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Civil Nuclear Reactor Programme

NNB GenCo Licence Condition 6 Compliance Arrangements

Assessment Report: ONR-CNRP-AR-12-089

Revision 1

11 January 2013

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ASSESSMENT REPORT

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ASSESSMENT REPORT

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EXECUTIVE SUMMARY

Background

NNB Generation Company Ltd (NNB GenCo) has applied for a nuclear site licence to install and operate two EPRTM nuclear power reactors at Hinkley Point C in Somerset. As part of ONR's assessment of this application, a review of NNB GenCo's arrangements for compliance with the conditions to be attached to the nuclear site licence has been conducted. This report presents the findings of ONR's assessment of NNB GenCo's compliance arrangements for Licence Condition 6 (LC6) 'Documents, records, authorities and certificates'. The assessment informs ONR's judgement on whether a nuclear site licence should be granted to NNB GenCo to construct, commission and operate EPR power reactors at Hinkley Point C in Somerset.

The assessment considers the adequacy of NNB GenCo's arrangements, and their implementation, for the stage of development that NNB GenCo has reached. It is recognised that the arrangements will continue to evolve as the project proceeds, and continuing ONR interaction with NNB GenCo is anticipated to gain assurance that the arrangements remain fit for purpose and that they are implemented effectively. NNB GenCo has not yet completed its own due process, including Self Assessment (SA) and Independent Assessment Challenge and Oversight (IACO). The SA is scheduled for December 2012 and the IACO will take place in 2013; these company activities will make a detailed examination of the arrangements and their implementation. This assessment therefore considers NNB GenCo's future development plans as well as its current position.

Assessment and Inspection work carried out by ONR

This assessment has been informed by a number of level 4 (working level) meetings plus a targeted intervention which took place at the end of July 2012. The level 4 meetings provided a forum for dialogue and for influencing the development of NNB GenCo's LC6 compliance arrangements.

NNB GenCo were able to demonstrate during the intervention that their arrangements for compliance with LC6 have the essential elements for a document and records management system as defined in GS-R-3, ISO9001 and T/AST/033. The on going dialogue ONR and NNB GenCo have had in support of this work stream over the past year has yielded positive benefits in terms of the approach adopted by NNB GenCo and the design of the arrangements.

The key elements assessed have been management commitment, responsibilities, resources, process design, controlling documentation, infrastructure, paper and physical samples and implementation. These elements were examined during the intervention in July. The Electronic Document and Record Management System (EDRMS), which is central to NNB GenCo's management of documents and records, is based on the 'Business Collaborator' (BC) software platform. The central document management team have introduced strict protocols for using this system. BC is due to be replaced by the 'Documentum' platform in 2013 to improve the interface with the Architect Engineer and planning is on going for this change over.

The HPC project is in its early phases and the arrangements are still being refined and developed. Implementation is not yet mature, however NNB GenCo have made significant progress and have established or are in the process of establishing the key attributes of a document and records management system. It was clear from the enthusiasm and attitudes of staff involved during the intervention in July and the evidence of senior management support that there is an on going forward momentum within the company to continue with the positive development of the system.

The arrangements presented during the intervention in July were approved at NNB GenCo's management board meeting on Monday 30 July 2012 and should now provide the impetus and authority to the document management team to implement the improved arrangements more fully.

The HPC project lifecycle has a number of key phases such as: design, manufacture, construction, commissioning and operation, shutdown and decommissioning. The LC6 compliance arrangements will need to be robust enough to cope with the varying demands of scale, complexity and technological challenges. As the project advances there will be increased users and different geographical locations; constant vigilance will be required to ensure that arrangements develop accordingly and are implemented effectively.

Matters arising from ONR's work

NNB GenCo's arrangements are still evolving and implementation is immature. In addition a number of infrastructure developments are planned such as the change over from BC to 'Documentum' and the provision of a temporary physical store. ONR will need to monitor the on going development of the arrangements and infrastructure changes.

Conclusion

This report presents the findings of ONR's assessment of NNB GenCo's compliance arrangements for Licence Condition 6 (LC6) 'Documents, records, authorities and certificates'.

To conclude, I am broadly satisfied that NNB GenCo's compliance arrangements for LC6 have adequately addressed the expectations of relevant standards. The arrangements and implementation are still evolving, but outstanding issues have been recognised and there is a strong forward momentum within the company to carry this development forward. This gives me confidence that they are sufficiently well advanced for this stage of the project.

Recommendations

My recommendations are as follows:

1. NNB GenCo's arrangements for compliance with LC6, and their implementation of these arrangements, should be considered adequate to support a decision by ONR to grant a nuclear site licence for Hinkley Point C.
2. ONR should continue to monitor and influence the continued development of NNB GenCo's compliance arrangements for LC6.

LIST OF ABBREVIATIONS

ALARP	As low as is reasonably practicable
BSL	Basic Safety Level (in SAPs)
BSO	Basic Safety Objective (in SAPs)
BMS	(ONR) How2 Business Management System
HSE	Health and Safety Executive
IAEA	International Atomic Energy Agency
LC	Licence Condition
ONR	Office for Nuclear Regulation (an agency of HSE)
PCER	Pre-construction Environment Report
PCSR	Pre-construction Safety Report
PID	Project Initiation Document
PSA	Probabilistic Safety Assessment
PSR	Preliminary Safety Report
RGP	Relevant Good Practice
SAP	Safety Assessment Principle(s) (HSE)
SFAIRP	So far as is reasonably practicable
SSC	System, Structure and Component
TAG	Technical Assessment Guide(s) (ONR)
TSC	Technical Support Contractor
WENRA	Western European Nuclear Regulators' Association

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1 INTRODUCTION

1.1 Background

1 NNB Generation Company Ltd (NNB GenCo) has applied for a nuclear site licence to install and operate two EPR™ nuclear power reactors at Hinkley Point C in Somerset. As part of ONR's assessment of this application, a review of NNB GenCo's arrangements for compliance with the conditions to be attached to the nuclear site licence has been conducted. This report presents the findings of ONR's assessment of NNB GenCo's compliance arrangements for Licence Condition 6 Documents, records, authorities and certificates. Relevant documentation was provided by NNB GenCo to support the intervention undertaken in July 2012. This assessment has been undertaken in accordance with the requirements of the Office for Nuclear Regulation (ONR) HOW2 Business Management System Procedure PI/FWD Issue 3 (Ref. 1). The ONR Safety Assessment Principles (SAP) (Ref. 2), together with supporting Technical Assessment Guides (TAG), Ref. 3) have been used as the basis for this assessment.

