



ONR GUIDE			
Incident Notification and Reporting Process			
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1. INTRODUCTION

- 1.1 Under arrangements made to comply with The Energy Act 2013 and its relevant statutory provisions ONR regularly receives notifications and reports of incidents and events occurring on nuclear sites and other locations from duty-holders. In addition to the alerting function, notifications also allow ONR to collect and process operating experience (OpEx) that it needs to assist in its judgement that a nuclear installation or related activity is operated safely and securely and to inform its regulatory strategies and interventions. Furthermore, notifications of incidents are used to inform decisions on whether follow-up action by ONR inspectors is necessary.
- 1.2 Many of the licence conditions attached to the standard nuclear site licence require, or imply, that duty-holders should make arrangements to comply with regulatory obligations under the conditions. ONR inspects compliance with licence conditions, and also with the arrangements made under them, to judge the suitability of the arrangements made and the adequacy of their implementation. Most of the standard licence conditions are goal-setting, and do not prescribe in detail what the duty-holders arrangements should contain; this is the responsibility of the duty-holder who remains responsible for safety.
- 1.3 ONR's guidance to duty-holders describing what, when and how to notify ONR of incidents has been developed following agreement with duty-holders. Details of the agreed guidance can be found in "Notifying and Reporting Incidents and Events to ONR" (ONR-OPEX-GD-001, Ref. 1).

2. PURPOSE AND SCOPE

- 2.1 The purpose of this document is to outline ONR's arrangements for recording and disseminating initial information related to notifications of incidents occurring on nuclear sites and other facilities and locations where activities are regulated by ONR. It includes details on the requirements and arrangements for receipt of follow up reports (FURs) associated with initial Incident Notification Form (INF1s) received from duty-holders. These procedures apply to all incident notifications in the areas of nuclear safety (Ns), radiological safety (Rs), security (Sc), safeguards (Sg) and transport (Tr) safety.
- 2.2 Serious industrial health and safety incidents which require notification under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) are reported to ONR separately, by duty-holders using the Health and Safety Executive's (HSE) on-line reporting tool.
- 2.3 The document covers receipt of initial notifications from duty-holders and a common process for recording and disseminating the information to appropriate staff within ONR, other regulators and government departments, if necessary.
- 2.4 This document also includes guidance on the action needed for incidents meeting the Ministerial Reporting Criteria (MRC). Annex 1 presents the criteria for incidents occurring on nuclear licensed sites. Annex 2 presents the criteria for incidents occurring during Transport (Tr) of radioactive materials. Equivalent reporting criteria and reporting processes are in place for security and safeguards events but are not included in the scope of this document.
- 2.5 This document excludes notifications of nuclear emergencies received through calls to the "red telephone", which are to be dealt with in accordance with instructions contained in the ONR Emergency Response Instructions (ONR-EP-IN-002, Ref. 2).

3. RELEVANT FORMS

3.1 THE INF1 FORM

- 3.1.1 Incidents are normally reported to ONR by duty-holders by completing Part A of an ONR Incident Notification Form (INF1), which can be downloaded from the ONR website. Further guidance on completion of the INF1 Part A is available in ONR's external guidance "Notifying and Reporting Incidents and Events to ONR" (ONR-OPEX-GD-001, Ref. 1).
- 3.1.2 Part B of the INF1 form is completed by the relevant ONR inspector within 72 hours (i.e. three working days) of the INF1 being allocated to that inspector. This form records ONR's initial view of the incident and intended response, further details can be found in section 5.1 of this guidance.
- 3.1.3 The INF1 Part C provides details of the duty-holder's follow-up report (FUR) to the event, and provides references to any on-going follow-up by ONR. The INF1 Part C is completed by the inspector and the information is updated on the INF1 database, further information on the Part C can be found in section 6.6 of this guidance.

3.2 THE INF2 FORM

- 3.2.1 The INF2 form can be found in Appendix 2 of this guidance. The INF2 form is used for reporting incidents provisionally rated as level 1 (or greater) on the International Nuclear Event Scale (INES), or those incidents that meet MRC to relevant Government departments (BEIS or MoD) and to Ministers, respectively. The text from the INF2 form is used in the Quarterly Statement of Reportable Events sent to Ministers¹.
- 3.2.2 The INF2 Part A is completed by the relevant inspector for events that are INES 1 and above, and events that meet MRC (see Annex 1 and 2). The INF2 Part A provides a summary of ONR's initial view on the significance of an incident written in clear English and details of our intended response and are then reported to BEIS as soon as practicable.
- 3.2.3 The INF2 Part B is completed by the relevant inspector for events that meet MRC only; the INF2 Part B provides a summary of the findings of the duty-holder and ONR's response to the event written in clear English and are used to provide the text for the Quarterly Statement of Reportable Events.
- 3.2.4 Further detail on the INF2 form can be found in section 6, and in Appendix 2, of this guidance.

