



ONR Guidance			
Communication of Operational Experience (OPEX) and Learning via Advice Notes and Alerts			
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1. INTRODUCTION

- 1.1 The process outlined in this guidance provides a mechanism for the dissemination of learning, in accordance with the International Atomic Energy Agency (IAEA) General Safety Requirements and the Regulatory Framework for Safety, GSR Part 1 (Ref 1). Requirement 15 states “The Regulatory Body shall make arrangements for analysis to be carried out to identify lessons to be learned from operating experience and regulatory experience, including experience in other States, and for the dissemination of the lessons learned and for their use by authorised parties the regulatory body and other relevant authorities”
- 1.2 ONR’s Regulatory Intelligence function is responsible for supporting the delivery of this requirement through ONR’s processes (Ref. 4) which are consistent with the International Atomic Energy Agency (IAEA) Safety Standard “Operating Experience Feedback for Nuclear Installations” process (Ref. 6). The audience for this learning are ONR’s Specialisms and Divisions and our duty holders.

2. PURPOSE AND SCOPE

- 2.1 This guidance describes ONR’s system for ‘Advice Notes’ and ‘Alerts’ to distribute intelligence in line with IAEA guidance.
- 2.2 The Sub Division Board (SDB)/Divisional Board or Specialism Meeting may decide an Advice Note or Alert needs to be issued, following identification of learning which has wider application or relevance. This can be as a result of:
- Quarterly or Annual Intelligence Reviews
 - Incidents notified by a duty holder in the nuclear sector or
 - Operating experience identified from outside of the nuclear sector; both domestic and international
- 2.3 Advice Notes are intended to:
- share regulatory and operational experience internally within ONR, including learning arising from incidents, or regulatory intelligence gathered from interventions.
 - support Divisional or Specialism knowledge management highlighting and reinforcing learning identified from historical incidents to ensure that our staff maintain an awareness to common causes of regulatory failure and success
 - share good practice
 - contribute to and support ONR’s learning culture.
- 2.4 An Alert is a communication tool:
- to notify our duty holders of a specific significant concern that without immediate action could result in a serious injury or a threat to public safety or
 - where ONR want to notify duty holders, and other stakeholders of a danger and for them to review and consider if what they are doing is adequate in light of the OPEX or
 - where ONR identify dangerous equipment, processes, procedures or substances as a result of investigations, notifications from other regulators (domestic and foreign) or as a result of our regulatory intelligence process; that could result in a risk to nuclear safety, security, safeguards, or transport (i.e. could affect the achievement of proper operating conditions,

prevention of accidents, mitigation of accident consequences or undue radiation hazards)

3. RESPONSIBILITIES

This section sets out the responsibilities of those involved in delivering this process.

3.1 Technical Director

The Technical Director (or delegate) is responsible for approval of Alerts.

3.2 Professional Leads/Delivery Leads (Approver)

Once the decision has been made that an Advice Note or Alert is required the Professional Lead (PL) or Delivery Lead (DL) should inform the Regulatory Intelligence (RI) Function who will monitor completion via the Approval Register (Appendix 4).

Advice Notes must be approved for publication by the relevant Professional Lead or Delivery Lead responsible for the Specialism/Sub-Division/Division. The PL/DL should also liaise with the Divisional Communications Business Partners (CBP) to check and agree the distribution list and review the content.

Once approved the PL/DL is responsible for communicating the Advice Note to the agreed distribution list, ensuring it is published on the Nucleus RI area and inform the RI Function.

In the case of Alerts the PL/DL should distribute the Alert on behalf of the Technical Director in accordance with Section 5 of this guidance.

3.3 Regulatory Intelligence Lead

The Regulatory Intelligence Lead is responsible for monitoring implementation of this process via the Approval Register and providing any advice or guidance to authors on the drafting of Advice Notes or Alerts. They will provide bi monthly updates to the PL/DLs via email.

To feedback to the TD Board on an annual basis on the health of this process, including an evaluation of the quantity and quality of the communications being produced.

3.4 Regulatory Intelligence Topic Leads (Nuclear, CH&S, CNSS and Transport)

As part of the RI review process the topic leads will take this guidance into consideration when deciding if an Advice Note or Alerts is warranted. The need for an Advice Note will also be considered as part of the response to an incident notified by a duty holder or operating experience identified from outside the nuclear sector, both domestic and internationally.

