



PROJECT ASSESSMENT REPORT			
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<b>Project:</b>	Amendment to the preface to the Hunterston B Plant Maintenance Schedule		
<b>Site:</b>	Hunterston B		
<b>Title:</b>	Request for Approval under LC 28(5) to amend the preface to the Hunterston B plant maintenance schedule		
<b>Licence Instrument No:</b> (if applicable)	Approval, LI 550		
<b>Nuclear Site Licence No:</b>	Sc.13		
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Role	Name	Position	Signature	Date
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Reviewer	[REDACTED]	Principal Inspector		22 12 2015
Accepted by <sup>1</sup>	[REDACTED]	Superintending Inspector		22 12 2015
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#### Revision History

<sup>1</sup> Acceptance of the PAR to allow release of LI

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Licensee	[REDACTED] – Station Director, Hunterston B Power Station	22 12 2015



**Amendment to the preface to the Hunterston B Plant Maintenance Schedule**

**Request for Approval under Licence Condition 28(5) to amend the preface to the  
Hunterston B plant maintenance schedule**

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## EXECUTIVE SUMMARY

### Title

Request for approval under Licence Condition (LC) 28(5) to amend the preface of the Hunterston B plant maintenance schedule.

### Permission Requested

EDF Energy Nuclear Generation Ltd (NGL) has written to ONR requesting approval under LC 28(5) for an amendment to the preface to the Hunterston B Power Station Maintenance Inspection and Test Schedule Preface MITS 5A - Preface, replacing revision 003 with Revision 005.

### Background

Nuclear site LC 28(4) requires the licensee to prepare a plant maintenance schedule for each plant. This schedule identifies the examination, inspection, maintenance and testing necessary to meet the requirements of the safety case. The preface to the plant maintenance schedule (referred to as the MITS preface by the licensee) describes procedures for controlling maintenance and dealing with maintenance intervals. Once approved, no further alteration or amendment can be made to any approved part of any plant maintenance schedule unless ONR has approved it under LC 28(5).

The extant approved MITS Preface Revision 003 dated 26 July 2004 references procedures that have now been superseded within the station's management systems. The licensee has therefore amended the MITS preface and now requests approval of the updated revision 005 (revision 004 was cancelled and never issued) from ONR. This Project Assessment Report (PAR) considers this request and recommends approval of the amendments to MITS preface revision 005.

### Assessment and inspection work carried out by ONR in consideration of this request

From the assessment work undertaken in relation to this application, I note that the proposed revision to the preface now makes more general reference to site LC 22 compliance arrangements and also the company management systems manual. These supersede previous reference, in revision 3, to the company specification for the modifications process BEG/ICP/SHE/EC/001, company manual BEG/MAN/001 and Management Systems Manual BEG/MAN/002.

I acknowledge the licensee's statement that making such changes at this stage will enable changes to company specifications in future to be made more flexibly in the context of the approved preface.

I am satisfied that:

- The requirements of ONR site inspection and enforcement guidance have been met;
- The proposed amendment retains equivalent information to maintenance schedule preface documents at other sites operated by the licensee and approved by ONR; and
- The proposed amendment retains suitable controls for the extension of intervals in the plant maintenance schedule.

I consider that the station has put appropriate controls in place to manage the amendment of the MITS preface. The station has completed its internal processes, including consulting the Nuclear Safety Committee.

It has been confirmed by inspection that neither the maintenance intervals noted in the preface, nor the engineering change methodology upon which the preface relies to control changes to these intervals have changed significantly since 2004. As a result I consider that there has been no impact on nuclear safety in the meantime by referencing superseded documentation.

## **Matters arising from ONR's work**

I have drafted Licence Instrument 550 for approval for amendment to the “Hunterston B Power Station MITS 5A – Preface” under LC 28(5).

## **Conclusions**

I judge that an appropriate case has been made by the licensee to amend The Hunterston B Power Station MITS 5A, replacing revision 003 with revision 005.

## **Recommendations**

I recommend that the Superintending Inspector:

- Signs this PAR to confirm support for the technical and regulatory arguments that justify issuing of Licence Instrument 550.
- Signs this PAR approving its release for publication, after redaction where relevant.

I further recommend that an ONR Deputy Chief Inspector, who is authorised to act on behalf of ONR, signs Licence Instrument 550 granting approval for amendments to the “Hunterston B Power Station MITS 5A – Preface”.

## LIST OF ABBREVIATIONS

EMIT	Examination, Inspection, Maintenance and Testing
HOW2	(Office for Nuclear Regulation) Business Management System
LC	Licence Condition
MITS	Maintenance Inspection and Test Schedule
NGL	EDF Energy Nuclear Generation Limited
NSC	Nuclear Safety Committee
ONR	Office for Nuclear Regulation
PAR	Project Assessment Report



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## 1 PERMISSION REQUESTED

1. NGL has written to ONR <sup>[1]</sup>, <sup>[2]</sup> requesting approval under LC28(5) for an amendment to the preface to the Hunterston B Power Station Maintenance Inspection and Test Schedule Preface MITS 5A - Preface, replacing Revision 003 with Revision 005.