4. RESPONSIBILITIES

4.1 DUTY-HOLDERS

- 4.1.1 ONR-OPEX-GD-001 'Notifying and Reporting Events to ONR' (Ref. 1) outlines the responsibilities for duty-holders to notify ONR of incidents that meet the published ONR criteria, and to provide FURs where relevant.

¹ The previous process for producing a clear English summary of events for reporting them to relevant Government departments (BEIS or MoD), has been combined with the INF2 form which now comprises an INF2 Part A and B.

4.2 REGULATORY INTELLIGENCE DIVISIONAL DELIVERY SUPPORT (RI DDS) AND SECURITY DIVISIONAL DELIVERY SUPPORT TEAM (SEC DDS)

4.2.1 When a Ns, Rs, Sg or Tr notification is received into the ONR incident notification email account ONR.Incidents@onr.gov.uk from an duty-holders or ONR inspector, or via courier to the Security DDS, the relevant RI DDS or Sec DDS are responsible for:-

- Uploading the INF1 to the ONR Incidents Database thus creating a unique number for the incident report and saving the original INF1 form onto CM9 under this unique identifier;
- Selection of the appropriate division from the database options
- Distribution of the INF1 (post completion of the Part B) to the circulation list selected;
- Forwarding any security (Sc) related INF1 notifications to Sec DDS for loading onto the incidents database. INF1s loaded by Sec DDS are then only accessible by security staff, and ensures that the information related to security related incidents is adequately protected;
- Recording any FURs received into the onr.incidents account, or by courier, into CM9, having identified the corresponding INF1;
- Updating the INF1 database with the information from the Part C provided by the inspector;
- Monitoring progress of INF1s and prompting the appropriate division when progress appears delayed beyond target response timescales set out in Section 4;
- Using the INF2s returned within the Quarter to produce the ONR Quarterly Statement of Reportable Events.
- On the first day of each Quarter, issuing a calling note to each Division requesting confirmation that all Ministerial reportable events from the previous Quarter have been identified. Divisional Directors must respond to RI within one week.

4.3 DIVISIONAL DELIVERY SUPPORT TEAMS (DDS)

4.3.1 Divisional Delivery Support Teams are responsible for:-

- Maintaining accurate, up-to-date distribution lists for incident notifications;
- Once notified of a new INF1: allocating it to an appropriate (and available) Inspector to complete Part B;

4.4 ONR INSPECTORS

4.4.1 Once notified of a new INF1, the ONR inspector is responsible for:-

- Reviewing Part A of the submitted INF1 for clarity and completeness, and if necessary contacting the duty-holder for further information or clarification;
- Ensuring that the INES rating of the event appears appropriate to the description and the inspector's knowledge of the event.
- Completing the INF1 Part B within 72 hours (3 working days) of the inspector being notified;
- Identification of relevant ONR specialisms who would have an interest in the event for OPEX purposes;
- Categorisation of the event based on ONR's level of attention (Ref. 3);
- Completing the INF2 Part A (see Appendix 2) for events that are INES 1 (or greater) or those which meet MRC. The INF2 Part A should be completed within 72 hours (3 working days) of completion of the INF1 Part B;

- Completion of the INF2 Part B as soon as possible and ensuring it is reviewed and approved within one month of the end of the Quarter for inclusion in the ONR Quarterly Statement of Reportable Events (see Appendix 2);
- Monitoring and requesting FURs that are approaching due date (60 days post receipt of INF1). Requesting final reports if the FUR is interim and further investigation is planned by the duty-holder;
- Completing the INF1 Part C within 28 days of receipt.

4.5 DELIVERY LEAD

4.5.1 The relevant Delivery Lead is responsible for:-

- Ensuring relevant inspectors progress INF1s to completion;
- Ensuring, for events meeting MRC, timely completion of INF2 Part A and Part B by inspectors;
- Reviewing the text within the INF2 (Part A and B) prior to approval by the Divisional Director, noting that this text that will be extracted into the ONR Quarterly Statement of Reportable Events, and ensuring that Divisional Director approval is achieved in time for inclusion in the statement.

