Meeting Minutes

ONR NGO Forum Meeting

**19 April 2023, 110 Rochester Row, Victoria, London, SW1P 1JP (held in person and via Zoom)**

|  |  |
| --- | --- |
| In Attendance (ONR): | In Attendance (NGO): |
| Rachel Grant (RG) – Director of Policy and Communications (co-chair)  Mark Foy (MF) – Chief Executive and Chief Nuclear Inspector  Sarah High – Deputy Chief Executive  Donald Urquhart (DU) – Executive Director of Regulation and Deputy Chief Nuclear Inspector  Mike Finnerty (MFinn) – Director of Regulation, Operating Facilities Division  Kobina Lokko (KL) – Senior Policy Advisor  **Secretariat/organisers:**  Daniel Jones – Communications Manager  Enid Lovelady – Communications Officer  **Environment Agency:**  Alan McGoff - Manager, Reactor Assessment and Radiological Monitoring Team | Dr Jill Sutcliffe (JS) – Low Level Radiation and Health Conference (co-chair)  Katy Attwater (KA) – Stop Hinkley  Sue Aubrey (SA) – Stop Hinkley  Dr Ruth Balogh (RB) – West Cumbria and North Lakes Friends of the Earth  Peter Banks (PBan) – Blackwater Against New Nuclear  Prof. Andy Blowers (AB) – Blackwater Against New Nuclear  Richard Bramhall (RB) – Low Level Radiation Campaign  Jo Brown (JB) – Parents Concerned About Hinkley  Peter Burt (PB) – Nuclear Awareness Group/Nuclear Education Trust  John Busby (JB) – Low Level Radiation and Health Conference  David Cullen (DC) – Nuclear Information Service  Stephen Dewick (SD) – Bradwell B Action Network  Alison Downes (AD) – Stop Sizewell C  Alan Hatt (AH) – Together Against Sizewell C  Rita Holmes (RH) – Ayrshire Radiation Monitoring Group  Allan Jeffrey (AJ) – Stop Hinkley  Tor Justad (TJ) – Highlands Against Nuclear Power  Richard Outram (RO) – Nuclear Free Local Authorities  Ian Ralls (IR) – Friends of the Earth Nuclear Network  Jo Smoldon – Stop Hinkley  Mike Taylor (MT) – Together Against Sizewell C  Pete Wilkinson (PW) – Together Against Sizewell C  Chris Wilson (CW) – Together Against Sizewell C |

1. Welcome and introductions
   1. Mark Foy (MF) welcomed everyone to the Forum and took the opportunity to welcome Rachel Grant (RG), ONR’s new Director of Policy and Communications to the role of Forum co-chair. RG thanked MF and noted that it was an honour for her to take on the co-chairing responsibilities. RG and Dr Jill Sutcliffe (JS) also welcomed everyone to the meeting including those joining remotely. JS in her opening remarks also highlighted that Germany had recently closed its last nuclear power plant.
2. ONR Presentation – Mark Foy
   1. MF commenced his update by reflecting on the discussions that took place at the last Forum meeting on the topic of ‘ethics’. MF acknowledged the work undertaken by Peter Burt (PB) and noted several key points from PB’s paper.
   2. MF acknowledged that ONR could improve its engagement with certain communities and advised that work was starting on this. He also highlighted areas where he considered ethics should be front and centre such as in dealing with legacy waste. MF also flagged the three underlying principles in the new ONR ‘Openness and Transparency’ document namely: informing, engaging, and consulting, and noted that ONR recognises that there is more it could do to consult about its decision and processes both formally and informally.
   3. MF provided examples of where ONR had engaged and hoped NGO colleagues recognised this. He also made an offer to PB to attend and present the paper that he delivered at November’s Forum about ethics to a future meeting of the ONR board.
   4. MF commented that there are opportunities for ONR to learn from other regulators about how they deal with ethical issues. He advised that ONR recognised that it did have a role to influence government, although he acknowledged this is not always visible. He also cited the regulatory work done by ONR to drive down Highly Active Liquor stocks at Sellafield, which he felt was an ethical issue.
   5. Tor Justad (TJ) asked what have other government departments/agencies done in this area.
   6. Alan McGoff (AM) noted that the Environment Agency (EA) has detailed arrangements in place regarding consultations but recognised that it shouldn’t stop learning.
   7. MF noted that there was potentially an opportunity to share the paper produced by PB with other members of the UK Health and Safety Group.

