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NO PROTECTIVE MARKING	RRMPOL	Issue: Version 1.0

**Progress Update in Response to
Recommendations in ONR Fukushima Interim / Final Reports, Dutyholder
Considerations and Stress Test Findings in ONR Nuclear Power Plant and non-
Power Generating Nuclear Facilities Reports
– June 2012**

Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-1	The government should approach IAEA, in co-operation with others, to ensure that improved arrangements are in place for the dissemination of timely authoritative information relevant to a nuclear event anywhere in the world.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	Whilst the response to this recommendation is to be led by the Government, we would welcome the opportunity to support it in the development of its response.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Functional outcomes relating to emergency response capability are addressed in response to specific recommendations and findings, and are discussed appropriately within the relevant progress statement included within this report.
4	Progress to date
	RRMPOL has not been specifically requested to support this recommendation, however RRMPOL remain committed to providing support as needed.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation. RRMPOL remain committed to continuous improvement and ongoing review of national and international nuclear industry and cross industry learning
6	If the finding is not closed, plans for closure including justification of timescales
	Being a small site we anticipate that this will be coordinated though the existing communication arrangements with ONR.
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-9	The UK Government, nuclear industry and ONR should support international efforts to improve the process of review and implementation of IAEA and other relevant nuclear safety standards and initiatives in the light of the Fukushima-1 (Fukushima Dai-ichi) accident.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	Whilst the response to this recommendation is to be led by the Government, we would welcome the opportunity to support it in the development of its response.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Functional outcomes relating to learning from the events at Fukushima 1 are addressed in response to specific recommendations and findings, and are discussed appropriately within the relevant progress statement included within this report.
4	Progress to date
	RRMPOL are currently engaged in addressing recommendations raised by the ONR, Stress Test Reports, and internal reviews in order to ensure adequate resilience and preparedness in response to Fukushima LFE.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation. RRMPOL are committed to continuous improvement and ongoing review of national and international nuclear industry and cross industry learning.
6	If the finding is not closed, plans for closure including justification of timescales
	Being a small site we anticipate that this will be coordinated through the existing communication arrangements with ONR.
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-2	The Government should consider carrying out a review of the Japanese response to the emergency to identify any lessons for UK public contingency planning for widespread emergencies, taking account of any social, cultural and organisational differences.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	Whilst the response to this recommendation is to be led by the Government, we welcome the opportunity to support it in the development of its response. We maintain an interest in the development of national contingency plans and need to ensure our emergency arrangements are consistent with them.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Functional outcomes relating to learning from the events at Fukushima 1 are addressed in response to specific recommendations and findings, and are discussed appropriately within the relevant progress statement included within this report.
4	Progress to date
	RRMPOL has not been specifically requested to support this recommendation, however RRMPOL remain committed to providing support as needed.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation. RRMPOL remain committed to continuous improvement and ongoing review of national and international nuclear industry and cross industry learning.
6	If the finding is not closed, plans for closure including justification of timescales
	Maintain membership of national groups and industry expert bodies.
7	For non-closed findings, key milestones and programme
	RRMPOL will take into account the implications of any further review findings from government studies and support this process accordingly on an ongoing basis.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-3	The Nuclear Emergency Planning Liaison Group should instigate a review of the UK's national nuclear emergency arrangements in light of the experience of dealing with the prolonged Japanese event.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL is a member of the Nuclear Emergency Planning Liaison Group, (NEPLG).
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To ensure that the national nuclear emergency plans provide sufficient capability taking into account lessons learned in dealing with the prolonged Japanese event.
4	Progress to date
	RRMPOL remains a member of the NEPLG and continues to take relevant actions to support its work.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation. RRMPOL remain committed to continuous improvement and ongoing review of national and international nuclear industry and cross industry learning, including through its membership of NEPLG.
6	If the finding is not closed, plans for closure including justification of timescales
	RRMPOL will support a review of the UK's national nuclear emergency arrangements through its membership of NEPLG.
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-6	The nuclear industry with others should review available techniques for estimating radioactive source terms and undertake research to test the practicability of providing real-time information on the basic characteristics of radioactive releases to the environment to the responsible off-site authorities, taking account of the range of conditions that may exist on and off the site.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	<p>There are currently a number of Continuous Air Monitors (CAMs) monitoring the airborne activity on the NFPP site and feeding the information to a PC in real-time. There are also Radiation Area Monitoring System (RAMS) units for dose monitoring.</p> <p>There is currently 1 portable AIDME (Accident or Incident Deployed Measuring Equipment) advanced environmental monitoring system available. This can be located some distance away as required and can perform air sampling and measure dose rates. It is also fitted with GPS and is mimicked in both Bronze (Forward) and Silver (Area) Commands.</p> <p>Neptune site uses local gamma monitoring monitored in the Neptune Radiological Calibration Facility. Selected Health Channels repeat in Neptune Bronze and Silver Command.</p>
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To ensure that any radioactive releases can be monitored in real-time to ensure that appropriate action can be take and the responsible authorities are fully informed of any situation.
4	Progress to date
	<p>There are current plans to install a further 7 CAMs to increase coverage</p> <p>The Neptune Health Channels have recently been refurbished, re-calibrated and tested.</p> <p>The NFPP site has camera coverage that can be interrogated from the NFPP gatehouse and the ECC.</p> <p>Neptune has extended camera coverage so the reactor room can be interrogated from Neptune Bronze.</p>

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5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	No
6	If the finding is not closed, plans for closure including justification of timescales
	<p>Subject to review RRMPOL are considering options for the installation of additional monitoring stations around the perimeter of the site, and the benefits such systems might afford in addition to existing provisions. These would monitor dose rates and conduct air sampling.</p> <p>It is also being considered whether to acquire additional AIDME units for the NFPP site.</p>
7	For non-closed findings, key milestones and programme
	A proposal has been submitted within RRMPOL for detailed consideration and selection of options. Once this process is completed RRMPOL will formalise a programme for any implementation actions found necessary.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-7	The Government should review the adequacy of arrangements for environmental dose measurements and for predicting dispersion and public doses and environmental impacts, and to ensure that adequate up to date information is available to support decisions on emergency countermeasures.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	Whilst the response to this recommendation is to be led by the Government, we would welcome the opportunity to support it in the development of its response.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Whilst the response to this recommendation is to be led by the Government, RRMPOL have identified related specific functional outcomes as part of recommendation FR-6.
4	Progress to date
	RRMPOL has not been specifically requested to support this recommendation, however RRMPOL remain committed to providing support as needed. RRMPOL are taking action to consider the need for additional source term measurement in response to FR-6.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation.
6	If the finding is not closed, plans for closure including justification of timescales
	Being a small site we anticipate that this will be coordinated through the existing communication arrangements with ONR.
7	For non-closed findings, key milestones and programme
	Whilst RRMPOL have no programme of work specifically relating to this recommendation, RRMPOL are taking related action against recommendation FR-6.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-5	The relevant Government departments in England, Wales and Scotland should examine the adequacy of the existing system of planning controls for commercial and residential developments off the nuclear licensed site.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	Whilst the response to this recommendation is to be led by the Government, we would welcome the opportunity to support it in the development of its response.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	RRMPOL support appropriate planning controls, adequate to address nuclear siting issues for developments off the nuclear licensed sites.
4	Progress to date
	RRMPOL has not been specifically requested to support this recommendation, however RRMPOL remain committed to providing support as needed.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation.
6	If the finding is not closed, plans for closure including justification of timescales
	Being a small site we anticipate that this will be coordinated through the existing communication arrangements with ONR.
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-4	Both the UK nuclear industry and ONR should consider ways of enhancing the drive to ensure more open, transparent and trusted communications, and relationships, with the public and other stakeholders

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL maintains an open and transparent dialogue with its local communities within the constraints imposed by UK national security requirements.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To ensure a constructive and trusted relationship with stakeholders to sustainable future for nuclear operations on the RRMPOL Raynesway site.
4	Progress to date
	RRMPOL has existing arrangements for the management of communication with all our stakeholders and will continue to work with industry and regulators to ensure more open, transparent and trusted communication.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL has no programme of work to address changes to the existing processes of dialogue with stakeholders. RRMPOL however remains committed to a process of ongoing review and continuous improvement, including maintaining suitable dialogue with stakeholders, and learning from industry wide experience.
6	If the finding is not closed, plans for closure including justification of timescales
	RRMPOL has existing arrangements for the management of communication with all our stakeholders. RRMPOL remains committed to working with the nuclear industry and ONR to support any improvements in communications and relationships.
7	For non-closed findings, key milestones and programme
	Whilst RRMPOL have no programme of work associated with further enhancing its current dialogue with stakeholders, there remains a commitment to continuous improvement.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-8	The Government should consider ensuring that the legislation for the new statutory body requires ONR to be open and transparent about its decision-making, so that it may clearly demonstrate to stakeholders its effective independence from bodies or organisations concerned with the promotion or utilisation of nuclear energy.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	Whilst the response to this recommendation is to be led by the Government, we would welcome the opportunity to support it in the development of its response.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	RRMPOL support the open and transparent operation of an independent nuclear regulator to give credence to a sustainable future of nuclear operations in the UK.
4	Progress to date
	RRMPOL has not been specifically requested to support this recommendation, however RRMPOL remain committed to providing support as needed.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation.
6	If the finding is not closed, plans for closure including justification of timescales
	Being a small site we anticipate that this will be coordinated though the existing communication arrangements with ONR.
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-5	Once further detailed information is available and studies are completed, ONR should undertake a formal review of the Safety Assessment Principles to determine whether any additional guidance is necessary in the light of the Fukushima accident, particularly for “cliff-edge” effects.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL safety cases are generated in accordance with the Safety Assessment Principles.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	RRMPOL supports the culture of continuous improvement, taking cognisance of any Learning from Experience (LFE) from within the nuclear industry, together with the formalisation of this learning into principles, goals and guidance set down by the ONR as appropriate.
4	Progress to date
	RRMPOL continues to engage in dialogue with the ONR regarding its ongoing and planned nuclear operations at the Raynesway site.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation.
6	If the finding is not closed, plans for closure including justification of timescales
	RRMPOL are committed to supporting ONR in reviewing any proposed revisions to the Safety Assessment Principles either directly or through membership of national committees.
7	For non-closed findings, key milestones and programme
	RRMPOL have developed a programme of work (Safety Improvement Programme) to complete an internally generated periodic review of safety recommendations and shortfalls by November 2014. This includes preparation and approval of the updated site and facilities safety case for the NFPP to current standards by this date.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-6	ONR should consider to what extent long-term severe accidents can and should be covered by the programme of emergency exercises overseen by the regulator.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	As a responsible operator, RRMPOL prepares comprehensive emergency plans for all of our nuclear licensed sites and tests these regularly, both internally and in conjunction with public authorities, including the effectiveness of our communications during an emergency. Whilst the response to this recommendation is to be led by Government, we would welcome the opportunity to support it in the development of its response.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	RRMPOL are committed to effective planning for emergency response, and testing of these arrangements to give confidence in the effective capability to minimise nuclear risks as well as implications for business continuity.
4	Progress to date
	RRMPOL schedule emergency exercises to ensure staff are prepared for emergency situations. One such exercise was conducted in May 2012.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation other than to continue existing programmes of exercises in conjunction with the ONR, as well as routine internal training exercises (incorporating relevant emergency services, DFRS and EMAS).

