



ONR GUIDE			
<b>LICENSED SITE ANNUAL REVIEW MEETINGS</b>			
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## 1. INTRODUCTION

- 1.1 Site Annual Reviews (SARs) provide an opportunity to carry out a stand-back review of the site's performance during the previous year. They can include ONR's view on successes and challenges, lessons learned, ONR's inspection findings summary, update licensees on how ONR issues are being addressed by their site. SARs should seek to align the views of the licensees with those of ONR and note where there are differences. SARs are also an opportunity to look ahead to the next year's interactions between ONR and the licensees. ONR may also use the opportunity to influence the future actions of senior site personnel if this is felt to be necessary. The SAR is known as the Annual Review of Safety and Security by some licensees and in some instances combined with the site's review by the relevant environmental regulator. Where nuclear safety activities are limited (for example on defuelled sites) the SAR may cover more than one licensed site.
- 1.2 This document describes ONR's procedure and guidance for conducting SARs with licensees. Though this procedure has been written as guidance to nuclear safety inspectors, these meetings reflect ONR's wider regulatory remit and Regulators' Code requirements on efficient means of engagement. Consequently, where practical, SARs should not be limited to reviewing nuclear safety, but instead should be scoped to cover as broad a range of ONR's regulatory purposes as appropriate, providing a "one stop shop" for the licensee through a "One ONR" approach.

## 2. PURPOSE AND SCOPE

- 2.1 From the licensee's perspective the SAR is a senior level meeting providing a means of:
- a) Reviewing compliance with the law regulated by ONR and safety, security, safeguards and transport performance, as appropriate, over the preceding period;
  - b) Reviewing the extent to which commitments made at the previous SAR or, start-up meeting (where appropriate), have been met;
  - c) Providing a strategic forward look over the next year, including what the licensee is committing to achieve, what needs to be accelerated and how; and
  - d) Setting out its medium / longer term plans and the challenges that are foreseen and how these will be addressed.
- 2.2 From ONR's perspective the purpose of the SAR is to:
- a) Provide a set-piece opportunity for formal, senior level regulatory discussions;
  - b) Respond to the matters raised above by the licensee from the perspective of ONR's regulatory responsibilities;
  - c) Raise any other important regulatory matters, particularly where safety (or security or safeguards or transport) performance has been poor or progress on resolving Regulatory Issues [Ref 6.1] has been slow.
  - d) Acknowledge and encourage the licensee in areas where safety or security performance has been particularly good.
  - e) Set out ONR's strategic regulatory focuses for the site over the coming period (year), and highlighting areas where improvements are expected from the licensee.

- f) Promote and reinforce regulatory messages being pursued on an industry-wide basis.
  - g) Ensure the duty holder has returned the ONR Annual Review of ONR's Regulation – Duty holder Survey (Ref 6.2).
- 2.3 The extent of the review should be commensurate with the magnitude of the hazard and risks presented by the site and the complexity of its operations. For lower hazard sites owned or managed by a single company, combined SARs covering multiple sites may be convened. For complex sites, a series of “feeder” annual reviews conducted at local site inspector level should be arranged, with the key outputs from these reviews fed (as appropriate) into the main site-level SAR.
- 2.4 As already noted, the SAR's scope should be set by ONR as appropriate to the circumstances of the site, ideally covering all of ONR's purposes (nuclear safety, nuclear security, conventional health and safety, radioactive transport and safeguards). ONR's senior level attendance should reflect the meeting's scope. Where practical, the meeting should be held jointly with the relevant environmental regulator and should also include the Defence Nuclear Safety Regulator where appropriate.
- 2.5 Attending site for the SAR also provides an opportunity for a senior ONR member of staff to meet the site's safety representatives and (where considered appropriate) other worker representatives. The topics typically covered in the SAR (paras 2.1 and 2.2) will normally make it appropriate for the safety / worker representatives to attend the SAR.
- 2.6 A separate meeting can if necessary be arranged to meet the site's safety representatives. These meetings should:
- a) precede the SAR (in case matters raised need to also be raised at the SAR);
  - b) Enable the safety / worker representatives to raise any concerns or complaints in private [Ref 6.3]; and
  - c) Provide an opportunity for ONR to share matters of mutual importance in line with our openness and transparency principles.