3.5 Initial Professional Development Programme (IPDP) Lead

The IPDP lead will support the drafting of regular Advice Notes by the IPDP team to develop their learning and indeed ONR learning from historical incidents and to ensure examples of regulatory failures and/or successes are communicated.

3.6 Inspectors

Site and nominated inspectors are responsible for maintaining an awareness of published Advice Notes and Alerts and using the information within to inform their interventions.

3.7 Communication Business Partners

Divisional Communications Business Partners are to review the content of Alerts before any final sign off by the Technical Director. They should also review the proposed distribution list on the Approval Register held by the RI function.

4. PROCEDURE

- 4.1 Specialisms and Divisions will identify the requirement to produce Advice Notes and/or Alerts via a number of means including during quarterly and annual Regulatory Intelligence (RI) reviews. The need to undertake these RI reviews is set out in guidance on HOW2 (Ref. 2 and 3) and in the RI process map on HOW2 (Ref. 4). . Once aware of a matter of concern that poses a risk to health or safety then the Alert system is a mechanism by which to disseminate information.
- 4.2 Once the decision has been made by the DL/PL that an Advice Note and/or Alert is required, an author is assigned by them and a time frame agreed. Alerts require immediate duty holder attention and therefore should be produced and issued as soon as possible. The Regulatory Intelligence lead needs to be informed when an Advice Note or Alert is being drafted and they will monitor progress via the Approvals Register. Any decisions about security or legal implications, due to, for example, an on-going investigation, will need to be considered and advice taken as required.
- 4.3 Communications Business Partners (CBP) must also be notified if an external Alert is to be generated and the expected date for release. The PL/DL should liaise with the CBP to check and agree the distribution list, and to review the content before any final sign off by the Technical Director.
- 4.4 An Alert will normally be approved via the TD Director; although, this may not be possible if the Alert requires an urgent response then the TD Director may delegate this function. Prior to approval, the TD Director or delegate will determine whether consultation is required with members of the Regulatory Leadership Team (RLT) or Senior Leadership Team (SLT).
- 4.5 Once approved the PL or DL needs to arrange for the distribution of the Advice Note or Alert in accordance with Section 5 below.
- 4.6 The Regulatory Intelligence team will provide oversight and support for this process. They will monitor the creation of Advice Notes and Alerts for each Specialism and Division via an Approval Register (Appendix 4) which will be shared on a bi monthly basis with PL/DLs. The general expectation is that each Specialism and Division (including TD delivery functions e.g. EP&R) will produce at least 1 Advice Note or Alert per year. The RI function will report annually to the TD Board on the health of this process.
- 4.7 **Approvers** must take reasonable steps to ensure that:
- a. Content is factually correct and not based on conjecture. The source of the information should be referenced in the Advice Note/Alert.
 - b. Appropriate internal consultation has taken place. For external publications this consultation may include (as appropriate) members of the Regulatory Leadership

Team (RLT) and/or Senior Leadership Team (SLT) and/or legal advice with regard to any on-going investigation and communications business partners (RI hold contact details).

- c. Information and photographs are used legitimately (for example, from duty holders). The Health and Safety at Work etc. Act 1974 addresses disclosure of information, as does the Energy Act 2013. There are a number of restrictions on information disclosure in both Acts, however, none of those restrictions are relevant to the circumstances considered by this ONR guidance. If it can be demonstrated that it is necessary for ONR, or a person acting on its behalf, to disclose information for the purposes of ONR's functions, then that disclosure is lawful. (Note: For disclosure of information not falling within the scope of this guide, then legal advice should be sought).
- d. No sensitive nuclear or commercial information is included and
- e. If for external publication, the Divisional Communications Business Partners should be consulted to agree the distribution list of Alerts, and Advice Notes as required and must have reviewed the content, before it is signed off by the Technical Director or Delegate.

5. COMMUNICATIONS

The distribution list should be determined and agreed between the approver (PL/DL) and the Divisional Communications Business Partner i.e.:

- External – stakeholders, duty holders,
- Internal – DLs, PLs, Site/Nominated Inspectors, Conventional Health and Safety, Security Site Inspectors, and Divisions

Advice Notes – Internal Audience

Advice Notes are primarily intended for internal distribution, but may be shared with duty holders on a case by case basis.