**Action 23.03** – MF to consider sharing ethics paper with other UK Health and Safety Regulators and to highlight paper to NDA colleagues.

* 1. Pete Wilkinson (PW) commented that there had been no ‘outcry’ from ONR when discharges were being made to the Irish sea from Sellafield e.g. as a result of reprocessing Magnox fuel. He also noted discharge issues at Sizewell B.
  2. MF advised that there had to be balance with discharges and that ONR and the EA had influenced Sellafield significantly regarding discharges. He noted that the health impacts of any discharges are considered. AM added that the regulators work to international standards when determining discharges and that ‘Best Available Techniques’ (BAT) principles are applied by the EA to minimise discharges.
  3. PW commented that discharges were in complete contradiction to the key principle of containing waste. PW also asked that people be made aware of the health impacts of discharges so that they could understand the risk.
  4. MF advised that ONR applies [[1]](#footnote-2)ALARP principles and does make its assessment decisions available. PW expressed view that people should be told what the health risks are.
  5. MF advised that ONR had held a meeting with NGOs on 21 February 2023 to discuss NGO concerns regarding low level radiation dose rates, noting that ONR is engaging on this issue. PW expressed view that ONR doesn’t seem to take evidence on board.
  6. Andy Blowers (AB) commented that Germany’s decision to abandon nuclear power was based partly on a [[2]](#footnote-3)report about the ethics of nuclear power and JS added on childhood leukaemia impacts.

**Action 23.04** – AB to share report reference with ONR.

[**Post meeting note** – Report reference shared with ONR: Ethics Commission (2011) *Germany’s Energy Turnaround - A Collective Effort for the Future,* presented by the Ethics Commission on a Safe Energy Supply, Berlin, 30 May 2011]