2 NNB GenCo revised their approach to developing their LC6 compliance arrangements towards the end of 2011 following their own IACO and Mandatory Evaluation and commentary from ONR. From the end of 2011 onwards a series of Level 4 meetings have been held between ONR and NNB GenCo to discuss the development of arrangements. The level 4 meetings led to the intervention in July to formally assess the status of the arrangements and their implementation.

1.2 Scope

3 The scope of this report covers the adequacy and potential for further development of NNB GenCo's arrangements for compliance with the requirements of Licence Condition 6: Documents, records, authorities and certificates, prior to drafting of ONR's project assessment report for licensing. The assessment has been undertaken before NNB GenCo's arrangements are fully developed and before they have completed their own due process but at a point when sufficient progress has been made to be able to assess their adequacy for this stage of the project.

1.3 Methodology

4 The methodology for the assessment follows ONR BMS document PI/FWD Issue 3 Purpose and Scope of Permissioning (Ref. 1), in relation to mechanics of assessment within the Office for Nuclear Regulation (ONR).

5 This assessment has focussed on the arrangements for compliance with the requirements of Licence Condition 6 Documents, records, authorities and certificates. The assessment considers the process and documented procedures for the management of documents and records.

2 ASSESSMENT STRATEGY

6 The intended assessment strategy for NNB GenCo's arrangements for complying with Licence Condition 6 (LC6), Documents, records, authorities and certificates, is set out in this section. This identifies the scope of the assessment and the standards and criteria that have been applied.

7 ONR and NNB GenCo have been engaged in a series of Level 4 meetings to discuss the arrangements NNB GenCo have been developing to comply with the requirements of LC6. These culminated in an ONR intervention to assess the status of the arrangements and their implementation as part of the licensing process. This intervention was an opportunity for NNB GenCo to demonstrate how their arrangements are structured and how the discussions at the Level 4 meetings have influenced their development. The reports of these meetings and the intervention are listed Annex 1.

2.1 Standards and Criteria

8 The relevant standards and criteria adopted within this assessment are principally the Safety Assessment Principles (SAP), Ref. 2, internal ONR Technical Assessment Guides (TAG), Ref. 3, relevant national and international standards and relevant good practice informed from existing practices adopted on UK nuclear licensed sites. The key SAPs and relevant TAGs are detailed within this section. National and international standards and guidance have been referenced where appropriate within the assessment report. Relevant good practice, where applicable, has also been cited within the body of the assessment.

2.2 Safety Assessment Principles

9 The key SAPs applied within the assessment are included within Table 1 of this report. There are numerous references to documents and records within the SAP however the majority refer to records specific to a particular activity. The SAPs which have been identified refer to the requirement for a quality management system and the attention that is required for documents and records.

2.2.1 Technical Assessment Guides

10 The following Technical Assessment Guides have been used as part of this assessment (Ref. 3):

- T/AST/033 – Issue 2 Licensee management of records

2.2.2 National and International Standards and Guidance

11 The following international standards and guidance have been used as part of this assessment (Refs 4, 5 and 6):

- IAEA GS-R-3 The Management System for Facilities and Activities
- IAEA GS-G-3.1 Application of the Management System for Facilities and Activities
- BS EN ISO9001:2008 Quality management systems - Requirements

12 The Technical Assessment Guide T/AST/033 incorporates the key aspects of these standards.

2.3 Use of Technical Support Contractors

13 No supporting contractors were used.

2.4 Integration with other Assessment Topics

14 Document control and records are specific considerations of the GS-R-3 'The Management System for facilities and Activities' and ISO9001 'Quality management systems – Requirements'. This report contains an assessment of the adequacy NNB GenCo's management arrangements to comply with the requirements of Licence Condition 6 'LC6' Documents, records, authorities and certificates. The adequacy of NNB GenCo's arrangements to comply with Licence Condition 17 Management Systems, which covers quality management arrangements, is being assessed separately. It should be noted that there are documents and records associated with all the licence conditions, which are managed within the framework afforded by the compliance arrangements for LC06, therefore the arrangements can be exercised when considering arrangements for other licence conditions. NNB GenCo has an integrated approach to document and records management and the same electronic infrastructure is used for both. Documents may evolve into records as part of the process of document and records management. The adequacy of the arrangements has therefore been considered holistically. This approach is reflected in the report; however specific features required for a records system are clearly identified.

2.5 Out-of-scope Items

15 No out of scope items have been included.

3 LICENSEE'S SAFETY CASE

16 NNB GenCo has not provided its compliance arrangements for Licence Condition 6, Document, records, authorities and certificates, as a formal safety case; rather they have been presented as a suite of documentation to support the intervention in July 2012. This intervention has formed the basis for the overall assessment. The documentation provided and sighted is identified in Annex 2.

4 ONR ASSESSMENT

17 This assessment has been carried out in accordance with ONR document PI/FWD Issue 3 Purpose and Scope of Permissioning, (Ref. 1).

4.1 Scope of Assessment Undertaken

18 The aim of ONR's assessment is to gain assurance that the arrangements for document and records management are adequate for this stage of the project, that the arrangements will continue to develop in order to be adequate as the project progresses, and that there is a defined forward action plan for continuing development of the arrangements.

19 ONR and NNB GenCo have been engaged in a series of Level 4 meetings (see sub section 2.1 and Annex 1) to discuss the development and adequacy of their proposals based on the requirements and guidance provided in the documents identified in sub sections 2.2.1 and 2.2.2 above.

4.2 Assessment

20 This assessment is based primarily on the intervention which was undertaken on the 24 to 26 July 2012. This intervention provided NNB GenCo with an opportunity to demonstrate their compliance arrangements for LC6 at this stage of the project. The Intervention Report (IR) ONR-HPC-IR-12-175 [TRIM2012/315793] provides a detailed account of the NNB GenCo's current arrangements and how they compare against the requirements and guidance offered in the standards and guidance identified in Section 2. This IR has been a major source of information for this assessment.

