



ONR GUIDE			
<b>LC9 INSTRUCTIONS TO PERSONS ON THE SITE</b>			
<b>Document Type:</b>	Nuclear Safety Technical Inspection Guide		
<b>Unique Document ID and Revision No:</b>	NS-INSP-GD-009 Revision 6		
<b>Date Issued:</b>	November 2019	<b>Review Date:</b>	December 2022
<b>Approved by:</b>	K McDonald	Professional Lead Operational Inspection	
<b>Record Reference:</b>	CM9 Folder 1.1.3.979. (2020/208802)		
<b>Revision commentary:</b>	Rev 5: Revised to implement new guidance template Rev 6: Updated review period		

### TABLE OF CONTENTS

1	INTRODUCTION .....	2
2	PURPOSE AND SCOPE .....	2
3	LICENCE CONDITION 9 - INSTRUCTIONS TO PERSONS ON THE SITE.....	2
4	PURPOSE OF LICENCE CONDITION 9 .....	2
5	GUIDANCE ON INSTRUCTIONS FOR LICENCE CONDITION 9 .....	3
6	GUIDANCE ON INSPECTION OF INSTRUCTIONS FOR LC9 .....	4
7	GUIDANCE ON INSPECTION OF IMPLEMENTATION OF PROCEDURES FOR LC9.....	4

## 1 INTRODUCTION

- 1.1 Many of the licence conditions attached to the standard nuclear site licence require, or imply, that licensees should make arrangements to comply with regulatory obligations under the conditions. However, Licence Condition (LC) 9 is one of the licence conditions which do not formally require the licensee to make and implement adequate arrangements. This is discussed more fully in paragraph 5.2. ONR inspects compliance with licence conditions 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. 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 is for use by all inspectors in ONR. Its purpose is to facilitate a consistent approach to LC 9 compliance inspections and to provide assistance to inspectors while carrying out their duties in this area. The guidance should not be regarded as either comprehensive or mandatory.
- 2.2 The guidance provided is split into four main elements:
- 1) Purpose of LC 9.
  - 2) Guidance on instructions for LC 9.
  - 3) Guidance on inspection of instructions.
  - 4) Guidance on inspection of implementation of instructions.

## 3 LICENCE CONDITION 9 - INSTRUCTIONS TO PERSONS ON THE SITE

- 3.1 The licensee shall ensure that every person authorised to be on the site receives adequate instructions (to the extent that this is necessary having regard to the circumstances of that person being on the site) as regards the risks and hazards associated with the plant and its operation, the precautions to be observed in connection therewith and the action to be taken in the event of an accident or emergency on the site.

## 4 PURPOSE OF LICENCE CONDITION 9

- 4.1 The purpose of this condition is to ensure that the licensee provides all people on the site with sufficient information about the risks and hazards (including security if appropriate) associated with the plant and its operation to enable them to take appropriate precautions and to respond appropriately and without delay to an incident or emergency situation. It is closely linked to LC 8 (Warning notices) and LC 11 (Emergency arrangements).
- 4.2 The LC is not intended to repeat the statutory duties to ensure that employees and other persons have suitable instruction, training and supervision as detailed in Sections 2(2)(c) and 3(3) of Health and Safety at Work etc. Act 1974, Regulation 10 of the Management of Health & Safety at Work Regulations 1999, and Regulation 15 of the Ionising Radiations Regulations 2017.

- 4.3 The licensee should in particular ensure instructions are given to new staff, contractors and visitors. Compliance with these requirements may be verified by consideration of the formal system for disseminating written procedures and local checks on implementation by the site inspector.

## 5 GUIDANCE ON INSTRUCTIONS FOR LICENCE CONDITION 9

- 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 accident that would result in an emergency response. LC 9 is principally concerned with ensuring that people on the site are instructed in the appropriate precautions and respond appropriately and without delay to an accident or emergency situation in a manner which is consistent with the operator's emergency plan produced under regulation 10 of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 and LC 11.
- 5.2 A licensee is required to ensure that the requirements of LC 9 are met and be able to demonstrate compliance with this condition. In this context the term procedure is used to describe the formal way that adequate instructions are developed and disseminated. These may be explicitly identified elsewhere in compliance with other LCs and training requirements.
- 5.3 The following list provides ONR's views on what the licensee's procedures might be expected to contain to comply with LC 9. 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). [Note: not all licensees use generic models].
- a. Procedures that address the LC requirements should be readily available and should be extant, signed by an appropriate senior manager and controlled under a system compliant with the requirements of LC 17 (Management systems).
  - b. The procedures should note that the requirements of this condition supplement the requirements of Sections 2(2) (c) and 3(3) of the Health and Safety at Work etc. Act 1974, Regulation 10 of the Management of Health & Safety at Work Regulations 1999, and Regulation 15 of the Ionising Radiations Regulations 2017.
  - c. The procedures should be informed by the information addressing the requirements of LC 16 (Site plans, designs and specifications).
  - d. The procedures should ensure that all persons on the site have been given appropriate instruction on the risks, hazards and responses necessary, during normal operations and potential accidents or emergencies. The procedures should address any precautions that need to be observed in the event of any accident or emergency situation.
  - e. The procedures should ensure that instructions are given to new staff, contractors and visitors and that refresher training is also given at appropriate intervals.
  - f. The procedures should ensure that authorised casual visitors who do not meet normal training requirements are escorted when on the site.
  - g. The procedures should ensure that records of relevant training are made, controlled and kept under the arrangements made for LC 6 (Documents, records, authorities and certificates).