* 1. AB advised that CORWM had taken ethics into consideration, and he congratulated ONR on this move. He asked if ONR could designate a senior person within the organisation to take on this brief.
  2. MF responded by advising that he wouldn’t necessarily be keen on just one person taking the lead on this issue, but instead he considered it needed to embed across the organisation.
  3. Katy Attwater (KA) commented that she didn’t feel that ONR or the EA were able to challenge the ‘smartness’ of EDF Energy (EDF). KA advised that the outcome of a democratic process was that EDF was required to install an acoustic fish deterrent (AFD) at Hinkley Point C, but due to a loophole it is now going back to consultation, with EDF refusing to do what is required of them. KA asked that ONR and the EA support them on this issue.
  4. MF advised that ONR was aware of this issue. AM commented that the company had applied to remove the requirement for an AFD, and that the EA was reviewing the permit and would consult on this in due course. AM advised that no decision has been made and noted that the requirement for an AFD was in the development consent order.
  5. MF commented that there is an opportunity for EDF to revisit its application, but that the EA has been strong and robust.
  6. Alison Downes (AD) asked if the forthcoming testing of the UK national alarm system is motivated by the need to be able to deal with a radiological emergency. MF responded by advising that this wasn’t the case, but that its purpose was to ensure the UK was able to disseminate information.
  7. MF moved to update on the creation of Great British Nuclear (GBN). He confirmed that individuals had been identified to lead GBN and will soon be in place. He advised that GBN would be looking at the deployment of small modular reactors (SMRs) and would run the SMR competition. Questions followed about the role and type of organisation that GBN will be.
  8. MF responded by advising that GBN would be an arms-length body similar to that of ONR or the Nuclear Decommissioning Authority (NDA).
  9. In relation to SMR competition, TJ asked if just one model would be selected.
  10. MF advised that this would be up to GBN. He confirmed that ONR was currently completing a Generic Design Assessment (GDA) of the Rolls-Royce SMR design. He also advised that he expected that ONR would be asked by government to complete two further GDAs. He noted that ONR was ensuring it was suitably resourced to do this.
  11. John Busby (JB) noted that competition for natural uranium will be severe as more reactors are built. He expressed view that he could not see how reactors could be fuelled.
  12. MF advised that ONR recognised this challenge and that it was for the nuclear industry to look at this issue.
  13. Ian Ralls (IR) asked how many of the new SMR designs would be breeder reactors. MF advised that some of the reactors could be classed as breeder.
  14. Further questions were asked about the remit of GBN as well as the funding of new build activities.
  15. MF advised that GBN would run the SMR competition and that it would also look at funding models.
  16. Mike Taylor (MT) expressed concern that in relation to Sizewell C no ‘value for money’ study has been undertaken. MF advised that ONR’s role was to ensure any proposed development was safe and secure.
  17. MF noted the appointment of Andrew Bowie MP as the new minister with the nuclear portfolio. He advised that since he took up post, ONR representatives had met with the minister.
  18. AD asked if ONR could reinforce message with the Department of Energy Security and Net Zero (DESNZ) and the minister about their lack of engagement with the NGO community.
  19. Following the formation of GBN it was suggested that ONR could lose staff to the new organisation who may look to ONR to help fill its posts. MF advised that he recognised this concern, but that ONR was looking at its terms and conditions to ensure it remained competitive with others.
  20. MF moved to update on the latest position regarding the European Pressurised Reactor (EPR) in light of issues at the reactor in Taishan. He confirmed that ONR was continuing to engage with other regulators including the Chinese regulator regarding the issues experienced at Taishan.
  21. AD noted that it was her understanding that the cause of damage to the fuel at Taishan was not yet understood and asked why there was not more focus on root causes. AD also referenced recent publication of IRSN reports and requested confirmation if ONR was aware of the IRSN doc published in January 2023.
  22. MF advised that this was an issue very high on ONR’s agenda and that there was nothing in the IRSN reports that ONR was not aware of. MF confirmed that ONR was working closely with the French and Finnish regulators on this matter. AD also requested further information regarding the key points on the Hinkley Point C timeline.

**Action 23.05** – ONR to share copy of IRSN report published in January 2023.

[**Post meeting note** – Report shared with Alison Downes on 11.5.23.]

**Action 23.06** – Recognising the requirement to respect commercial, safety and security sensitivities, ONR to review/consider what information it may be able to share regarding the Hinkley Point C timeline.

[**Post meeting note** - Response issued to Alison Downes on 11.5.23]

* 1. MF moved to discuss the publication of the ‘Good Practice Guide’ for SSG/LLC meetings. MF asked for feedback from NGOs on how it had ‘landed’ since it was rolled out around 12 months ago.
  2. Rita Holmes (RH) advised that she had not noticed much difference since the publication was issued. PB commented that he had seen no moves to open up meetings to NGOs. Allan Jeffery (AJ) advised that he was aware of a new website having been created which was making it easier for people to access information about meetings. Tor Justad noted some minor changes to the Dounreay SSG meeting.

**Action 23.07** – Consider inviting update from SDF chair at a future Forum meeting and to monitor implementation of the guide.

* 1. MF confirmed that the next Chief Nuclear Inspector’s themed inspection in 2024 would focus on the topic of Climate Change. He advised that ONR was starting to develop the scope of the inspection.
  2. MF moved to update on the recent Convention on Nuclear Safety. He advised that the meeting was satisfied with the UK’s safety and had identified one area of ‘Good Practice’, which was around ONR’s regulatory recruitment. He noted that ONR had been commended on the innovative recruitment pipelines that it had introduced to ensure it could be adequately resourced in the future.
  3. MF concluded by updating on some of the recent international collaborative work that ONR has been undertaking, noting that ONR was working with other nuclear regulators.

