

<b>Adjacent or Enclave Nuclear Premises</b>			
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# 1. Introduction

1. ONR has established its assessment principles, which apply to the assessment by ONR specialist inspectors of safety, security and safeguards submissions for nuclear facilities or transports that may be operated by potential licensees, existing licensees, or other dutyholders. These assessment principles are supported by a suite of guides to further assist ONR's inspectors in their technical assessment work in support of making regulatory judgements and decisions against all legal provisions applicable for assessment activities. This technical assessment guide (TAG) is one of these guides.
2. The term 'security plan' is used to cover all dutyholder submissions such as nuclear site security plans, temporary security plans and transport security statements. Dutyholders under Regulation 22 of the Nuclear Industries Security Regulations 2003 ('NISR 2003') [1] may also use the ONR's Security Assessment Principles (SyAPs) [2] as the basis for Cyber Security and Information Assurance (CS&IA) documentation that helps them demonstrate ongoing legal compliance for the protection of Sensitive Nuclear Information (SNI). The SyAPs are supported by a suite of guides to assist ONR inspectors in their assessment and inspection work, and in making regulatory judgements and decisions. This TAG is such a guide.

# 2. Purpose and Scope

3. This TAG contains guidance to advise and inform ONR inspectors in the exercise of their regulatory judgement during intervention activities relating to assessment of a dutyholder's processes for ensuring cooperation with any adjacent or enclave nuclear premises. It aims to provide general advice and guidance to ONR inspectors on how this aspect of a site's security regime should be assessed. It does not set out how ONR regulates the dutyholder's arrangements. It does not prescribe the detail or methodologies for dutyholders to follow to demonstrate they have addressed the SyAPs. It is the dutyholders responsibility to determine and describe this detail within their submission and for ONR to assess whether the arrangements are adequate.

# 3. Relationship to Relevant UK Legislation and Policy

4. The term 'dutyholder' mentioned throughout this guide is used to define 'responsible persons' on civil nuclear licensed sites and other nuclear premises subject to security regulation, a 'developer' carrying out work on a nuclear construction site and approved carriers, as defined in NISR. It is also used to refer to those holding SNI.



5. NISR defines a 'nuclear premises' and requires 'the responsible person' as defined to have an approved security plan in accordance with Regulation 4. This regulation includes a requirement to ensure the security of equipment and software used in connection with activities involving Nuclear Material (NM) or Other Radioactive Material (ORM). NISR further defines approved carriers and requires them to have an approved Transport Security Statement in accordance with Regulation 16. Persons to whom Regulation 22 applies are required to protect SNI. ONR considers CS&IA to be an important component of a dutyholder's arrangements in demonstrating compliance with relevant legislation.
6. The SyAPs provide ONR inspectors with a framework for making consistent regulatory judgements on the effectiveness of a dutyholder's security arrangements. This TAG provides guidance to ONR inspectors when assessing a dutyholder's submission demonstrating they have effective processes in place to achieve Security Delivery Principle 6.5 – Adjacent or Enclave Nuclear Premises, in support of FSyP 6 – Physical Protection Systems. The TAG is consistent with other security TAGs and associated guidance and policy documentation.
7. The Government Functional Standard on security [3] describes expectations for security risk management, planning and response activities for cyber, physical, personnel, technical and incident management. It applies, whether these activities are carried out by, or impact, the operation of government departments, their arm's length bodies or their contracted third parties. The security principles, governance, life cycle and practices detailed within the Functional Standard have been incorporated within SyAPs. This ensures that all NISR dutyholders are presented with a coherent and consistent set of regulatory expectations for protective security whether they are related to government or not.
8. The Government Security Classifications document, together with the ONR Classification Policy [4] describes types of information that contain SNI, the level of security classification that should be applied, and the protective measures that should be implemented throughout its control and carriage.

## 4. Relationship to International Standards and Guidance

9. The essential elements of a national nuclear security regime are set out in the Convention on the Physical Protection of Nuclear Material (CPPNM) [5] and the IAEA Nuclear Security Fundamentals [6]. Further guidance is available within IAEA Technical Guidance and Implementing Guides.
10. These elements are emphasised in Recommendations level guidance, specifically Nuclear Security Series (NSS) 13 [7], and NSS 14 [8]. Further



guidance is available within IAEA Technical Guidance and Implementing Guides.

## 5. Advice to Inspectors

- 11. The UK nuclear industry is highly diverse. Separate dutyholders might share a single licenced site but have different security outcomes required for their individual PPS. They will operate under separate and distinct security plans which might be based on common or shared services. For example, they may share access control arrangements and search protocols that are provided by a third-party contractor. Such arrangements are common on sites where tenant organisations are located.
- 12. Additionally, many sites have an adjacent site operating under a separate licence. They too will operate under separate and distinct security plans, which might have common or shared services, but with different security outcomes required from their PPS. This is the case for several Magnox and AGR sites across the country, where the Magnox station will be defueled, but the adjacent AGR site is still generating and must deliver more stringent security outcomes. This issue will potentially be more complicated and require greater consideration for adjacent new build sites where the security outcomes required of the PPS will increase in line with the sensitivity of the site as construction progresses. However, in all cases, the level of ONR scrutiny is dependent on the nuclear security significance of the nuclear facility concerned.