21 The assessment consists of three main themes people, process and plant which mirrors the headings used in ONR-HPC-IR-12-175. These major headings are then broken down into topic areas. A brief key assessment point summary is provided at the end of each theme.

PEOPLE

4.2.1 Management Commitment

22 Discussions during the series of level 4 meetings held from the end of 2011 and the support provided for the intervention in July has demonstrated a growing and effective commitment of senior management to the delivery of adequate compliance arrangements for LC6 in terms of resource provision and support to the work of the document and records management team. These meetings and the intervention are identified in Annex 1 (from the 21 November 2011 onwards). A TRIM reference is provided for the reports.

23 There was evidence in a recent PowerPoint presentation to staff of a clear recognition from the HPC Project Director of the importance of document and records management, the role of the document and records management team and the need to follow the new company arrangements and procedures on document and records management. [TRIM2012/312810 (Slide 11)]

24 Board level support to the document management team is provided by a Director who has direct responsibility for delivering this work stream. The Director attended a separate briefing from ONR at the end of the recent intervention visit.

25 The responsibilities for managers and process owners have been clearly stated in policy documents and supporting procedures.

4.2.2 Responsibilities

26 Responsibilities for management and staff are clearly defined in policy, process documentation and controlling procedures. Document and records management responsibilities are also identified in job profiles and descriptions.

27 The overall responsibilities for records are set out in NNB-OSL-COP-000002 Documents and Records Practice and Guidelines. Section 9 Record and System Ownership states that each record has a record owner and that in the majority of situations the record owner shall be the process owner of the company procedure that generates the record. Other ownership relates to contract and project managers who receive documentation from third parties in relation to the goods and services provided. Section 13 Accountabilities identifies the various roles and the associated responsibilities with regard to document and records management. [TRIM2012/313111]

28 For all individual procedures a 'Section 8' titled 'People' is included which defines the people involved and their specific responsibilities for that procedure.

29 Employees are issued with a code of conduct they must adhere to [HR-POL-001 Version 9] which has a reference, section 4.1, to compliance with company rules, policies and procedures. In addition each employee is required to sign a Management Service Agreement which makes a reference in Section Duties to compliance with policies and procedures. [TRIM2012/312989] [TRIM2012/312994]

30 Section 4, Summary of Mandatory Practices, paragraph 4.6, Intelligent Customer, places a requirement on Contract and Project Managers to '...ensure third parties are aware of their responsibilities under the documentation and records policy and associated management arrangements.

31 The document control team proactively examine the 'List of Deliverables' in each process area and organise the appropriate metadata. The document control team engage with the process owner to make sure that records are adequate and appropriate. [TRIM2012/313008]

32 All procedures have a 'Section 6' which defines the records required from that activity.

4.2.3 Resources

33 The NNB GenCo Documentation Manager confirmed during the intervention in July 2012 that the resources engaged at this stage of the project are considered sufficient. An organisation chart illustrating the structure of the NNB GenCo Document Management Team and the staff in post was provided. This chart identifies the core team and the document controllers in the process areas including staff in post at HPC site. The required complement will vary according to the stage of the project as the project develops. [TRIM2012/313014]

34 A sample of job descriptions/role profiles for the document management team was provided during the intervention in July 2012, including the documentation manager and deputy, the lead document controller at HPC site and a project controller at the Qube on a fixed term contract. Three new starters are expected on the 6 August 2012, including a document control manager to support the Documentation Manager. These new starters are fully trained document controllers but they will need familiarising with Business Collaborator (BC). New starters will receive a hard copy training pack and will shadow an existing document controller for a week. The document management team will be at full complement for this stage of the project when the three new starters are

available however the team will be reviewed and extended as required as the project develops. [TRIM2012/313027] [TRIM2012/313034] [TRIM2012/313052] [TRIM2012/313040]

35 There will be a rolling programme of training for document controllers who are embedded in the process areas. These document controllers will be focussed on document control so that there is no tension with other work.

36 A range of training packages is being developed. Foundation training is available already and consists of a 1.25 hour PowerPoint presentation. This will be part of the overall training package. There are different levels of training for different users which is identified on a training matrix. Specific training for BC including super user training is under development and will be rolled out in mid August 2012. A rolling session of 1 to 1 training is also being introduced. The target is to have training completed by the end of September 2012 with the Headquarters being completed first followed by the site. [TRIM2012/313057] [TRIM2012/313062] [TRIM2012/313064]

37 Process Owners have responsibilities outlined in NNB-OSL-COP-000002 Documents and Records Practice and Guidelines to set up appropriate arrangements for managing their records. Guidance on identifying records is provided in NNB-OSL-GUI-000201 Guidelines for Identifying Company Records. [TRIM2012/313111] [TRIM2012/313248]

38 Contractors will be trained by NNB GenCo and will only be granted access to BC when training has been completed. A 'place holder' in BC will be allocated to a contractor onto which the contractor can then import documents. The document management team undertake a quality check of documents imported by the contractor before releasing them internally for comment. Comments will be passed back through the document management team who will then release them to the contractor.

39 The document management team can monitor the quality and performance of contractors on BC and can interrogate to check who has done what and to what level. The capacity to do this will be retained when the move has been made to 'Documentum'.

40 The system should achieve stability soon since the requirements are defined in procedures, guidance has been produced and a range of training is being developed.

41 The access rights to BC will be reviewed and altered to suit following the management board approval of the new procedures. This will help to reinforce the discipline and consistency in using BC which has been introduced by the document management team.

