

# Office for Nuclear Regulation (ONR) Site Report for HINKLEY POINT C

Report for period 1 January 2021 – 31 March 2021

## Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are published on the ONR website (<http://www.onr.org.uk/lhc/>).

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## **1 INSPECTIONS**

The ONR nominated site inspector and/or other ONR specialist inspectors including ONR warranted Health and Safety Executive Construction Division inspectors made inspections on the following dates during the quarter at the HPC construction site:

- 23 February 2021
- 18 March 2021

## **2 ROUTINE MATTERS**

### **2.1 Inspections**

Inspections are undertaken as part of the process for monitoring compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the Energy Act 2013;
- the Health and Safety at Work Act 1974 (HSWA74);
- regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99);
- the Regulatory Reform (Fire Safety) Order 2005; and
- the Nuclear Industries Security Regulations 2003.

ONR has implemented a programme of interventions to:

- secure ONR's regulation of the construction and installation of two UK EPR™ reactor units by NNB GenCo (HPC) Ltd.;
- ensure that NNB GenCo (HPC) Ltd. is complying with its legal responsibilities;
- conduct theme focused interventions and cross-theme team inspections aimed at gathering evidence to form a judgement on the on-going development of NNB GenCo (HPC) Ltd.'s competence and capability and the effectiveness of its management arrangements for controlling procurement, design and manufacture; and
- to inform ONR's judgement on the adequacy of NNB GenCo (HPC) Ltd.'s site construction related compliance arrangements to support ONR's permissioning decisions.

In this period, routine site inspections at the Hinkley Point C construction site covering the following Licence Conditions (LCs) and other applicable legislation were performed:

- LC17 – Management systems
- LC19 – Construction or installation of new plant
- Health and Safety at Work Act 1974 (HSWA74) – Covid-19 control measures

As NNB GenCo (HPC) Ltd.'s construction activity increases at the HPC site, ONR's site interventions will include increasing focus on NNB GenCo (HPC) Ltd.'s ability to adequately control construction and installation at the HPC site in accordance with NNB GenCo (HPC) Ltd.'s justified design.

For LC 19 and HSWA74 ONR found NNB GenCo (HPC) Ltd. to be compliant with its legal duties with only minor areas for further improvement being identified.

For LC 17 Management systems, ONR found that improvements were required to the implementation of NNB GenCo (HPC) Ltd.'s quality management arrangements in relation to pools, tanks, sumps and liners by NNB GenCo (HPC) Ltd. and its contractors. ONR has informed NNB GenCo (HPC) Ltd. of the required improvements and has raised an associated regulatory issue to ensure appropriate regulatory oversight of this matter.

ONR continues its engagement with the project via regular site visits and meetings at NNB GenCo (HPC)'s office locations across the following themes:

- Design and Safety Case
- Organisational Capability
- Conventional Health and safety and fire safety
- Security

These inspections are providing ONR with valuable intelligence on the progress NNB GenCo (HPC) Ltd. is making to continue developing its competence and capability to manage the design, procurement, and construction of Hinkley Point C.

### **3 NON-ROUTINE MATTERS**

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

#### **Covid-19**

As a result of the Covid-19 pandemic NNB GenCo (HPC) Ltd. has taken a number of steps aimed at ensuring effective social distancing and other control measures in accordance with Public Health England and industry guidance. ONR continues to engage with NNB GenCo (HPC) Ltd. and its internal regulator to ensure that appropriate social distancing measures are in place, including via regular attendance at the HPC site. In addition, ONR has put in place enhanced reporting measures to ensure appropriate regulatory oversight during this period of non-routine working.

At the start of the year ONR paused non-essential site visits for approximately 6 weeks whilst the impact of the Covid-19 second wave was understood. Following this pause, ONR remobilised to the HPC site in late February and has maintained a regular programme of site visits since.

#### 4 REGULATORY ACTIVITY

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'Licence Instruments', but can take other forms. In addition, inspectors may issue Enforcement Notices to secure improvements to safety.

