



Wylfa emergency arrangements

**Licence condition 11(3) – Emergency arrangements, request for approval of issue 15 of
Wylfa accident and emergency arrangements**

Project Assessment Report ONR-SDFW-PAR-19-030
Revision 0
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EXECUTIVE SUMMARY

Title

Approval under licence condition 11(3) to implement revised accident and emergency arrangements at Wylfa.

Permission Requested

Magnox Limited (ML) has requested the Office for Nuclear Regulation's (ONR) approval to amend its accident and emergency arrangements at Wylfa, which will result in those arrangements being consistent with the contingency arrangements at other defuelled ML reactor sites. This request is made in accordance with licence condition 11(3) in schedule 2 of nuclear site licence 58A.

Background

Licence condition (LC) 11 (emergency arrangements) requires the licensee to make and implement adequate arrangement for dealing with any accident or emergency arising on the site and their effects. Since the previous approval of Wylfa's emergency arrangements in October 2019 (Approval licence instrument 572), which first introduced contingency emergency arrangements (but the site retaining 24/7 operational shift working), Wylfa has completed its preparations for operational shift transition (OST). OST means the cessation of 24/7 operational shifts at Wylfa; which reflects the significant reduction in nuclear safety risk at the site and that no future work is planned to be undertaken during the site's silent hours.

Assessment and inspection work carried out by ONR in consideration of this request

ONR has targeted the readiness of people to undertake their accident and emergency roles; the completion of physical changes to support surveillance and monitoring of the site; and the review and update of instructions, procedures and other documentation that support delivery of an adequate accident and emergency response.

Matters arising from ONR's work

There are no unresolved matters from ONR's work.

Conclusions

I am satisfied that the licensee's proposed amendment of the Wylfa emergency arrangements is adequate and satisfies the requirements of LC 11 (emergency arrangements).

Recommendation

I recommend that in accordance with LC 11(3), ONR approves the proposed amendment to Wylfa's emergency arrangements.

LIST OF ABBREVIATIONS

CNSS	Civil Nuclear Security and Safeguards (ONR)
EA	Environment Agency
HOW2	(Office for Nuclear Regulation) Business Management System
LC	Licence Condition
ML	Magnox Limited
NRW	Natural Resources Wales
ONR	Office for Nuclear Regulation
OST	Operational Shift Transition
REPPIR	Radiation (Emergency Preparedness and Public Information) Regulations
WYA	Wylfa (licensed nuclear site, licence number 58A)

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1 PERMISSION REQUESTED

1. Magnox Limited (ML), the licensee, has requested (Reference 1) the Office for Nuclear Regulation's (ONR) approval to amend its accident and emergency arrangements at Wylfa, which will result in those arrangements being consistent with the contingency arrangements at other defuelled ML reactor sites. This request is made in accordance with licence condition 11(3) in schedule 2 of nuclear site licence 58A..

2 BACKGROUND

2. LC 11 (emergency arrangements) requires the licensee to make and implement adequate arrangement for dealing with any accident or emergency arising on the site and their effects. To comply with this requirement, Wylfa has submitted to ONR a document titled "Wylfa Accident and Emergency arrangements. Sites in monitoring and surveillance in silent hours" (Reference 1).
3. This is the second of two planned changes to Wylfa's emergency arrangements following defuelling and fuel free verification of the site in September 2019. The first planned change, which involved the introduction of contingency emergency arrangements consistent with ML defuelled reactor sites (with 24/7 operational shift working) was approved by ONR in October 2019 (Reference 2); and was supported by a project assessment report (Reference 3) which recorded ONR's regulatory assessment and inspection work.
4. Reference 3 recorded that Wylfa has reviewed its duties under the Radiation (Emergency Preparedness and Public Information) Regulations 2019. Wylfa has confirmed it considers that the Regulations no longer apply to its operations on site and that no duties fall on the local authority.
5. The request made by Wylfa is to implement the second of its planned changes (called operational shift transition or OST) and reflects the significant reduction in nuclear safety risk at the site. The issue of ONR's approval for this requested change will result in the removal of 24/7 operational shift working; and will mean that work on the site will be delivered between defined hours during the normal working day.

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

6. ONR has carried out a programme of work that included inspection (Reference 4) of the licensee's proposal to ensure it is consistent with the requirements of LC 11. ONR's programme of work has targeted those activities detailed in Reference 5. In summary my inspection activity has targeted people, plant and process:
 - 6.1 In relation to people I sought confirmation that all role holders identified to deliver the accident and emergency arrangement have completed adequate training; that there is adequate resilience in the number of persons who can deliver each role; and that role holders have demonstrated they are suitably qualified and experienced through practical demonstration of the emergency arrangements described in issue 15 of WYA/EMP/001 (Reference 1).
 - 6.2 In relation to plant I sought confirmation that changes in the configuration of the site to support monitoring and surveillance activities had been implemented (e.g. alarm re-routing etc); that warning notices had been amended as necessary (e.g. muster points, escape routes etc); and that all equipment required to support contingency arrangements was available in the incident response centres.
 - 6.3 In relation to process I sought confirmation that instructions to persons on the site had been updated and briefed; contingency emergency arrangement documentation

reviewed and updated where necessary; risk assessments for on-going work reviewed; and that Wylfa's governance process had been followed throughout.