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6	If the finding is not closed, plans for closure including justification of timescales
	<p>Any additional activities will be actioned through the normal business of planning on-site emergency exercises.</p> <p>RRMPOL are committed to incorporate any changes ONR require for the testing of any severe accident arrangements. The licensed sites hold biennial emergency exercises, the scopes of which are agreed in advance with the ONR and which are observed by the ONR, following discussion with ONR Site Inspector and ONR Assessment Branch and the agreement of exercise scenarios.</p>
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-7	ONR should review the arrangements for regulatory response to potential severe accidents in the UK to see whether more should be done to prepare for such very remote events.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	Whilst the response to this recommendation is to be led by ONR, as a responsible operator, RRMPOL would welcome the opportunity to support it in the development of its response.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	A robust understanding, including advice and guidance from the ONR, in terms of levels of preparedness for very remote events is important in giving assurance that appropriate arrangements are in place.
4	Progress to date
	RRMPOL are currently engaged in addressing recommendations raised by the ONR, Stress Test Reports, and internal reviews in order to ensure adequate resilience and preparedness in response to Fukushima LFE.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation other than to continue existing programmes of exercises in conjunction with the ONR.
6	If the finding is not closed, plans for closure including justification of timescales
	Whilst RRMPOL have no programmed work specifically relating to this recommendation, appropriate action against any future findings or recommendations to ensure adequacy of emergency preparedness will be taken.
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-10	ONR should expand its oversight of nuclear safety-related research to provide a strategic oversight of its availability in the UK as well as the availability of national expertise, in particular that needed to take forward lessons from Fukushima. Part of this will be to ensure that ONR has access to sufficient relevant expertise to fulfil its duties in relation to a major incident anywhere in the world.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	Whilst the response to this recommendation is to be led by ONR, as a responsible operator, RRMPOLE would welcome the opportunity to support it in the development of its response.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Providing a centre of relevant national expertise will improve national and international nuclear response capability.
4	Progress to date
	RRMPOL has not been specifically requested to support this recommendation, however RRMPOLE remain committed to providing support as needed.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL have no programmed work specifically relating to this recommendation. RRMPOLE remain committed to continuous improvement and ongoing review of national and international nuclear industry and cross industry learning.
6	If the finding is not closed, plans for closure including justification of timescales
	RRMPOL will take into account the implications of any further review findings from government studies and support this process accordingly on an ongoing basis.
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-8	The UK nuclear industry should review the dependency of nuclear safety on off-site infrastructure in extreme conditions, and consider whether enhancements are necessary to sites' self sufficiency given for the reliability of the grid under such extreme circumstances.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL does not rely on off-site infrastructure for the maintenance of nuclear and radiological safety on the site. We will review the implications of this recommendation as part of the next periodic review to see if any change is required.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Re-assertion that the sites continue not to rely on off-site infrastructure following extreme conditions supports the finding that the existing diverse supplies routes and back up supplies provide a greater degree of confidence in the sites' capabilities than the minimum requirement.
4	Progress to date
	As part of the Periodic Review of Safety RRMPOL reviewed the loss of external services and whether enhancements are necessary to the sites' self sufficiency given the unreliability of the grid under such extreme circumstances. RRMPOL as part of the PRS will consider any implications for change through appropriate existing processes. The PRS for the NFPP was submitted to ONR for review in November 2011. Neptune underwent a 3 year interim review in 2010.

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5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	<p>Whilst existing safety assessments show the site is not dependent on off-site supplies to maintain nuclear safety following extreme conditions, recommendations have been made to examine the potential benefits of improving resilience of radiometric equipment to monitor plant conditions.</p> <p>Following the findings of the PRS, an updated site and facilities safety case is to be prepared for the NFPP. This will include detailed assessments of external hazards, loss of supplies and other events / combinations of events as appropriate.</p>
6	If the finding is not closed, plans for closure including justification of timescales
	<p>The decision date for RRMPOL's submission for the PRS for the NFPP by ONR is 30 November 2012. This will be managed through routine interaction with ONR.</p> <p>Neptune will undergo a further 3 year interim review in 2013 and retain the option to bring their PRS forward by 2 years to 2015.</p> <p>It is currently under consideration to improve the stocks of food held on site for emergency situations, with the potential for self-heating meals. However, there is a kitchen with microwave on the first floor of the ECC which will remain available under flood conditions. A significant volume of food supplies will be purchased and in placed in storage by mid to late 2012.</p> <p>The NFPP generators have fuel to last for 3 to 4 days, with the availability to utilise the 50000 litres of fuel contained in the site diesel tank.</p> <p>A larger replacement ECC generator is available for installation in the near future.</p> <p>The Neptune Bronze generator is able to utilise the large volume of fuel contained within the main site IT generator diesel tank if required.</p>
7	For non-closed findings, key milestones and programme
	<p>NFPP related PRS findings are subject to a programme of improvements which are programmed for completion by November 2014. The updated NFPP site and facilities safety case is programmed for submission before November 2014.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-9	Once further relevant information becomes available, the UK nuclear industry should review what lessons can be learnt from the comparison of the events at the Fukushima-1 (Fukushima Dai-ichi) and Fukushima-2 (Fukushima Dai-ni) sites.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	If further information becomes available RRMPOL in conjunction with other operators will undertake a formal review of the report and any other relevant information to ensure that any additional learning points are addressed.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Continued confidence in operating plant safety and adequacy of emergency preparedness in the face of learning from the events at Fukushima 1 and 2.
4	Progress to date
	RRMPOL have not undertaken any specific programmes of work to support this recommendation alone, however internal reviews and stress testing have identified recommendations that are being addressed and reported separately within this progress statement. Resolution of other recommendations raised by the ONR are also being progressed individually and reported in this progress statement. RRMPOL has an appointed Safety Director who sits on the Safety Directors Forum. Information and actions from the SDF and SDF Regulator meetings are distributed through RRMPOL as appropriate.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL are working to address recommendations raised from internal reviews, stress testing and from the ONR.

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6	If the finding is not closed, plans for closure including justification of timescales
	RRMPOL are addressing the recommendations raised, and lessons learnt. It is anticipated that many of the findings will be addressed as part of the work to update the NFPP site and facilities safety case. This and the work to address the findings of the 2011 PRS are programmed for completion by November 2014.
7	For non-closed findings, key milestones and programme
	Programmes for addressing recommendations vary, and, where applicable, are reported in subsequent progress statements within this report. As a fundamental objective it is planned to complete the improvements derived from the 2011 PRS, including the preparation of the updated NFPP site and facilities safety case by November 2014.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-10	The UK nuclear industry should initiate a review of flooding studies, including from tsunamis, in light of the Japanese experience, to confirm the design basis and margins for flooding at UK nuclear sites, and whether there is a need to improve further site-specific flood risk assessments as part of the Periodic Review of Safety programme, and for any new reactors. This should include sea-level protection.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The RRMPOL Licensed Site is approximately 100km from the sea. The site is located adjacent to the River Derwent and approximately 63km downstream of the Derwent dams. Riverine flooding is considered as part of our safety cases. RRMPOL considers riverine flooding as part of its 10 yearly Periodic Review of Safety and uses the latest Environment Agency flood modelling.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	RRMPOL's operations at their Raynesway site are susceptible to riverine flooding. Whilst the current safety case shows current radiological risks from flooding to be low, there is a substantial risk to business continuity. RRMPOL are therefore seeking to fully understand the level of flood risk presented, and present improvement strategies to further reduce risks to nuclear safety and business continuity.
4	Progress to date
	A Flood Assessment to support Safety Cases was produced for RRMPOL in 2012.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Further studies relating to assessing reducing vulnerability to flood are currently being undertaken.

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6	If the finding is not closed, plans for closure including justification of timescales
	<p>A Flood Protection report for the NFPP site is currently in production.</p> <p>The ONR decision date for the Periodic Review of Safety is 30 November 2012.</p> <p>The review is a comprehensive survey of the site against modern standards, including those relevant to external hazards. RRMPOL will review the outcome of the re-assessment and take any recommendations for improvement through appropriate existing processes.</p>
7	For non-closed findings, key milestones and programme
	<p>A programme of work is in place to address recommendations and shortfalls from the NFPP Periodic Review of Safety for completion by November 2014. An updated NFPP site and facilities safety case is also planned for submission by November 2014.</p> <p>The flood protection study is planned for draft completion by 3rd Qtr 2012; this will be followed by a review of identified options, after which selected improvements will be formally programmed for implementation.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-11	The UK nuclear industry should ensure that safety cases for new sites for multiple reactors adequately demonstrate the capability for dealing with multiple serious concurrent events induced by extreme off-site hazards.