- Approver (PL/DLs) to cascade to their teams via email and discuss at KITs/meetings
- Approver (PL/DLs) to circulate the Advice Note to agreed distribution list
- Approver (PL/DLs) to arrange publication on Nucleus RI area
<http://communities/connect.ti/ONRIntranet/viewcontent?contentid=186355>
- Approver to share with ONR training team

Alerts – External Audience

Alerts are primarily intended for external distribution but should also be circulated internally to ONR Divisions/Specialisms.

- Approver (Technical Director) via PL/DL to send a targeted email or letter to duty holders.
- Approver (Technical Director) via PL/DL to send email or letter when a specific duty holder/ is involved
- Approver (Technical Director) via PL/DL shares with ONR representatives who attend meetings with sector/industry bodies/partners/stakeholders e.g. Nuclear Safety Directors Forum and Nuclear Engineering Directors Forum. (1*)
- Approver (Technical Director) via PL/DL arranges publication on Nucleus RI area

Going forward:

- WIRED 2020 will have a specific duty holder portal area which can be used to share Advice Notes and Alerts.

(1*)If the Advice Note or Alert relates to or may be distributed to a defence site, the Defence Nuclear Safety Regulator (DNSR) should be considered as part of distribution.

6. REFERENCES

1. International Atomic Energy Agency (IAEA) General Safety Requirements and the Regulatory Framework for Safety, GSR Part 1
2. CM9 2017/449266 - Guidance for undertaking Sub division/divisional Regulatory Intelligence reviews
3. CM9 2017/454282 - Guidance for undertaking Specialism Regulatory Intelligence Reviews
4. Regulatory Intelligence process map – HOW2- [process map](#)
5. Nucleus – Regulatory Intelligence [RI web page](#) (the HOW2 link 'Advice Notes' directs you to this Nucleus page)
6. International Atomic Energy Agency (IAEA) Safety Standard 'Operating Experience Feedback for Nuclear Installations' SSG 50 (Page 23 Fig 2)

