



ONR GUIDE			
LC8 WARNING NOTICES			
Document Type:	Nuclear Safety Technical Inspection Guide		
Unique Document ID and Revision No:	NS-INSP-GD-008 Revision 6		
Date Issued:	December 2018	Review Date:	December 2023
Approved by:	Kulvinder McDonald	Professional Lead Operational Inspection	
Record Reference:	CM9 Folder 1.1.3.979. (2020/208797)		
Revision commentary:	Rev 5: Routine update Rev 6: Updated review period		

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1 INTRODUCTION

- 1.1 Many of the licence conditions (LC) attached to the standard nuclear site licence require, or imply, that licensees 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 licensees' arrangements should contain; this is the responsibility of the duty-holder who remains responsible for safety. LC8 (and the related LC9) are more prescriptive as they use the term 'shall ensure that suitable and sufficient notices are kept on site...'. It is therefore important that ONR and the licensee are clear as to the type of warning notice/signal that is included within LC 8. To support inspectors undertaking compliance inspection, ONR produces a suite of guides to assist inspectors to make regulatory judgements and decisions in relation to the adequacy of compliance, and the safety of activities on the site. This inspection guide is one of the suite of documents provided by ONR for this purpose.

2 PURPOSE AND SCOPE

- 2.1 This guidance has been prepared as an aid to inspection activities carried out by Inspectors at the Office for Nuclear Regulation in judging the licensees compliance with the requirements of LC 8. This guidance provides a framework for these inspection activities within which the Inspector is expected to exercise their discretion. This framework is provided to facilitate a consistent approach to LC 8 compliance inspection.
- 2.2 The guidance does not indicate when or to what extent LC 8 inspections should be carried out as these matters are covered in individual inspector's inspection programmes.
- 2.3 The guidance provided is split into three main elements:
- (i) Purpose of the Licence Condition.
 - (ii) Guidance on arrangements for LC 8.
 - (iii) Guidance on inspection of arrangements and their implementation.

3 LICENCE CONDITION 8 WARNING NOTICES

- 3.1 This Licence Condition states:

The licensee shall ensure that suitable and sufficient notices are kept on site for the purposes of informing persons thereon of each of the following matters, that is to say:

- (a) the meaning of any warning signal used on the site;
- (b) the location of any exit from any place on the site, being an exit provided for use in the event of an emergency;
- (c) the measures to be taken by such persons in the event of fire breaking out on the site or in the event of any other emergency;

and that such notices are kept posted in such positions and in such characters as to be conveniently read by those persons.

4 PURPOSE OF LICENCE CONDITION 8

- 4.1 LC 8 is a standard condition attached to all Nuclear Site Licences. Nuclear site licensees are required to comply with the LC. How this compliance is achieved is for the licensees to decide. However, ONR must judge the adequacy of this compliance. It carries out this function by compliance inspection. It is closely related to LC 9 (Instructions to persons on the site).
- 4.2 This condition's purpose is to ensure the safety of all people on the site in respect of their ability to be able to respond appropriately and without delay to an incident or emergency situation. All warning notices and signs should be in appropriate places to advise people what to do or what to avoid in that area in the event of fire or other emergency. This LC is not intended to capture hazard warning signs, but is focussed on emergency situations which may include fire, site emergency, criticality and chemotoxic hazards and others. The hazards may originate off the licensee's licenced site e.g. an adjacent licenced site or other hazardous installation. The licensee will need to determine the hazards during potential emergencies for which warning notices are required, this may require co-operation with other organisations. In addition, signs should be provided to mark exit routes, emergency equipment and mustering points. Systems for logging the location and for periodic checking of notices should be in place.
- 4.3 Matters for consideration by inspectors include the system for determining the need for notices and also the system for production, posting and maintenance of notices including those required during periods of disruption such as outages. The main thrust of this condition will be met if notices are both appropriate to the hazard and the local situation and intelligible to visitors and contractors as well as employees. If the notices refer to warning signals then such signals should be audible or visible and understood by persons likely to be in that area. Signs should conform to the Health and Safety (Safety Signs and Signals) Regulations 1996 (SI 1996, No 341). Licensee's arrangements should also take cognisance of British Standard BS 5378 where appropriate.