1. ONR presentation – Donald Urquhart
   1. Donald Urquhart (DU) commenced by noting the significant regulatory oversight ONR was continuing to have at Hinkley Point C. He also updated on the work ONR was doing with industry around innovation to look at how things are done. He advised that ONR’s overall focus was to ensure that innovative methods are safe and secure, and that he wanted ONR inspectors to be open to innovation, and to be confident in regulating innovative methods.
   2. DU updated on the recent exchanges with the French regulator, ASN. He advised that in February ONR held a bilateral three-day meeting with a delegation from ASN, noting that both ONR and ASN had agreed to extend their cooperation agreement for a further five years.
   3. DU explained that Sizewell B (SZB) has recently completed its statutory outage, during which inspections for stress corrosion (as seen in French fleet) cracking were undertaken. He noted that ONR was looking at certain ageing effects at the site and keeping a close eye on this. DU also confirmed that EDF has come forward to seek lifetime extensions at Heysham 1 and Hartlepool.
   4. DU advised that at Sellafield retrievals had now commenced from the Magnox Swarf Store Storage Pond.
   5. DU confirmed that ONR’s safeguards function had been reviewed by Euratom and given a ‘clean bill of health’. He also highlighted the publication in March of ONR’s Annual Safeguards Report.
   6. DU provided a summary of enforcement taken by ONR over recent months, highlighting the various prohibition notices and enforcement notices issued by ONR. He noted the theme around conventional health and safety (CHS).
   7. DU advised that CHS was of uppermost importance on nuclear sites. He explained that he had asked ONR’s specialists to look specifically at how we might influence greater CHS improvements on sites, and to also look at how we might strengthen our CHS strategy.
   8. DU also updated on the annual review that ONR undertook in December to look at its own performance, and how it had sought the views of different duty holders. He also updated on the WiRed IT project which ONR is currently rolling out. He explained once fully implemented it will help the industry to see ONR as more ‘joined up’. He also noted the need for the organisation to look at its efficiency and confirmed this is something that ONR will continue to focus on.
   9. Questions were asked about the recent Sizewell B outage, and the inspection regime deployed. Noting some of the issues, questions were asked about any potential read across to the EPR reactor planned for Sizewell C. MFinn confirmed that there would be no direct read across as the EPR would have its own set of inspection arrangements that we would inspect as part of our routine compliance inspections.
   10. Chris Wilson (CW) asked about ONR’s expectation on the Sizewell C site licence. DU advised that there were two issues that needed to be resolved before a licence could be issued, which were in relation to the tenure of land and the governance arrangements of the licensed entity. He explained that he couldn’t give a precise timescale on when ONR might issue the site licence, but that he expected the proposed licensee would be seeking it within the next 12 months.
   11. Further questions were asked about the movement of sites out of enhanced attention. DU explained that the sites of most concern currently were in the defence sector. He noted that good progress has been made at the AWE Burghfield site which is now in routine attention. He confirmed that AWE Aldermaston was moving forward but did express some concerns about Devonport.
   12. PW asked if ONR was happy with the small number of inspections carried out on welds at Sizewell B (SZB). MFinn responded that ONR had influenced SZB to increase the number of inspections carried out during the outage and was content that the sample was representative. Questions were also asked about whether ONR should have extended its cooperation with ASN sooner.
   13. DU confirmed that ONR has engaged with ASN regarding stress corrosion cracking, which has helped to establish what a good representative of welds to inspect would be. He advised that ONR was satisfied with the number of inspections carried out by EDF. DU also advised that ONR has had a cooperation agreement with ASN in place for some time, but that ONR had wanted to review its information exchange agreement. He confirmed that ONR has now re-signed the agreement with ASN for a further period of time.
   14. IR asked what SMR designs are likely to enter the GDA process. DU/MF advised they were not at liberty to disclose this information.
2. Reflections on meeting to discuss low-level radiation concerns – NGOs and Donald Urquhart
   1. Richard Bramhall (RB) advised that some members of the NGO Forum had met with ONR in February to discuss concerns around the issue of low-level radiation. RB expressed view that in his opinion ‘agreeing to disagree’ was not an option. He also commented that he considered the response provided by the UK Health Security Agency (UKHSA) to the two papers submitted by NGOs to ONR in advance of the meeting, and which ONR had sought the views of UKHSA, were evasive. He confirmed that he was writing a piece in relation to the response which he will share with ONR in due course. RB also requested clarification if government had deleted the justification for a review of the Ionising Radiation Regulations.