### 3. RESPONSIBILITIES

#### The Site Inspector

- 3.1 The (nuclear safety) Site Inspector is responsible for:
- a) Coordinating ONR's preparations for the SAR (e.g. attendance, timing, agreeing the proposed agenda with the licensee, comments on the Information Pack, briefings, advising the licensee on ONR expectations, liaising with any other regulators attending etc.) and facilitating its smooth running;
  - b) Following the SAR, agreeing minutes of the meeting with the licensee and ensuring an adequate auditable trail is made (including writing the Contact Record (CR) or Intervention Report (IR));
  - c) Ensuring the completion of all agreed actions.

#### ONR SAR Lead Inspector

- 3.2 The ONR SAR Lead Inspector (normally a Superintending Inspector, see paragraph 3.3 for criteria) is responsible for:

- a) Leading the ONR team at the SAR;
  - b) Agreeing the meeting scope with the licensee (e.g. whether the meeting should be broadened to include matters other than nuclear safety, paragraph 1.2; and the format of the process, paragraphs 5.1 to 5.2);
  - c) Ensuring that ONR fields a suitably knowledgeable and experienced team appropriate to the agreed scope and agenda.
- 3.3 The choice of SAR Lead Inspector should reflect the intent of the SAR to be an annual, senior level, set-piece engagement between ONR and the licensee and also take account of the seniority of the licensee's lead for the meeting (normally the licensee's head of site / station director). Normally the Lead Inspector will be the relevant Delivery Lead (i.e. a Superintending Inspector), but where the site's size or hazard potential merit this, the Programme Director should lead the team. At lower hazard sites the Delivery Lead may delegate another inspector (normally the Site Inspector) to lead the team or attend the meeting alone.

#### **4. DEFINITIONS**

- a) SAR – Site Annual Review, previously known as the Annual Review of Safety and Security
- b) Site Inspector – the individual appointed by ONR to lead on day-to-day regulatory matters at the site and in this guide, the individual responsible for ONR aspects of the smooth running of the SAR – see paragraph 3.1.
- c) Lead Inspector – see paragraphs 3.2 to 3.3.

#### **5. PROCEDURE**

- 5.1 Figure 1 shows a generic structure for planning and conducting SAR meetings. The structure includes the following elements:
- a) An Information Pack;
  - b) A site tour;
  - c) A presentation by the licensee based on its own self-reviews;
  - d) A presentation by worker representative(s)
  - e) A presentation by ONR based on its inspections and assessments of the previous year and ONR's priorities for inspections during the following year.
  - f) Agreed meeting notes and actions.
  - g) Sharing the ONR CR or IR with the licensee
- 5.2 These elements (and their depth / extent / coverage) should be selected at the discretion of the SAR Lead Inspector taking account of ONR's regulatory strategy for the site and the extent of other senior level contact with the licensee. Not all elements need be included in every SAR.
- 5.3 The Information Pack provided by the licensee should be a distilled output from its own internal reviews of aspects such as its legal compliance, incident and events, learning from experience, dose levels, safety culture etc. The broad format and content of the