1	Does the Submitting Body agree with the finding?
	Not applicable to RRMPOL
2	How does this apply to the Submitting Body? Describe the level of relevance
	The RRMPOL Licensed Site does not have multiple reactors, nor any plans to do so.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	N/A
4	Progress to date
	N/A
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	N/A
6	If the finding is not closed, plans for closure including justification of timescales
	N/A
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-12	The UK nuclear industry should ensure the adequacy of any new spent fuel strategies compared with the expectations in the Safety Assessment Principles of passive safety and good engineering practice.

1	Does the Submitting Body agree with the finding?
	Not applicable to RRMPOL
2	How does this apply to the Submitting Body? Describe the level of relevance
	No spent fuel is stored, or intended to be stored, on site.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	N/A
4	Progress to date
	N/A
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	N/A
6	If the finding is not closed, plans for closure including justification of timescales
	N/A
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-13	The UK nuclear industry should review the plant and site layouts of existing plants and any proposed new designs to ensure that safety systems and their essential supplies and controls have adequate robustness against severe flooding and other extreme external events.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The RRMPOL Licensed Site is approximately 100km from the sea. The site is located adjacent to the River Derwent and approximately 63km downstream of the Derwent dams. Riverine flooding is considered as part of our safety case.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	As part of ongoing programmes of work RRMPOL are seeking to review options to address known susceptibilities to external hazards (particularly flooding) and undertake new assessments of external hazards as part of the updated safety case to be prepared for the NFPP.
4	Progress to date
	<p>A system of flood warnings in association with the Environment Agency is already in place.</p> <p>The NFPP Licensed Site submitted a 10 yearly Periodic Review of Safety in November 2011. The Periodic Review of Safety addresses all appropriate external hazards and combinations of external hazards to the site.</p> <p>A flooding study was issued in 2012 for the site. It considers potential flood heights, water velocities and provides an indication of available response times. An additional Naturally Occurring Hazards assessment is currently in production to be submitted by mid to late 2012.</p> <p>Neptune perform scheduled 3 yearly interim reviews between PRSs.</p> <p>The NFPP site is currently undergoing a regeneration project, which will address the potential for severe flooding and other external events.</p> <p>A flood protection study is planned for draft completion by 3rd Qtr 2012, and will address measures which could be adopted for important existing facilities. The study also considers the potential for collapsed masonry.</p>

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5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	A programme of work to prepare an updated NFPP site and facilities safety case for the NFPP is in place, this includes work to undertaken external hazards analysis. A flood protection study is currently in production.
6	If the finding is not closed, plans for closure including justification of timescales
	<p>RRMPOL will review the outcome of the re-assessment and consider any recommendations for improvement through appropriate existing processes.</p> <p>The Neptune site is considering the option to bring forward their next PRS by 2 years to 2015.</p> <p>A programme of work to prepare an updated site and facilities safety case for the NFPP is in place, this includes work to undertaken external hazards analysis. A flood protection study is currently being prepared to examine options to improving resilience to flooding.</p> <p>The site regeneration project includes locating the buildings on plinths such that they will not be at risk of flooding. Safety case work to support the design (and layout) of the regenerated facilities is ongoing and will include comprehensive analysis of external hazards at relevant project stages.</p>
7	For non-closed findings, key milestones and programme
	<p>The NFPP PRS decision date is November 2012. A programme for work to address PRS recommendations and shortfalls is in place for completion by November 2014. An updated NFPP site and facilities safety case is also planned for submission by November 2014.</p> <p>The flood protection study is planned for draft completion by 3rd Qtr 2012; this will be followed by a review of identified options, after which selected improvements will be formally programmed for implementation.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-14	The UK nuclear industry should ensure that the design of new spent fuel ponds close to reactors minimises the need for bottom penetrations and lines that are prone to siphoning faults. Any that are necessary should be as robust to faults as are the ponds themselves.

1	Does the Submitting Body agree with the finding?
	Not applicable to RRMPOL
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL does not have spent fuel on the Licensed Site. The irradiation level of fuel from the Neptune facility is sufficiently low that there are no requirements for storage ponds.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	N/A
4	Progress to date
	N/A
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	N/A
6	If the finding is not closed, plans for closure including justification of timescales
	N/A
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-15	Once detailed information becomes available on the performance of concrete, other structures and equipment, the UK nuclear industry should consider any implications for improved understanding of the relevant design and analyses.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL are in the process of setting up discussions with the civil engineering contractor. This is not considered to be a major outstanding issue as concrete is mostly only used for site foundations. The Neptune Reactor Hall is constructed from concrete. Neptune structural surveys conducted at least every 5 years (the last being in 2010) have not reported any significant degradation of concrete.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	A robust understanding of structural performance under extreme load scenarios to ensure safety analysis and building performance remains appropriate.
4	Progress to date
	A structural survey of the NFPP is planned for 2012. Updated facility and site safety cases for the NFPP are currently under preparation for submission by November 2014. RRMPOL has an appointed Safety Director who sits on the Safety Directors Forum. Information and actions from the SDF and SDF Regulator meetings are distributed through RRMPOL as appropriate.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	No, this is an ongoing issue.
6	If the finding is not closed, plans for closure including justification of timescales
	When detailed information becomes available on the performance of concrete, other structures and equipment, RRMPOL will review any changes to codes and standards and review the implications for their licensed sites.

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7	For non-closed findings, key milestones and programme
	Following the structural survey in 2012, RRMPOL will review all relevant learning from nuclear industry and cross industry sources, including from revised codes and standards. Programmes of work to implement any learning will be put in place as necessary.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-16	When considering the recommendations in this report the UK nuclear industry should consider them in the light of all extreme hazards, particularly for plant layout and design of safety-related plant.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	<p>All reasonably foreseeable hazards to the site are identified in the existing site safety case.</p> <p>More recent information on the potential for hazards has been generated as part of the normal work practices on the site.</p> <p>RRMPOL is currently undertaking a 10 yearly Periodic Review of Safety. As part of this review all potential external hazards (both natural and man-made) to the site are being reviewed. The review will utilise best available information at the time. Suggested areas for improvement on site will be considered and implemented through appropriate existing processes.</p> <p>There are no claims in the current safety cases for defined response / intervention timescales to avert progression to more serious conditions.</p>
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To ensure continued confidence in nuclear safety for extreme hazards.
4	Progress to date
	<p>The ONR Periodic Review of Safety decision date is 30th November 2012, following submission in November 2011. A naturally occurring hazards review and a flood protection report are currently being produced. An updated NFPP site and facilities safety case for the NFPP is also planned for submission by November 2014.</p> <p>An interim 3 yearly review for the Neptune facility was conducted in 2010.</p> <p>A discussion of progress against specific related recommendations, including from stress test reviews, internal reviews and from ONR reports are included separately in this progress report.</p>

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5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	A programme of work to prepare an updated site and facilities safety case for the NFPP is ongoing, this includes external hazards assessment.
6	If the finding is not closed, plans for closure including justification of timescales
	<p>The option to bring forward the Neptune PRS by 2 years to 2015 is being considered; the next interim safety review is scheduled for 2013.</p> <p>A review of the naturally occurring hazards susceptibility at the Raynesway site is being undertaken, due for completion mid to late 2012. A flood protection study is also in production, due for draft completion for 3rd Qtr 2012. Implementation of any required improvements to flood protection provisions will be programmed once identified from ALARP reviews that will be undertaken once the study is complete.</p> <p>An updated site and facilities safety case for the NFPP is at an early stage of preparation, and is planned for submission in November 2014.</p>
7	For non-closed findings, key milestones and programme
	Key dates are discussed in section 6.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-2	The UK nuclear industry should ensure that structures, systems and components needed for managing and controlling actions in response to an accident, including plant control rooms, on-site emergency control centres and off-site emergency centres, are adequately protected against hazards that could affect several simultaneously.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL Raynesway incorporates emergency control centres. Forward command centres (Bronze) and site level command (Silver) are currently in place, these have varying susceptibilities to extreme external hazards.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To take all reasonable steps to ensure effective facilities for managing emergency response in extreme hazards scenarios.
4	Progress to date
	Identification and review of options to improve the availability of emergency control centres are currently being undertaken. Considerations include: It is under consideration to upgrade the glass in the doors and windows of the Emergency Control Centre (ECC) to increase to flooding. Options to relocate both of the Bronze command centres on the top floor of the ECC to improve resilience. Possibility of alternative off-site locations for Silver command, use of containerised back-up Health Physics instrumentation and equipment.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work to address the availability of emergency control centres is ongoing.

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6	If the finding is not closed, plans for closure including justification of timescales
	<p>Work is currently in progress relating to resilience of emergency response facilities.</p> <p>A new reception centre, incorporating NFPP bronze command facilities is planned for construction in 2014. This will incorporate improved resistance to external hazards, and there will be change and decontamination facilities available.</p> <p>In the event the ECC were to flood, the new Bronze would be equipped as a mini-Silver and operations could move there with relative ease.</p> <p>It is under consideration to purchase some standalone easily erectable temporary structures with the capability to provide shelter for 30 to 40 people. They would be stored along with compressor and generator and a set of radios.</p>
7	For non-closed findings, key milestones and programme
	<p>The review of options for improving resilience of emergency response facilities is planned for completion by end of 2012. Once suitable options have been reviewed and selected, a programme of implementation will be put in place.</p> <p>See also section 6, above.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-3	Structures, systems and components needed for managing and controlling actions in response to an accident, including plant control rooms, on-site emergency control centres and off-site emergency centres, should be capable of operating adequately in the conditions, and for the duration, for which they could be needed, including possible severe accident conditions.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The design for the new Reception building incorporates a new NFPP Bronze facility which has taken account of flooding and is. If the Operations Bronze facility was untenable then the ECC or Neptune Bronze could be used. Similarly, the ECC could be used if Neptune Bronze became unavailable. The upper storey of the ECC could be used if the ground floor was flooded.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To take all reasonable steps to ensure effective facilities for managing emergency response in extreme hazards scenarios.
4	Progress to date
	The new Reception building, incorporating NFPP Bronze command centre, is scheduled to complete construction and become operational during 2014. The new facility will provide improved capability to withstand extreme events. RRMPOL are currently considering options for back-up off-site Silver Command, protected from flooding and strong winds. This would then remain available in the event the site was flooded. Related detailed recommendations were made by RRMPOL as part of the stress test studies undertaken. In the event of a site emergency, site is not reliant on IT to respond accordingly as all operations are manual. If the phones were unavailable for use in the event the masts suffered damage, there are radios with 4 channels available for use. The ECC is configured such that it can operate with a re-circulating air system without the need to use potentially contaminated external air.