**Action 23.08** – ONR to check the regulations and respond to confirm if this was the case or not.

[**Post meeting note** – ONR can confirm that there has been no ‘deletion’ of the need for a review of these regulations. The Post Implementation Review of the Ionising Radiation Regulations 2017 was completed in 2022 ([**https://consultations.hse.gov.uk/hse/irr-2017-post-implemention-review/**](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fconsultations.hse.gov.uk%2Fhse%2Firr-2017-post-implemention-review%2F&data=05%7C01%7CDaniel.Jones%40onr.gov.uk%7C7d1f3407e79848b23eb008db93671c70%7C742775df807748d681d01e82a1f52cb8%7C0%7C0%7C638265843285671677%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=zmlylrSzNfDCKG270ktH05vQSFH9Xbtp5GBLi4TPoa0%3D&reserved=0)). In line with existing requirements to review regulations introduced after 2012 every five years, we expect the next review of the Ionising Radiation Regulations 2017 to take place in 2027.]

* 1. PW commented that it had been refreshing to have had this dialogue with ONR and that he hoped such dialogue would continue, and that he was looking forward to a further meeting. Expressed view that he hoped discrepancies with the linear no threshold (LNT) model could be discussed further.
  2. DU thanked PW, RB and JS for the conversation they had held with him and other ONR colleagues in February. He advised that ONR’s professional lead for radiological protection had explained the ONR position, and that the overwhelming evidence is that the LNT model is internationally recognised as prevailing good practice. He explained that ONR does have a voice and would input if we had concerns, and that ONR would look at any new research on this issue.
  3. AB commented that justification was also required for reactors and asked if this could be raised with government. MF confirmed that the requirement for justification remains but explained that this was a task for government to undertake.

1. NGO presentation (Scottish Issues) – Tor Justad
   1. TJ commenced his update by noting the increase in the number of radioactive particles that have been found on the shoreline around Dounreay. He advised that there had been a big increase between January and March 2022, and that it had been difficult to understand who had been monitoring this. TJ advised that he understood it was the Scottish Environmental Protection Agency’s (SEPA) responsibility to monitor and report on findings but expressed view that there had been a lack of communication about the rise in the number of particles which HANP had found to be concerning. He advised that he felt ONR could have a more active role in this area.
   2. TJ also raised concerns about the proposed manufacturing of SMRs at Freeports. He expressed view that Freeports had not been successful elsewhere. TJ asked what more ONR could tell NGOs about the manufacture of SMRs.
   3. MF explained that the concept behind SMRs is that they can be constructed and assembled off-site. He noted that to construct and assemble was not a licensable activity, and that ONR recognised that the way industry will want to build SMRs is different to current approaches.
   4. DU added that SMRs were at a very early stage of conception, and this might be an issue to return to at a later date. JB commented that the Rolls-Royce SMR was not small in size.
   5. In response to the earlier point raised by TJ, MF advised that ONR has responsibility for regulating activities on the licenced site. He added that responsibility for monitoring particles on the beach areas surrounding the Dounreay licensed site did sit with SEPA. AM also concurred with this point.

**Action 23.09** – ONR to flag concern from HANP about the lack of information/communication on the numbers of particles being located on Dounreay shoreline and the reasons for this to SEPA.

[**Post meeting note** – This concern was communicated with Dounreay nominated ONR Site Inspector who raised matter with SEPA during a meeting with them on 5 June 2023.]

