



ONR INSTRUCTION			
Provision of information to the public through production and distribution of SSG/LCLC/LLC reports and attendance at SSG/LCLC/LLC meetings by ONR Inspectors			
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TABLE OF CONTENTS

1. PURPOSE AND SCOPE	2
2. BACKGROUND	4
3. RESPONSIBILITIES AND PROCEDURE.	4
4. APPENDIX A – FORMAT AND CONTENT OF SSG/LCLC/LLC REPORTS.	7
5. APPENDIX B – PRODUCTION OF SSG/LCLC/LLC REPORTS.	8
6. APPENDIX C – FORMAT AND CONTENT OF COVERING LETTER.	8
7. APPENDIX D – DISTRIBUTION OF SSG/LCLC/LLC REPORTS.	9
8. APPENDIX E – DIRECTION TO THE OFFICE FOR NUCLEAR REGULATION REGARDING THE SUPPLY OF INFORMATION IN RELATION TO THE NUCLEAR SAFETY OF CIVILIAN INSTALLATIONS.	10
9. TABLE 1 – LICENSED AND OTHER NUCLEAR SITES – LOCAL COMMUNITY GROUP DESIGNATION.	12

1. PURPOSE AND SCOPE

- 1.1 This instruction outlines the format and content to be adopted for the production of ONR's site stakeholder reports. These reports are provided to local community groups for sites regulated by ONR (see Table 1 for listing). It also covers the distribution of the reports internally and externally to the ONR website (www.onr.org.uk). Additionally, ONR guidance is provided to ONR inspectors attending the meetings.
- 1.2 This document assists in implementing Article 8(1)(a) and (b) of Council Directive 2014/87/Euratom of 8 July 2014 amending Directive 2009/71/Euratom, by highlighting ONR's regulatory expectations concerning the provision of nuclear safety related information to the public by licensees, and by defining how ONR may meet the new legal powers granted to ONR under an associated Government Direction (Appendix E – the wording in this Direction closely follows the wording of Articles 8(1)(a) and (b) of the NSD) covering the provision of site nuclear safety information and nuclear regulatory information). The Direction places a new legal requirement on ONR in that 'ONR must, in connection with its purposes under section 68 of the Energy Act 2013, provide or make otherwise available necessary information in relation to the nuclear safety of nuclear installations and its regulation'. There are two aspects of this obligation: (a) ONR must ensure that licensees "provide or otherwise make available" 'necessary' information concerning nuclear installations and (b) ONR must directly "provide or otherwise make available" 'necessary' information covering the regulation of such installations. The terms 'provide or otherwise make available' in this context effectively means that all such 'necessary' information should be put into the public domain. This should be understood to include publication of reports; posting of material on websites; or, in the context of this guidance note, the distribution of such material at stakeholder events and/or regular meetings ONR attends or participates in.

Article 8(1) of the Directive contains the following text: Member states shall ensure that necessary information, (in accordance with relevant legislation and international instruments, provided that this does not jeopardise other overriding interests, such as security, which are recognised in relevant legislation or international instruments), in relation to the nuclear safety of nuclear installations and its regulation is made available to workers and the general public, with specific consideration to local authorities, population and stakeholders in the vicinity of a nuclear installation. That obligation includes ensuring that the competent regulatory authority and the licence holders, within their respective fields of responsibility, provide the following in communication policies:

(a) Information on normal operating conditions of nuclear installations to workers and the general public; [*see paragraphs 2.1, 2.2, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.11, 3.12, 3.13, 3.14, Appendix A [Sections A1 – A2], Quarterly Site Report template ONR-DOC-TEMP-008 Revision 5 (Section 2.1 - 2.2) and NS-INSP-GD-059 Revision 5, NS-INSP-GD-064 Revision 3 covering ONR inspection practices and publication of Intervention record summaries, in line with ONR's policy to apply open, transparent, and effective dialogue with stakeholders including licensees*]; and

(b) Prompt information in case of incidents and accidents to workers and the general public and to the competent regulatory authorities of other Member States in the vicinity of a nuclear installation [*see paragraphs 2.1, 2.2, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.11, 3.12, 3.13, 3.14 Appendix A (Sections A1 – A2), Quarterly Site Report template ONR-DOC-TEMP-008 Revision 5 (Section 2.2, 3) and ONR-OPEX-GD-001 Revision 5*].