4.2.4 Key Assessment Point Summary – People

- There is commitment from senior managers to the records system;
- Staff have been made aware of the need to maintain adequate records;
- Process owners are integrated into the arrangements;
- Responsibilities for documents and records are clearly defined in procedures;
- Job profiles recognise documents and records management responsibilities;
- There are adequate numbers of SQEPs;
- A comprehensive training package is being developed;
- Current and projected physical resources are adequate:

PROCESS

4.2.5 Process Design

42 NNB GenCo has a range of documentation which defines the process design. Documents and Records is one of the 21 processes described in the Management Systems Manual. The key elements of the system are described by the following documentation:

43 The Management System Manual (MSM) NNB-OSL-MAN-000004 Pages 16 and 17 identifies six layers of documentation with an increasing level of detail from the 'Vision Mission Strategy' at the pinnacle through to the working Instructions at the base layer. This illustrates the types of documents and their place in the overall hierarchy. [TRIM2012/313283]

44 An illustrative flowchart was presented during the intervention in July which identifies the document hierarchy specific to Document and Records Management. The hierarchy consists of a Documents and Records Policy, NNB-OSL-POL-000001, Documents and Records Practice and Guidance, NNB-OSL-COP-000002 supported by the process and procedural documentation. A comment was offered that this flowchart which has been drawn up for illustrative purposes could be a useful addition to a supporting guidance document. [TRIM2012/313286]

45 An extract from the NNB GenCo Nuclear Site Licence Compliance Matrix for LC6 was presented which makes reference to the documentation identified on the illustrative flowchart above and in so doing demonstrates the 'golden thread' from the LC to the supporting documentation. [TRIM2012/313103]

46 The 'Documents and Records Policy' document NNB-OSL-POL-000001 provides a high level discussion of the approach being taken. The 'Documents and Records Practice and Guidelines' document NNB-OSL-COP-000002 provides a series of mandatory practices that must be adopted throughout the business for document and records management. The document provides a list of standard retention times for types of documents and a route map into procedures and guidance documents. The HPC Project Director has provided direct support to this document. [TRIM2012/313107] [TRIM2012/313111]

47 At the time of the intervention in July these documents were awaiting NNB GenCo board approval. During the week following the intervention NNB GenCo sent confirmation of board approval of their arrangements and copies of the approved procedures (1/2 August 2012). [TRIM2012/306517] [TRIM2012/308706]

48 A record retention schedule, NNB-OSL-SCH-000010, has been developed which identifies the types of records, retention time, years to be kept, retention location, records requirements, procedures, Nuclear Site Licence and the record owner. The reference to permanent and non permanent retention periods is explained in the guidance documents. A list of records for each licence condition can be called up through appropriate searches. Record schedules will be drawn up by Process Owners which will provide detailed listings of records in their areas, reference will be made to the record retention schedule and the guidance document, NNB-OSL-GUI-000201, when drawing up the record schedule. New fields have been set up on the EDRMS to provide information on the retention period, review date and an index ID. The record retention schedule is a live document and remains work in progress with additions being made as the project progresses. The Document Management Team is engaging with the process

leads to determine more precise retention periods for their records using the guidance document. [TRIM2012/313120] [TRIM2012/313248]

49 NNB-OSL-PRO-000009 Version 1.9 'Manage Documentation and Associated Records' is the comprehensive controlling procedure for records. An impact assessment for this procedure has been produced to justify the change and timescales, reference NNB-OSL-FRM-000421. The impact assessment states a requirement for introduction of the procedure of the 1 August 2012. This procedure together with NNB-OSL-PRO-000135 Management of Physical Records was derived from the original NNB-OSL-PRO-000009 in response to comments to break the procedure down into more manageable pieces of information. The two procedures have been through due process and were approved with minor comments. However one comment advised breaking down the procedures further to improve readability. The procedures have been broken down into four and three separate procedures respectively. NNB-OSL-PRO-000009 and 000135 were in draft at the time of the intervention and contained all relevant information; the further breakdown has been designed to improve further the user friendliness rather than change information. [TRIM2012/313126] [TRIM2012/313311] [TRIM2012/308706]

50 More detailed information on the identification of a record and the allocation of retention times is provided in NNB-OSL-GUI-000201 Guidelines for Identifying Company Records Version 1.0 which is an accompaniment to the record retention schedule, procedure NNB-OSL-PRO-000009 and the Documents and Records Practice and Guidelines NNB-OSL-COP-000002. [TRIM2012/313248]

51 A working level demonstration of the security documentation on the IMS and the documents and records on BC was provided by the security manager during the intervention in July. The demonstration focussed on the vetting procedure. There is a 'records button' to show the associated records at the 'Activity level' but also records are identified at procedure level. Procedure NNB-OSL-PRO-000005 V2.0 Manage Contractor BPSS Vetting provided an illustration of the section of what records were required however generically all procedures have a section which identifies the records that are associated with the procedure. Authorised signatures are kept on the 'V' drive and a hard copy kept in a locked cabinet however there is a proposal to upgrade 'Documentum' to restricted in which case the information on the 'V' drive could be incorporated into the EDRMS.

52 During the demonstration we noted and highlighted a discrepancy between the versions of procedure NNB-OSL-PRO-00063 on the IMS and BC which had a reference to licence conditions. The intention is for all procedures to be migrated from the procedural element on BC/Documentum to the IMS at which point the facility on 'BC/Documentum' will be switched off.

53 The process is clearly defined and documented and has the essential features expected from a records management system as defined in Technical Assessment Guide T/AST/033. NNB GenCo's management system contains comprehensive and consistent procedures which provide a clear definition of what records are required. There is a records retention schedule which is well advanced and is viewed as a live document subject to on going development as the project progresses. Process owners will develop specific record schedules for the area they are responsible for. The EDRMS is being used effectively and management controls have been introduced to improve consistency. The document management team has established itself as the focal point for documents and records and has network supporters within the process areas. A comprehensive training package is being developed for users and administrators.

4.2.6 Documentation

54 NNB-FIN-STA-000007 Version 1.0 Company Procedure Modelling Standards for MEGA defines the modelling rules and describes the use of the modelling tool 'MEGA' for developing NNB GenCo procedures for the IMS. This tool can be accessed through CITRIX. There are 21 top level processes which are expanded into sub tier documentation. [TRIM2012/313130]

55 There is a shadow system where models are created which will eventually be placed on the IMS Portal. Business Architecture will assist people to get their procedures onto MEGA. The process to convert a procedure can vary from an hour to a number of days. Currently there are 130 live on the portal with 12 under development. The Process, Procedures Quality Group (PPQG) verify that the procedure is acceptable. Work is on going to populate the IMS.

56 The Record Retention Schedule (RRS) is on the IMS portal and the PPQG review records. The RRS is up dated through the Documentation Manager although the work is done by Business Architecture. The reference to Permanent/Non Permanent will be replaced by an identification of specific years. There is management control of the RRS and the allocation of retention times. Environment records are being considered however dialogue is on going with the relevant manager on what is required. Some processes are more advanced than others with regard to records identification. Process owners are still to be briefed on what is required for a record schedule.