7. APPENDICES

APPENDIX 1: PROCESS FLOW DIAGRAM

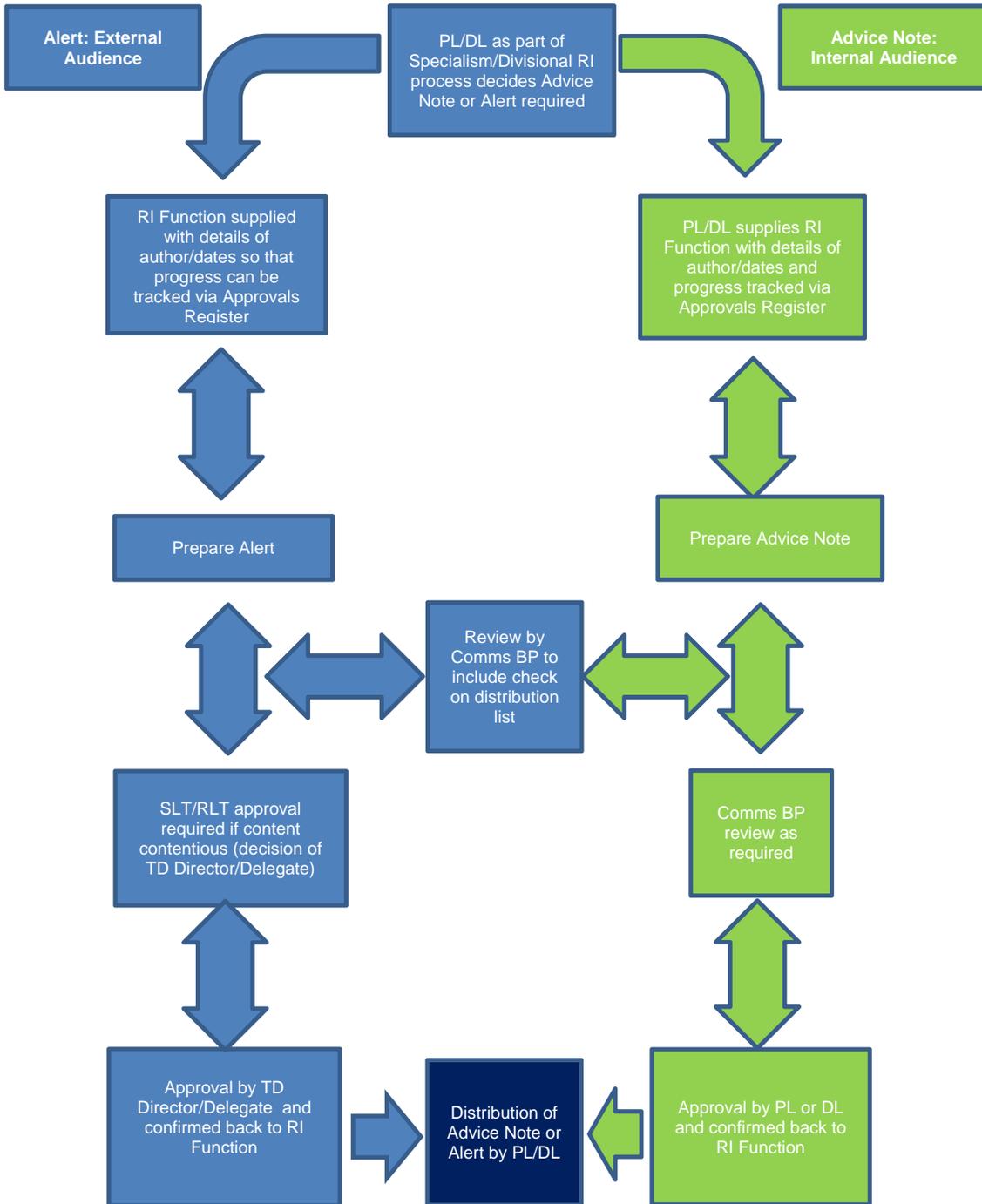
APPENDIX 2 : ADVICE NOTE TEMPLATE

APPENDIX 2 : ALERT TEMPLATE

APPENDIX 4 : RI APPROVAL REGISTER

APPENDIX 1

APPROVAL PROCESS



APPENDIX 2

 Office for Nuclear Regulation		ADVICE NOTE (Ref from RI)					
TITLE							
Site	XX						
Licensee	XX						
Incident Date/Time (if applicable)	XX						
Issuing Specialism / Division	XX						
Incident Summary							
What happened/found Risks to Safety, Security or Safeguards ONR Response If example of good practice – why							
Key Learning							
Initial findings from Investigation Next steps Relevant Statutory Provisions							
Advice to Inspectors							
Identify regulatory learning What do Inspectors need to do in response?							
References and further information							
Links to media/web providing additional learning and information Links to reports/ Links to Nucleus/HOW2 Who to contact for further information and how							
ONR INF1 Ref or Regulatory Issue Ref	XX/XX	ONR Reporting Code	NSXX	INES Rating	X	OELG Coding/s	XX

APPENDIX 3

 ALERT (Ref from RI)		
TITLE		
Site	XX	
Licensee	XX	
Sector	XX	
Background		
What is the issue that needs to be shared What happened – describe the incident or information that needs to be disseminated Risks to Safety, Security or Safeguards What are ONR doing to resolve the issue		
Target Audience		
Refer to Guidance		
Summary		
Incident/events that have led to concerns		
Action required by duty holders		
Action the duty holder needs to consider (Regulatory Statutory Provisions) Any stakeholders involved Comms methods Any follow up action required and timescales Any required recording by ONR		
References and further information		
Relevant references and web links Who to contact for further information and how		

APPENDIX 4

RI APPROVAL REGISTER – for Advice Notes and Alerts

Date	Alert/Advice Note Unique Number	Title of Advice Note/Alert	Author	Division/Specialism	Approved by Divisional Comms BP	Approved by PL	Approved by TD Director	Advice Note Distribution list (PLs/Site inspectors & CH&S/Division accts, other)	Alert Distribution list (PL/DL to state stakeholders/duty holders/ (after liaising with the Communications BP):	CM9 ref
	RI XXX									