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5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work to address the performance of the emergency control facilities remains ongoing.
6	If the finding is not closed, plans for closure including justification of timescales
	<p>A number of options for improving the withstand of emergency command facilities are currently under review. Programmes of work to implement any changes will be put in place as required.</p> <p>Improved Bronze command facilities are planned to be put into operation by 2014.</p> <p>It is planned to move the muster point to building D154 by the end of Q3 2012. The building isn't located on a plinth, but is one of the highest buildings on the site. If further space is required to locate people, Atlantic House has a further 3 storeys in addition to the one housing the current muster point. It is considered that there is sufficient space to locate people in a severe event scenario.</p>
7	For non-closed findings, key milestones and programme
	<p>The review of options for improving resilience of emergency response facilities is planned for completion by the end of 2012. Once suitable options have been reviewed and selected, a programme of implementation will be put in place.</p> <p>See section 6 above.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-17	The UK nuclear industry should undertake further work with the National Grid to establish the robustness and potential unavailability of off-site electrical supplies under severe hazard conditions.

1	Does the Submitting Body agree with the finding?
	Not applicable to RRMPOL
2	How does this apply to the Submitting Body? Describe the level of relevance
	The Nuclear Fuel Production Plant Site does not require external services to maintain safe nuclear or radiological conditions. The Neptune Zero Energy Reactor Site does not require external services to safely shut down the reactor or to maintain safe nuclear or radiological conditions.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	N/A
4	Progress to date
	N/A
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	N/A
6	If the finding is not closed, plans for closure including justification of timescales
	N/A
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-18	The UK nuclear industry should review any need for the provision of additional, diverse means of providing robust sufficiently long-term independent electrical supplies on sites, reflecting the loss of availability of off-site electrical supplies under severe conditions.

1	Does the Submitting Body agree with the finding?
	Not applicable to RRMPOL
2	How does this apply to the Submitting Body? Describe the level of relevance
	The Nuclear Fuel Production Plant Site does not require electrical services to maintain safe nuclear or radiological conditions. The Neptune Zero Energy Reactor Site does not require electrical services to safely shut down the reactor or to maintain safe nuclear or radiological conditions.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	N/A
4	Progress to date
	N/A
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	N/A
6	If the finding is not closed, plans for closure including justification of timescales
	N/A
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-19	The UK nuclear industry should review the need for, and if required, the ability to provide longer term coolant supplies to nuclear sites in the UK in the event of a severe off-site disruption, considering whether further on-site supplies or greater off-site capability is needed. This relates to both carbon dioxide and fresh water supplies, and for existing and proposed new plants.

1	Does the Submitting Body agree with the finding?
	Not applicable to RRMPOL
2	How does this apply to the Submitting Body? Describe the level of relevance
	The Licensed Nuclear Fuel Production Plant Site does not require the ability to maintain long term cooling supplies to maintain safe nuclear or radiological conditions as demonstrated in the existing site safety case. The Licensed Neptune Zero Energy Reactor Site does not require the ability to maintain long term cooling supplies to safely shut down the reactor or to maintain safe nuclear or radiological conditions demonstrated in the existing site safety case.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	N/A
4	Progress to date
	N/A
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	N/A
6	If the finding is not closed, plans for closure including justification of timescales
	N/A
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-20	The UK nuclear industry should review the site contingency plans for pond water make up under severe accident conditions to see whether they can and should be enhanced given the experience at Fukushima.

1	Does the Submitting Body agree with the finding?
	Not applicable to RRMPOL
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL does not operate spent fuel ponds.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	N/A
4	Progress to date
	N/A
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	N/A
6	If the finding is not closed, plans for closure including justification of timescales
	N/A
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-21	The UK nuclear industry should review the ventilation and venting routes for nuclear facilities where significant concentrations of combustible gases may be flowing or accumulating to determine whether more should be done to protect them. (Nuclear Fuel Production Plant)

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	There is no recognised process route for the production of significant quantities of flammable gas. Natural gas is used within a boiler house on the NFPP site to provide process and comfort heating. Any requirements for ventilation and venting of such accumulations within the boiler house will be addressed within the updated safety case.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To give continued confidence that the potential for propagation of flammable fuel – air mixtures within ventilation systems and between plant areas is minimised.
4	Progress to date
	The Periodic Review of Safety was submitted in November 2011 and its decision date is 30 November 2012. Work has commenced on the updated NFPP site and facilities safety case and is due for completion by November 2014.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Whilst no specific programmes of work are in place to address this recommendation (no relevant aspects have been identified), further study of site ventilation systems, including boiler house (it has a natural gas supply) are an implicit component of the updated NFPP site and facilities safety case.
6	If the finding is not closed, plans for closure including justification of timescales
	Study of site ventilation systems, including boiler house are an implicit component of the updated NFPP site and facilities safety cases to be submitted by November 2014.

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7	For non-closed findings, key milestones and programme
	See section 6 above.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-21	The UK nuclear industry should review the ventilation and venting routes for nuclear facilities where significant concentrations of combustible gases may be flowing or accumulating to determine whether more should be done to protect them. (Neptune Zero Energy Reactor)

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	There is no recognised process route for the production of significant quantities of flammable gas. A gas main runs above ground through the Neptune Site. Any gas leaking from the pipework would disperse rather than accumulate. This will be reviewed during the next Neptune Periodic Review of Safety.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To give continued confidence that the potential for propagation of flammable fuel – air mixtures within ventilation systems and between plant areas is minimised.
4	Progress to date
	Work on the Neptune Periodic Review of Safety has not yet commenced.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Whilst no specific programmes of work are in place to address this recommendation (no relevant aspects have been identified) further review will be undertaken as part of the next Periodic Review of Safety.
6	If the finding is not closed, plans for closure including justification of timescales
	The option of bringing forward the Neptune Periodic Review of Safety by 2 years to 2015 is being considered. An interim review of safety is scheduled for 2013.

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7	For non-closed findings, key milestones and programme
	See section 6 above.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-22	The UK nuclear industry should review the provision on-site of emergency control, instrumentation and communications in light of the circumstances of the Fukushima accident including long timescales, wide spread on and off-site disruption, and the environment on-site associated with a severe accident.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	On-site emergency controls are followed as part of RRMPOL's response during an emergency. Lessons learnt from the Fukushima incident will be used to inform any improvements required.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To take all reasonably practicable steps to ensure effective facilities for managing emergency response in extreme hazards scenarios.
4	Progress to date
	An internal review is due to be conducted to determine what improvement needs to be made to the emergency arrangements. The ECC is seismically qualified and is equipped with telephones and radio communication equipment. In the event of flooding, there is the capability to use the upstairs of the ECC. Options to provide an off-site backup are also being considered. A new bronze command for the NFPP is to be constructed within the next two years. Neptune Site has the capability to cut the power from a sub-station if necessary. Any power dip would lead to the plant being shut down.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work remains ongoing to determine actions required to fully address this recommendation.

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6	If the finding is not closed, plans for closure including justification of timescales
	<p>The new Reception Building is scheduled to complete construction and become operational during early 2014. Bronze Command will then be relocated to the new building, which is to be constructed 1m above ground level as a protection for flooding.</p> <p>It is currently under consideration to locate additional equipment (Health Physics instrumentation, PPE, Comms equipment) safely in a dry off-site location. There are some issues which require further consideration, such as the calibration of the HP instruments and return to site at regular intervals. However, there are options being considered and a decision should be made by the end of 2012.</p> <p>Following the production of the Flood Protection Study (1st draft due Aug 2012), any recommendations relating to the ECC can be reviewed and considered, and any actions to be taken can be planned accordingly to an appropriate timescale.</p>
7	For non-closed findings, key milestones and programme
	<p>Reception Building to become operational early 2014. Bronze Command to be transferred to new Reception Building.</p> <p>Flood Protection Study 1st draft due 3rd Qtr 2012.</p> <p>A review of the naturally occurring hazards susceptibility at the Raynesway site is being undertaken, due for completion mid to late 2012.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-23	The UK nuclear industry, in conjunction with other organisations as necessary, should review the robustness of necessary off-site communications for severe accidents involving widespread disruption

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL recognises the requirement to maintain key communication links during accidents. In its on-site emergency control centres RRMPOL already maintains a number of diverse means of communication.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To ensure sufficient off-site communications for emergency control centres use including following extreme hazard events.
4	Progress to date
	RRMPOL already maintains a number of diverse means of communication.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work to consider options for off-site provision of equipment and back-up facilities are being considered.
6	If the finding is not closed, plans for closure including justification of timescales
	RRMPOL will liaise with other licensees through the national industry forums to determine what actions can be carried out to review the robustness of off-site communications. RRMPOL will use the existing change control processes for the Site to manage any necessary changes. RRMPOL is considering options for alternative (back-up) off-site emergency control centre provision, and options for off-site dry storage of back up instrumentation and communications equipment.