- 1.3 In the context of Directive Article 8(1) (a), the term 'necessary' regulatory information for 'normal operating conditions ...' is taken to be information concerning routine regulatory matters on a Nuclear Licenced site, including the outcome of ONR

interventions, in particular in relation to the compliance inspections against legislation which ONR regulates to confirm safe operations, and covered under 'routine matters' within ONR Site Reports. In the context of 8(1)(b) 'Incidents and accidents' 'necessary' regulatory information should be covered under 'non routine' matters within ONR Site Reports, this includes Incidents and Accidents that meet the Ministerial Reporting Criteria as defined in *ONR-OPEX-GD-001 Revision 5* (for examples of both see section 2.2 and 3 and A9 Link to [ONR Site Report \(SSG LCLC LC\) Template document](#))

- 1.4 Licensees' compliance with licence conditions, and with ONR regulatory expectations set out in relevant Technical Inspection Guides, is deemed sufficient to meet the requirements of the Directive. However, not all the provisions of the Directive could be met through this approach. BEIS and ONR legal advice was that nothing less than a legislative measure might be used to implement Articles 8(1)(a) and (b) of the Directive which introduce further requirements for the provision of nuclear safety information and its regulation to workers and to the public. A legislative measure in the form of a Government Direction from BEIS dated 12 July 2017, under Section 92(1) of the Energy Act 2013 (Appendix E) was therefore introduced to meet the UK's Article 8(1)(a) and (b) obligations, with specific consideration given to the provision of information by licensees (covering site operations) and by ONR (covering regulatory matters) to local authorities, population and stakeholders in the vicinity of civilian nuclear installations (Nuclear Power Plants, Nuclear Fuel Fabrication Plants, Enrichment Plants, Research Reactors, Reprocessing Plants & Spent Fuel Plants).
- 1.5 The Direction can be found at the following link and Appendix E. It closely follows the wording of Article 8(1) (a) and (b) <http://www.onr.org.uk/documents/2017/direction-supply-of-information.pdf>. The requirements of the Direction under the Energy Act make ONR responsible for ensuring that licensees make necessary nuclear safety information available, either published directly by licensees or published by ONR. The requirements of the Direction also make ONR directly responsible for ensuring that all 'necessary' information covering the regulation of each relevant site is also published.
- 1.6 Paragraph 2 of the Direction makes ONR legally responsible for ensuring that this type of information-sharing of 'necessary' licensee nuclear safety site information occurs. It is ONR's expectation that this obligation will be met using existing arrangements. However, the Direction gives ONR a new legal power to publish licensee information where it determines that available necessary nuclear safety information covering 'normal operations' and 'incidents and accidents' is not being made available to the identified persons and bodies in Article 8(1) (a) and (b) of the Direction. It is the responsibility of nominated site inspectors to determine that nuclear safety information and its regulation is being made publically available in compliance with the Direction. When assessing what nuclear safety information is being provided to the public and whether it is adequate for the purposes of the Direction, the site inspector should consider the particular unique circumstances of each licensed site, taking cognisance of any feedback received from members of the public and or organisations representing the public (see paragraph 3.4 below).
- 1.7 If the site inspector identifies shortfalls in the necessary information being shared by the licensee, they are to write to the licensee detailing the perceived shortfalls, stating the powers allocated to ONR under the Direction and stating that under such powers 'available necessary information' will be published by ONR if the licensee fails to publish within a specified timescale (see paragraph 3.4 below).
- 1.8 The Directive and Direction apply to civilian nuclear installations (Nuclear Power Plants, Nuclear Fuel Fabrication Plants, Enrichment Plants, Research Reactors, Reprocessing Plants and Spent Fuel Plants) as defined in the Direction (see Appendix E)

In addition to paragraphs 2.1, 3.1, 3.2, 3.4 and 3.5 also see 3.11 – 3.14 and Appendix A – General Guidance for inspectors (Sections A1 – A2) and the ONR Site Report SSG, LCLC, LC template document (Sections 1 – 4), at Appendix A, A9 Link.