1. ONR presentation – Mike Finnerty
   1. MFinn commenced his presentation by providing an overview of the defence sites that ONR regulates, noting that some are licensed, and others are authorised sites; he explained the differences between both.
   2. MFinn advised that AWE Aldermaston and Devonport Royal Dockyard (DRDL) remain in enhanced attention. He noted that areas of focus for ONR at DRDL centre around leadership, organisational capability and decision making, and duty-holder compliance, delivery and organisational capability at AWE.
   3. He confirmed that AWE Burghfield had recently moved back into routine regulatory attention. MFinn advised that the other defence sites which include BAE Barrow, RRSL Derby and RRDL Rosyth all remain in routine regulatory attention.
   4. MFinn updated on recent enforcement activities across the defence estate, including the issuing of a prohibition notice to AWE; an improvement notice to DRDL due to shortfalls in electrical safety; and the issuing of an improvement notice to Babcock Marine, Clyde, due to shortfalls in the management of risks associated with battery replacement activity. On the latter, he noted that there had been a very positive response, which had enabled the notice to be closed out one month earlier than expected.
   5. MFinn noted some of the major programmes of work ahead at AWE which will require regulatory focus. These include the decommissioning of legacy facilities, the upgrading of current ageing operational facilities and the delivery of new build facilities to support future programmes. He also advised that a challenge for AWE is to build its capacity and capability to meet these objectives. MFinn confirmed that management of ageing plant and industrial safety compliance remain areas of close regulatory attention.
   6. MFinn also updated on the work programmes of propulsion licensees. He noted they also faced significant programmes of work ahead including Astute, Dreadnought and AUKUS submarine campaigns involving BAE Systems and Rolls-Royce Submarines Limited and major refurbishment of docking facilities and decommissioning legacy submarines at Devonport. Like other licensees across the defence portfolio, he confirmed that propulsion licensees needed to build their capacity and capability to meet these objectives. MFinn also advised that management of ageing plant and industrial safety compliance remain areas of close regulatory attention on these sites.
   7. MFinn concluded by updating on some of the high-level findings to emerge from the regulatory vires review work across the defence sector. He noted that this had been a significant legal and policy review to provide assurance that ONR was discharging its statutory safety purposes in an appropriate manner. He explained that the review had concluded this was the case and had ensured that all parties had greater clarity of each other’s areas of responsibility. He advised that the review had highlighted some areas where further constructive working between ONR and the Defence Nuclear Safety Regulator would be beneficial, noting that specific areas of activity have been identified and will be captured as case studies to be included in a refreshed General Agreement between ONR and MoD. He also advised that a further output from the review had been the creation of a pan-enterprise strategic forum which is helping to foster a more positive working relationship and further cement effective regulation of the sector.
   8. Following recent media coverage regarding quality of work undertaken on HMS Vanguard, David Cullen (DC) asked if there were quality control issues.
   9. MFinn advised that the incident referred to in the media occurred around three years ago. He explained that it wasn’t a safety issue, but that it did point to potential cultural issues on the site. He explained that ONR’s intent was to drive such issues up to the executive level of licensees to improve nuclear safety culture.
   10. PB asked about staffing levels at the Defence Nuclear Safety Regulator (DNSR) and enquired if ONR had seconded any members if its staff to DNSR. He also asked if ONR could raise with the Ministry of Defence (MOD) issues around lack of transparency. MFinn advised that ONR did have a staff member seconded to DNSR who was working at a strategic level within the organisation.

**Action 23.10** – ONR to flag concerns about levels of transparency with the MOD.

* 1. Allan Jeffery asked about ONR’s role in the regulation of depleted uranium. DU and MFinn advised that if it were located on a civil nuclear site, it would be regulated by ONR, but not if it was on a non-licensed MOD site.

