

Inspection Record – Dutyholder Report			
Accountancy and Control Plan (ACP) inspection (QBSZ)			
Inspection ID	IR-53225	Inspection Date(s)	31/10/2024 For 2 Days
Dutyholder	Westinghouse Springfields	Site	Springfields Works
Inspection Type	Announced Planned	Site Area / Group	
ONR Purpose	Safeguards	Inspection Source	
Subject (s) of Inspection			
Activity			RAG Rating
NSR19 Reg09 - Operation of an accountancy and control plan			GREEN
FSE 3 Competence Management			GREEN
NSR19 Reg07 - Accountancy and control plan			GREEN
FSE 1 Leadership and Management for NMACS			GREEN
System (s) – where applicable			
Inspector(s) taking part in Inspection			
Lead Inspector [REDACTED]			
Attending [REDACTED] [REDACTED] Office for Nuclear Regulation			

[REDACTED]	[REDACTED]	Office for Nuclear Regulation
[REDACTED]	[REDACTED]	Office for Nuclear Regulation

This report is an automated extract of data from the ONR WIRed Inspection database.

1. Scope

1.1 Aim of Inspection

ONR nuclear safeguards inspectors and a specialist inspector (leadership and management) conducted a safeguards compliance inspection at Springfields Fuels Ltd, on 31 October and 01 November 2024. The purpose of this inspection was to seek evidence in support of Springfields Fuels Ltd.'s compliance with the Nuclear Safeguards (EU Exit) Regulations 2019 (NSR19).

ONR forms regulatory judgements and provides a rating in line with ONR's inspection rating guidance of Springfields Fuels Ltd.'s compliance against the following regulations in NSR19:

Regulation 7 – Accountancy and control plan

Regulation 9 – Operation of an accountancy and control plan

To form effective regulatory judgements on Springfields Fuels Ltd.'s compliance with the NSR19 regulations listed above, where relevant to inspection activities, ONR considers the fundamental safeguards expectations (FSEs) detailed in the ONR Guidance for Nuclear Material Accountancy Control and Safeguards (ONMACS).

In particular:

FSE 1 - Leadership and management for NMACS

MACE 1.2 - Capable organisation

FSE 3 - Competence management

1.2 Inspection Scope

The recent and upcoming changes in the Springfields Safeguards team, and the numerous projects on site which implementation will impact the safeguards activities, provided an appropriate opportunity for leadership and management for Nuclear Material Accountancy, Control and Safeguards (NMACS) to be evaluated.

ONR sought to draw an independent and informed regulatory judgement that Springfields Fuels Ltd. has appropriate arrangements for maintaining adequate organisation capability for accountancy and control of nuclear material and that arrangements are in place to ensure that personnel with specific responsibilities in this area are competent to fulfil their role.

ONR sought evidence of the implementation of the arrangements described and

referenced in the Accountancy and Control Plan (ACP) to ensure appropriate capability to implement and maintain the NMACS arrangements for its undertakings, to manage the competence of those with assigned NMACS roles and responsibilities.

1.3 Relevant Regulatory Guidance

The following regulatory guidance corresponds with this inspection

Name
SAFEGUARDS TECHNICAL INSPECTION GUIDE
ONR Nuclear Material Accountancy, Control, and Safeguards Assessment Principles (ONMACS)
Nuclear Material Accountancy Technical Assessment Guide Safeguards

2. Summary Statement

This inspection focused on seeking regulatory confidence that the operator is maintaining an appropriate system of accountancy and control of qualifying nuclear material that includes suitable arrangements for organisational capability and competence management.

We sought evidence of adequate arrangements and their implementation through discussions with Springfields Fuels Ltd. staff, a review of records and documentation relevant to FSE 1 and FSE 3, in order to make judgements of alignment against regulatory expectations. To support consistency in our judgements we utilised Nuclear Material Accountancy, Control, and Safeguards Assessment Principles (ONMACS) [ONR-CNSS-MAN-001, issue 5], and ONR's Technical Inspection Guide (TIG) for Safeguards [SG-INSP-GD-001, issue 4].

Based on the inspection activities sampled, we judged that Springfields Fuels Ltd. was maintaining an appropriate system of accountancy and control of qualifying nuclear material, in compliance with the requirements under regulations 7 and 9 of NSR19 and was adequately implementing those arrangements in line with our regulatory expectations detailed in FSE 1 (in particular MACE 1.2) and FSE 3 of ONMACS, we judged that the inspection is rated GREEN.