4.6 COMMUNICATIONS TEAM

4.6.1 In relation to incident notifications the Communications Team is responsible for:-

- Considering all INF1s with INES ratings of 1 and above, received to ensure appropriate lines to take are produced for incidents likely to lead to media interest;
- Reviewing the text within the INF2 (Part A and B) prior to the Divisional Director approval, checking the following:
 - Could any of the information in the INF2 cause undue alarm or distress?
 - Is there potential for the information in the INF2 to generate media interest?
 - Is the information in the INF2 consistent with information on the event already in the public domain²?
- Arranging for placement of ONR Quarterly Statement of Reportable Events on the ONR website, in line with Ministerial approval of the publication date.

4.7 DIVISIONAL DIRECTORS

4.7.1 The Divisional Directors are responsible for:-

- Ensuring consistent application of these arrangements within their Division;
- Reviewing and approving the text within the INF2 (Part A and B) providing updates to incidents that meet MRC, post Communications Team approval, noting that this text will be extracted into the ONR Quarterly Statement of Reportable Events.

4.8 CHIEF NUCLEAR INSPECTOR (CNI) OFFICE

4.8.1 The Chief Nuclear Inspector's Office is responsible for:-

- Endorsing completed INF2s for inclusion in the ONR Quarterly Statement of Reportable Events.

² For example, this could include reporting in the media, statements released by the duty-holder or, in the case that events are INES 2 and above, UKINO's report to the IAEA (see sections 3.10 and 5.2).

- Approving the ONR Quarterly Statement of Reportable Events and the covering letter, prior to sign-off by the CNI to authorise the issuing of the statement to Ministers and publication on the ONR website.

4.9 REGULATORY INTELLIGENCE LEAD

4.9.1 The RI Lead is responsible for:-

- Coordinating the Regulatory Intelligence function and incident reporting arrangements within ONR;
- Reviewing and revising as necessary the arrangements outlined in this document;
- Providing and maintaining guidance to duty-holders in relation to notifying incidents and events to ONR;
- Developing and maintaining an ONR incident notification database;
- Performing sample quality checks on INF1 information on the database to ensure that incident records are accurate, up to date and accessible³;
- Facilitation and creation and distribution of OPEX and Regulatory Intelligence outputs for key stakeholders;
- Developing processes and coordinating their implementation with divisions and specialisms for the analysis of incident information, alongside other operational experience information;
- Compiling the ONR Quarterly Statement of Reportable Events using the INF2s received for approval by the CNI Office;
- Issuing an advance draft copy of the ONR Quarterly Statement of Reportable Events to ONR's contact in BEIS for peer review in advance of publication;

4.10 UK INES NATIONAL OFFICER (UKINO)

4.10.1 The UKINO is appointed by the Department for Business Energy and Industrial Strategy (BEIS) normally from among ONR's inspectors, and acts independently of ONR in this role. The UKINO is responsible, inter alia, for:-

- Monitoring the INES rating consistency of UK users' application of the INES scale through reviewing relevant incident notifications made to ONR;
- Submitting to IAEA details of any incident rated at level 2 or above as soon as is reasonably practicable; and
- Challenging INES rating if considered to be incorrect and ultimately deciding on the final rating of any event.
- Promoting awareness and consistent application of the International Nuclear and Radiological Event Scale across UK duty-holders, relevant government departments and agencies.

4.10.2 Memoranda of Understanding (MoUs) are in place with other agencies within the UK for reporting details of incidents to IAEA that are outside the vires of ONR.

5. PROCEDURE AND GUIDANCE

5.1 RECEIVING NOTIFICATIONS OF INCIDENTS OR EVENTS

5.1.1 Incident notifications can be received by email or telephone through established lines of communication. All notifications should result in the production of an INF1 Part A (see [Appendix 1](#)), normally by duty-holder staff. If an ONR inspector receives a verbal notification of an incident that clearly falls into an ONR reporting category, as defined

³ The learning from sample quality checks of INF1s on the database will be used to continuously improve ONRF training, guidance and performance.

in ONR-OPEX-GD-001 (Ref. 1) then they should prompt the duty-holder to notify ONR by submission of an INF1 Part A form. In certain circumstances, for example for transport events involving duty-holders whose organisation is limited in resource, the duty-holder may not have the capability to complete the INF1 Part A, in which case the inspector should complete it.