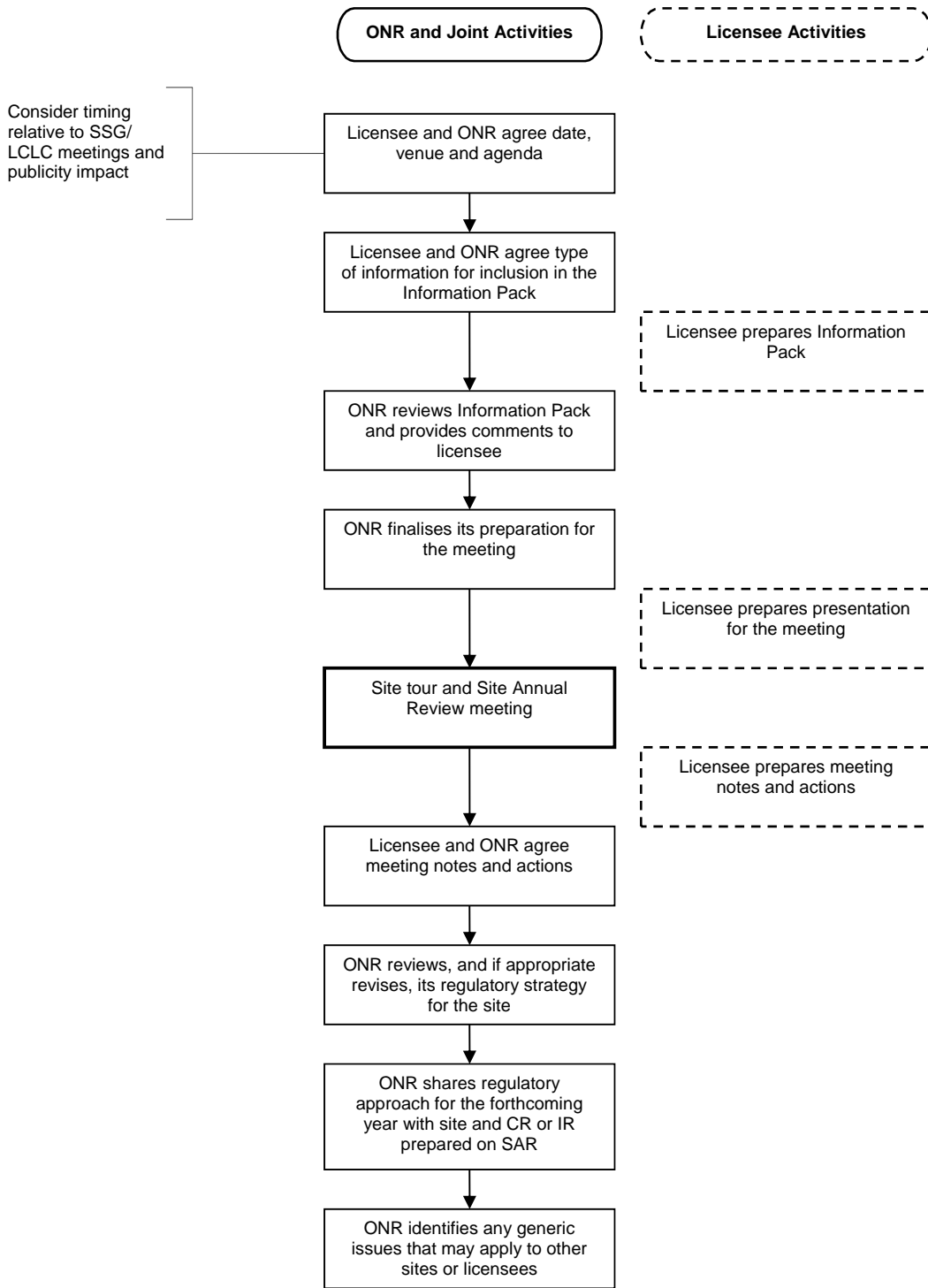
Pack should be agreed between the SAR Lead Inspector and the licensee in advance of the meeting. It is considered good practice for the information pack to be subject to some form of independent review as part of the licensee's internal governance process. This may be achieved through being reviewed by the licensee's internal regulator or Nuclear Safety Committee.

- 5.4 One option which several licensees have found useful, has been to structure nuclear safety aspects of their reviews (and consequently their Information Packs) around the 'Framework for Nuclear Safety Performance' developed by a subgroup of the Safety Directors' Forum in consultation with ONR. Figure 2 shows the framework. One benefit of this approach is that it supports the choice of Key Performance Indicators (KPIs) for inclusion as evidence in the Information Pack since all licensees have already mapped their KPIs against this framework.
- 5.5 The licensee is expected to brigade its outputs into a high level presentation to facilitate the meeting discussions. Use of single overview slides either in place of, or to supplement more detailed Information Packs has been a successful approach at some sites in ensuring the SAR retains a high level focus. Such approaches, which are consistent with ONR's sampling philosophy, are supported provided the underpinning review conducted by the licensee is suitably detailed. Over-detailed Information Packs and/or long and complicated licensee presentations should be discouraged.
- 5.6 A typical SAR agenda is given in Appendix 1 which focuses on the highlights from the previous year including those matters than did not go as expected. This approach provides time to include an ONR presentation of its findings and future plans for inspecting the site. ONR will include information on nuclear safety, security and safeguards, and conventional safety as appropriate.
- 5.7 An alternative approach adopted for Sellafield, noting the priority for this site to achieve timely high hazard and risk reduction, and taking advantage of the integrated ways of working brought about under the so-called "G6 approach", is for the Information Pack to be restricted to single slides describing review outcomes for eight general topics (see Appendix 2). In this approach, the licensee is still expected to conduct its own reviews by applying an established framework (such as that described in paragraph 5.4 above).
- 5.8 ONR should provide feedback on the licensee's nuclear and convention safety (and where relevant, security, transport & safeguards) performance over the relevant period. At a minimum this should be a summary of inspection and assessment ratings, highlighting any key findings and overview of progress on resolving Regulatory Issues [Ref 6.1]. The opportunity may also be taken to provide feedback on other performance aspects, such as from ONR's Leadership and Management for Safety Reviews [Ref 6.4] if any have taken place.
- 5.9 Attendance at the SAR should be coordinated carefully between the ONR SAR Lead Inspector and the licensee. Experience suggests that having too many people in attendance can lead to a lack of focus. Meeting sizes of more than 15, even for the most complex sites and broadest agendas, are not recommended. Instead, the Lead Inspector should allocate responsibilities within the team to achieve an optimal balance between covering the topics adequately and the numbers attending, and then encourage the licensee to do likewise. Where necessary, the Lead Inspector may take a brief from inspectors not attending to ensure they are knowledgeable on important safety issues that have arisen during the year. Some ONR investigation information may be withheld at the time of the SAR to meet legal requirements if legal action is pending.
- 5.10 Where the site has an internal regulator, they should contribute to the SAR proactively. The internal regulator should:

