
Office for Nuclear Regulation

New Transport Technical Assessment Guides for Applications for UK Competent Authority Approval (Shielding, Criticality and Engineering)

RPC rating: **Validated**

Description of proposal

The assessment outlines the introduction of new technical assessment guides, to be introduced by the Office for Nuclear Regulation (ONR) for its inspectors. The guides will specify '*shielding, engineering and criticality*' requirements for duty holders' transport packaging of nuclear materials. This will inform ONR inspectors' regulatory judgements in approving such packaging.

The assessment suggests that the guidance will be of interest to all organisations that apply to the ONR for the approval of their radioactive material transportation packaging. Guides will provide transparency to these organisations in relation to ONR expectations on packaging. The assessment states that this will allow these organisations to reduce their interaction with the ONR and deliver "right first time" safety cases.

The ONR notes that the guidance does not introduce any new burdens for businesses. The guidance should help to inform regulatory judgements with respect to the requirements already stipulated in UK law.

Impacts of proposal

The ONR states that the only direct cost to businesses from the measure will be the costs of reading and familiarisation with the new guidance. This will impact only on organisations that apply to the ONR for approval of their radioactive material transport designs. Based on numbers for pre-existing applications, the assessment notes that twenty such organisations presently exist in the UK. Based on the ONR's knowledge of the industry, it anticipates that an average of five people per organisation will read the guides. The ONR expects two reads to be sufficient for comprehension and that this will take an average of four hours, based on RSA group guidance reading times. Those required to read it are estimated to have a wage of £47.86 per hour, based on 2015 ASHE data. This implies one-off familiarisation costs of £19,100 across approximately 20 businesses.

The IA outlines that duty-holders may re-familiarise themselves with guidance when applying for new approvals. Based on figures from the ONR's Transport Permissioning Programme, the ONR estimates that 40 such applications will be made each year. The assessment expects 3 people per organisation to review the guides once, implying a reading time of two hours based on RAS data. This generates an annual cost to business of £11,500 at the previously specified wage rate.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0.0 million. This will be a qualifying regulatory provision that will score under the business impact target.

Quality of submission

The assessment explains sufficiently the rationale behind the new guides and provides proportional analysis of their costs and benefits.

However, the ONR produced no reasoning as to why five employees initially, then three annually thereafter, would need to familiarise themselves with the guide. Sufficient justification was subsequently provided by the department external to the IA. Future assessments could be improved by providing justification for figures chosen in cost calculation.

Terms used in the guidance, such as "shielding, engineering and criticality assessments" are also not clear to the average reader. The assessment could have been improved by defining these terms. The assessment would also have benefitted from the provision of more information on the details of the guidance.

Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net direct cost to business (EANDCB)	£0.0 million
Business net present value	£0.0 million

RPC assessment¹

¹ For reporting purposes, the RPC validates EANDCB and BIT figures to the nearest £100,000

Classification	Qualifying regulatory provision (IN)
EANDCB – RPC validated	£0.0 million
Business impact target score	£0.0 million



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