- 5.1.2 The Carriage of Dangerous Goods Regulations place legal responsibility for notifying events onto the consignor, however consignees are encouraged not to delay immediate notification to ONR, if the event category requires it. Subject to agreement with ONR certain very minor transport events can be reported to the ONR by means alternative to the use of the INF1 process. In all such cases advice should be sought from the relevant ONR inspector.
- 5.1.3 For nuclear safety and radiological related incidents, where immediate notification is necessary in normal office hours the email is accompanied by a telephone call from the duty-holder alerting ONR to the notification. Where the notification is made out-of-office-hours then the duty-holder representative will contact ONR on the 'out of hours' number detailed on the INF1 form.
- 5.1.4 The process followed for security related incidents or events is the same, except that initial notifications should be made as soon as practicable via telephone to an ONR Civil Nuclear Security (CNS) inspector or through the CNS Duty Officer for out-of-hours notifications and in any event within 24 hours of the event occurring or being detected. The oral report should be followed-up in writing by the duty-holder within 48 hours using an INF1 form as detailed above.
- 5.1.5 Upon receipt of the notification, the CNS inspector should complete the INF1 security pre-notification proforma and save to the database. This will generate an automatic email to all CNS inspectors informing them of the event.
- 5.1.6 RI DDS shall maintain oversight of the ONR incident notification email account (onr.incidents@onr.gov.uk) for incoming notifications from duty-holders. On receipt of an INF1 form, RI DDS must complete the relevant quality check for completeness, load the INF1 onto the database, and send to the relevant DDS promptly, ideally within 1 working day.
- 5.1.7 In the case of Defence related incidents, the INF1 will be flagged during upload to the database such that details of the incident will only be visible to Incident database users with the necessary level of clearance (this is associated to the individual's login account).
- 5.1.8 The DDS shall then nominate an appropriate and available inspector to complete Part B of the INF1.
- 5.1.9 The relevant ONR inspector should review Part A of the form for completeness and accuracy and, if necessary, should contact the reporting organisation for further information or clarification. Part B of the INF1 form should then be completed within 72 hours (three working days) of the inspector being notified and should include:
 - Technical based quality review of the INF1 to ensure what is written within the INF1 makes sense and is in adequate context;
 - Initial opinion on the adequacy of the duty-holders response to the incident
 - Initial proposal for ONR action (or justification if no action proposed, see section 6.5);
 - Statement of nuclear safety significance;
 - Any points of significant media interest (and where appropriate guidance on lines to take);

- Rationale for the decision on the MRC assigned to the event;
- And with the exemption of security reports which are distributed separately, the appropriate circulation option selected, as follows:

5.1.9.1 Normal Distribution: This is for all INF1s rated below INES1

- This should be the default distribution for non-security INF1s unless the incident meets the criteria for Divisional Circulation
- Distributed to: *Relevant Deputy Chief Inspector, Relevant Superintending Inspector (Delivery Lead), Relevant Site Inspector, RI Lead, UKINO, RI DDS.*
 - *Defence incidents: INF1 sent to DNSR incidents account*
- Security INF1s will be distributed to: Deputy Chief Inspector CNS, all CNS Superintending Inspectors, all CNS B2 delivery Leads, relevant site security inspectors.

5.1.9.2 Divisional Distribution for INF1 notifications rated at INES1 and above

- Events that are categorised as INES 1 and above will be notified to BEIS via the INF2 Part A under agreed arrangements. The INF2 Part A is completed by the inspector for these events, to provide a clear English summary of the event. Distributed to: *Normal Distribution plus CE, CNI, DCIs, Head of Policy and Communications, Communications Account, BEIS and RI Lead, RI DDS and the Regulatory Oversight Manager.*
- The automatic distribution of CNS security event reports obviates the need for full Divisional distribution.

6. DISSEMINATING THE INCIDENT NOTIFICATION REPORT

6.1 DISSEMINATION

- 6.1.1 On completion of part B, the database auto-generates an e-mail to the RI DDS (or to the CNS event report account) notifying them of the completion. The INF1 is then circulated using the selected circulation group via e-mail as a portable document format (pdf) file.
- 6.1.2 In the case of defence related sites or other premises where security markings may pertain, the 'Normal' and 'Divisional Distribution' may be tailored to the content of the specific INF1 in line with the 'Need to Know' principle and will not include distribution outside ONR; As such distribution may not include wider ONR addressees (e.g. Press Office etc.). The INF1 will however be shared with the Defence Nuclear Safety Regulator (DNSR).
- 6.1.3 In the case of defence sites or other premises where security markings may pertain, and following discussion with the appropriate Unit Head, 'Full Distribution' is necessitated, consultation with DNSR (and if so advised, the MoD directly) will take place prior to any distribution. This may lead to caveats on the 'Full Distribution' such as (but not limited to) marking the INF1 'NOT TO BE CIRCULATED OUTSIDE ONR' or redaction of the INF1 prior to distribution.