2. BACKGROUND

- 2.1 Local community groups meet to discuss site matters in relation to the local population. These groups have no basis in statutes. However, as part of ONR’s commitment to make information about inspection and regulatory activities relating to sites that it regulates available to the public (and to meet ONR legal obligations concerning the publication of ‘necessary’ regulatory information – see Appendix E), reports are produced for distribution to these groups.
- 2.2 ONR site or project inspectors attend the group meetings to explain ONR’s regulatory activities, the findings of this work, to provide clarification arising from information contained in their reports and to respond to questions from group members. There are currently three types of local community group: Site Stakeholder Groups (SSG); Local Community Liaison Councils (LCLC); and Local Liaison Committees (LLC). The different terminology is for historical reasons, and in many cases related to site ownership. There are also some constitutional differences between committees, in chairmanship, meeting venue and frequency, for instance.

3. RESPONSIBILITIES AND PROCEDURE

Production of the report

- 3.1 The periodicity for producing ONR site reports aligns with the frequency of local stakeholder group meetings. The ONR Site Inspector, in agreement with the responsible Superintending Inspector Delivery Lead (DL), shall produce their report on a frequency that coincides with that of the particular site stakeholder meeting. As a minimum there should be two reports produced per year in relation to each site. In this way ONR meets its legal obligation under a Government Direction (Appendix E) to publish ‘necessary’ nuclear safety information covering the regulation of relevant sites. However, there are some sites in the final stages of decommissioning and clean-up, prior to being de-licensed by ONR, that do not hold meetings with local stakeholders. ONR does not therefore produce specific reports on its interactions on these sites. However, as for all licensed sites, ONR publishes summaries of Project Assessment Reports (PARs) and Intervention Records (IRs) associated with permissions issued and interventions undertaken. The publication of this information is deemed sufficient to meet ONR’s legal obligation to publish ‘necessary’ nuclear safety information covering the regulation of these sites.
- 3.2 The nominated ONR Site Inspector should ensure that the report is finalised four weeks before the next SSG, LCLC or LLC meeting.
- 3.3 The report shall be in line with guidance provided in Appendix A (Sections A1 - A2) and the Site Report template ONR-DOC-TEMP-008 Revision 6 (Sections 1- 4, which set out normal operating conditions and incident / accident reporting requirements; further guidance on incident reporting can be found in ONR-OPEX-GD-001 Revision 5.
- 3.4 To ensure that the UK obligations of Article 8(1) (a) and (b) of the Nuclear Safety Directive 2014/87/Euratom and associated Direction (appendix E) are adequately met by the Licensee, ONR, through the site inspector, will in the first instance review both ONR (LLC/LCLC/SSG, PARs and IRs) and Licensee’s reports to ensure the Licensee’s and ONR’s compliance with the Direction, i.e. all necessary nuclear safety information covering the site’s operation and its regulation of the site is to be published. The site inspector will undertake this task as part of routine engagement with the site and in particular through input to LLC/LCLC/SSG meetings. Where the

inspector feels that there are shortfalls in the information provided by the Licensee in complying with the Directive, this will be recorded in either a Contact Record (CR) or Intervention Record (IR) as appropriate, escalated through the appropriate Regulatory Interface Meeting (RIM) and confirmed in writing as noted in paragraph 1.7. Similarly, where a site does not produce a LLC/LCLC/SSG report, the site inspector should escalate any such concerns they have through the relevant RIM, confirming this in writing and taking appropriate action, in consultation with their Superintending Inspector, to invoke powers under the Direction and publish available necessary information if the Licensee fails to do so within a specified period. ONR Policy and Communications should also be informed where this is the case. Where a site inspector is concerned that ONR has not met the requirements of the Direction to provide all 'necessary' information concerning nuclear safety regulation, this information should be included within the next site inspector's LCC/LCLC/SSG report or published via some other means agreed with the DL and ONR Policy and Communications. To promote consistency of approach, the site inspector drafting the report should follow the guidance on format and content set out in Appendix A.