57 The Management System Content Manager controls the system and during development of the IMS the administration rights for procedures are restricted. The procedure owners have to ask for 'permission' to up date their procedure, whereupon limited access to the system will be granted in order to do this.

58 There is an on going 'BC Clean Up' project. Currently there are 16000+ records which are being reviewed in discipline order. Justification for the clean up has been provided by the Documentation Manager. BC will be the record schedule and the project team are checking the retention times.

59 NNB GenCo management system procedures follow a defined format and content. Each procedure has ten consistent headings; included in each is a flow chart, definition of procedural steps, responsibilities and the records required. The controlling documentation for document and records management follows this consistent format. A record retention schedule has been developed and is considered a live document. Specific record schedules for process areas will now be developed by process owners assisted and guided by the document management team.

4.2.7 Implementation

60 NNB Level 2 – HPC – Procedure Implementation Programme Lv2 Rev 1.0 Update (June 12) data date 01-Jul-12 identifies the achievements so far and a look ahead to the key steps still outstanding. [TRIM2012/313132]

61 Greater discipline, consistency and control has been established in document and records management and the use of BC. The new procedures will be rolled out and appropriate communication and training will be arranged when they have been finally approved. A training specialist will be engaged to provide document management training. A procedure brief is prepared for each new procedure which includes an impact assessment. [TRIM2012/313137] [TRIM2012/313140]

62 A 'clean up' of document information on the Record Retention Schedule (RRS) relating to 'location', 'retention period' and 'years' is on going. [TRIM2012/313330]

63 The key achievements to date are:

- Procedures have been simplified and are now focussed and easier to understand;
- The mandatory rules for the system have been set out in NNB-OSL-COP-000002 Version 1.0 Documents and Records Practice and Guidelines;
- A record retention schedule and supporting guidance have been developed;
- The document management team is engaging with the Process Owners
- Process briefs are being developed which include impact assessments;
- BC has been up graded;
- Lists of Deliverables (LOD) are being stipulated at high level which are interrogated by the document management team to proactively allocate metadata to documents;
- The document management team has established itself in the business and has a network of document controllers supporting it in the process areas which gives better control of documents and records;
- The difficulties in progressing the migration to 'Documentum' have been resolved;
- Sufficient resources have been established for this stage of the project:

64 The key next steps:

- Training packages to be completed and rolled out;
- Clean up of documents on BC and reconfiguration of metadata;
- Approval of procedures [30 July 2012 (TRIM2012/308706) (TRIM2012/306517)]
- Access to BC for non users to be switched off;
- Self Assessment scheduled for Dec 12/Jan 13;
- Independent Assessment Challenge and Oversight IACO schedule for 2013;
- Introduction of long term platform 'Documentum';
- Forward work plan for the document management team to provide more clarity on resources required moving forward:

4.2.8 Key Assessment Point Summary - Process

- The process is clearly defined and documented;
- The process design has the essential features of a DRMS;
- There is a clear definition of the types of records to be retained;
- There is a 'golden' thread from the LC to working level documentation;
- The drivers for record retention are being identified;
- The longevity of records and the long term management are being considered;
- There is comprehensive controlling documentation and guidance;
- There is a record retention schedule;
- The process owners will develop record schedules for their areas;
- The arrangements are gradually being rolled out;
- A SA and IACO are planned for the end of 2012 and 2013 respectively;

PLANT

Infrastructure

4.2.9 Electronic Platform

65 The current platform for the electronic management of documents and records is Business Collaborator (BC). This system has been used for some time and has recently been upgraded to version BC6. The use and application of BC has been developing over this time and the demonstrations provided during the intervention illustrated the powerful capabilities it has to manage documents in both the development and issued phases. BC however is a temporary solution; long term the EDRMS will be based on the 'Documentum' platform which is currently in use with the Architect Engineer. 'Documentum' will establish a consistent way of working between NNB GenCo and the Architect Engineer.

66 The migration to 'Documentum' has been delayed because of differences with the Architect Engineer on how the system should be applied. The Information Systems Manager explained during the July intervention that the HPC Project Execution Plan (PEP) has now been delivered and that these differences have been resolved. Efforts are now being made to proceed to 'Documentum'. The migration will be a two phase project. Phase 1 will be for an early delivery of a development and test solution option (i.e. development and test environments, no production environment) with a preliminary version of 'Documentum'. It will also include development of migration, test and quality plans to get NNB GenCo in a position to progress to Phase 2. Phase 2 will deliver a suitably configured version of 'Documentum' (Production EDRMS) to support business adoption of the solution as efficiently as possible. Phase 1 is scheduled for June 2012 to December 2012 and Phase 2 from November 2012 to December 2013. [TRIM2012/313225]

67 Phase 1, the development and test environments for the Documentum platform, is being run at Barnwood. The system will be designed to house BC and also information from the N&R drives which is to be transferred.

68 A high level 'Technical Architecture' document will be developed. There are two potential options: the first would be a separate NNB GenCo system with a gateway and managed portal for the Architect Engineer (AE); the second option would allow the AE to work on NNB GenCo folders.

69 The options for data migration are being considered and a data migration strategy document to manage data migration is being developed. The primary data centre facility for NNB GenCo will be based at Barnwood. A secondary data centre will be based at Andover which will provide a disaster recovery capability. The detailed recovery capabilities, including recovery time and acceptable data loss are still to be defined. Andover will become an accredited centre for both networks.

70 Future proofing of the electronic systems is being considered. Documents will be stored in 'Portable Document Format Archive' pdfa file format. There will be managed road maps for the platform and managed navigation through the versions. Using pdfa file format gives confidence that migration will be possible in the future. There will also be a three year refresh of hardware.

71 A live 'Documentum' platform is expected next year. BC has been used in a way which is compatible with 'Documentum' in order to facilitate the change from one system

to the other. Use of the EDRMS is more structured now so there will be a limited number of users. The change over plan needs to be developed.

72 The Information Systems Manager agreed, during the July intervention, to send the Phase 1 plan, milestones and the High Level Architecture document to the ONR C&I specialist for information.

73 BC and 'Documentum' are proven platforms. NNB GenCo has improved the management arrangements of the current BC platform which will carry over when migrating to the 'Documentum' platform. NNB GenCo is planning a structured migration to the 'Documentum' platform during the coming year. The need to future proof documents in electronic format is recognised and the current strategy is to utilise portable document format archive pdfa for documents.