1. ONR presentation – Kobina Lokko
   1. Kobina Lokko (KL) commenced his presentation by explaining that the current nuclear National Policy Statement (EN-6) – ‘Government’s planning policy for siting nuclear electricity generating infrastructure up to 2025’ needed to be updated. He confirmed that the UK Government had stated that it would develop a new National Policy Statement (NPS), which will cover the siting and policy framework for nuclear electricity generating infrastructure, including SMRs, beyond 2025 and they would consult on this in due course.
   2. KL explained that the new NPS was intended to cover the policy framework for deploying new nuclear power stations beyond 2025; support the UK in meeting its ambition of reaching up to 24GW of nuclear energy by 2050, as set in the British Energy Security Strategy (BESS); and could include greater flexibility in the approach to siting new nuclear developments, including the potential deployment of advanced nuclear technologies such as SMRs.
   3. KL provided details on the policy process, explaining that government intended to consult later this year on how best to determine how new nuclear developments might be located and to consult on the new nuclear NPS in due course. He noted that the government’s intent was to designate the NPS following parliamentary scrutiny. He also advised that it was expected the planning policy would be in place for the deployment of nuclear projects beyond 2025.
   4. KL moved to update on ONR’s current role. He advised that ONR was providing advice to government on the development of policy options on siting criteria for the new nuclear NPS; advising on the development of the consultation on siting approach for the new nuclear NPS; and providing advice in support of stakeholder engagement.
   5. KL noted some of the key issues that ONR will communicate with government for them to consider when setting policy for the siting of new nuclear power stations, including climate change, flood risk, platform height, multi-facility sites and third-party sea defences.
   6. JB commented that the concept of SMRs was to integrate the power plant with industry.
   7. KL advised that the new siting policy will need to be broader. MF added that co-generation will need to be part of the new siting criteria.
   8. IR asked if reactors would be sited in Freeports. KL advised that thinking on site locations was still at an early stage. DU added that decisions still need to be made and that we would need to wait and see. MF also commented that government thinking on where technologies might be located was not yet mature, noting the only sites identified were the eight that had been previously discussed at the Forum.
   9. PB commented on the government’s ambition for nuclear to provide 24 GW of electricity by 2050. PB asked if alternatives were available would this figure still need to be met.
   10. KL advised that he understood government’s intent was to ensure there was significant flexibility in the siting policy to allow a pragmatic approach. From ONR’s perspective, he advised that ONR needed to understand what it might be required to regulate.
   11. PB urged ONR to push the point on ‘first principles’ when entering discussions with government.
   12. AB expressed view that government had totally neglected its siting policy. He advised that, in his view, of the eight sites put forward by government most people now recognised there were issues with certain sites, and that the criteria needed to be revised. AB commented that if we are going to have SMRs, they should be small and placed in suitable locations. AB noted his dismay at discussion.
   13. MT commented that Together Against Sizewell C (TASC) had been trying to get ministers to review policy since 2017. He noted that four of the eight sites were in flood zones. He also noted that it was ‘not on’ to consider building a reactor in a location without an adequate supply of water.
   14. KL advised that if government is to take its new siting policy forward then ONR does need to be involved in those discussions.
   15. AM advised that government will be consulting on EN1. MF also added that government will be consulting on various documents, and he encouraged NGO colleagues to take the opportunity to comment on them.
   16. PW commented that he was glad ONR was taking responsibility and that he hoped ONR would raise NGO concerns, so that they can have confidence issues are being raised and considered.

**Action 23.11** – Update on ONR’s role in the siting policy developments to be provided at future meetings of the ONR NGO Forum.

1. ONR update – Rachel Grant
   1. RG provided a brief update on the climate change workshops which ONR introduced last year to provide greater opportunities for in-depth discussion with NGOs on this important topic and area of concern. RG advised that ONR hopes to hold a further two workshops this year and advised that following recommendations from NGOs, ONR has appointed an external facilitator to help deliver the two workshops. Further information to be shared in due course.
   2. RG also updated on the Retained EU Law (Revocation and Reform) Bill advising that ONR remains engaged with government to ensure that legislation relevant to ONR’s work is kept.
2. Summary and close – Rachel Grant and Dr Jill Sutcliffe
   1. RG and JS thanked all attendees for joining the meeting. For those who had attended in person, they wished everyone a safe onward journey.

**The meeting closed at 1500.**

1. [Guidance on the application of ALARP](https://www.onr.org.uk/operational/tech_asst_guides/ns-tast-gd-005.docx) [↑](#footnote-ref-2)
2. Ethics Commission (2011) *Germany’s Energy Turnaround - A Collective Effort for the Future,* presented by the Ethics Commission on a Safe Energy Supply, Berlin, 30 May 2011 [↑](#footnote-ref-3)