- 3.5 The draft inspector site SSG/LCLC/LLC report should be recorded in CM9 and forwarded to Divisional Delivery Support (DDS) for distribution to the communications team, who will review each report to offer a 'non-technical' view on the content and suggest any amendments to the text, while also identifying any potential reputational issues which might require further stakeholder briefing or external positioning (e.g. 'lines to take.')
- 3.6 DDS shall forward the draft report to the DL for review which includes ensuring formatting and use of plain English.
- 3.7 The DL should review and discuss any significant issues contained in the draft with the Site Inspector and resolve these and when satisfied should confirm DL approval via an email to the relevant Divisional DL account. This should be completed within one week.
- 3.8 The DL should email confirmation of approval and that the report can be finalised in CM9 to their relevant DDS account.

(The process flow diagram at Appendix B shows the process for drafting the report and the internal approvals process).

Distribution of the report

- 3.9 The relevant Division's DDS team is responsible for prompt distribution of the report to the relevant licensed site, other regulatory bodies and internally within ONR. To facilitate this they should:
 - finalise the report on the CM9 system (unless already done by the inspector).
 - produce a covering letter/e-mail in the nominated site inspector's name (See Appendix C for text of covering letter to be used).
 - for the Welsh sites, Trawsfynydd and Wylfa, arrange for the report to be translated into Welsh, through translation services.
 - send a covering letter with the report attached to the site, and/or email them, if agreed with the site.
 - distribute the report by email to the ONR email account for the ONR Communications Team to publish onto the ONR website. The ONR communications team will publish the report on the ONR website, having

received it no later than one week before the next SSG, LCLC, LLC meeting and attendance at local community group meetings.

- monitor the timings and status of each report to assist (thus meeting the requirements of the Direction (Appendix E) for ONR to publish all 'necessary' information concerning the nuclear safety regulation of relevant sites).

(Please see Appendix D regarding distribution of SSG/LCLC/LLC reports and table 1 for full listing of sites and their local community groups).

3.10 Attendance by ONR inspectors at SSG/LCLC/LLC etc. meetings is formally in the capacity of 'observer' as opposed to 'member', though they will usually be called upon to participate by reporting verbally in support of their report and to respond to any questions arising from members of the group, or members of the public.

3.11 The points set out below are for guidance purposes for ONR attendees:

- a. ONR attendees should not participate in the general discussion, except to intervene if the meeting would otherwise be misled on matters relating to ONR's remit of security and safety, where ONR has a corporate position which should be represented or to provide information that they consider the licensee has not provided to meet the requirements of Article 8(1) (a) and (b) of Council Directive 2014/87/EURATOM of 8 July 2014 amending Directive 2009/71/EURATOM.
- b. To emphasise ONR's role as an independent regulator serving the public, it is mandatory that inspectors wear ONR identification and not licensee-provided identification. They should sit in an unobtrusive position, and where possible, not with licensee or other nuclear industry representatives.
- c. At the agenda item for the ONR report, inspectors should introduce themselves and invite any questions or points of clarification on the previously circulated report. Inspectors will not routinely give formal presentations, though where invited in advance by the chair or secretariat, will consider positively any opportunity to provide information about regulatory matters to the members and the public.
- d. From time to time it may be appropriate to give a brief insight into ONR's role in relation to site matters and the legal duty for licensees to comply with the licence conditions, Nuclear Industries Security Regulation (NISR) and other legislation, such as conventional health and safety legislation, when conducting its business.
- e. Inspectors can find the latest ONR position on any relevant ONR corporate or general issues on Nucleus. The communications team can provide advice in advance of the meeting and also welcomes feedback from inspectors following the meeting, particularly if anything contentious was discussed.

APPENDICES

APPENDIX A : Format and content of SSG/LCLC/LLC reports

This appendix provides guidance for those inspectors involved in producing the above reports. It specifies the use of standard format and content to promote a consistent approach across all sites and ensures that the UK obligations of Article 8(1) (a) and (b) of the Nuclear Safety Directive 2014/87/EURATOM and associated Direction under Section 92(1) of the Energy Act 2013 are met.

General Guidance for Inspectors:

A1 The purpose of the report is to give an indication to the public of ONR's activities and interests on the licensed/regulated site(s) during the period of the report. It should cover licensee-specific responsibilities and should not seek to justify, excuse or otherwise account for any actions taken by the licensee. The licensee submits its own report to the local stakeholder group. For complex multi-facility sites, an overall Executive summary may be helpful to readers and can be provided if appropriate.