4.2.10 Security and Access Rights

74 This was demonstrated on the system by the Lead BC Administrator during the July intervention. The controlling document is NNB-OSL-SPE-000008 Scheme of Access Rights. There is an internal and an external process. Internally two approvals are required before access can be granted, Head of Function and Workspace Manager. The approved application then comes to the document management team for action. The system defines the level of access for each function. ONR have been granted access to the company library and BC documentation.

75 External access for contractors is customised but generally it is only in one or two areas. The existing training package which is given to contractors at HPC will be up graded to the new training package the documentation manager has under development. The contractor will be able to put documents onto BC but these will be quality checked by the document management team before they are released internally. Conversely comments going out to the contractor go through the document management team before they are released to the contractor.

76 The document management team can override privacy settings and they are aware of who is logging on the system and if they fail five times to enter. Access is given to the EdF NNB GenCo EDRMS and is confined to specific areas. Entry and exit needs to be formally notified. PPQB-FIN-PRO-000082 V1-V2 Control of Access to Information Systems covers entry/exit and change of areas. HR will be the catalyst for movements.

4.2.11 Metadata

77 The document management team will apply the metadata for documents. The metadata will consist of the normal document control features including an original ID and a contract ID. The metadata will also include a system code e.g. RCP (Reactor Cooling System). Contractors will use this system. The metadata can be applied automatically before the document arrives and the document management team will proactively interrogate the process areas list of deliverables to do this. In so doing the contractor will get the metadata applied automatically.

78 Packages can be applied with metadata as well as individual documents within the package. The Process owners must tell the document management team what they want and DMT will enter it into the system. The DMT can identify individual documents and how they interface with the package and vice versa however the process owners have to advise what they want. This is why the list of deliverables (LOD) is important. The LOD is on a spreadsheet and the data can be uplifted from it.

4.2.12 Migration Plans

79 Migration plans will be drawn up as required for various databases to cover changes. There will be one for the change from BC to Documentum. An illustration of this was the physical move of the IMS web server for the green network. The migration plan for this was NNB Green Network Project – Application Migration v0.2 10/07/2012 Physical Design Document (PDD) which is currently going through due process.

80 The current version of the IMS and the previous versions reside on the Green Network.

4.2.13 Paper and Physical Samples

81 The relevant procedure for this discipline is NNB-OSL-PRO-000135 Management of Physical Records. This procedure has been developed from the original procedure NNB-OSL-PRO-000009 Management of Records which was split to make it more 'user friendly'. During NNB-OSL-PRO-000135's passage through due process for approval a recommendation was made that it was split down further into three separate elements. This has been done and the three separate elements were approved at the NNB GenCo board meeting on Monday 30 July 2012. The procedures take into account the different process required for the storage, access and disposal of physical records. [TRIM2012/313228] [TRIM2012/306651] [TRIM2012/308706]

82 The process briefly is that the owner of the physical record decides what is to be kept and will complete a storage request. This request is then sent to the document management team who will create a place holder in the EDRMS. This will provide a unique number and enable tracking of the item. The storage request will also be copied to the physical storage facility. It is anticipated that 'Documentum' will allow better tracking of the items since in BC two systems are needed: one at BC and one at the store. Transportation and storage details will be logged and registered. The EDRMS will be used to record where the item is. A sample will have documentation associated with it.

83 A temporary records store is required to bridge the gap until the permanent facility can be built on site. A functional specification, NNB-OSL-SPE-000154 Functional Specification for Temporary Storage Facility, has been developed for a temporary store which is currently in draft. This specification will be forwarded to the procurement branch that will develop a procurement solution to meet the requirements of the specification. The potential solutions range from a custom built store to identification of a suitable existing facility. [TRIM2012/313232]

84 Security and access protocols will be established. The key elements of the process for removal of items from the store will include an approved request to the storage facility with appropriate approvals. Transport will then be arranged to where the item is needed. A notification will be given to the EDRMS to update the storage location on the system. Arrangements will need to be developed to maintain the integrity of the item whilst it is away from the store and to ensure that the returning item is the same as what was despatched. Process owners will decide on disposal arrangements.

4.2.14 Key Assessment Point Summary - Plant

- BC/Documentum are proven platforms;
- Future proofing of electronic documents will be facilitated using pdfa;
- The migration from BC to 'Documentum' is being planned;
- The management arrangements include security and access rights;

- The management arrangements include contractor interfaces;
- Comprehensive training packages are being developed;
- There is functional specification for a temporary storage facility;
- The plant construction will include a long term records store;

4.3 Comparison with Standards, Guidance and Relevant Good Practice

85 NNB GenCo's arrangements for Licence Condition 6 Documents, records, authorities and certificates have been assessed against the requirements of the standards and the associated guidance identified in paragraph 2.2. Technical Assessment Guide T/AST/033 'Licensee management of records' captures the requirements and guidance for records management from these international documents and NNB GenCo's compliance arrangements for LC6 have been assessed against this guide.

86 The process is clearly defined and documented and has the essential features expected from a records management system as defined in Technical Assessment Guide T/AST/033 Licensee management of records.

5 CONCLUSIONS AND RECOMENDATIONS

5.1 Conclusion

Summary Remarks

87 NNB Generation Company Ltd (NNB GenCo) has applied for a nuclear site licence to install and operate two EPR™ nuclear power reactors at Hinkley Point C in Somerset. As part of ONR's assessment of this application, a review of NNB GenCo's arrangements for compliance with the conditions to be attached to the nuclear site licence has been conducted. This report presents the findings of ONR's assessment of NNB GenCo's compliance arrangements for Licence Condition 6 (LC6) 'Documents, records, authorities and certificates'. The assessment considers the arrangements themselves, which are documented in process and procedural documentation; the level of implementation up to the end of July 2012; and future development needs. The assessment has been based on the requirements of GS-R-3, ISO9001 and the ONR Technical Assessment Guide T/AST/033.