## 2 BACKGROUND

2. Nuclear site Licence Condition 28(4) requires the licensee to prepare a plant maintenance schedule for each plant. The schedule identifies the examination, inspection, maintenance and testing necessary to meet the requirements of the safety case. ONR's published guidance <sup>[3]</sup> states it is ONR's current practice in respect of power reactor sites to specify a high-level section of the plant maintenance schedule, often termed the preface (referred to as the MITS Preface by the licensee), be submitted for approval. The MITS Preface describes procedures for controlling maintenance and dealing with extensions to maintenance intervals. Once approved no further alteration or amendment can be made to any approved part of any plant maintenance schedule unless ONR has approved it under Licence Condition 28(5).
3. Currently Hunterston B has an approved MITS 5A - Preface Revision 003 dated 26 July 2004 which references procedures that no longer exist in the EDF Energy Nuclear Generation Ltd (NGL) / Hunterston B management systems, having been superseded by other corporate documentation. The station has completed its internal processes to and has written to ONR to request approval of Revision 005 to the MITS 5A - Preface (Revision 004 was never issued and subsequently cancelled). This PAR considers this request and recommends approval of the amended MITS Preface

## 3 ASSESSMENT AND INSPECTION WORK CARRIED OUT BY ONR IN CONSIDERATION OF THIS REQUEST

4. ONR received a letter <sup>[1]</sup> dated 11 March 2014 from the licensee requesting Approval of the implementation of amendments to the Preface. These amendments have been progressed under a Category 3 Engineering Change, EC 350326. In addition, the changes to the Preface and the Category of the Engineering Change were noted at the September 2013 NSC (Nuclear Safety Committee).
5. Due to the time elapsed since the original request letter was received, and due to some administrative queries raised regarding its content a further letter <sup>[2]</sup> was received dated 18 December 2015 along with a copy of the Hunterston B power station document titled "Hunterston B Power Station Maintenance Inspection and Test Schedule Preface MITS 5A - Preface Revision 005" <sup>[4]</sup>.
6. From the assessment work undertaken in relation to this application, I note that the proposed revision to the preface now makes more general reference to site licence condition 22 licence condition compliance arrangements and also the company management systems manual. These supersede previous reference, in Revision 3, to the company specification for the modifications process BEG/ICP/SHE/EC/001, company manual BEG/MAN/001 and Management Systems Manual BEG/MAN/002.
7. I acknowledge the licensee's statement that making such changes at this stage will enable changes to company specifications in future to be made more flexibly in the context of the approved preface.
8. I am satisfied that:

- The requirements of ONR site inspection and enforcement guidance have been met;
  - The proposed amendment retains equivalent information to maintenance schedule preface documents at other sites operated by the Licensee and approved by ONR; and
  - The proposed amendment retains suitable controls for the extension of intervals in the plant maintenance schedule.
9. I consider that the station has put appropriate controls in place to manage the amendment of the MITS Preface. The station has completed its internal processes, including consulting the Nuclear Safety Committee.
10. It has been confirmed by inspection that neither the maintenance intervals noted in the preface, nor the engineering change methodology upon which the preface relies to control changes to these intervals have changed significantly since 2004. As a result I consider that there has been no impact on nuclear safety in the meantime by referencing superseded documentation.

#### **4 MATTERS ARISING FROM ONR'S WORK**

11. The letters requesting Approval of the implementation of amendments to the Preface<sup>[1][2]</sup> both refer to Revision 005 of the MITS 5A - Preface, date October 2013. The copy of Revision 005 attached to the first letter was dated 1 May 2014 and the copy of Revision 005 attached to the second letter was dated "TBC". Revision 005 was resubmitted on 22 December 2015 which now reflects the correct implementation date of 20 January 2016.
12. I have drafted Licence Instrument 550 for Approval for amendment to the "Hunterston B Power Station MITS 5A – Preface" under LC 28(5).

#### **5 CONCLUSIONS**

13. I judge that an appropriate case has been made by the licensee to amend The Hunterston B Power Station MITS 5A, replacing Revision 003 with Revision 005. This is based on:
- NGL's modification submission having satisfactorily completed full due process.
  - ONR's inspection and assessment activity undertaken pursuant to this request.

#### **6 RECOMMENDATIONS**

14. I recommend that the Superintending Inspector:
- Signs this Project Assessment Report to confirm support for the technical and regulatory arguments that justify issuing of Licence Instrument 550.
  - Signs this Project Assessment Report approving its release for publication, after redaction where relevant.

15. I recommend that an ONR Deputy Chief Inspector, who is authorised to act on behalf of ONR, Signs Licence Instrument 550 granting Approval for amendments to the “Hunterston B Power Station MITS 5A – Preface”.

## 7 REFERENCES

- [1] EDF, *Letter requesting approval of MITS Preface revision 005*, 11 March 2015, TRIM 2014/107359.
- [2] EDF, *Letter requesting approval of MITS Preface revision 005*, 18 December 2015. TRIM 2015/481419.
- [3] ONR, *HOW 2 Guidance: LC28 Examination, Inspection, Maintenance and Testing (EMIT), NS-INSP-GD-028 Revision 3*, May 2013, [http://www.onr.org.uk/operational/tech\\_insp\\_guides/ns-insp-gd-028.pdf](http://www.onr.org.uk/operational/tech_insp_guides/ns-insp-gd-028.pdf).
- [4] NGL, *Hunterston B MITS 5A - Preface Revision 005*. TRIM 2015/481427.