



Emergency Arrangements

Approval of the revised Capenhurst Emergency Plan C(EP-5)

Project Assessment Report ONR-DFW-PAR-15-001

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EXECUTIVE SUMMARY

Approval of the revised Capenhurst Emergency Plan

This report summarises the assessment by ONR of the application for the approval of a revised Capenhurst Emergency Plan, which had been prepared by the Urenco UK Limited licensee.

Permission Requested

Urenco UK Limited (the licensee) has written to the Office for Nuclear Regulation (ONR) requesting approval of its proposed changes to the Capenhurst Emergency Plan.

Background

In compliance with the licensee's arrangements, the licensee has written to ONR to request approval of the proposed changes incorporated into the revised 'on site' Capenhurst Emergency Plan.

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

I have assessed the differences between the proposed new emergency plan and the existing approved emergency plan, which were of a minor nature. Changes reflected the development of construction by a tenant organisation of the Tails Management Facility, within a fenced enclave on the licensed site, together with a change in the site guard force and the contractorisation of the 'on site' fire and rescue service.

I have confirmed that the licensee's revised Capenhurst Emergency Plan meets the requirements of extant ONR guidance.

I have confirmed that the licensee has completed all aspects of due process in compiling and reviewing the proposed new Capenhurst Emergency Plan. This has included consultation with the 'off site' emergency services, who play a significant role in the implementation of the Capenhurst Emergency Plan, together with the licensee incorporating independent advice from the nuclear safety committee in the preparation of the proposed new Capenhurst Emergency Plan. I made a site intervention to inspect evidence of some records of the licensee's emergency arrangements training and to discuss the licensee's incorporation of learning from the rolling programme of 'on site' emergency exercises, one of which is annually observed by ONR. I confirmed that the licensee's application was valid and had completed all relevant aspects of the licensee's due processes.

Matters arising from ONR's work

There are no matters arising from this project assessment report.

Conclusions

I have concluded that the licensee has made a valid application for an 'Approval' Licence Instrument, to approve the revised Capenhurst Emergency Plan. The licensee's planned (triennial) periodic review of the Capenhurst Emergency Plan has incorporated the consequences of additional activities on the Capenhurst licensed site, notably the ongoing construction of the significant Tails Management Facility, within a fenced part of the licensed site. A range of other minor changes have been duly incorporated into the revised Capenhurst Emergency Plan. The revised Capenhurst Emergency Plan has been considered by the Emergency Planning Consultative Committee, incorporating advice from the

emergency services following that meeting and has also been considered by the licensee's nuclear safety committee.

I have concluded that the licensee has made an adequate case to justify the issue of an Approval Licence Instrument for the revised Capenhurst Emergency Plan.

Recommendation

I recommend that Licence Instrument 538 be issued to Urenco UK Limited to approve the revised Capenhurst Emergency Plan and thereby withdraw approval of the existing Capenhurst Emergency Plan.

LIST OF ABBREVIATIONS

ALARP	As low as reasonably practicable
BSL	Basic Safety Level (in SAPs)
BSO	Basic Safety Objective (in SAPs)
CNS	Capenhurst Nuclear Services Limited (a tenant organisation on the Urenco UK Limited licensed site).
EPCC	(Urenco UK Limited) Emergency Planning Consultative Committee
HOW2	(Office for Nuclear Regulation) Business Management System
HSE	The Health and Safety Executive
IAEA	The International Atomic Energy Agency
ONR	Office for Nuclear Regulation
RGP	Relevant Good Practice
SAP	Safety Assessment Principle(s)
SFAIRP	So far as is reasonably practicable
SSC	Structure, System and Component
TAG	Technical Assessment Guide (ONR)
TMF	Tails Management Facility

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1 PERMISSION REQUESTED

1. The Licensee submitted a request for ONR 'Approval' of the revised Capenhurst Emergency Plan, in compliance with the licensee's licence condition 11 arrangements.

2 BACKGROUND

2. As required under its arrangements for the implementation of licence condition 11, emergency arrangements, the licensee has conducted a planned triennial review of the Capenhurst Emergency Plan, resulting in an amended Capenhurst Emergency Plan.

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

3. ONR has carried out a programme of work to assess the application for an Approval Licence Instrument, to approve the revised Capenhurst Emergency Plan.
4. On reviewing the original Licence Instrument application from the licensee, dated 17 November 2014, I noted that the licensee had duly consulted the licensee's nuclear safety committee at a meeting on 14 August 2014, the minutes of which were attached to the application letter. I also noted that the licensee had duly completed the extant ONR "Emergency Plan Review Checklist" document. However, a shortfall which I identified was that the licensee had not at that stage consulted with the external 'blue light' emergency services. I provided regulatory advice to the licensee to consult with the external emergency services and this consultation occurred at the Emergency Planning Consultative Committee (EPCC) meeting held at Capenhurst on 11 December 2014, which I attended. Cheshire Constabulary requested that minor changes be made to the plan, including references to Cheshire Constabulary and the authority of the Cheshire Fire & Rescue Service Commander to be able to declare a 'Major Accident'. The licensee duly made these minor amendments to the Capenhurst Emergency Plan, which was then presented to ONR with a request for approval, in a valid and comprehensive revised application letter, sent to ONR dated 5 January 2015. I advised the licensee that given the minor consequent changes to the Capenhurst Emergency Plan, there was no need for the licensee to represent the Capenhurst Emergency Plan to the licensee's nuclear safety committee.
5. On 9 December 2014, an ONR team of five inspectors observed the licensee's Level One demonstration emergency exercise "Pine", which demonstrated what were then the current site emergency arrangements. The exercise demonstrated the response of both the licensee and the Capenhurst Nuclear Services Limited (CNS) tenant organisation to a simulated criticality event. Overall, ONR assessed this emergency exercise as an adequate demonstration of key aspects of the 'on site' emergency arrangements, embodied within the Capenhurst Emergency Plan, with only minor areas for improvement identified arising from this emergency exercise, which have been incorporated in to the revised Capenhurst Emergency Plan. This provided a degree of regulatory confidence in the licensee's ability to implement the key provisions of the Capenhurst Emergency Plan. I wrote to the licensee on 15 January 2015, in a letter titled "Confirmation of observations of Level One emergency exercise "Pine" held on 9 December 2014 and request for a response to the exercise observations by the end of April 2015".
6. At the EPCC meeting on 11 December 2014, the licensee also provided a document titled "Emergency Roles Baseline Statement of Resources – 2014". This document was an organisational baseline of resources, describing the emergency organisation, arrangements and resourcing levels to ensure adequate emergency management by the licensee. I did not assess this document in depth, although I noted that it was a