88 The assessment considers the adequacy of NNB GenCo's arrangements, and their implementation, for the stage of development that NNB GenCo has reached at this point. It is recognised that the arrangements will continue to evolve as the project proceeds, and continuing ONR interaction with NNB GenCo is anticipated to gain assurance that the arrangements remain fit for purpose and that they are implemented effectively. NNB GenCo has not completed its own due process, including Self Assessment (SA) and Independent Assessment Challenge and Oversight (IACO). The SA is scheduled for December 2012 and the IACO will take place in 2013: these company activities will make a detailed examination of the arrangements and their implementation. This assessment therefore reflected on NNB GenCo's future development plans as well as its current position.

89 The key elements assessed by ONR have been management commitment, responsibilities, resources, process design, controlling documentation, infrastructure, paper and physical samples and implementation. The Electronic Document and Record Management System (EDRMS), which is central to NNB GenCo's management of documents and records, is based on the 'Business Collaborator' (BC) software platform. The central document management team have introduced strict protocols for using this system. BC is due to be replaced by the 'Documentum' platform in 2013 to improve the interface with the Architect Engineer and planning is ongoing for this changeover. These key elements are identified on the schedule for the July intervention and are described in the preceding sections of this report. These key areas were identified from the HSE Technical Assessment Guide T/AST/033. [TRIM2012/278512] [TRIM2012/278825] [TRIM2012/250275]

90 NNB GenCo were able to demonstrate during the intervention that their arrangements for compliance with LC6 have the essential elements for a document and records management system as defined in GS-R-3, ISO9001 and T/AST/033. The ongoing dialogue ONR and NNB GenCo have had in support of this work stream over the past year has yielded positive benefits in terms of the approach adopted by NNB GenCo and the design of the arrangements.

91 The HPC project is in its early phases and the arrangements are still being refined and developed. Implementation has not yet matured however NNB GenCo have made significant progress and have established, or are in the process of establishing, the key attributes of a document and records management system. It was clear from the enthusiasm and attitudes of staff involved during the intervention in July and the

evidence of senior management support that there is an ongoing forward momentum within the company to continue with the positive development of the system.

92 The arrangements presented during the intervention in July were approved at NNB GenCo's management board meeting on Monday 30 July 2012 and should now provide the impetus and authority to the document management team to implement the improved arrangements more fully.

93 The HPC project lifecycle has a number of key phases such as: design, manufacture, construction, commissioning and operation, shutdown and decommissioning. The LC6 compliance arrangements will need to be robust enough to cope with the varying demands of scale, complexity and technological challenges. As the project advances there will be increased users and different geographical locations; constant vigilance will be required to ensure that arrangements develop accordingly and are implemented effectively.

94 NNB GenCo has produced NNB-OSL-REP-000201 Evidence Pack for LC6 Documents, Records, Authorities and Certificates Readiness for Granting. This document provides a useful route map to the documented arrangements for supporting compliance with the requirements of LC6 [TRIM2012/313238].

IIS Rating LC6 Documents, Records, Authorities and Certificates

95 NNB GenCo has made significant progress over the past year which has been reflected in the Level 4 meetings and the recent intervention in July. Their documented arrangements have now been approved and the formal implementation programme will begin shortly. The document management team has developed disciplines and protocols which have achieved much greater control and consistency over people's interface with the document and records management system. The right people are now doing the right things in the right direction with the right level of control. In recognition of the success that has been achieved and the strong positive forward momentum I consider an **IIS rating of 3 (adequate)** to be appropriate.

Concluding Remarks

96 NNB GenCo has made significant progress since the end of 2011. They have designed, documented and are beginning to implement adequate arrangements for this stage of the project. They are aware of the need to review and develop arrangements as the project progresses. The requirement to develop further arrangements should reduce in time as the HPC project reaches maturity.

97 During the July intervention NNB GenCo demonstrated their system and their commitment to developing adequate arrangements. The work is not yet complete but the forward momentum that has been demonstrated, and the plans for further implementation, give confidence that the arrangements will eventually be fully developed and implemented.

98 The granting of a site licence will enhance rather than diminish ONR's ability to influence future progress on developing further the arrangements. The arrangements are judged to be adequate for this stage of the project and will provide a sound platform for development as the project proceeds.

99 To conclude, I am broadly satisfied that NNB GenCo's compliance arrangements for LC6 are addressing the expectations of relevant standards. The arrangements and their implementation are still evolving, but outstanding issues have been recognised by NNB GenCo and there is a strong forward momentum within the company to carry this

development forward. This gives confidence that they are sufficiently far advanced for this stage of the project.

5.2 Recommendations

100 My recommendations are as follows:

1. NNB GenCo's arrangements for compliance with LC6, and their implementation of these arrangements, should be considered adequate to support a decision by ONR to grant a nuclear site licence for Hinkley Point C.
2. ONR should continue to monitor and influence the continued development of NNB GenCo's compliance arrangements for LC6.

6 REFERENCES

- 1 *ONR How2 Business Management System Procedure PI/FWD Issue 3 BMS Permissioning – Purpose and Scope of Permissioning*
<http://www.hse.gov.uk/nuclear/operational/assessment/index.htm>
- 2 *Safety Assessment Principles for Nuclear Facilities*. 2006 Edition Revision 1. HSE. January 2008. www.hse.gov.uk/nuclear/SAP/SAP2006.pdf.
- 3 *Licensee management of records T/AST/033 Issue 2 HSE August 2009*
www.hse.gov.uk/nuclear/operational/tech_asst_guides/index.htm.
- 4 *IAEA GS-R-3 The Management System for Facilities and Activities*
Western European Nuclear Regulators' Association. Reactor Harmonization Group.
WENRA Reactor Reference Safety Levels. WENRA. January 2008. www.wenra.org.
- 5 *IAEA GS-G-3.1 Application of the Management System for Facilities and Activities*
www.iaea.org.
- 6 *BS EN ISO9001:2008 Quality management systems - Requirements*