A2 The report should be confined, as far as is possible, to statements about ONR activities in relation to the site (which includes regulatory action, a summary of all compliance inspections and when appropriate significant events that require ministerial reporting) and should be based on statements of fact supported by evidence as appropriate. It should not include subjective matters, for example thoughts, opinions or beliefs. Readers may infer ONR views from the action we took in each case; e.g. issued a licence instrument, a formal enforcement notice or an enforcement letter. When required the Nominated site inspector should add in relevant information that covers conventional health and safety and security activities (adding security information to this report will be dependent on its classification).

A3 The style is important to the purpose of the report and should be suited to the intended reader, i.e. the layperson, not a scientist or engineer. It should be written in clear English, be factual, informative and avoid jargon and unexplained abbreviations. The nominated site inspector should consider the language used in the report and the potential for it to be misinterpreted or cause public concern. The communications team can provide advice and support if necessary.

A4 The report should not include information that may pre-empt or compromise any investigation or associated enforcement action. However, a preliminary statement may be made in relation to incidents where an investigation is in-hand.

A5 This is ONR's independent report and regulatory independence must be maintained. However, the inspector may share a draft of the report with the licensee as a check only on matters of factual accuracy. It might be necessary to withhold information in the interests of security, and inspectors should obtain appropriate advice where necessary.

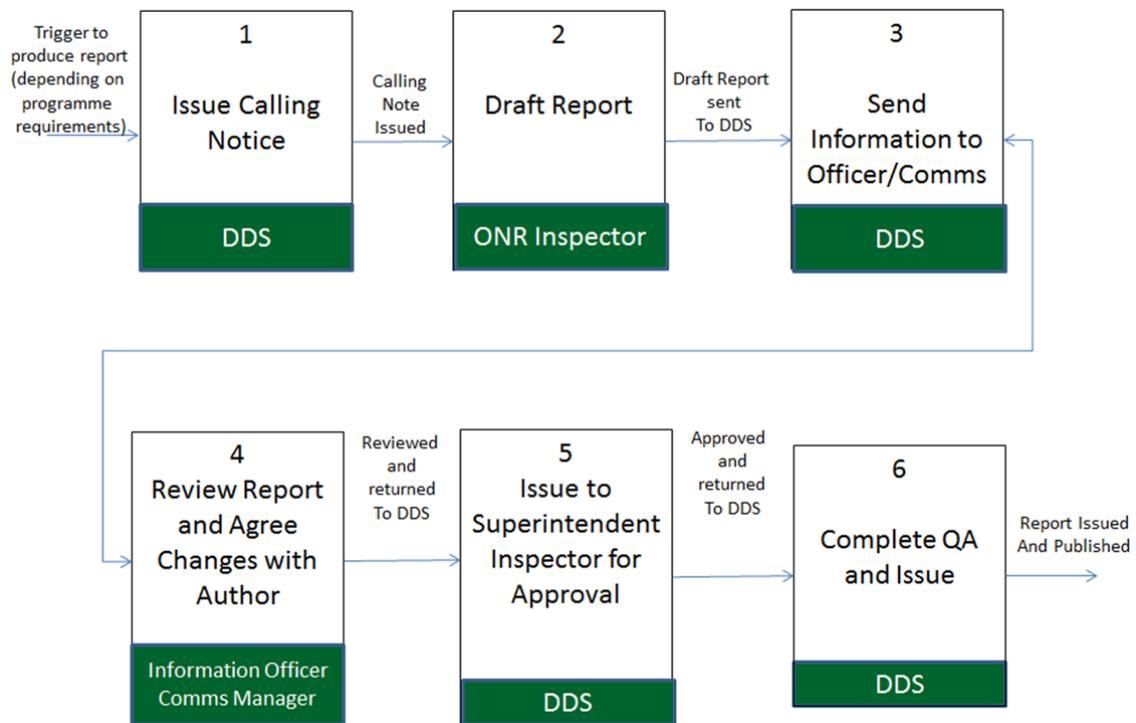
A6 Where significant security considerations apply at a site, e.g. Aldermaston, Sellafield etc. building identifiers, numbers and descriptions should not be used in the text. The preference should be to use generalised descriptions of the facilities.