We provided regulatory advice in relation to the evaluation of internal safeguards training, observed good practices and minor observations which were identified during the inspection. These were fed back to Springfields Fuels Ltd at the end of the inspection, who accepted the regulatory advice.

3. Record & Judgement

3.1 Staff seen as part of Inspection

The following principal staff were seen as part of this inspection

Name	Role	Company
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.
[REDACTED]	[REDACTED]	Springfields Fuels Ltd.

3.2 Record

Evidence

This intervention targeted the arrangements as described by Springfields Fuels Ltd in their ACP (SSI 945, Rev. 1, January 2023) regarding leadership and management for NMAC&S, including organisational capability, and competence management, with the aim of the inspection to assess the implementation of these arrangements.

For this intervention, we also took into account a previous joint LC36 compliance inspection (IR-51105) with an ONR LMfS specialist inspector at Springfields Fuels Ltd., during which some points of concerns were identified in relation to FSE 1 related to leadership and management for NMAC&S and FSE 3 related to competence management.

FSE 1 - Leadership and management for NMAC&S

Prior to the inspection, we reviewed the relevant arrangements referenced in the Springfields Fuels Ltd's ACP relating to FSE 1: the terms of reference of the Springfields

environment, health and safety committee (SEHSC), the Springfields site instruction (SSI) 819 for Springfields Safeguards policy implementation, the SSI 538 for organisational capabilities describing the arrangements for managing organisational capability to ensure that the dutyholder is compliant with LC36 and how changes to organisational capabilities are managed, the SSI 532 setting out the NMAC&S standards at Springfields Fuels Ltd including the roles and responsibilities for safeguards, the SSI 791 defining the site wide roles.

Springfields Fuels Ltd presented their NMACS leadership and governance structure. It confirmed the main points described in Springfields arrangements and provided us with useful information on the recent changes at Springfields with impact on leadership management. A new Managing Director was designated in June 2024, who initiated changes in the Board composition. The Board now comprises more members, two of the new members being from Westinghouse global business (from outside the UK business), offering more diversity in the competence and bringing some independence to the Board. We also identified that several Board members are SQEP for safeguards at Springfields (for example the Head of oxide and the Head of uranium recovery), which may help the Board in setting directions to achieve and sustain high standards of NMAC at Springfields. We observed this as an element of a good practice.

Observation 1– We observed as a good practice the changes and diversification of the Board composition.

From the discussions with the Managing Director and the Head of Site, we noted their clear intention to give more consideration to safeguards at Springfields. They reflected that until recently, the priority was given to safety and security as these areas gave rise to more concerns than safeguards. We were provided with the safeguards policy endorsed by the new Managing Director the month after his nomination. We were satisfied that this policy defined clear requirements covering safeguards at Springfields and referred to UK regulations and international standards. We sampled the August 2024 Head of site report to the Board and we were satisfied to note that safeguards was visible in the report. During the LC36 compliance inspection (IR-51105) we observed that safeguards was raised at the Board by exception, such as when Springfields' ACP was assessed by ONR and judged as non compliant with NSR19. We noted this change as an improvement in leadership and management for NMACS.

As a consequence of the safeguards policy being implemented, Springfields has commenced revising site arrangements to enable the management system to better incorporate visibility of NMACS based on the UK regulations and international standards. We sampled evidence of these changes considering the SSI 949 for the management of new build projects. The arrangements initially comprised quality plans and related guidance for safety and security. The version under revision was extended and comprises now two separate quality plans: one for safety and one for security and safeguards as their requirements have to be considered at almost similar stages of the plan. Specific guidance for safeguards quality plan has also been included to the document, which we judged to be satisfactory.

Observation 2– From the evidence gathered, it appears that the profile of safeguards at

the board has been improved; it is visible in the arrangements in place at Springfields, signposting safeguards to be more specifically taken into account and reflects a positive change in the safeguards culture at Springfields.

In relation to the roles on the Board, the Managing Director explained that he combines his role as Managing Director and the Chair role on the Board. We judged this combination as not in line with ONR TAG for corporate governance for safety (NS-TAST-GD-104); good practice for an effective board composition would be to appoint an effective chair with individual directors. We observed that appointing an independent director may be beneficial if clearer independence is sought. In reaction to this observation, Springfields informed us that an independent review of Board governance was being undertaken, and that the combination of roles pointed at by ONR has been recognised in this process.