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7	For non-closed findings, key milestones and programme
	Work to consider options for off-site provision of equipment and back-up facilities are being considered and a decision should be made by the end of 2012.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-24	The UK nuclear industry should review existing severe accident contingency arrangements and training, giving particular consideration to the physical, organisational, behavioural, emotional and cultural aspects for workers having to take actions on-site, especially over long periods. This should take account of the impact of using contractors for some aspects on-site such as maintenance and their possible response.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL emergency arrangements already recognise the need to manage resources through a longer term response to incidents. As a responsible licensee RRMPOL will liaise with other licensees through the national forums to look for any improvements that can be made.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure suitable provisions and facilities for providing suitable long term actions in response to severe events.
4	Progress to date
	<p>There are ongoing reviews of nuclear emergency response arrangements, including the possibility of using specialist flood response contractors to providing site access.</p> <p>Additional breathing apparatus (BA) equipment has been purchased which will allow use by individuals without a requirement to undergo a BA medical. This ensures that more people can be trained to use it and therefore there will be a greater capability in an emergency scenario.</p> <p>In the event of an emergency, approximately 95% of the response team are staff.</p> <p>A number of people are associated with each key role to provide some security of availability.</p> <p>Current emergency arrangements can draw on a wide range of RRMPOL and other resources.</p> <p>RRMPOL has committed Human Factors support which is available to address any of the HF factors arising.</p>

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5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work is continuing to review emergency response capability.
6	If the finding is not closed, plans for closure including justification of timescales
	<p>RRMPOL will continue through its membership of national forums on emergency response to look for improvements that can be incorporated into the emergency arrangements.</p> <p>Work will continue to examine emergency response arrangements, and options for site access, and back up facilities for severe accident response.</p> <p>The Radsafe van is due to be replaced in the near future. It is under consideration and discussions are ongoing to replace it with a vehicle with a more flexible use.</p> <p>In July 2012 a 3 day table top activity is planned to consider a flood based incident. The study will look at 3 key aspects; the incident, business continuity and recovery; and will consider the whole of the Rolls-Royce Raynesway site.</p> <p>It has been suggested and is currently undergoing talks, to have the option to move Silver operations to the RRMPOL Sinfin site. This is located a few miles from Raynesway and is not located on a flood plain.</p>
7	For non-closed findings, key milestones and programme
	Options for site access, and back up facilities for severe accident response are being considered to be completed by the end of 2012.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-11	The UK nuclear industry should continue to promote sustained high levels of safety culture amongst all its employees, making use of the National Skills Academy for Nuclear and other schemes that promote “nuclear professionalism”.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	<p>There is an awareness within the Core Design and Manufacture (CDM) business of the training products available through the National Skills Academy – Nuclear, which promote and underpin nuclear professionalism and behavioural safety / safety culture.</p> <p>CDM provide routine attendance at the UK Nuclear Human Performance Forum, which includes membership from the broader UK nuclear industry as well as the National Skills Academy. Integral to the intention and purpose of this group is improved safety culture and behavioural safety within the industry, supported through the implementation of successful human performance programmes.</p>
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure sustained high levels of safety culture amongst all RRMPOL employees.
4	Progress to date
	<p>RRMPOL uses the Rolls-Royce HF community to provide expert advice.</p> <p>The training products available through the National Skills Academy – Nuclear are currently being reviewed for suitability and will be integrated into future training plans where appropriate.</p> <p>In response to the output from a RRMPOL organisation-wide safety climate survey in 2010, a multi-functional team (‘CDM Behavioural Safety Working Group’) was formed that included cross-representation from the CDM Licensed Sites. The team were initially tasked with reviewing the results (specific to CDM) from the survey and developing a focused action plan to address key shortfalls identified in employee responses and support improvements in maturity of the safety culture on site. Several work streams have been created which have been progressed over the past 18 months, including; improved awareness of the event reporting system, HSE suggestion scheme, hazard awareness & site induction, safety conversations and peer review. The Working Group has implemented an approach that is consistent with the Rolls-Royce Nuclear Sector ‘Safety Culture Framework’ and consistent focus has been maintained through a</p>

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	<p>management-level safety culture lead/champion and routine 'weekly' meetings.</p> <p>Also, since the start of 2012 an overarching Safety Improvement Programme ('Target Zero') has been implemented across the Rolls-Royce Nuclear Sector (including RRMPOL) with the shared vision of 'zero incidents'.</p> <p>RRMPOL's HF support area is reviewing the approaches taken to safety culture specific to the licensed site.</p>
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	A number of comprehensive work programmes are currently underway.
6	If the finding is not closed, plans for closure including justification of timescales
	A number of comprehensive work programmes are currently underway on the CDM Licensed Sites that support each of these key themes, including developing a strong safety culture.
7	For non-closed findings, key milestones and programme
	Key programme details can be provided on request.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
IR-25	The UK nuclear industry should review, and if necessary extend, analysis of accident sequences for long-term severe accidents. This should identify appropriate repair and recovery strategies to the point at which a stable state is achieved, identifying any enhanced requirements for central stocks of equipment and logistical support.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The site safety case, which is subject to periodic review and is currently being updated, considers a number of accident sequences. The NFPP Licensed Site has recently submitted a 10 yearly Periodic Review of Safety to ONR. As part of this review the potential for accidents to escalate to severe accidents will be reviewed. Suggested areas for improvement on-site will be subject to appropriate existing processes.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure suitable provisions for long term severe accident response.
4	Progress to date
	RRMPOL submitted the NFPP PRS to ONR on 30 November 2011. This is currently undergoing review and has a decision date of 30 November 2012. Neptune conducted a 3 yearly interim review in 2010. It is currently under consideration to locate additional equipment (Health Physics instrumentation, PPE, Comms equipment) safely in a dry non-seismically vulnerable off-site location. There are some issues which require further consideration, such as the calibration of the HP instruments and return to site at regular intervals. However, there are options being considered and a decision should be made by December 2012. The stress test reports submitted in December 2011 to address ENSREG stress test requirements reviewed the resilience of facilities including emergency response included recommendations to improve resilience. Specific stress test findings raised by the ONR in response to the stress test reports are also being addressed. The progress relating to the specific recommendations arising from the stress test studies and ONR stress test findings are reported separately within this progress report.

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5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	A number of periodic and interim safety reviews are ongoing or planned. A review of options for central, off-site storage of equipment is being undertaken.
6	If the finding is not closed, plans for closure including justification of timescales
	Neptune have a further 3 yearly interim review due in 2013 and are considering options to bring forward their 2017 scheduled PRS to 2015. The updated NFPP site and facilities safety case is due for completion in 2014. There may be limited severe accident analysis in the updates to the NFPP and Neptune safety cases. The outcomes of these would be used to inform the emergency arrangements.
7	For non-closed findings, key milestones and programme
	ONR decision date for NFPP Periodic Review of Safety – 30 November 2012. Options for alternative command centres, and central stocks of equipment to be complete for 3rd Qtr 2013; subsequent programme for implementation. Neptune ISR – 2013. Updated NFPP site and facilities safety case – 2014. Neptune Periodic Review of Safety – 2017, with option to bring forward to 2015.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-1	All nuclear site licensees should give appropriate and consistent priority to completing the Periodic Review of Safety (PRS) to the required standards and timescales, and to implementing identified reasonably practicable plant improvements.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL schedule 10-yearly PRSs for both licensed sites. Identified actions for improvement are managed through appropriate existing processes. RRMPOL is committed to performing PRSs for both licensed sites to required standards and timescales.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Continued confidence in plant safety, demonstration of commitment to continuous improvement, formal opportunity to implement industry learning from experience in a systematic and comprehensive approach.
4	Progress to date
	The NFPP Licensed Site has recently undertaken a scheduled 10-yearly PRS. This was submitted on 30 November 2011, the Progress Assessment issues and statements of case due 30 June 2012, Assessment Report due 31 July, Internal Report due 31 July, ONR findings to RRMPOL due 30 3rd Qtr, and the ONR decision date is 30 November 2012. RRMPOL are in the process of implementing improvements on site in accordance with the Safety Improvement Programme (SIP). This includes an updated NFPP site and facilities safety case. Neptune conducts 3 yearly interim reviews between PRSs with that last having taken place in 2010. The option to bring forward the Neptune Periodic Review of Safety by two years to 2015 is being considered.

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5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	RRMPOL has ongoing programmes of interim and periodic reviews of safety for Neptune and NFPP.
6	If the finding is not closed, plans for closure including justification of timescales
	The NFPP PRS has been submitted to ONR and has a decision date of 30 November 2012. The next Neptune 3 yearly review is to be conducted in 2013. The next PRS is due in 2017; however it is RRMPOL's current intention to look to bring it forward to 2015.
7	For non-closed findings, key milestones and programme
	All SIP activities relating to actions coming out of the PRS are scheduled to be completed by November 2014. The updated Safety Case is scheduled to gain approval for use from 2014.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
FR-4	The nuclear industry should ensure that adequate Level 2 Probabilistic Safety Analyses (PSA) are provided for all nuclear facilities that could have accidents with significant off-site consequences and use the results to inform further consideration of severe accident management measures. The PSAs should consider a full range of external events including “beyond design basis” events and extended mission times.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The RRMPOL sites safety cases make use of probabilistic assessment techniques.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure suitable and sufficient probabilistic assessment of hazards at the sites.
4	Progress to date
	RRMPOL are progressing the update of the NFPP Site Safety Case, which is programmed for submission by November 2014. This will incorporate the appropriate level of PSA.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work to undertake formal review of the probabilistic safety analyses as part of the Period Safety Reviews is planned.
6	If the finding is not closed, plans for closure including justification of timescales
	During Neptune’s work for the PRS, RRMPOL may take the opportunity to also update the Safety Case with an appropriate level of PSA. Updated NFPP Site Safety Case is programmed.