ONR issued no licence instruments or enforcement notices relating to NNB GenCo (HPC) Ltd. during the period covered by this report.

**Table 1**  
**Licence Instruments and Enforcement Notices Issued by ONR during this period**

Date	Type	Ref No	Description
N/A	N/A	N/A	N/A

Reports detailing regulatory decisions taken at Hinkley Point C can be found on the ONR website at <http://www.onr.org.uk/pars>.

#### 5 NEWS FROM ONR

Below are summaries of key activities over the last three months. Further detail is available on our [website](#).

##### **Covid-19 (Coronavirus) (ONR position)**

- We are continuing to obtain assurance that nuclear site licensees and other dutyholders are adequately resourced to continue to safely and securely carry out their activities. We remain satisfied with industry's response at this time and there has been no significant change to dutyholders' safety and security resilience. As Covid-19 restrictions change, our focus is on the preparedness for the weeks and months ahead and maintaining safe and secure operations. Our latest position can be found on our [website](#).

##### **Enforcement Action**

- In January, we agreed to extend two [Improvement Notices](#) served on the Atomic Weapons Establishment (AWE), recognising the good progress made so far. The Notices, which were served in June 2019, relate to the way the company controls changes to organisational structure and resources which may affect safety.
- In January, we served an [Improvement Notice](#) on Sellafield Ltd following a number of electrical safety incidents across the site. While we are satisfied that Sellafield Ltd is currently meeting the high standards expected with regards to nuclear safety, as a regulator we require sustained improvements in the area of electrical safety.

- In February, we served an [Improvement Notice](#) on Morgan Sindall Construction and Infrastructure Ltd after workers came close to striking a live high voltage electric cable during excavation work at the Sellafield site. Nobody was harmed in the incident on 7 October 2020, and there was no impact on the public or the environment. However, the incident posed a serious risk to workers who were operating within one metre of the 11kV cable.

## Regulatory Updates

- In March, we published a response on our [website](#) to a BBC report relating to Sellafield. We were naturally concerned to hear the claims, particularly any suggestion that staff have been subjected to racist abuse of any kind. As a regulator, if we had any concerns or evidence that bullying and harassment was impacting safety at the site, we would take robust action to ensure this is addressed as a matter of urgency.
- In March, we [published](#) an article about how we responded to the serious nuclear accident at the Fukushima Dai-ichi nuclear power plant in 2011 to mark the 10<sup>th</sup> anniversary.
- In March, we gave [EDF permission](#) for Reactors 3 and 4 at Hinkley Point B power station to return to service for a limited period of operation. Permission for Reactor 3 will allow it to operate to a core utilisation of 17.55 terawatt days, while permission for Reactor 4 is to operate to a core utilisation of 17.3 terawatt days, which equates to two periods of approximately six months operation for each reactor.

## Stakeholder Engagement

- In February, we encouraged interested parties to take part in a [Nuclear Energy Agency \(NEA\)](#) survey about building and maintaining trust between nuclear safety regulators and the stakeholders they engage with.
- In February, we provided an update about the [leadership structural changes](#) we initially announced in December 2020. Under existing contractual arrangements, current Chief Executive Adrienne Kelbie CBE was always expected to step down as her extended term of office comes to an end in January 2022. Mark Foy will step into the new combined role on 1 June 2021, when the new leadership structure will come into full effect.
- In February, we announced that we had appointed [Donald Urquhart](#) to the newly-created role of Executive Director of Operations, which will form part of our new leadership structure. As Executive Director of Operations, Donald will be responsible for leading our regulatory work.
- In March, we announced that as part of our new leadership arrangements, we had [appointed three new deputy chief nuclear inspectors](#) (DCIs) to our regulatory and senior leadership teams: Jane Bowie, Paul Dicks and Steve Vinton, currently all senior superintending inspectors at ONR. All three new DCIs have a strong track record of delivering regulation across the organisation, and will help us maintain a focus on our Strategy 2020-25.

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