- 6.4 I also sought from the ML internal oversight site inspector confirmation that a satisfactory readiness review had been completed.
7. Wylfa has summarised its responses (Reference 6) to all of my questions at Reference 5. On the basis of these responses and my inspection at Reference 4, I am satisfied that this proportionate engagement confirms preparations to implement OST have been adequately completed.
8. In accordance with its own governance and oversight process, ML's internal oversight function has confirmed (Reference 7) through its inspections that it is satisfied with the process Wylfa has followed and the site is ready to implement OST. In reaching this decision the ML internal oversight function has observed (Reference 8) an adequate emergency exercise demonstration using issue 15 of WYA/EMP/001; and observed a rigorous Wylfa internal readiness review (Reference 7).
9. ONR's Welsh region nominated site security inspector has confirmed (Reference 9) no objection to the issue of approval licence instrument 574.
10. In accordance with the memorandum of understanding agreed between ONR and Natural Resources Wales (NRW), that provides a framework for how regulatory activities will be co-ordinated to improve effectiveness, I have consulted NRW on Wylfa's request to change its emergency arrangements. NRW (supported by the Environment Agency [EA]) sought assurance that specific training, plant isolations and procedures had been completed, which Wylfa confirmed was the case (References 6 and 10). On the basis of this confirmation NRW (supported by the EA) has confirmed (Reference 11) that it has no objection to the issue of approval licence instrument 574.

4 MATTERS ARISING FROM ONR'S WORK

11. There are no unresolved issues remaining from ONR's assessment and inspection work.

5 CONCLUSIONS

12. This report presents ONR's consideration of Wylfa's request to amend its emergency arrangements under LC11 (3). ONR has targeted the readiness of people to undertake their accident and emergency roles; the completion of physical changes to support surveillance and monitoring of the site; and the review and update of instructions, procedures and other documentation that support delivery of an adequate accident and emergency response.
13. In my opinion the licensee's proposed amendment to the Wylfa accident and emergency arrangements is adequate to satisfy the requirements of LC11 (Emergency arrangements). In reaching this judgement I have taken into account the following:
 - My interventions with site staff on the proposed new contingency emergency arrangements; and the adequate demonstration of those arrangements.
 - The proposal having followed the licensee's governance process and was endorsed by its Nuclear Safety Committee on 10 December 2019.
 - Wylfa having completed an adequate readiness review.
 - Wylfa has confirmed that REPPIR 2019 no longer applies to its operations on site and that no duties fall on its local authority.

6 RECOMMENDATIONS

14. I recommend that a person with delegated authority in ONR:
- Accepts the conclusions in this report that justify issuing Approval Licence Instrument No. 574.
 - Signs Licence Instrument No. 574 giving effect to ONR's Approval of Wylfa's proposed amendment of its emergency arrangements under LC 11(3).

7 REFERENCES

- Wylfa letter WYA52554R dated 2 March 2020. Licence condition 11(3) – Emergency arrangements, request for approval of issue 15 of Wylfa accident and emergency arrangements, document WYA/EMP/001. CM9 2020/66986
- 2 Licence Instrument 572 dated 24 October 2019. Approval under LC11(3) of Wylfa’s accident and emergency arrangements (sites working in contingency arrangements) WYA/EMP/001 Issue 14. CM9 2019/310496
 - 3 ONR-SDFW-PAR-19-014 dated 24 October 2019. Project assessment report, Licence condition 11(3) – Emergency arrangements, Request for approval of issue 14 (rev 1) of Wylfa accident and emergency arrangements. CM9 2019/284536
 - 4 ONR-SDFW-IR-19-154 dated 20 January 2020. Intervention record, Magnox Limited, Wylfa, Planned Licence Condition Compliance Inspection and meetings (LC11, 22 and 23). CM9 2020/10861
 - 5 Email dated 28 November 2019. ONR Welsh region nominated site inspector to Wylfa regional engineering manager. Magnox Limited, Wylfa LC11 Part 4 permission scheduled for March 2020 - Proposed inspection/evidence gathering activities. CM9 2019/350722
 - 6 Email dated 12 March 2020. Wylfa deputy engineering manager to ONR nominated site inspector. Magnox Limited, Wylfa, LC11(3) request, Operational shift transition (OST). Wylfa’s response to ONR site inspector’s email of 28 November 2019 (2019/350722). CM9 2020/80013
 - 7 Email dated 10 March 2020. ML Welsh region internal oversight inspector to ONR Welsh region nominated site inspector. Magnox Limited, Wylfa, LC11, Accident and emergency arrangements, WYA/EMP/001 Issue 15, Operations Shift Transition (OST) - ML internal oversight - readiness to implement (LI574). CM9 2020/76634
 - 8 Magnox Limited report IntOv-2020-013 dated 19 February 2020. Internal oversight team assessment report, Demonstration exercise “Quebec”, Wylfa site, Wednesday 12th February 2020. CM9 2020/64069
 - 9 Email dated 9 March 2020. ONR Welsh region security inspector to ONR Welsh region nominated site inspector. ONR CNSS team stakeholder engagement, Wylfa request to implement operational shift transition - Approval LI574. CM9 2020/74631
 - 10 Email dated 13 March 2020. ONR nominated site inspector to EA site inspector. Natural Resources Wales. Wylfa LC11(3) permission, OST. RE: Approval of revised emergency arrangements under LC11 at Wylfa reflecting operational shift transition (refer 2020/79993). CM9 2020/80116
 - 11 Natural Resources Wales letter WYL/20/001/O dated 11 March 2020. Wylfa licence instrument – operational shift transition. CM9 2020/79993