Observation 3– Springfields may reconsider the Board composition taking into account good practice described in the ONR TAG for corporate governance for safety (NS-TAST-GD-104), for example the separation of the roles Managing Director and a Chair on the Board, and the possible inclusion of an independent Director.

We reviewed the SSI 931 for Independent Nuclear Assurance (INA) prior to our discussion with the Springfields INA Technical Leader. We sampled the INA program for NMACS. We judged that the arrangements in place are adequate and appropriate, that the INA function was clearly structured and correctly resourced.

However we observed a lack of clarity with regards to assurance processes implementation, and from the discussions with the INA Technical Leader, we noted that the way INA reports to the board didn't fully align with SSI 931. We observed that although Springfields has strong arrangements in place for INA, they may ensure that these arrangements are implemented properly or, if necessary, clarify these arrangements.

Observation 4– Springfields may review the SSI 931 and consider the description of the roles within the INA function and the need to clarify who reports to the Board for the INA function to make it consistent with the practice.

From the discussions with the Managing Director, the Head of Site and the Security and Safeguards Manager, we were satisfied that Springfields has adequately resourced NMACS governance structure including Board members responsible for NMACS. In the ACP, Springfields states that oversight of nuclear safeguards is the responsibility of the Board but delegated to the Projects & Services Department (PSD), under the Head of Site. We sampled the SSI 538 setting out the arrangements for organisation capability including management of change (MOC) at Springfields, the SSI 890 that details the nuclear baseline for PSD, and the SSI 791 that describes the site wide roles and identifies the site subject matter experts. We targeted these arrangements because in a previous inspection (IR-51105) shortfalls in how MOC was managed were identified. As we reviewed the management of change with regards to the Deputy Safeguards Manager (also SME) retirement planned for the end of 2024, we were provided with the related management of change risk assessment (MOCRA ref. 24/1283) and associated succession plan. We noted that the MOCRA was raised in a timely manner by a SQEP person different from the person who was leaving for retirement, allowing a more transparent assessment; the

assessment was also supported by a detailed succession plan. Based on the evidence gathered, we were satisfied that the arrangements in place were in line with ONR guidance and were adequately implemented.

Observation 5—We observed a strong Springfields culture with a high level of loyalty of the staff. This seems to be a strength for Springfields, but could also be a source of weakness as it may inhibit the raising of concerns and opportunities to improve. Springfields may think about maintaining constructive criticism, make more use of independent reviewers to avoid complacency and dependence on key staff.

From the arrangements reviewed, the evidence gathered, we judged that Springfields has adequate arrangements in place to allow a suitable leadership and management for NMACS structure. We judged that Springfields Fuels Ltd aligns with the FSE 1.

FSE 3 - Competence management

We reviewed the relevant arrangements referenced in the Springfields Fuels Ltd's ACP relating to FSE 3: the SSI 532 setting out the NMAC&S standards at Springfields Fuels Ltd and the roles and responsibilities for safeguards, SSI 718 detailing the arrangements at Springfields to meet the requirements of SSI 532 with respect to Material Custodians, the SSI 890 detailing the nuclear baseline.

Springfields Fuels Ltd presented their arrangements for competence management and the training structure. Roles and responsibilities for safeguards were clearly defined in the arrangements. We reviewed the nuclear baseline and the uranium recovery baseline, we were satisfied that those with responsibilities for safeguards were clearly identified in the arrangements, for example: the safeguards team members, Material Custodians (MC), operational NMAs and other DAP (managers and staff involved in the physical inventory taking and internal verification). We were provided with the operational capability index (OCI) where the training requirements that allow to maintain the expected level of competence in safeguards is defined for all those who are involved in safeguards activities. The Security and Safeguards Manager is responsible for determining the adequate level of training for each relevant group of staff members. Several levels of safeguards training are delivered depending on defined learning objectives; they are delivered by safeguards team members, mainly a nuclear material accountant. The MC and DAP can only be officially appointed once they have completed the required training and passed an evaluation test. The completion of the training and the related training plan is logged in the trainee's role proficiency graph (SSI 314-RPG). The training plan will comprise some refreshers to the initial safeguards training, also submitted to final assessment. In response to our queries, Springfields has identified that evaluation of training takes place, typically via feedback from those in training. We provided regulatory advice that Springfields should further build upon this in relation to ensuring the training is meeting its objectives and improvement are being identified, aligning more with FSE3 to ensure competence development is more robustly evaluated.