6.2 INES RATINGS AND SUBMISSION TO IAEA

- 6.2.1 Civilian nuclear and radiological incidents occurring on nuclear licensed sites or in transport, reported to the ONR using the INF1 form are to be rated on the International Nuclear Events Scale INES. If the duty-holder has provisionally rated the event at INES Level 1 or above then RI DDS, on receipt of the Part A, should inform the UK INES Officer (UKINO) as soon as possible to enable them to review the provisional INES rating. For those incidents with an INES rating of 2 or above, the UKINO will

facilitate international dissemination of the event details through IAEA as soon as is reasonably practicable. Events that rated as INES level 2 and above meet MRC and are therefore reported ministers. Inspectors should ensure that information on the event in the Quarterly Statement to Ministers is consistent with that in the IAEA report.

- 6.2.2 The scope of INES does not extend to events on Defence Sites. Nevertheless, Defence Sites have been requested by ONR to assign INES ratings on the INF1 form for consistency with the Civil Sector.
- 6.2.3 In support of the UKINO role (see para 4.10) any incidents initially reported with an unknown INES rating should have this information updated when it becomes available. Where applicable, the relevant inspector must obtain the rating from the duty-holder at the earliest opportunity. The rating shall be provided to ONR Regulatory Intelligence to enable the ONR incident database and the UKINO to be updated.

6.3 INF2 UPDATE REPORTS FOR INCIDENTS MEETING MINISTERIAL REPORTING CRITERIA

- 6.3.1 Incidents deemed to have met the Ministerial Reporting Criteria (outlined in [Annex 1](#) and 2) must have an update provided on an INF2 form. Part A of the INF2 form should be completed within 72 hours (3 working days) of completion of the INF1 Part B. The INF2 should then be kept live and Part B of the form should be updated as information becomes available to maintain an accurate description of the current status and response to the event. The INF2 should be completed promptly by the inspector and signed off within one month of the end of the Quarter in time for inclusion in the ONR Quarterly Statement of Reportable Events. Guidance on the ONR reporting categories that relate directly to the Ministerial Reporting Criteria can be found in ONR-OPEX-GD-001 (Appendix 1).
- 6.3.2 The purpose of the INF2 update is to generate the text which will appear in the ONR Quarterly Statement of Reportable Events made by the Chief Nuclear Inspector to Ministers in accordance with the provisions of the Energy Act 2013 (as amended). The statement is also published on ONR's website, accordingly it must be written in clear English and understandable by members of the public. The INF2 form contains guidance on the information to be included. A copy of the INF2 form is included in Appendix 2 of this guide.
- 6.3.3 The relevant inspector should update the INF2 as information becomes available to maintain the current position in relation to the incident. Within one month of the end of the Quarter in which the event occurred, the relevant inspector should gain approval of the text in the form from the Divisional Director. Prior to approval, it is good practice to engage with the relevant Delivery Lead and the ONR Communications Team to get their input into the INF2.
- 6.3.4 Following approval from the relevant Divisional Director, the CNI Technical Advisor will review the INF2 on behalf of the CNI Office and endorse the INF2 for inclusion in the ONR Quarterly Statement. Guidance on the checks to be made for approval of the INF2s is included in the INF2 (Appendix 2).

6.4 PRODUCING THE QUARTERLY STATEMENT OF INCIDENTS

- 6.4.1 The RI DDS shall prompt DDSs within one month of the end of the Quarter to provide any non-security INF2 update reports on incidents that have either been deemed to meet Ministerial Reporting Criteria or were previously identified as possible candidates but needed further investigation. The Ministerial Reporting Criteria is included in [Annex 1](#) and [Appendix 2](#) provides a copy of the INF2 and guidance on what information an INF2 should contain.

- 6.4.2 The text from the completed INF2 reports will be collated by RI DDS and included in the ONR Quarterly Statement of Reportable Events, together with a covering letter to relevant ministers. The statement is then peer reviewed by RI and by ONR's contact within BEIS prior to approval by the CNI Office and signing and authorisation for issue by the Chief Nuclear Inspector. Any significant subsequent changes made to the event information in the Quarterly Report will require agreement from the relevant Division.
- 6.4.3 The distribution of the Statement is undertaken by the RI DDS to a list maintained through consultation with the ONR Policy Unit and Communications Team. The statement is submitted to Ministers within one month of the quarter end, and then published on the ONR website.