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7	For non-closed findings, key milestones and programme
	<p>Updated NFPP Site Safety Case due to gain approval for submission for November 2014.</p> <p>Neptune PRS is scheduled for 2017, but option to bring forward to 2015 is being considered.</p>

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IR-26	A response to the various recommendations in the interim report should be made available within one month of it being published. These should include appropriate plans for addressing the recommendations. Any responses provided will be compiled on the ONR website.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The Licensee will be addressing, where appropriate, the recommendations from the ONR Interim Report. The Response to recommendations contained within the ONR interim report – Japanese Earthquake – 2011 reports for both NFPP and Neptune, submitted in May 2011 discharges this action.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	N/A
4	Progress to date
	N/A
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	N/A
6	If the finding is not closed, plans for closure including justification of timescales
	N/A
7	For non-closed findings, key milestones and programme
	N/A

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FR-12	Reports on the progress that has been made in responding to the recommendations in this report should be made available to ONR by June 2012. These should include the status of the plans, together with details of improvements that have been implemented by that time.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL is committed to appropriately providing responses to the ONR recommendations by the end of June 2012. This report discharges this action.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Statement on progress of addressing recommendations raised.
4	Progress to date
	This report states the progress made in responding to the recommendations from the Fukushima Recommendations Database. It will be made available to ONR by 30 June 2012.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Yes, upon submission of this report the recommendation is considered closed.
6	If the finding is not closed, plans for closure including justification of timescales
	If ONR require further progress updates, RRMPOL will endeavour to provide them on an appropriate timescale.
7	For non-closed findings, key milestones and programme
	N/A

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1	Investigate the capability of the diesel generator to provide back up to the ECC for extended periods (up to 24 hours, preferably longer) without need for off-site fuel supplies.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	<p>The Nuclear Fuel Production Plant Site does not require electrical services to maintain safe nuclear or radiological conditions.</p> <p>The Neptune Zero Energy Reactor Site does not require electrical services to safely shut down the reactor or to maintain safe nuclear or radiological conditions.</p> <p>The back-up is to ensure safe working conditions and a safe environment including the continued working of the ventilation systems.</p>
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	<p>Improving the resilience of the site power distribution network such that it will be impervious to flood is not considered reasonably practicable (and the benefits of doing so are not clear in many cases).</p> <p>However, steps towards this goal will be incorporated in the Operations Site Regeneration process. This process is due to take place over the coming years when all new structures are planned to be sited at least a metre higher than at present, sited on concrete bases.</p>
4	Progress to date
	<p>A larger replacement ECC generator is available for installation in the near future.</p> <p>This could include the option to incorporate a larger bulk fuel tank which will supply the generator for in excess of 24 hours.</p> <p>The Operations Site Regeneration process is due to take place over the next 11 years.</p>
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work is being undertaken to review the options for improving generation capability for the ECC.

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6	If the finding is not closed, plans for closure including justification of timescales
	Regeneration of the NFPP site will result in improvement of the site's resilience. This is subject to an ongoing programme of work, and many aspects remain at an early stage. Due consideration of these aspects will be taken at appropriate points in the progression of the Regeneration programme.
7	For non-closed findings, key milestones and programme
	The RRMPOL site Regeneration Project is due for final completion during 2023. Selection of options for ECC generator capability is subject to ongoing review and implementation.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
2	Consider improving the resilience of the site power distribution networks, site UPS and Chemical Plant and site diesel generators to improve availability post flood. (Nuclear Fuel Production Plant)

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The Nuclear Fuel Production Plant Site does not require electrical services to maintain safe nuclear or radiological conditions. The back-up is to ensure safe working conditions and a safe environment including the continued working of the ventilation systems.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Improving the resilience of the site power distribution network such that it will be impervious to flood is not considered reasonably practicable (and the benefits of doing so are not clear in many cases). However, steps towards this goal will be incorporated in the Operations Site Regeneration process. This process is due to take place over the coming years when all new structures are planned to be sited at least a metre higher than at present sited on concrete bases.
4	Progress to date
	It is proposed to replace the Emergency Control Centre standby generator with a larger generator in the near future. It is likely to incorporate a larger bulk fuel tank which will supply the engine for in excess of 24 hours. There is a Flood Protection study currently in production for RRMPOL, with 1 st draft due in 3rd Qtr 2012. This report pays particular attention to the Chem Plant, Clean Shop, Fissile Store, Pickle Liquor Store, CIDAS Room and the ECC.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work remains ongoing to address this recommendation.

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6	If the finding is not closed, plans for closure including justification of timescales
	Any recommendations and findings from the Flood Protection study will be considered following its submission in 3rd Qtr 2012, and appropriate timescales for any actions will be determined.
7	For non-closed findings, key milestones and programme
	The Operations Site Regeneration process is due to take place in staged operations over the next 11 years. Flood protection study draft to be completed 3rd Qtr 2012, subsequent implementation requirements will be subject to programming once defined.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
2	Consider storing the Neptune portable generator within the reactor building or other location not susceptible to flooding to improve its availability post flood. (Neptune)

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The Neptune Zero Energy Reactor Site does not require electrical services to safely shut down the reactor or to maintain safe nuclear or radiological conditions. The back-up is to ensure safe working conditions and a safe environment including the continued working of the ventilation systems.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure sufficient availability of back-up power supplies.
4	Progress to date
	The location of the portable generator has been considered and it is required to remain external to any buildings due to the fumes produced. It has been elevated by 0.5m for some time and remains close to the building.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Yes. The generator is located at its correct point of use and following some consideration, there is no location which would be more suitable.
6	If the finding is not closed, plans for closure including justification of timescales
	N/A
7	For non-closed findings, key milestones and programme
	N/A

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
3	Consider improving the resilience of the Bronze Command to site flooding, provision of an alternative back up location that is not susceptible to Derwent River flooding, or relocating part or all of the stock of Health Physics instrumentation and PPE to a location not susceptible to flooding.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The design for the new Reception building incorporates a new Bronze facility which has taken account of flooding and is raised 1m. If the Operations Bronze facility was untenable then the ECC or Neptune Bronze could be used. The upper storey of the ECC could be used if the ground floor was flooded. In the event Neptune Bronze became unavailable, the ECC could be used.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Provide appropriate equipment in a usable condition to facilitate severe accident response scenarios.
4	Progress to date
	It is currently under consideration to locate additional equipment (Health Physics instrumentation, PPE, Comms equipment) safely in a dry off-site location. There are some issues which require further consideration, such as the calibration of the HP instruments and return to site at regular intervals. However, there are options being considered and a decision should be made by the end of 2012. The new Reception building is scheduled to complete construction and become operational during early 2014. Neptune invested in the purchase of a new set of BA kits which are maintained by the fire department. These are now in line with those used on the NFPP site providing some redundancy in the event that one store of equipment cannot be used.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work remains ongoing to address this recommendation.

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6	If the finding is not closed, plans for closure including justification of timescales
	<p>The CPC Regeneration Project will be carried out through the use of appropriate existing processes (including a new Bronze command facility as part of the new reception building).</p> <p>Options for alternative back-up facilities at an off-site location and for use of the upper floor of the existing ECC as an alternative forward (Silver) command area are ongoing.</p>
7	For non-closed findings, key milestones and programme
	<p>Flood protection studies are due for draft completion by 3rd Qtr 2012.</p> <p>Studies to consider options for back-up facilities should be complete by the end of 2012 for subsequent implementation if required.</p> <p>The new Reception Building is scheduled to complete construction and become operational during early 2014.</p> <p>The NFPP Bronze Command will then be relocated to the new building, which is to be constructed above ground level as a protection against flooding.</p>

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4	Consider improving the resilience of the ECC to site flooding, or provision of an alternative back up location that is not susceptible to Derwent River flooding and to which access from off-site locations can be assured.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	In the event that the ground floor of the ECC becomes flooded, there is the capability for the upper floor to be used.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Sufficient emergency response management facilities for coordination of flood response.
4	Progress to date
	There is a Flood Protection study currently in progress which is to focus somewhat on the ECC. The 1 st draft of this study is due for submission in 3rd Qtr 2012.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Improvements to the resilience of the ECC to flooding remain subject to ongoing flood protection studies.
6	If the finding is not closed, plans for closure including justification of timescales
	It has been suggested and is currently undergoing talks, to have the option to move Silver operations to the RRMPOL Sinfin site. This is located a few miles from Raynesway and is not located on a flood plain. Any recommendations to come from the Flood Protection study will be considered following its submission in 3rd Qtr 2012, and any resulting actions will take place under an appropriate timescale.
7	For non-closed findings, key milestones and programme
	1 st draft of the Flood Protection study to be submitted 3rd Qtr 2012. Any subsequent implementation works will be programmed as needed.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
5	<p>Consider how to improve the resilience against combinations of earthquake and flooding of:</p> <ul style="list-style-type: none"> • Chemical Plant bund; • Pickle Liquor Store bund; • Clean Shop Fissile Store racking; • Metal Mix Charge Tube racking, and • Chemical Plant Gloveboxes <p>Attention should be focussed especially on the use and integrity of the Fissile Store racking, including whether to change the loading arrangements to make formation of unfavourable arrangements of fissile material less likely following topple. The benefits of moving material to this store when flooding is predicted should also be reviewed.</p>

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The recommendation relates to specific perceived plant vulnerabilities identified from the stress test work performed.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure appropriate plant resilience against combinations of earthquake and flooding.
4	Progress to date
	<p>There are several options for the fissile store currently under review:</p> <ul style="list-style-type: none"> • Rearranging the way fissile components are stored, both horizontally and vertically, • A means of introducing a poison or spacing material. • The potential to introduce physical restraints. <p>There is an outstanding action on the Chemical Plant to improve the restraint of process plant components.</p> <p>There is a Flood Protection study underway, with 1st draft due for submission to RRMPOL early 3rd Qtr 2012. This is to Look at options to improve the resilience of vulnerable areas of the site.</p>