We targeted our inspection sample on the management of the site safeguards team given changes due to impending retirement of the Deputy Safeguards Manager. Springfields took this coming change in the staff as an opportunity to identify more clearly the roles and

associated competences, define a new organisation of the safeguards function, evaluate the competences and need for training of each member of the team and identify where there could be gaps. We reviewed the identified profiles, the team competence evaluation, the team training plan, the present and future organigrams for the safeguards function. The information and evidence presented by Springfields highlighted that there was a relatively high degree of reliance on the Deputy Safeguards Manager, to fulfil many of the needs of safeguards competence management, including elements of training and assessment of personnel. Springfields provided outputs of a safeguards resilience exchange programme initiated with the support of Westinghouse experts, with the purpose to establish the level of safeguards resilience at Springfields in terms of skills, knowledge, training and succession planning and to determine how Westinghouse Global safeguards could provide support and direction. Springfields has also started to collaborate with Urenco Capenhurst to share and compare knowledge and experience in relation to governance and competence management. We observed as good practice that Springfields was seeking to reduce their vulnerability through multiple mitigations such as splitting out the responsibilities of a single individual into several roles, seeking deeper collaboration from industry, particularly similar UK sites and Westinghouse Global, controlling and mitigating risks with actions in an associated MOCRA. In this regard Springfields have a potential opportunity to collaborate on developing a more systematic and robust Safeguards competence management system, providing more resilience for the future.

Observation 6– We observed as good practice that Springfields designed a new structure for the safeguards function and team, focusing on a better definition of competences, assessing the available resources and identifying potential gaps, and building resilience.

Observation 7–We observed as good practice that Springfields collaborates with peers to share good practice and seek support from Westinghouse Global to assure to raise the expected level of competence for the team after a key member retirement.

From the evidence sampled, we judged that Springfields has suitable arrangements for competence management and aligns to the expectations under FSE 3.

Judgement

Based on the sample inspected during the intervention, we judged that Springfields Fuels Ltd. was implementing their arrangements for leadership and management of NMACS and competence management in line with the regulatory expectations, in particular FSE 1 and 3, and was compliant with NSR19 regulations 7 and 9.

We identified no shortfalls, we provided regulatory advice in relation to the evaluation of internal safeguards trainings, we highlighted observations made during the inspection.

Upon consideration of the ONR guidance on inspection ratings, we judged that a rating of GREEN (no formal action) was appropriate.

Observations / Advice

Regulatory advice—Springfields have identified that evaluation of training takes place, typically via feedback from those in training. Springfields should build upon this process in line with FSE3 to ensure competence development is more robustly evaluated, particularly in terms of whether the competence development opportunities are achieving the necessary standards of performance that are required. This will necessarily require a more objective form of evaluation than participant feedback comments alone.

Observation 1— We observed as a good practice the changes and diversification of the Board composition.

Observation 2— From the evidence gathered, it appears that the profile of safeguards at the board has been improved; it is visible in the arrangements in place at Springfields, signposting safeguards to be more specifically taken into account and reflects a positive change in the safeguards culture at Springfields.

Observation 3— Springfields may reconsider the Board composition taking into account good practice described in the ONR TAG for corporate governance for safety (NS-TAST-GD-104), for example the separation of the roles Managing Director and a Chair on the Board, and the possible inclusion of an independent Director.

Observation 4— Springfields may review the SSI 931 and consider the description of the roles within the INA function and the need to clarify who reports to the Board for the INA function to make it consistent with the practice.

Observation 5—We observed a strong Springfields culture with a high level of loyalty of the staff. This seems to be a strength for Springfields, but could also be a source of weakness as it may inhibit the raising of concerns and opportunities to improve. Springfields may think about maintaining constructive criticism, make more use of independent reviewers to avoid complacency and dependence on key staff.

Observation 6— We observed as good practice that Springfields designed a new structure for the safeguards function and team, focusing on a better definition of competences, assessing the available resources and identifying potential gaps, and building resilience.

Observation 7—We observed as good practice that Springfields collaborates with peers to share good practice and seek support from Westinghouse Global to assure to raise the expected level of competence for the team after a key member retirement.

3.3 Regulatory Issues

The following regulatory issues were raised, reviewed or closed as a result of this inspection.

Issue	Title
-------	-------