6.5 ONR'S RESPONSE TO INCIDENT NOTIFICATIONS

- 6.5.1 Relevant Delivery Leads, in conjunction with their site inspectors, should decide if preliminary enquiries into the event are required, based on the significance (nuclear safety / radiological / other) of incidents notified to ONR. If preliminary enquiries are deemed necessary, they should be conducted as soon as practicable after notification of an incident and a decision made whether the matter warrants investigation in accordance with the timescales identified in ONR's Investigation Process (Ref. 4).

6.6 FOLLOW-UP BY DUTY-HOLDER AND ONR

- 6.6.1 FURs should be sent to the same account as Incident notifications (onr.incidents@onr.gov.uk/ ONR.CNS.Event.Reports@onr.gov.uk as appropriate) and copied to the relevant site inspector. The inspector should record any follow-up by ONR as outlined in Part C (1) of the INF1 form. This information should be recorded on the incident database by RI DDS.
- 6.6.2 Part C (2) of the form recommends that the duty-holder provide a FUR outlining the results from the duty-holder investigation into the circumstances surrounding any incident that has been notified to ONR. The expectation is that the report is furnished to ONR within 60 days of the incident. Where final investigations have yet to be concluded at 60 days an updated FUR needs to be forwarded when the full and complete details are available. Ref. 1 contains further guidance on what incidents require a FUR, and defines ONR's expectations regarding the content of these reports, including identified root and direct causes, actual and potential consequences, corrective actions both planned and implemented, final INES rating and ONR Category as well as any lessons learnt as appropriate. The RI team will record and process this information for strategic review, analysis and provision of advice to divisions and stakeholder engagement purposes.

7. FINALISING INCIDENTS AND CLOSING INF1

- 7.1 Incident Notifications (INF1s) may only be closed after sufficient information is held by ONR. This includes completion of all stages of the INF1 process (see Annex 3) as well as receipt and agreement of final FURs by the relevant Site Inspector. Part C of the INF1 should be populated with all relevant information on the incident by the inspector.
- 7.2 The Part C should provide an auditable trail documenting ONR's response to the incident. This may include reference to completed intervention records, contact records, enforcement decision records etc. If ONR's response to an incident is likely to be protracted and tracked by other means, it is acceptable to close the Part C with reference to these on-going activities (for example by reference to an Investigation Decision Record or ONR issue).

7.3 Once Part C is completed by the inspector, the INF1 will be reviewed by RI DDS or Sec DDS as relevant for completeness and any gaps addressed with the Site Inspector / DDS or Division DDS. Once all fields are complete, the RI DDS/Sec DDS will finalise the INF1 on the database

8. REFERENCES

- 1) ONR-OPEX-GD-001 Rev.5, Notifying and Reporting Incidents and Events to ONR, July 2017, CM9:2017/113080
- 2) ONR-EP-IN-002 Rev. 8, Initial Notification and Event Classification. Emergency Response Instructions, April 2016, CM9: 2016/136340
- 3) ONR-OPEX-GD-004 Rev. 0, Guidance for INF1 Categorisation, Governance and Oversight, November 2019, CM9: 2019/302768
- 4) ONR-ENF-GD-005 Rev.3 Process for Conducting Investigation, May 2019 CM9: 2019/40909.

APPENDIX 1 – ONR INCIDENT NOTIFICATION FORM (INF1)

A version of the INF1 Part A form that contains software providing lists and other helpful features, is available on HOW2, or externally via

<http://www.onr.org.uk/operational/inspection/onr-incident-notification-form-inf1.doc>

- A1.1 These should be enabled in MS Word by selecting Tools – Macro – Security and selecting “Medium” from the options displayed.
- A1.2 Clicking [F1] in many fields will display help-text. There is a spell-check button at the top of the form.

The Incident Notification Database can be accessed from HOW2.

APPENDIX 2 – ONR INCIDENT NOTIFICATION UPDATE FORM (INF2)

A2.1 This appendix provides additional guidance on completion of the INF2 form. The INF2 should provide a brief summary of incident, comprising a short paragraph written in clear English as far as practicable. It should include, where appropriate:

- Personnel affected and any release of radioactive material.
- Why the event was not reported in the previous quarter, if applicable.
- Summary of findings of the duty-holder’s investigation.
- Summary of findings from any ONR investigation undertaken to date.
- Commentary on duty-holder’s response and ONR involvement in the aftermath including any enforcement action taken.
- INES rating (Provisional or Final) and accompanying description
- Concluding or holding statement on ONR position e.g. content with duty-holder’s response; investigating further; monitoring duty-holder’s response etc.