A7 The reports are Crown Copyright and as such licensees and local stakeholder groups should be asked, where necessary, to include a link to the ONR website rather than copy the reports onto its own websites.

A8 For the report format, an ONR house-style is available and should be followed; this allows easier publishing on the ONR website. The format set out below represents the house-style (e.g. no paragraph numbering, Font Arial 11).

A9 Link to [ONR Site Report \(SSG LCLC LC\) Template document](#). The site inspector should complete Sections 1 – 4, this ensures that the UK obligations of Article 8(1) (a) and (b) of the Nuclear Safety Directive 2014/87/EURATOM and associated Direction under Section 92(1) of the Energy Act 2013 are met.

APPENDIX B – Production of SSG/LCLC/LLC reports



APPENDIX C : Format and content of covering letter to site

The standard text below should be used in a covering letter to site with the ONR report, in some case's agreements could be made with sites to email the report, if so use the text below in the body of the email message with the report attached as a word document.

ONR letter headed paper

Dear Site Manager/Director/nominated people

Licensed Site Name – ONR Site Inspector's SSG/LCLC/LLC Report

Please find enclosed a copy of the ONR site inspector's report for the period (day/month/year to day/month/year).

I should be grateful if you would arrange for it to be copied and sent to all full members of the (site name and committee) and to the site's safety representatives.

A copy of the report will be placed on the ONR web site, the address of which is provided in the report.

Yours sincerely

PP by Divisional Delivery Support

[Inspector's name]

(Principal) Inspector of Nuclear Safety

APPENDIX D : Distribution list for ONR SSG/LCLC/LLC reports

The DDS teams are responsible for distributing the reports to the following organisations/people. Internal distribution, as appropriate, will be by electronic means. If arrangements can be made with external recipients then distribution should also be by email attachments.

External Recipients

Site Licensee (for distribution to all members of SSG/LCLC/LLC and the Site Safety Representatives)

Defence Nuclear Programme Sites and appropriate Ministry of Defence departments e.g. The Defence Nuclear Safety Regulator.

APPENDIX E : Direction to the Office for Nuclear Regulation regarding the supply of information in relation to the Nuclear Safety of Civilian Nuclear Installations.

Energy Act 2013

Direction to the Office for Nuclear Regulation regarding the supply of information in relation to the Nuclear Safety of Civilian nuclear installations.

Laid before Parliament by the Secretary of State for Business, Energy and Industrial Strategy pursuant to section 92(8) of the Energy Act 2013.

Direction under section 92(1) of the Energy Act 2013

Introduction

Section 92(1) (directions from Secretary of State) of the Energy Act 2013 ("the EA 2013") provides a power to the Secretary of State to give the Office for Nuclear Regulation ("the ONR") a direction as to the exercise by it of its functions generally, or any of its functions specifically.

Section 68 (nuclear safety purposes) of the EA2013 provides that ONR's nuclear safety purposes means the purposes of protecting persons against risks of harm from ionising radiations from nuclear sites through measures such as the design and construction of nuclear installations, arrangements for operation and decommissioning, storage arrangements, and arrangements to minimise risks in the event of an escape or release of ionising radiations.

Section 78 (principal function) of the EA 2013 provides that the ONR must do whatever it considers appropriate for the ONR's purposes, including, so far as it considers appropriate, assisting and encouraging others to further those purposes.

Section 87 (provision of information) of the EA2013 provides that the ONR is under a duty to make arrangements to provide information that it holds that is relevant to the ONR's purposes to any person or category of persons (whether or not concerned with matters relevant to the ONR's purposes).

Information will be made available to the general public in accordance with relevant legislation and international instruments, provided that this does not jeopardise other overriding interests, such as security, which are recognised in the relevant legislation or international instruments.

