**NNB GenCo (SZC) application for site licence grant**

**Assessment of security arrangements**

 Assessment note ONR-CNSS-AN-22-002

Revision 0

April 2023

**ABBREVIATIONS**

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AN Assessment note

CNSS Civil Nuclear Security and Safeguards

CS&IA Cyber Security & Information Assurance

CSSP Construction site security plan

EdF Electricite de France

HPC Hinkley Point C

NISR Nuclear Industries Security Regulations

NNB GenCo Nuclear New Build Generation Company Ltd

NSSP Nuclear Site Security Plan

ONR Office for Nuclear Regulation

PAR Project Assessment Report

SZC Sizewell C

SyAPs Security Assessment Principles

TAG Technical assessment guide

TCO Technical Client Organisation

TIG Technical inspection guide

1 INTRODUCTION

1. Nuclear New Build Generation Company (Sizewell) Ltd (NNB GenCo (SZC)) has applied for a nuclear site licence to construct two EPRTM reactors at Sizewell C (SZC). This assessment note summarises the findings of the assessment of the security arrangements presented in the Nuclear Site Security Plan (NSSP). The NSSP is the key security document relating to the site licence application.

2. The purpose of the Nuclear Industries Security Regulations (NISR) 2003 (as amended) are to ensure that licensed nuclear sites, nuclear material held on other nuclear premises or during the course of transport, the construction of new nuclear sites adjoining existing operating nuclear sites and sensitive nuclear information (SNI) and uranium enrichment equipment/software held by the civil nuclear industry are protected by an effective security regime.

3. Prior to any potential granting of a nuclear site licence, a nuclear construction site must hold and comply with an ONR-approved construction site security plan (CSSP). If a nuclear site licence was to be granted, SZC must hold and comply with an approved security plan, aligned with the ONR security assessment principles (SyAPs) and in accordance with the requirements of NISR 2003.

2 background

4. This assessment note (AN) presents the findings of the assessment of security arrangements as presented in the SZC NSSP and the supporting documentation provided by NNB GenCo (SZC). Assessments were undertaken in accordance with the requirements of the Office for Nuclear Regulation (ONR) management system. The SyAPs, together with supporting ONR technical assessment guides (TAGs), have been used as the basis for this assessment.

5. This AN addresses the security aspects of the security cornerstone and is written to support a Project Assessment Report (PAR) which is informed by a number of key cornerstone themes. The PAR records ONR’s overall judgement on whether to grant a nuclear site licence to NNB GenCo (SZC). The AN also considers how ONR anticipates the further development of the security arrangements commensurate with activity on site and the associated level of risk.

3 security intervention strategy AT SZC

6. ONR’s security interventions are proportionate, targeted and integrated with the NNB GenCo (SZC) project milestones and ONR’s licensing strategy. Emphasis is placed on:

* assessment of the adequacy of the standards, procedures, and arrangements relating to physical, personnel and information security, presented in the ONR-approved SZC NSSP.
* compliance with the standards, procedures and arrangements detailed in the ONR-approved NSSP and associated documents
* assessment, based on the documented evidence provided in the security plan, of NNB GenCo’s capability to construct and then operate a nuclear facility.

4 status of security arangements at SZC

**Nuclear Site Security Plan**

7. NNB GenCo (SZC) submitted the NSSP in January 2022 for ONR approval. The NSSP is the key document as it presents the claims, arguments and supporting evidence as to how the dutyholder will maintain a satisfactory security regime for the life cycle of the facility. The NSSP was assessed by ONR and is currently being assessed and it is anticipated that a decision on approval will be made by mid-May 2022[[1]](#footnote-1).

8. In addition to detailing the security standards, arrangements, and procedures during the construction phase of the project, the NSSP should also demonstrate to ONR that NNB GenCo (SZC) has a comprehensive understanding of what the security regime will be when the facility is operational and how the arrangements will meet regulatory expectations. The NSSP should demonstrate that NNB GenCo (SZC) will maintain the capacity and capability to securely operate a nuclear facility. It is acknowledged that specific details of the security arrangements during the later stages of the project will not yet be confirmed, but these will be included in future iterations of the NSSP. To benefit from the operational experience gained at Hinkley Point C (HPC), NNB GenCo (SZC) has used the principles of ‘intelligent replication’ to adopt and adapt some of the security arrangements currently employed at HPC.

**Engagement**

9. More engagement will be held with NNB GenCo (SZC) staff to gain further confidence that NNB GenCo (SZC) continues to develop and implement adequate security arrangements commensurate with the extant threat and risk profile of the project. Progress on addressing shortfalls in the arrangements presented in the NSSP, to agreed priorities and timescale, will continue to be monitored during routine engagement. ONR recognises that some of these arrangements may not be fully developed and, if so, ONR will expect NNB GenCo (SZC) to have plans in place to further develop the arrangements and achieve an appropriate level of maturity as the project progresses.

10. During routine engagement and interventions, NNB GenCo (SZC)’s proposals will be considered and ONR will make judgements against the regulatory expectations set out in SyAPs, relevant TAGs/Technical Inspection Guides (TIGs), Approved Codes of Practice and other relevant international standards and guidance (normally referenced from TAGs/TIGs and SyAPs). During engagement with NNB GenCo (SZC), assurances will be sought that they have the capability and capacity to construct, and then operate a nuclear licensed site.

**Look Ahead**

11. NNB GenCo (SZC) and the EdF Technical Client Organisation (TCO) security staff continue to develop key areas in support of the proposed security arrangements at SZC - the current construction phase and the subsequent transitional phases through to full operations.

12. The continued development of all aspects of the security regime will be subject to ongoing discussion between NNB GenCo (SZC), TCO staff and ONR inspectors to ensure alignment with regulatory expectations. The NSSP will be further developed in alignment with the SyAPs and to reflect the changing security regime commensurate with the level of construction activity and proportionate to the risk profile of the project.

5 ConclusionS

13. In summary, the ONR site security inspector is content that the security arrangements in the SZC NSSP meet regulatory expectations and is confident of the continued compliance with those arrangements.

14. There are no immediate security concerns which would raise objections to the granting of a nuclear site licence.

6 REFERENCES

1. Sizewell C Nuclear Site Security Plan Version 1 (Document Nos 100944103 (Part 1), 100944105 (Part 2) and 100944106 (Part 3) ) (CM9 folder: 4.4.2.25763.).

2. ONR Security Assessment Principles 2017 edition. <http://www.onr.org.uk/syaps/security-assessment-principles-2017.pdf>

1. The NSSP was subsequently approved [↑](#footnote-ref-1)