## **6 GUIDANCE ON INSPECTION OF INSTRUCTIONS FOR LC9**

6.1 This section of guidance is to assist inspectors in judging the adequacy of the licensee's instructions. 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 targeted list of aspects of LC 9 that can be examined during routine inspections.

- a. Check that documents demonstrating compliance with LC 9 are in place.
- b. Examine the structure and configuration of the compliance procedures and check that they are consistent with the disseminated instructions and operator's emergency plan. Review the 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.
- c. Check that the procedures align with the information derived from LC 16; in particular check that buildings and plant which might affect safety identified within LC 16 are, where appropriate, identified within the LC 9 procedures, and this information informs the LC 9 procedures described in paragraphs 6.5 – 6.6.
- d. Check that the procedures ensure all persons on the site receive appropriate instructions during their time on the site. Confirm that they address the differing requirements of new staff, both term and itinerant contractors and visitors as well as suitable refresher training where necessary.
- e. Check that the procedures ensure that the amount of information and approach to induction is commensurate with the hazard and complexity of emergency arrangements and that consideration is also given to whether access is to be unescorted or limited.
- f. Check that procedures are in place to ensure escorts have an adequate knowledge of the hazards and emergency arrangements associated with the location for which they are providing the escort duties.
- g. Confirm that the procedures require records of relevant training and instruction and check that there is suitable cross reference to and consistency with the arrangements for LC 6, LC 10 (Training) and LC 11 (Emergency arrangements).

## **7 GUIDANCE ON INSPECTION OF IMPLEMENTATION OF INSTRUCTIONS FOR LC9**

7.1 This section of guidance is to assist inspectors in judging the adequacy of the licensee's implementation of their instructions (i.e. is the licensee doing what their procedures say they should be). 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 9 that can be examined during routine inspections.

- a. Check that a system exists for establishing the necessary instructions for visitors to the site, term and itinerant contractors and employees. The instructions and information should be commensurate with the hazard and complexity of the site and whether access is to be unescorted or limited. Cross check with LC 10 arrangements that the system for providing basic induction training to persons coming onto the site as required by LC 9 exists in a reasonable form and has satisfactory compliance.

- b. Inspectors may find it helpful to consider the site or facility to be a series of layers with the specific nuclear activity being at the core and site reception/security/pass office to be the outer layer. The number and complexity of the layers will be dependent upon the differing responses to accidents or emergency situations. A sample inspection may cover one or more of the layers and that the instructions and information is commensurate with the hazard and complexity of the layer.
- c. Confirm that a system exists to provide the licensee with assurances that all visitors to the site, term and itinerant contractors and employees have been issued with the necessary instructions and that the system is robust. This is particularly important during periods where there is a significant increase in the workforce (e.g. operational reactor outage or period of active commissioning).
- d. Select a sample of individuals on the site and check that they have been given appropriate instructions on the risks and hazards associated with normal site operations and that they are aware of the associated precautions that should be taken.
- e. Select a sample of individuals on site and check that they been given appropriate instructions concerning the responses necessary in the event of an accident or emergency. Include staff that only attend the site during silent hours, (e.g. cleaners). Check also that they are aware of the types of alarm in use on the site and the location of relevant muster/assembly points.
- f. Select a sample of individuals on site and check that they are aware of: how to navigate the site or facility/building; event reporting procedures; and behavioural standards/expectations.
- g. Check that escorts have a suitable knowledge of the hazards and emergency arrangements associated with the site, and where applicable buildings/facilities.
- h. Review the records of instructions given to people on the site and confirm that they are being implemented and also compliant with LC 6 requirements. Examine a sample of records to establish that recent appointees, contractors or visitors with unescorted access have completed necessary basic induction training.
- i. Select a sample of people with escorted access, such as visitors arriving for a meeting and establish that they are escorted to and from the relevant part of the site in accordance with procedures.