A2.2 The text in the INF2 form will be collated by RI DDS and included in the ONR Quarterly Statement of Reportable events. The text will be taken verbatim and potentially not edited further, therefore the form must be approved prior to submission to the RI team. The approval route consists of the relevant Divisional Director and the CNI Office. Details of checks made at each stage of the approval route are described in the INF2 (see paragraph A2.4). In addition to formal approval, it is good practice for the inspector to engage with the relevant Delivery Lead and the ONR Comms Team prior to approval of the INF2 by the Divisional Director, further guidance on this is available in sections 3.5 and 3.6. Any significant subsequent changes made by the RI DDS for the Quarterly Report will require agreement from the Programme.

A2.3 The text from the completed INF2 reports will be collated by RI DDS and included in the ONR Quarterly Statement of Reportable Events, together with a covering letter to relevant ministers. The statement is then peer reviewed by RI and by ONR’s contact within BEIS prior to approval by the CNI Office and signing and authorisation for issue by the Chief Nuclear Inspector. Any significant subsequent changes made to the event information in the Quarterly Report will require agreement from the relevant Division.

A2.4 A copy of the INF2 form can be found on HOW2 in the Regulatory Intelligence UK Events Library section and in the templates and forms section. The form can also be viewed below.

ONR Incident Notification Update Form (INF2)

Note: This form should be completed where incidents meet the Ministerial Reporting Criteria (MRC); a description of this criteria can be found in Appendix 2 of ONR-OPEX-GD-001 Notifying and Reporting Incidents and Events to ONR. The purpose of this form is to generate text that will be included in the Quarterly Ministerial Reports made by the Chief Nuclear Inspector. Further guidance on completing the INF2 form, and the approval route for the form, can be found in ONR-OPEX-IN-001 Incident Notification and Reporting.

PART A

[Complete for Incidents which: are provisionally rated INES Level 1 (or greater); or meet MRC]

Operator/Site:	
Date of Incident:	
Date INF2 Part A completed:	
INES Rating of Incident: <i>(Indicate if rating is Final or Provisional)</i>	
Justification for INES rating: <i>(brief description of why the criteria for this rating have been met)</i>	
Ministerial Reporting Criteria (if applicable): <i>(Indicate a – g or MRCT1 – 7 as appropriate)</i>	
<p>Summary of incident, written in clear English, to include the following:</p> <ul style="list-style-type: none"> - Summary of the incident. - Consequences (were any personnel affected, was any radioactive material released? - ONR's view on the significance of the incident. - Initial proposed ONR action. <p><i>Please date any subsequent updates to the clear English summary.</i></p>	

PART B

[Only complete for Incidents which meet MRC]

Why was the event not reported in the previous quarter? <i>(if applicable)</i>	
Summary of findings of duty-holder's investigation. <i>(note the FUR must be sent to ONR within 60 days of the event, so this can reflect the duty-holder's investigation to date).</i>	
Summary of findings of ONR's investigation undertaken to date.	
Commentary on duty-holder's response and ONR's follow up to the incident, including any enforcement action taken.	
Concluding or holding statement on ONR's current position. <i>(delete or amend as appropriate)</i>	Content with duty-holder response. Investigating further. Monitoring duty-holder's response. Etc.
INF2 Completed by:	
Name	Signature
	Date

<p><i>Has the information required in Part A of the INF2 form been completed? Have you confirmed the description of the event is factually/ technically accurate? Is the clear English summary of the event written in an appropriate manner for a non-technical audience?</i></p>		
Name	Signature	Date
Completed INF2 Approval (Part B)		
Divisional Director Approval		
<p><i>Have you confirmed the INF2 factually/ technically accurate? Is the INF2 written in an appropriate manner for a non-technical audience? Could any of the information in the INF2 be misinterpreted/ cause undue alarm or distress/ generate media/public interest? Does the INF2 reflect the current situation with regards to the response to the event? Does ONR's response to the event, as described in the INF2, seem appropriate? Check that the INF2 does not make any assumptions as to the outcome of the event follow up and response.</i></p>		
Name	Signature	Date
Endorsement: Chief Nuclear Inspector Technical Advisor		
<i>Final checks prior to inclusion in the ONR Quarterly Statement of Reportable Events</i>		
Name	Signature	Date