## 6. Regulatory Expectation

- 13. The regulatory expectation upon the dutyholder is that they will demonstrate within their security plan how they ensure sharing of information and maintenance of a coherent, coordinated approach towards all aspects of security (and emergency response) that may be influenced by adjacent or enclave nuclear premises.

<b>FSyP 6 - Physical Protection Systems</b>	Adjacent or Enclave Nuclear Premises	SyDP 6.5
Dutyholders should give mutual consideration to the effects of adjacent or enclave nuclear premises on the maintenance of nuclear security.		

## 7. Adjacent and Enclave Sites

- 14. Inspection and assessment by ONR inspectors should focus on ensuring that individual dutyholders take responsibility for ensuring all the elements of their security regime, whether they are provided by a contractor or an adjacent or



enclave site, integrate effectively. This will be reflected in the security plans to ensure there are clear lines of accountability and the required effects of the physical protection system are met for all relevant dutyholders.

15. Dutyholder security plans should clearly articulate the shared services provided by or for the benefit of the adjacent or enclave site and the impact that one may have on the other. This includes any shared contingency/emergency arrangements.
16. Emergency response arrangements for a dutyholder site that has adjacent, or enclave premises must consider the risks and hazards presented by all dutyholders and deliver an appropriate means of emergency communications across them to ensure the planned response is effective. Regular dialogue and joint training and exercising amongst dutyholders are required to ensure a consistent and coherent emergency response.
17. Inspection and assessment by ONR inspectors should seek to identify those clear lines of communications between dutyholders exist, and there are identified and established points of contact for all matters pertaining to security and emergency response. It is considered good practice for dutyholders to have regular formal meetings with agreed terms of reference to consider and review security and emergency response protocols amongst adjacent or enclave sites.
18. Where the adjacent or enclave nuclear premises is undergoing development, the dutyholder must be fully aware of project timelines and consider the changing risks and hazards as an adjacent construction project develops. This is equally true for adjacent sites undergoing decommissioning, where certain security systems may no longer be supported once nuclear inventory is removed and the categorisation for theft and sabotage reduced. In these instances, it is particularly important for dutyholders to ensure there is continuous liaison with the adjacent operating site's security staff to inform them of any changes in risk or to the security arrangements in place.
19. Periodic review of security plans by dutyholders should ensure there is no potential for conflict or adverse impact on adjacent or enclave security plans and that the required effects of each dutyholder's PPS continue to be met.

#### **Inspectors should consider**

- Is a coherent, integrated, coordinated and documented approach taken to all aspects of security that may be affected or influenced by any adjacent or enclave nuclear premises?
- Does decision-making take full account of risks and hazards associated with adjacent and enclave sites, including any risks and hazards that may change over time?
- Are there appropriate communications with adjacent and enclave nuclear premises to ensure situational awareness during a nuclear



security event to facilitate decision-making and the achievement of security outcomes?

- Does the security plan identify all shared services and responsibilities for their delivery?
- Do the emergency preparedness and response arrangements consider the risks and hazards presented by all adjacent and enclave nuclear premises?
- Is there regular dialogue, joint training and exercising to ensure a coherent emergency response between adjacent and enclave nuclear premises and external stakeholders?
- Do local police and CNC plans take account of adjacent and enclaved sites and a demonstrate shared understanding of the relative priorities associated with them?

# References

- [1] H.M. Government, “The Nuclear Industries Security Regulations 2003 (NISR) (2003/403),” 2003.
- [2] ONR, “Security Assessment Principles for the Civil Nuclear Industry,” 2017.
- [3] H.M. Government, “Government Functional Standard GovS 007: Security,” [Online]. Available: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/903904/Government\\_Security\\_Standard.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/903904/Government_Security_Standard.pdf).
- [4] ONR, “ONR-CNSS-POL-001 - NISR 2013 Classification Policy for the Civil Nuclear Industry”.
- [5] IAEA, “Convention on the Physical Protection of Nuclear Material (CPPNM)”.
- [6] IAEA, “Nuclear Security Series No. 20. Objective and Essential Elements of a State’s Nuclear Security Regime”.
- [7] IAEA, “Nuclear Security Series No. 13. Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities (INFCIRC/225/Revision 5),” 2011.
- [8] IAEA, “Nuclear Security Series No. 14. Nuclear Security Recommendations on Radioactive Material and Associated Facilities”.

# Glossary and Abbreviations

AGR	Advanced Gas-Cooled Reactor
CPPNM	Convention on the Physical Protection of Nuclear Material
CNC	Civil Nuclear Constabulary
FSyP	Fundamental Security Principle
IAEA	International Atomic Energy Agency
NISR	Nuclear Industries Security Regulations
NSS	Nuclear Security Series
ONR	Office for Nuclear Regulation
PPS	Physical Protection System
SNI	Sensitive Nuclear Information
SPF	Security Policy Framework
SyAP	Security Assessment Principle
SyDP	Security Delivery Principle
TAG	Technical Assessment Guide