5 GUIDANCE ON ARRANGEMENTS FOR LC8

- 5.1 There are many potential hazards on a site that are either confined to local areas or represent a risk to personnel undertaking certain operations. These hazards are unlikely to lead to an incident that would result in an emergency response and would be covered by the need to display warning notices to comply with Health and Safety legislation rather than LC 8. Similarly on a construction site, hazards should be identified by risk assessment leading to hazard notices and the need to wear Personal Protective Equipment (PPE) but this is not covered by LC 8.
- 5.2 The licensee should have procedures in place to demonstrate compliance with LC 8; the following list considers aspects of the requirements. The list is neither exclusive nor exhaustive and will be subject to review and revision in light of operational experience. If licensees have generic model(s) for arrangements then it is for the site to justify any deviation from the model(s).
- 5.3 Procedures should be provided to comply with LC 8 requirements.

- 5.4 The person, or management position, responsible for compliance with LC 8 should be identified.
- 5.5 Procedures should be readily available and should be reasonably up to date, signed by an appropriate senior manager and controlled under a system compliant with the requirements of LC17.
- 5.6 Procedures should include a requirement for a schedule of warning notices to be kept that identifies the position and type of sign.
- 5.7 Procedures should ensure that systems are in place for review, inspection and maintenance of warning signs.
- 5.8 Procedures should ensure that the licensee has a process for identifying the warning signs required as derived from the hazards on their site or adjacent site(s).

6 GUIDANCE ON INSPECTION OF ARRANGEMENTS AND THEIR IMPLEMENTATION

- 6.1 Part 6 of this guidance is to assist inspectors in judging the adequacy of the licensee's arrangements and implementation. The following list is neither exclusive nor exhaustive and will be subject to review and revision in light of operational experience. It does, however, provide a list of aspects of LC 8 that can be examined during routine inspections. There is a close link to LC 9 (Instructions to persons on site) and inspection of LC 8 should consider compatibility of arrangements under both LCs.
- 6.2 Check that arrangements have been made to demonstrate compliance with the LC.
- 6.3 Review procedures to establish validity, whether any changes have been made since the last review and whether the identified responsible persons are correct. Note whether instructions, methods and quality assurance rules claimed in procedures have been followed and whether any changes have been incorporated and validated.
- 6.4 Check that the procedures require suitable documentation in the form of a schedule of warning notices together with identification of the responsible person or its preparation and regular review. Confirm that they require adequate records of inspection and maintenance (in accordance with LC6 procedures) for warning notices.
- 6.5 Check that the procedures ensure all warning notices are produced to a relevant and suitable standard. Confirm that they ensure signs and warning notices are produced appropriate to the specific hazards for which they are designated.
- 6.6 Examine the procedures and check that suitable and sufficient training requirements are identified to cover the requirements of this licence condition. This is closely linked to LCs 9 and 10.
- 6.7 Check that the procedures cover adequately and in sufficient detail all matters relevant to the location of warning notices. Confirm that this includes provision for specific requirements e.g. during construction where such requirements will change during progress of such work.
- 6.8 Check that there is a system in place both for producing and displaying the notices required by this licence condition. During plant inspections check that all appropriate places have been identified where warning notices are necessary and that the notices are appropriate for the chosen location. Details of any warning signal specific to the

hazard detailed on the warning notice should also be clear. Witness a test of a sample of hazard warning alarms.

- 6.9 Examine the schedule of warning notices and confirm that it gives details of each notice with written content, location and the required frequency of inspection and maintenance. Check the maintenance programme exceptions listing to establish there are none relevant to this licence condition and discuss as necessary with the responsible person identified in the procedures.
- 6.10 The adequacy of warning notices should be assessed with regard to their intelligibility to the licensee's staff and to visitors e.g. contractors' personnel and their conformance with the specific sign legislation. Check that personnel on the site understand warning notices. Confirm by discussion with personnel, that they are aware of any potential hazards in the areas in which they are working as well as general site emergency systems.
- 6.11 Check on a sample basis a typical escape route by following only the signs posted. Discuss as necessary with the responsible person identified in the procedures. Establish that muster points are identified and check that they are tested on a routine basis.

7 FURTHER READING

- 7.1 The Health and Safety (Safety Signs and Signals) Regulations 1996. Guidance on Regulations. L64. <http://www.hse.gov.uk/pubns/books/l64.htm>