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5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work remains ongoing for this recommendation.
6	If the finding is not closed, plans for closure including justification of timescales
	Following submission of the Flood Protection study, any recommendations will be considered and any resulting actions can be developed with appropriate timescales. The options for the fissile store will be reviewed by mid 2013 and any actions will be developed with appropriate timescales.
7	For non-closed findings, key milestones and programme
	1 st draft Flood Protection study due for submission early 3rd Qtr 2012. Options for fissile store to be reviewed by mid 2013.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
5	Perform analyses of the Neptune buildings against snow and wind loadings.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The recommendation relates to specific perceived plant vulnerabilities identified from the stress test work performed.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure appropriate plant resilience against snow and wind loadings.
4	Progress to date
	A naturally occurring hazards report is currently being produced which considers events such as snow and wind.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	This finding remains open pending completion of further work.
6	If the finding is not closed, plans for closure including justification of timescales
	The naturally occurring hazards report is due for submission late 2012. Snow and wind loading will also be considered in the next Interim Review of Safety (IRS) in 2013 and in the next PRS. The PRS is scheduled to take place in 2017; however it is currently the intention to bring it forward to 2015.
7	For non-closed findings, key milestones and programme
	The naturally occurring hazards report is due for submission mid to late 2012. Neptune IRS due 2013. Neptune PRS due 2017, under consideration to bring forward to 2015.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
6	Consider the need for a holding of Health Physics instrumentation and PPE in a location not susceptible to the same severe seismic events that could result in extensive production area damage.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL is considering holding extra HP monitoring equipment and PPE in an appropriate location. One option under consideration is whether to locate a dry iso storage container off-site to hold the additional equipment in a secure and protected environment.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure suitable holdings of equipment usable for emergency response action.
4	Progress to date
	The option to hold additional equipment in an off-site location is currently under consideration by RRMPOL.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work remains in progress to identified and select options to improving the availability of equipment to support emergency response action.
6	If the finding is not closed, plans for closure including justification of timescales
	It is currently under consideration to locate additional equipment (Health Physics instrumentation, PPE, Comms equipment) safely in a dry off-site location. There are some issues which require further consideration, such as the calibration of the HP instruments and return to site at regular intervals. However, there are options being considered and a decision should be made by the end of 2012.
7	For non-closed findings, key milestones and programme
	A decision relating to the requirement for and provision of equipment should be made by the end of 2012.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
7	Consider if a stock of neutron poisons should be retained in a location not susceptible to inaccessibility due to severe seismic events and flooding at the site, what form these could take and if there are practicable means of deployment following severe events.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	There remains a very small residual risk of criticality at the NFPP and Neptune sites in severe (beyond design basis) external events. This recommendation relates to considering the benefit of interventions to terminate any ongoing criticality event.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Include appropriate provision for taking action to terminate criticality events.
4	Progress to date
	<p>There is a limited stock of boronated material held at the site that can be mixed with water and used as a neutron poison.</p> <p>Options for providing installed boron poisons in key areas at risk of criticality in extreme events are being considered (for example as boron wraps).</p> <p>It remains uncertain if it is preferred to intervene in such a scenario, or wait for the event to self terminate, as each event and practicability of actions to terminate cannot be predicted at the current time.</p> <p>It is considered unlikely that neutron poisons would be deployed in Neptune. This is because the Reactor Hall is shielded and it is not considered ALARP to introduce people to a shielded area to attempt to gain control of such a situation.</p>
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work remains ongoing relating to addressing this recommendation.
6	If the finding is not closed, plans for closure including justification of timescales
	Further work to consider the practicability and desirability of deploying neutron poisons in a severe event remains to be undertaken. The sufficiency of existing stocks remains to be confirmed, if appropriate.

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7	For non-closed findings, key milestones and programme
	Review of the need for and, if appropriate, any supply and storage of neutron poisons remains to be decided. This is expected to be completed by mid 2013.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
8	Consider the provision, either as part of site infrastructure, or through arrangements with other sites or government providers, a means of safely accessing the site in the event of flooding at relatively short notice.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	There is the potential that in the event of flooding at NFPP and Neptune sites, safe access to the site will become problematic. Therefore the potential for the acquisition of a dedicated vehicle is currently being considered by RRMPOL.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure adequate capability to deploy emergency response actions.
4	Progress to date
	RRMPOL are to consider the acquisition of a dedicated large wheeled vehicle to provide a means to access site in the event the site is flooded The possibility of engaging an external response provider is also being examined.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work to determine the most appropriate means of accessing the site following severe events is in progress.
6	If the finding is not closed, plans for closure including justification of timescales
	RRMPOL intend to conduct further discussions to determine the requirements of any vehicle required for the Licensed Sites. A decision will be reached by the end of 2012 and any resulting actions will be given appropriate timescales.
7	For non-closed findings, key milestones and programme
	A decision will be reached by the end of 2012 and any resulting actions will be given appropriate timescales.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-27	RRMPOL should consider whether the failure of the four buildings identified in its submission, when subjected to a design basis earthquake, could undermine the withstand of the equipment those buildings contain.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The four buildings referred to in the ONR report “comprise three production shops (on the manufacturing site) and the Neptune low power research reactor with its associated facilities”. This finding will be addressed as part of the external hazards assessment being undertaken as part of the update of the site safety case.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure adequate performance of structures under design basis external loadings, including structures that could be impacted by lower integrity structures.
4	Progress to date
	The naturally occurring hazards assessment is currently in production and is due to be submitted by mid to late 2012. This will consider the four buildings – Clean Shop, Contact Shop, Chemical Shop and Neptune. In cases where building structures do not meet design basis loadings, the current safety case considers that plant areas at risk from seismic collapse are located within protected zones that will not suffer sufficient damage from structural collapse of surrounding structures.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work to address external hazards is programmed for completion as part of the NFPP safety case. The Neptune facility PRS is scheduled.
6	If the finding is not closed, plans for closure including justification of timescales
	Following the submission of the external hazards assessment, any recommendations can be considered and any resulting actions will be developed using appropriate timescales.

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7	For non-closed findings, key milestones and programme
	<p>The review to confirm the characterisation of naturally occurring external hazards review is due for submission mid to late 2012.</p> <p>Formal external hazards analysis will be undertaken as part of the NFPP updated site and facilities safety case to be submitted by November 2014.</p> <p>The Neptune PRS is scheduled for 2017, however the option to bring it forward to 2015 is being considered.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-28	RRMPOL should consider reviewing what improvements could be made to improve the seismic withstand of equipment within the production facility that could have an impact on radiological release.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	This finding will be addressed as part of the external hazards assessment being undertaken as part of the update of the site safety case.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure adequate seismic withstand of the operational facilities.
4	Progress to date
	A review of characterisation of naturally occurring external hazards assessment is currently in production and is due to be submitted by mid to late 2012. The updated NFPP site and facilities safety case (recently commenced) will include external hazards assessment, including seismic assessment.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work relating to this recommendation will be addressed by the updated NFPP site and facilities safety case.
6	If the finding is not closed, plans for closure including justification of timescales
	Following the submission of the external hazards assessment, any recommendations can be considered and any resulting actions will be developed using appropriate timescales.
7	For non-closed findings, key milestones and programme
	The naturally occurring external hazards characterisation review is due for submission mid to late 2012. The updated NFPP site and facilities safety case is programmed for submission by November 2014.

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STF-deleted	RRMPOL should investigate the impact of fire following a seismic event.

1	Does the Submitting Body agree with the finding?
	See STF-36
2	How does this apply to the Submitting Body? Describe the level of relevance
3	What is the desired functional outcome and what will be achieved by addressing the issue?
4	Progress to date
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
6	If the finding is not closed, plans for closure including justification of timescales
7	For non-closed findings, key milestones and programme

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-36	RRMPOL should consider assessing the challenges from increased seismically induced damage on-site and off-site and the limitations that imposes on external support and possible consequences of seismically induced fire.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The existing ECC (Silver command) is seismically qualified. Other areas of the site are qualified depending on the nuclear risk posed. Other parts of the site, including access roads, and some current emergency response provisions have no formal withstand.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To ensure adequate emergency response capability following severe events.
4	Progress to date
	<p>Flood Protection Studies are being undertaken to consider options to improve flood resistance of key areas of the site.</p> <p>Options for alternative ECC / Silver command are being considered, including back up off-site location.</p> <p>The option to use ECC upper floor as back up bronze has been identified, and remains subject to further review.</p> <p>A study into the options for site access vehicle to navigate, flooded or disrupted ground is currently ongoing.</p> <p>Further site seismic analysis will be undertaken as part of the updated NFPP site and facilities safety case. This updated safety case will also include emergency response capability.</p> <p>As at June 2012, there are surveys underway to be compiled into a report to consider fire at the Licensed Sites.</p> <p>Fire was considered in the PRS for NFPP submitted on 30 November 2011.</p>
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work remains ongoing relating to this finding.

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6	If the finding is not closed, plans for closure including justification of timescales
	<p>The flood protection study is due for completion 3rd Qtr 2012. Any implementation actions will be programmed as needed.</p> <p>Following the current fire survey, any remedial action for the protection against fire will be undertaken. Any further recommendations will then be provided in a report and actions will be developed accordingly.</p> <p>Options for Silver and Bronze command facilities, and means of vehicle access are subject to an ongoing review. This should be completed by the end of 2012, and any necessary implementation actions will be programmed as needed,</p> <p>Fire is considered within the PRS. All actions coming out from the PRS are part of the Safety Improvement Programme (SIP) and are scheduled to be completed by 30 November 2014.</p> <p>Fire will be considered in the Neptune PRS. This is scheduled for 2017, though the option to bring it forward to 2015 is being considered.</p> <p>In addition to the current fire surveys, a Fire Safety Case is to be produced and is to be completed by November 2014. The updated NFPP site and facilities safety case is to be submitted by November 2014.</p>
7	For non-closed findings, key milestones and programme
	See section 6 above.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-45	RRMPOL should consider assessing aspects of extreme weather other than snow and wind, such as high and low temperature and humidity, rainfall and lightning.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	This finding will be addressed as part of the external hazards assessment being undertaken as part of the update of the site safety case.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure risks to operational facilities from extremes of naturally occurring external loadings are ALARP.
4	Progress to date
	A review of characterisation of naturally occurring external hazards assessment is currently in production and is due to be submitted by late 2012. The updated NFPP site and facilities safety case (recently commenced) will include external hazards assessment.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work relating to this recommendation will be addressed by the updated NFPP site and facilities safety case.
6	If the finding is not closed, plans for closure including justification of timescales
	Following the submission of the external hazards assessment, any recommendations can be considered and any resulting actions will be developed using appropriate timescales.