- a) Be invited to provide an independent opinion on the licensee's presentation;
  - b) Be in a position to comment on the quality (strengths and weaknesses) of the licensee's underpinning reviews;
  - c) Provide any advice or opinions after the licensee's presentation but before ONR gives its views.
- 5.11 The ONR team must be properly prepared before the SAR. In particular each team member should:
- a) Have copies of the Licensee's Information Pack at least two weeks before the SAR meeting.
  - b) Review the Information Pack and prepare their initial feedback response to the ONR SAR Lead Inspector for those aspects where they are leading;
  - c) Review the current status and progress made in regard to all Regulatory Issues at Level 3 and above [Ref 6.1] relevant to these aspects and other safety (or security) performance matters (see paragraph 5.5) and decide what feedback (if any) should be provided;
  - d) Agree lines to take on contentious matters with relevant team colleagues and the ONR SAR Lead Inspector.
  - e) Feedback ONR's views of the site's performance.
- 5.12 The meeting will be recorded in an ONR Intervention Record or Contact Record (which will be shared with the licensee in draft for comment prior to formal issue). Minutes of the meeting should be available shortly after the meeting to be agreed by ONR and the licensee as an accurate reflection of the views of all parties and where necessary noting where there were disagreements between the parties and how they may be resolved.

## 6. REFERENCES

- 6.1 ONR HOW2 Process: Regulatory Issues Management
- 6.2 ONR Annual Review Of ONR's Regulation – Dutyholder Survey, 2019/161180
- 6.3 Appendix 8 of ONR Guide ONR-INSP-GD-064 Revision 3, ONR Inspection Guide, July 2019.  
ONR HOW2 Process: Conduct Investigations.  
ONR webpage: Health and Safety concerns/whistleblowing and complaints about ONR, <http://www.onr.org.uk/complaints-concerns-whistleblowing.htm>
- 6.4 ONR Nuclear Safety Technical Assessment Guide NS-TAST-GD-093, Revision 2, September 2016, [http://www.onr.org.uk/operational/tech\\_asst\\_guides/ns-tast-gd-093.pdf](http://www.onr.org.uk/operational/tech_asst_guides/ns-tast-gd-093.pdf)

