

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.

I have 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 name changes of organisations and roles and the clarification and minor re-organisation of emergency roles within incident response, scientific and technical advice and communications cells.

The licensee has continued to achieve adequate performance when demonstrating the On-Site Emergency Plan aspects of the LC11 emergency arrangements, the most recent example being at the Emergency Exercise 'Quince', observed by ONR on 2nd November 2017.

Matters arising from ONR's work

There are no matters arising from this project assessment report.

Conclusions

I am 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, I conclude that this submission satisfies the requirements of LC11(1).

Recommendation

I recommend that an approval should be granted under Licence Condition 11(3) allowing UUK Limited to make the requested amendments to its Emergency Plan and that Licence Instrument 539 be issued to implement them.

LIST OF ABBREVIATIONS

CNS	Capenhurst Nuclear Services Limited (a tenant organisation on the Urenco UK Limited licensed site)
UNS	Urenco Nuclear Stewardship (a tenant organisation on the Urenco UK Limited licensed site - previously CNS)
HOW2	(Office for Nuclear Regulation) Business Management System
ONR	Office for Nuclear Regulation
SAP	Safety Assessment Principle(s)
TAG	Technical Assessment Guide (ONR)
NSEC	Nuclear Safety and Environment Committee
EA	Environment Agency

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1 PERMISSION REQUESTED

1. UUK 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 UUK Emergency Plan [Ref **Error! Reference source not found.**]. This revision is documented as the "UUK Emergency Plan, (CEP-6), Licence Condition 11" [Ref **Error! Reference source not found.**].
2. The licensee currently has an approved on-site emergency plan [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 approved by its Nuclear Safety and Environment Committee (NSEC) [Ref 4].

2 BACKGROUND

4. The licensee has undertaken a periodic review of the UUK 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 **Error! Reference source not found.**].

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

7. In my assessment of the proposed emergency plan, I have considered the differences between the extant emergency plan [Ref 3] and the proposed emergency plan [Ref 2]. The main changes are noted below:
 - Capenhurst Nuclear Services (CNS) has changed name to Urenco Nuclear Stewardship (UNS).
 - The Incident Response Service (IRS) has been formed/re-named since the last issue, following a combination the Fire and Rescue Service and the Guard Service, and this is reflected throughout the document.
 - References to PCEMS system (site gamma monitoring system used for alarm confirmation) have been removed as, while the system is still operational, it is a legacy system and does not now form part of the formal emergency arrangements.
 - The Factory Controller role has been renamed to Emergency Controller.
 - Minor changes to the emergency roles with the formation of a Scientific and Technical Advice Cell (STAC) and a communications cell. This allows a number of similar roles to be grouped together to target training at groups with similar skill sets and aligns with similar arrangements used in external emergency organisations.
 - Minor editorial changes.

8. In my assessment these changes provide both clarity within the documents and allow for flexibility within the emergency response area.
9. The proposed amendments to the plan have been subject to the licensee's due governance process and approved by its Nuclear Safety and Environment Committee (NSEC) [Ref 4].
10. The licensee has continued to achieve an adequate performance when demonstrating the UUK Emergency Plan aspects of the LC11 emergency arrangements, the most recent example being at the emergency exercise observed by ONR on 2nd November 2017. [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. The Environment Agency (EA) has been informed of the proposed approval of the UUK Emergency Plan [Ref 7]. However, due to the minor nature of the amendments no formal consultation has been undertaken.
13. I have drafted Licence Instrument (LI) 539 [Ref 8] in response to the licensee's request for the approval of the UUK Emergency Plan 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 Treasury Solicitor's Department.

MATTERS ARISING FROM ONR'S WORK

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

4 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 were adequate.
16. The licensee has continued to successfully demonstrate the implementation of the UUK Emergency Plan.
17. Finally, I conclude that the proposed amendments should be implemented by granting an approval under LC 11(3).

18. RECOMMENDATION

19. I recommend that an approval should be granted under Licence Condition 11(3) allowing UUK Limited to make the requested amendments to its Emergency Plan and that Licence Instrument 539 be issued to implement them.

5 REFERENCES

1. UUK request for Approval of UUK Emergency Plan, C(EP-6), Licence Condition 11. TRIM Record: 2018/106568.
2. UUK Emergency Plan, C(EP-6), Licence Condition 11. TRIM Record: 2018/106570.
3. Capenhurst Emergency Plan, C(EP-5) Rev 2 (Licence Condition 11)", dated 16 October 2014. TRIM Record: 2014/428179.
4. UUK NSEC Minutes approving changes to the UUK Emergency Plan. TRIM Record: 2018/106591.
5. Level One Emergency Exercise Quince held on 2 November 2018 TRIM record: 2017/415168.
6. UUK Emergency Plan, C(EP-6) Nominated Site Security Officer Approval. TRIM Record: 2018/109408.
7. E-mail response from with the Environment Agency Site Nuclear Regulator, stating that no issues need to be addressed prior to the issue of an Approval licence instrument by ONR. TRIM Record: 2018/109677.
8. Urenco UK Limited LI 539 – Approval of the UUK Site Emergency Plan granted under Licence Condition 11(3). TRIM Record: 2018/104792.