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7	For non-closed findings, key milestones and programme
	<p>The naturally occurring external hazards characterisation review is due for submission mid to late 2012.</p> <p>The updated NFPP site and facilities safety case is programmed for submission in November 2014.</p> <p>The Neptune PRS is scheduled for 2017, however the option to bring it forward to 2015 is being considered.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-46	RRMPOL should consider reassessing the design basis for extreme weather events.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	This finding will be addressed as part of the external hazards assessment being undertaken as part of the preparation of the updated NFPP site and facilities safety case.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure risks to operational facilities from extremes of naturally occurring external loadings are ALARP.
4	Progress to date
	A review of characterisation of naturally occurring external hazards assessment is currently in production and is due to be submitted by mid to late 2012. The updated NFPP site and facilities safety case (recently commenced) will include external hazards assessment.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work relating to this recommendation will be addressed by the updated NFPP site and facilities safety case.
6	If the finding is not closed, plans for closure including justification of timescales
	Following the submission of the external hazards assessment, any recommendations can be considered and any resulting actions will be developed using appropriate timescales.

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7	For non-closed findings, key milestones and programme
	<p>The naturally occurring external hazards characterisation review is due for submission mid to late 2012.</p> <p>The updated NFPP site and facilities safety case is programmed for submission in November 2014.</p> <p>The Neptune PRS is scheduled for 2017, however the option to bring it forward to 2015 is being considered.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-48	RRMPOL should consider reviewing the utilisation factors and criteria used for assessing structural performance in extreme weather.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL will be consulting its structural engineer to ascertain whether utilisation factor is the most appropriate criteria for assessing structural performance in extreme weather.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure risks to operational facilities from extremes of naturally occurring external loadings are ALARP.
4	Progress to date
	The updated NFPP site and facilities safety case (recently commenced) will include external hazards assessment.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work relating to this recommendation will be addressed by the updated NFPP site and facilities safety case.
6	If the finding is not closed, plans for closure including justification of timescales
	A review of naturally occurring external hazards characterisation is ongoing. The updated NFPP site and facilities safety case is programmed. The Neptune PRS is scheduled.

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7	For non-closed findings, key milestones and programme
	<p>The naturally occurring external hazards characterisation review is due for submission mid to late 2012.</p> <p>The updated NFPP site and facilities safety case is programmed for submission in November 2014.</p> <p>The Neptune PRS is scheduled for 2017, however the option to bring it forward to 2015 is being considered.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-56	RRMPOL should consider reviewing its strategy for demonstrating the continuing safety of the plant post incident, including a consideration of power requirements for instrumentation (e.g. criticality detection systems).

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	A philosophy for the maintenance of operation of instrumentation including the CIDAS (criticality incident detection and alarm system) for prolonged periods without site electrical supplies will be developed.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure adequate means of demonstrating continuing safety of the plant post incident.
4	Progress to date
	A flood protection study, including review of protection of the CIDAS, is currently ongoing. Work to develop a philosophy for the maintenance of operation of instrumentation including the CIDAS for prolonged periods without site electrical supplies will be undertaken once the flood protection studies are complete.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work relating to this finding remains ongoing.
6	If the finding is not closed, plans for closure including justification of timescales
	See section 4 above.
7	For non-closed findings, key milestones and programme
	The flood protection study is planned for completion by 3rd Qtr 2012. A post severe event CIDAS philosophy will be developed by the end of 2013.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-75	All Defence licensees (AWE, RRMPOL, BAESM, DRDL and RRDL) should consider the approach taken by several civilian licensees of using beyond design basis containers that contain a range of equipment and materials that could be beneficial when responding to a beyond design basis accident. This finding is of a similar nature to that raised in the ONR National Stress Tests Final Report for UK NPPs (STF-15).

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL is considering holding additional equipment (Health Physics instrumentation, PPE, Comms equipment) and PPE in a dry off-site iso storage container.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure suitable provision of equipment and materials to facilitate severe accident response scenarios.
4	Progress to date
	The option to acquire an off-site location suitable to store additional equipment to be used in the event of a site emergency is currently under consideration by RRMPOL.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work relating to this finding remains ongoing.
6	If the finding is not closed, plans for closure including justification of timescales
	It is currently under consideration to locate additional equipment safely in a dry off-site location. A decision should be made by the end of 2012.
7	For non-closed findings, key milestones and programme
	A proposal has been suggested within RRMPOL for detailed consideration and selection of options. Once this process is completed RRMPOL will formalise a programme for any implementation actions found necessary.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-79	RRMPOL should consider reviewing the stress tests requirements when the manufacturing site regeneration project and modifications to the Neptune facility are sufficiently mature.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The manufacturing site regeneration project was commenced in 2011 and is due for completion in 2023. Modifications to the Neptune facility are currently in the development stage, to first assess the requirements and then to scope the modifications to be completed.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Ensure NFPP and Neptune licensed sites continue to meet the requirements as stated in the Stress Test findings.
4	Progress to date
	The CPC Regeneration Project has a programme attached to it and is currently underway with an expectation to be complete by 2023. The requirements for the modifications to Neptune are currently being assessed and will be complete for late 3rd Qtr 2012.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	The regeneration and Neptune modification programmes are ongoing. RRMPOL remain committed to reviewing the stress test requirements at such time the 2 projects are sufficiently mature.
6	If the finding is not closed, plans for closure including justification of timescales
	The modifications for the Neptune facility will need to be scoped following the set of requirements being identified by end 3rd Qtr 2012. The programme of modifications is required to be completed by 2015. Whilst RRMPOL have no programmed work specifically relating to the review of the stress tests following the regeneration project and modifications to Neptune, appropriate action will be taken to ensure the stress test requirements are met where required.

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7	For non-closed findings, key milestones and programme
	<p>Manufacturing site regeneration project due for completion – 2023.</p> <p>Neptune facility modifications due for completion – 2015.</p>

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-80	RRMPOL should consider reviewing the resilience of Bronze Commands to seismic events or propose alternative arrangements.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	The new design for Bronze Command will be seismically qualified. In the meantime, it is being considered to relocate the Bronze Command such that it is located above the current Silver Command. Neptune Bronze is not seismically qualified but can relocate to the ECC (or Ops Bronze when completed) if required.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	To take all reasonable steps to ensure effective facilities for managing emergency response in seismic event scenarios.
4	Progress to date
	The design for the new Reception building incorporates a new Bronze facility which has taken account of flooding and is raised 1m. If the Operations Bronze facility was untenable then the ECC or Neptune Bronze could be used. Similarly, the ECC could be used if Neptune Bronze became unavailable.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Yes, Bronze will move into the new Reception building upon completion and alternative arrangements are available for Neptune Bronze in the event of a seismic event.
6	If the finding is not closed, plans for closure including justification of timescales
	The new Reception building is scheduled to complete construction and become operational during early 2014.
7	For non-closed findings, key milestones and programme
	Bronze Command is to be relocated to the new Reception building following completion early 2014.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-81	RRMPOL should consider reviewing its emergency arrangements for coincident events.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	<p>RRMPOL will review its emergency arrangements for coincident events, though it is expected that the current arrangements are sufficient for the requirements of the safety case.</p> <p>RRMPOL Raynesway incorporates emergency control centres. Forward command centres (Bronze) and site level command (Silver) are currently in place, these have varying susceptibilities to extreme external hazards.</p> <p>The design for the new Reception building incorporates a new Bronze facility which has taken account of flooding and is raised 1m. If the Operations Bronze facility was untenable then the ECC or Neptune Bronze could be used. Similarly, the ECC could be used if Neptune Bronze became unavailable.</p> <p>The upper storey of the ECC could be used if the ground floor was flooded.</p>
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	<p>RRMPOL are committed to effective planning for emergency response, and testing of these arrangements to give confidence in the effective capability to minimise nuclear risks as well as implications for business continuity.</p> <p>RRMPOL also remain committed to taking all reasonable steps to ensure effective facilities for managing emergency response in extreme hazards scenarios.</p>
4	Progress to date
	<p>RRMPOL schedule regular emergency exercises to ensure staff are prepared for emergency situations. One such exercise was conducted in May 2012.</p> <p>The new Reception building, incorporating Bronze command centre, is scheduled to complete construction and become operational during 2014. The new facility will provide improved capability to withstand extreme events.</p> <p>RRMPOL are currently considering options for back-up off-site Silver Command, protected from flooding and strong winds. This would then remain available in the event the site was flooded.</p>

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	Related detailed recommendations were made by RRMPOL as part of the stress test studies undertaken.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Work to address the performance of the emergency control facilities and to review the emergency arrangements for coincident events remains ongoing.
6	If the finding is not closed, plans for closure including justification of timescales
	RRMPOL are committed to incorporate any changes ONR require for the testing of any severe accident arrangements. The licensed sites hold annual emergency exercises alternating between the 2 each year; the scopes of which are agreed in advance with the ONR and which are observed by the ONR, following discussion with ONR Site Inspector and ONR Assessment Branch and the agreement of exercise scenarios. A new reception centre, incorporating bronze command facilities is planned for construction in 2014. This will incorporate improved resistance to external hazards.
7	For non-closed findings, key milestones and programme
	Options for site access, and back up facilities for severe accident response are being considered to be completed by the end of 2012. Improved Bronze Command facilities to be put into operation by 2014.

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Recommendation / Consideration / STF No.	Recommendation / Consideration / Stress Test Finding Text
STF-94	Reports on the progress made in addressing the conclusions of the licensees Considerations and the ONR findings should be made available to ONR on the same timescale as that for HM Chief Inspector's recommendations (June 2012). These should include the status of plans and details of improvements that have been implemented.

1	Does the Submitting Body agree with the finding?
	Yes
2	How does this apply to the Submitting Body? Describe the level of relevance
	RRMPOL is committed to appropriately responding to the conclusions of the licensees Considerations and the ONR findings to ONR by the end of June 2012. This report discharges this action.
3	What is the desired functional outcome and what will be achieved by addressing the issue?
	Statement on progress of addressing recommendations raised.
4	Progress to date
	This report states the progress made in responding to the recommendations from the Fukushima Recommendations Database. It will be made available to ONR by 30 June 2012.
5	Is the finding considered closed by the Submitting body and if so the justification for closure?
	Yes, upon submission of this report the recommendation is considered closed.
6	If the finding is not closed, plans for closure including justification of timescales
	If ONR require further progress updates, RRMPOL will endeavour to provide them on an appropriate timescale.
7	For non-closed findings, key milestones and programme
	N/A

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