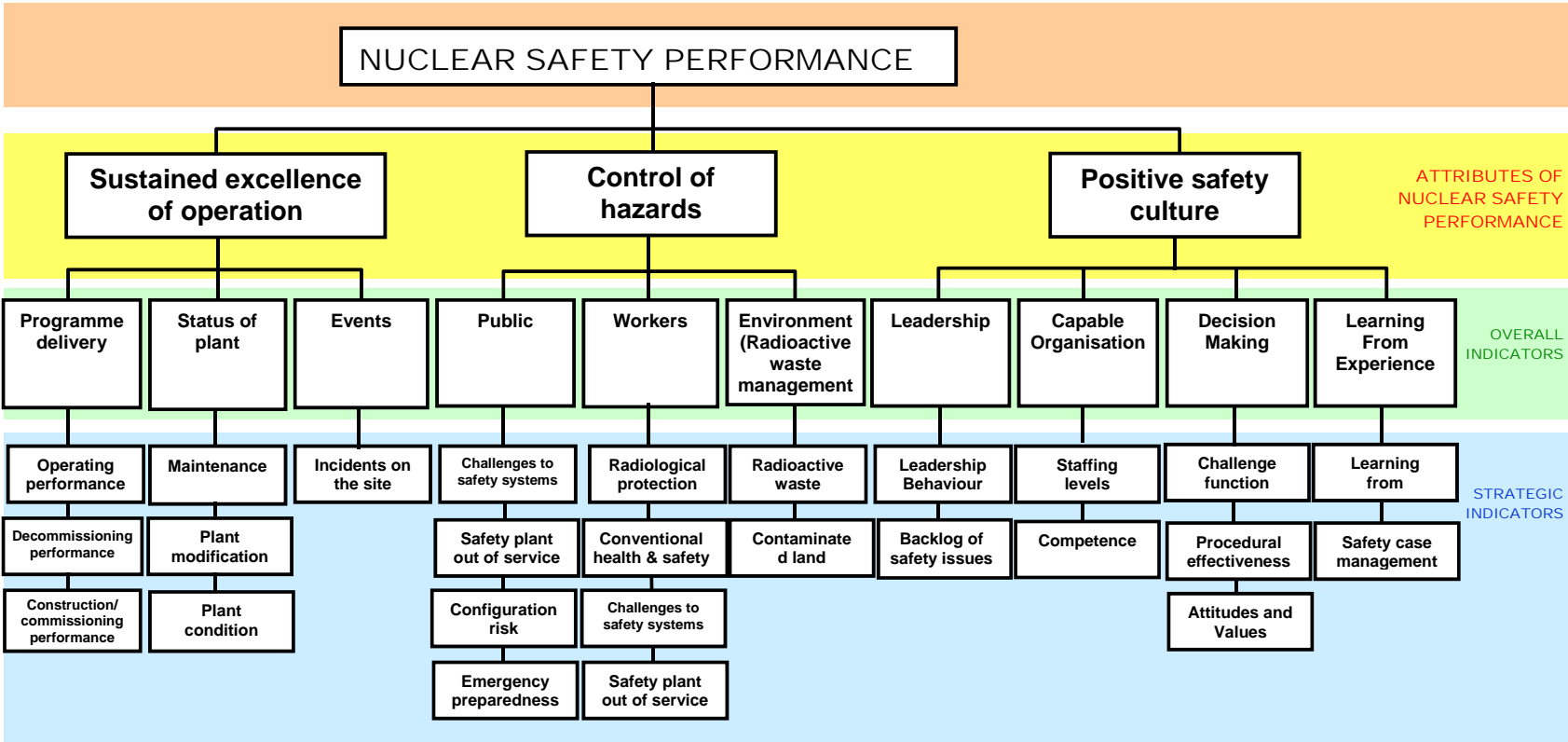


**Figure 1: Procedure for Site Annual Review Meetings**





# NUCLEAR SAFETY PERFORMANCE INDICATOR FRAMEWORK



\* Human performance spans this framework and licensees should be able to describe how this is reflected in their choice of indicators

Figure 2: Framework for Nuclear Safety Performance

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**APPENDIX 1 – EXAMPLE OF TYPICAL SITE ANNUAL REVIEW MEETING AGENDA**

- 1**      **Introductions & Apologies**
- 2**      **Approval of Minutes of Last Meeting** (Review/start-up meeting dd/mm/yy)
- 3**      **Review of Actions From Last Meeting**
- 4**      **Station Director’s Overview**
- 5**      **Safety Representatives Report**
- 6**      **Feedback From ONR Plant Tour**
- 7**      **Sustained Operational Excellence**  
Operational summary (programme delivery, plant status & events)  
Operations top ten issues  
Matters raised by ONR  
Technical specification performance  
etc
- 8**      **Managing the Asset**  
Investment planning  
Maintenance performance  
Safety system reliability and availability  
Plant modifications  
etc
- 9**      **Positive Safety Culture**  
Capable Organisation  
Leadership resilience  
Training  
Organisational capability  
Decision making  
etc
- 10**     **Control of Hazards**  
Radiological safety  
Radioactive material transport  
Emergency preparedness  
Industrial safety  
etc
- 11**     **Stakeholder Engagement**
- 12**     **Correspondance review**
- 13**     **A.O.B.**

## **APPENDIX 2 – MEETING STRUCTURE IN USE FOR SELLAFIELD**

The meeting should address the following topics in addition to the SAR general agenda:

1. Achieving and maintaining nuclear and radiological safety
2. Timely hazard and risk reduction
3. Emergency planning and resilience
4. Nuclear security
5. Environmental protection
6. Conventional health and safety
7. Radioactive transport safety
8. Safeguards

For each topic, the meeting should consider SL's performance and ambitions in three parts:

1. A look back reviewing compliance and how commitments made at the last Meeting have been delivered;
2. A forward look over the next year – what is SL committing to achieve? What needs to be accelerated and how will this be achieved?
3. A medium term forward look – where is SL heading and what challenges are foreseen?

For each topic, the Information Pack should comprise a single slide providing a suitable overview. Following each SL topical presentation, the SL internal regulator should be invited to provide its comment, after which ONR (or EA for topic 5) will express its opinion.



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