Table 1
Relevant Safety Assessment Principles Considered During the Assessment

SAP No.	SAP Title	Description
MS.1	<p>Directors, managers and leaders at all levels should focus the organisation on achieving and sustaining high standards of safety and on delivering the characteristics of a high reliability organisation</p> <p>Paragraph 50: Oversight of safety performance, led by the management board, should provide assurance at all levels and throughout all stages of the life of the undertaking, that safety being maintained and improved. It should secure the adequate, proportionate monitoring and auditing of the implementation and effectiveness of the safety policies, plans, goals and standards, systems and procedures through the application of a 'quality management system' (QMS)</p> <p>Paragraph 51: The QMS should be based on national and international standards or other defined documents and should be reviewed periodically. Consideration should be given to the adoption of a single company wide management system ensuring that the principle of continuous improvement is maintained.</p>	<p>This points to the requirement for a documented quality management system which encompasses all aspects described in the relevant standards and guidance.</p>
MS.2	<p>The organisation should have the capability to secure and maintain the safety of its undertakings</p> <p>Paragraph 60: There should be provision for identifying, updating and preserving documents and records relevant to safety. Documents and records should be stored securely and should be retrievable and readable throughout their anticipated useful life (including statutory retention periods) Particular attention should be paid to documents and records that:</p> <ul style="list-style-type: none"> a) will be of value throughout the whole life of a nuclear facility; b) would assist management in the event of incidents; c) are relevant to making modifications and decommissioning, and d) would contribute to improvements in plant 	<p>This makes specific mention of the need to have adequate control over documents and records</p>

Annex 1

Level 4 Meetings and Intervention to discuss LC6 Compliance arrangements

Date	Location	Topic	Contact Report Trim no
11/10/10	Bootle	Level 4 LC6 Documentation and Records (CR10108)	2010/514039
08/12/10	Qube	Level 4 LC6 Documentation and Records (CR10174)	2011/19648
16/02/11	Qube	Level 4 LC6 Documentation and Records (CR11039)	2011/144363
09/03/11	Qube	Level 4 LC6 (Documents and Records Management) (CR11050)	2011/264847
16/05/11	Barnwood	Level 4 LC6 Documentation and Records (CR11102)	2011/341103
06/07/11	Qube	Level 4 LC6 (Document and Records Management Meeting) (CR11129)	2011/380180
08/09/11	Qube	Level 4 LC6 (Document and Records Management Meeting) (ONR-NNB GenCo-IR-11-167)	2011/511625
21/11/11	Qube	Level 4 LC6 (Document and Records Management Meeting) (ONR-NNB GenCo-IR-11-217)	2011/629522
08/12/11	Qube	Level 4 LC6 (Document and Records Management Meeting) (ONR-NNB GenCo-IR-11-236)	2011/8199
02/02/12	Qube	Level 4 LC6 (Document and Records Management Meeting) (ONR-NNB GenCo-IR-12-004)	2012/97492
29/03/12	Qube	Level 4 LC6 (Document and Records Management Meeting) (ONR-NNB GenCo-IR-12-065)	2012/162448
15/05/12	Qube	Level 4 LC6 (Document and Records Management Meeting) (ONR-NNB GenCo-IR-12-095)	2012/211331
24, 25,26/07/12	Qube	ONR LC6 (Documents, records, authorities and certificates) Intervention (ONR-HPC-IR-12-175)	2012/315793

Annex 2

Documents Considered

Document Details	
Power Point Presentation	(TRIM2012/312810)
HR-POL-001 Version 9 Code of Conduct	(TRIM2012/312989)
Management Service Agreement	(TRIM2012/312994)
UKPN Services CES Project List of Deliverables	(TRIM2012/313008)
NNB Document Management Team July 2012	(TRIM2012/313014)
Job Description Documentation Manager	(TRIM2012/313027)
Job Description Deputy Documentation Manager	(TRIM2012/313034)
Job Description Lead Document Controller	(TRIM2012/313052)
Job Description Project Document Controller	(TRIM2012/313040)
28/05/2012 Training/Comms Plan LC06	(TRIM2012/313057)
Document and Records Management Foundation Training Power Point	(TRIM2012/313062)
Foundation Trainer Delivery Notes dated 09/07/2012	(TRIM2012/313064)
NNB-OSL-MAN-000004 Management System Manual Version 2.1 Extract	(TRIM2012/313283)
Illustrative Flowchart showing Document and Records Management document hierarchy	(TRIM2012/313286)
Extract from NNB GenCo Site Licence Condition Compliance Matrix for LC6	(TRIM2012/313103)
NNB-OSL-POL-000001 Version 6.2 Documents and Records Policy	(TRIM2012/313107)
NNB-OSL-COP-000002 Version 1.0 Documents and Records Practice and Guidelines	(TRIM2012/313111)
NNB-OSL-SCH-000010 Version 2.1 Record Retention Schedule	(TRIM2012/313120)
NNB-OSL-PRO-000009 Version 1.9 Manage Documentation and Associated Records	(TRIM2012/313126)
NNB-OSL-FRM-000421 – NNB-OSL-PRO-000009 Version 1.9 Impact Assessment	(TRIM2012/313311)
NNB-OSL-GUI-000201 Version 1.0 Guidelines for Identifying Company Records	(TRIM2012/313248)
NNB-OSL-PRO-000005 Version 2.0 Manage Contractor BRSS Vetting	
NNB-FIN-STA-000007 Version 1.0 Company Procedure Modelling Standards for MEGA	(TRIM2012/313130)
NNB Level 2 – HPC – Procedure Implementation Programme Lv2 Rev 1.0 Update (June 12) data date 01-Jul-12	(TRIM2012/313132)
Generic Process Brief	(TRIM2012/313137)
Manage Documentation and Records Process Brief	(TRIM2012/313140)
Details Clean up in IMS RRS 18 July 2012	(TRIM2012/313330)
NNB-OSL-SPE-000008 Scheme of Access Rights	
PPQB-FIN-PRO-000082 V1-V2 Control of Access to Information Systems	
NNB Green Network Project – Application Migration V0.2 10/07/2012 Physical Design Document (PDD)	
NNBECM Project Overview of Scope for Phases 1 & 11 dated 21 June 2012	(TRIM2012/313225)
NNB-OSL-PRO-000135 Management of Physical Records Version 0.5 Draft	(TRIM2012/313228)
NNB-OSL-SPE-000154 Functional Specification for Temporary Records Storage Facility Version 0.2 Draft	(TRIM2012/313232)
NNB-OSL-REP-000201 Evidence Pack for LC06 Documents, Records, Authorities and Certificates Readiness for Granting Version 1.5 (TRIM2012/313238)	
Confirmation of approval of POL-000001, COP-000002 and seven published procedures	(TRIM2012/308706)
Electronic copies of documents reviewed during intervention in July	(TRIM2012/306517)