Interpretation

For the purposes of this Direction:

"accident" means any unintended event, the consequences or potential consequences of which are significant from the point of view of radiation protection or nuclear safety;

"civilian nuclear installation" means

(a) an enrichment plant, nuclear fuel fabrication plant, nuclear power plant, reprocessing plant, research reactor facility, spent fuel storage facility; and

(b) a storage facility for radioactive waste that is on the same site and is directly related to a civilian nuclear installation listed in sub-paragraph (a);

"incident" means any unintended event, the consequences or potential consequences of which are not negligible from the point of view of radiation protection or nuclear safety;

"licence holder" means the holder of a nuclear site licence granted under section 3 (grant and variation of site licences) of the Nuclear Installations Act 1965 ("the NIA 1965") in respect of a civilian nuclear installation;

"nuclear safety" means the achievement of proper operating conditions, prevention of accidents and mitigation of accident consequences, resulting in protection of workers and the general public from dangers arising from ionising radiations from civilian nuclear installations.

Direction

In accordance with section 92(1) of the EA2013, the Secretary of State directs the ONR as follows:

1. In the exercise of its functions, including those under sections 78 and 87 of the EA 2013, the ONR must, in connection with its purposes under section 68 of the EA 2013, provide or make otherwise available necessary information in relation to the nuclear safety of nuclear installations and its regulation including:
 - (a) information on normal operating conditions of civilian nuclear installations to the general public, with specific consideration given to the local authorities, population and stakeholders in the vicinity of a civilian nuclear installation; and
 - (b) information promptly, in the event of an incident or accident, to the general public, with specific consideration given to the local authorities, population and stakeholders in the vicinity of a civilian nuclear installation, and to the competent regulatory authorities of other Member States of the European Union in the vicinity of a civilian nuclear installation.
2. In the exercise of its functions, including those under sections 78 and 87 of the EA 2013, the ONR must, in connection with its purposes under section 68 of the EA 2013, ensure that licence holders provide or make otherwise available in relation to any civilian nuclear installation for which they hold a licence the information referred to in paragraph 1 to the persons and bodies identified in paragraphs 1(a) and (b) as appropriate.
3. The ONR may meet the obligations set out in paragraph 2 by obtaining from licence holders in relation to any civilian nuclear installation for which they hold a licence the information referred to in paragraph 1 and providing or otherwise making it available on behalf of the licence holders to the persons and bodies identified in paragraphs 1(a) and (b) as appropriate.

Commencement

This Direction has effect from 15 August 2017

Signed by Richard Harrington MP on behalf of the Secretary of State.

TABLE 1 – Licensed and other nuclear sites – Local Community Group designation

Licenced & Other site	Frequency per annum	Type of Group
Operating Facilities Programme		
Dungeness B (joint with Dungeness A Site)	3	SSG (Joint)
Hartlepool	2	LCLC
Heysham 1 and 2	2	LCLC (Joint)
Hinkley Point B (joint with Hinkley Point A)	4	SSG (Joint)
Hunterston B (joint with Hunterston A Site)	4	SSG (Joint)
Sizewell B (joint with Sizewell A Site)	4	SSG (Joint)
Torness	2	LCLC
AWE Aldermaston & Burghfield	4	LLC (Joint)
HM Naval Base Clyde(incl. Coulport & Faslane)	1	LLC
Devonport Royal Dockyard & HM Naval Base	2	LLC (Joint)
BAE Systems Marine (BAESML), Barrow	1	LLC
Rolls-Royce Marine Power Operations, Derby	2	LLC (Joint)
Rosyth Royal Dockyard	1	LLC (Joint)

Sellafield, Decommissioning, Fuel and Waste Programme

Berkeley and Oldbury (joint meetings)	4	SSG
Bradwell	2	SSG
Chapelcross	4	SSG
URENCO (Capenhurst)	2	SSG
Dounreay (includes NRTE Vulcan)	4	SSG (Joint)
Harwell	3	SSG
GE Healthcare, Amersham	N/A	None convened
GE Healthcare, Cardiff	N/A	None convened
Sellafield (incl. Windscale, Calder Hall and LLW repository at Drigg)	4	SSG (Joint)
Springfields	3	SSG
Studsvik, Cumbria	As Required	SSG
Trawsfynydd	2	SSG
Winfrith	2	SSG
Wylfa	3	SSG
Imperial College, Research Reactor, Ascot	N/A	None convened

New Reactors		
Hinkley Point C (Will become joint with Hinkley Point A & B)	4	SSG (Joint)