ANNEX 1 – MINISTERIAL REPORTING CRITERIA FOR INCIDENTS OCCURRING ON NUCLEAR LICENSED SITES AND ASSOCIATED OPERATIONS

MRC Publication Criteria	Description of Criteria
a	<p>Dangerous occurrences reportable under the Nuclear Installations (Dangerous Occurrences) Regulations 1965. Summary of occurrences from Regulation No 3 are as follows:-</p> <p>3(a) any occurrence on a licensed site involving the emission of ionising radiations or the release of radioactive or toxic substances, causing or likely to cause death, or serious injury, on or off the site.</p> <p>3(b) any occurrences during transport causing or likely to cause death or serious injury or the breach of containment of a transport package.</p> <p>3(c) any explosion or fire on a licensed site affecting or likely to affect the safe working or safe condition of the nuclear installation.</p> <p>3(d) any uncontrolled criticality excursion.</p>
b	Confirmed exposure to radiation of individuals which exceed or are expected to exceed, the dose limits specified in Schedule 3 to the Ionising Radiation Regulations (IRRs) 2017.
c	Examination, inspection, maintenance, test or operation of any part of the plant revealing that the safe operation or condition of the plant may be significantly affected.
d	Abnormal occurrences leading to a confirmed release to atmosphere or spillage of a radioactive substance which exceeds or is expected to exceed, the limits set out in Column 5 of Part 1 of Schedule 7 to the IRRs 2017 except where the release is in a manner specified in an Authorisation under the Environmental Permitting Regulation 2010 or Environmental Authorisations (Scotland) Regulations 2018 (EASR18).
e	Abnormal occurrences leading to a release or suspected release or spread of radioactivity, on or off site, which requires special action or special investigation by the Operator.
f	Events likely to attract, or that have attracted, significant national media or public attention.
g	Events that are categorised as INES level 2 and above.

NB: Further information is provided on the above criteria in the document: ONR Guidance: Notifying or Reporting Incidents and Events to ONR (Ref. 1).

ANNEX 2 – MINISTERIAL REPORTING CRITERIA FOR TRANSPORT EVENTS (MRCT)

Under the United Nations classification scheme for transport of dangerous goods, radioactive material is classified as Class 7 material. Hence in these reporting criteria, radioactive material is referred to as 'class 7 goods' which is consistent with the terminology used in UK regulations.

MRCT Publication Criteria	Description of Criteria
MRCT1	A radiation emergency as defined in CDG (Amendment) Regulations 2019: means a non-routine situation or event arising during the carriage of Class 7 dangerous goods that necessitates prompt action to mitigate the serious consequences <ul style="list-style-type: none"> (a) Of a hazard from that situation or event (b) Of a perceived risk arising from such a hazard; or (c) To one or more of the following human life, health and safety, quality of life, property, the environment.
MRCT2	Theft or loss of High Consequence Radioactive Material in carriage (see Note 1).
MRCT3	An occurrence during loading, carriage or unloading of class 7 dangerous goods involving (a) any release of activity greater than A_2 of radioactive material from the packages or from the conveyance if being transported unpackaged; or (b) exposure leading to a breach of the limits set out in IRR17 to workers or members of the public. (See Notes 2 and 3).
MRCT4	An occurrence during loading, carriage or unloading of class 7 dangerous goods where there is reason to believe that there has been a significant degradation in any Type B(U); Type B(M); Type C or Fissile package safety function (containment; shielding; thermal protection; or criticality) that may have rendered the package unsuitable for continued carriage without additional safety measures (See Note 4).
MRCT5	An occurrence where class 7 dangerous goods have been transported with any non-compliance regarding radiation or contamination levels where those levels are greater than ten times the prescribed regulatory limits (See Note 5).
MRCT6	Events involving class 7 goods in carriage likely to attract, or that have attracted, significant national media or public attention.
MRCT7	Events involving class 7 goods in carriage categorised as INES level 2 and above.

NB: Further information is provided on the above criteria in the document: ONR Guidance: Notifying or Reporting Incidents and Events to ONR (Ref. 1).

Notes:

1. High Consequence Radioactive Material (HCRM) is defined in ADR 1.10.3.1.3.
2. A_2 is defined in ADR 2.2.7.1.3
3. The dose limits can be found in Schedule 3 of IRR17.
4. Type B(U); Type B(M); Type C and Fissile packages are approved, prior to use, by ONR in accordance with the requirements of ADR/RID. Any degradation to the safety function of a package, due to an occurrence or otherwise, would require permission from the competent authority before continued use. Requirements for these packages can be found in ADR/RID as follows: Type B(U) packages in 6.4.8, Type B(M) in 6.4.9 and Type C in 6.4.10.
5. The contamination limits can be found at ADR 2.2.7.1.2.

ANNEX 3 – FLOW DIAGRAM OF INF1 STAGES (EXCLUDES SECURITY*)

*Security INF1s follow a similar process administered by ONR/CNS