live document, duly reviewed by the licensee and was a useful adjunct to the licensee's emergency arrangements.

7. I reviewed the licensee's completed "Emergency Plan Review Checklist" document. I decided to focus on the topic of emergency arrangements training of personnel, given that the some shortfalls in the training of the licensee's auxiliary fire fighters had been observed by ONR at Capenhurst on a previous occasion. I requested a copy of the licensee's lower tier emergency arrangements document, titled EP (13) 32, "Review of Emergency Training" Issue 1, dated April 2015. I assessed aspects of this document and followed up this assessment by meeting with the licensee's Emergency Planning Manager at a site intervention on 21 April 2015, reported in an ONR Intervention Record. At that site intervention, I inspected samples of training records for staff with emergency arrangements responsibilities. I noted that the completion of training was routinely monitored by the licensee's lead team as a key performance indicator. I also established that key licensee staff were receiving familiarisation emergency arrangements training at the 'off site' Strategic Command Centre at Winsford. I provided regulatory advice to update the licensee's Technical Adviser role holders, which was accepted by the licensee. I was shown evidence of a contract to provide the Guard Force with timely site information packages, which the Guard Force would provide to the 'blue lights' emergency services when they respond to the Capenhurst site. I discussed the licensee's implementation of learning from the programme of emergency exercises. Overall, I was content that the licensee was adequately implementing key elements of the Capenhurst Emergency Plan, which enabled me to support the provision by ONR of the Approval Licence Instrument.
8. I have drafted the standard licence condition 11(3) Approval Licence Instrument, for the approval of the revised Capenhurst Emergency Plan and withdrawal of the ONR Approval of the previous Capenhurst Emergency Plan. The Licence Instrument complies with the extant ONR guidance for the preparation and issue of such standard Approval Licence Instruments.

MATTERS ARISING FROM ONR'S WORK

9. For this assessment, ONR effort has been concentrated on the assessment of the licensee's implementation of arrangements for periodic review of the emergency plan and the implementation of the findings of the licensee's review. There are no outstanding matters arising from ONR's work.

4 CONCLUSIONS

10. This report presents the findings of my assessment of the licensee's request for a Licence Condition 11 Approval Licence Instrument for the revised Capenhurst Emergency Plan, together with the findings of a related site intervention, at which aspects of the licensee's supporting arrangements were inspected, with an acceptable outcome.
11. To conclude, I am broadly satisfied with the claims, arguments and evidence laid down within the licensee's application and duly incorporated within the revised "Capenhurst Emergency Plan, C(EP-5) Rev 3 (Licence Condition 11)" dated 5 January 2015.

12. RECOMMENDATION

13. The project assessment report recommends that ONR issues 'Approval' Licence Instrument number 538, to approve the revised Capenhurst Emergency Plan and withdraw the approval of the previous version of the Capenhurst Emergency Plan.

5 REFERENCES

1. ONR HOW2 Guide - Purpose and Scope of Permissioning - NS-PER-GD-014 Revision 4. July 2014. <http://www.onr.org.uk/operational/assessment/index.htm>
2. Safety Assessment Principles for Nuclear Facilities. 2014 Edition Revision 0. November 2014. <http://www.onr.org.uk/saps/saps2014.pdf>.
3. ONR HOW2 Guide - Preparation and issue of Licence Instruments NS-PER-IN-001 Revision 6. May 2014. <http://www.onr.org.uk/operational/assessment/ns-per-in-001.pdf>.
4. ONR HOW2 Guide - Licence Condition 11 – Emergency Arrangements. Nuclear Safety Technical Inspection Guide. NS-INSP-GD-011. Revision 3. January 2015. www.onr.org.uk/operational/tech_insp_guides/ns-insp-gd-011.pdf
5. Original application letter from Urenco UK Limited to ONR, titled “Capenhurst Emergency Plan – Submission for Approval”, ONR/2014/27/R, 17 November 2014. Attached to the letter were the minutes of the Nuclear Safety Committee of 14 August 2014, at which the original draft of the Capenhurst Emergency Plan was discussed, together with Revision 2 of the “Capenhurst Emergency Plan, C(EP-5) Rev 2 (Licence Condition 11)”, dated 16 October 2014. Also attached to the letter was a completed copy of the “Emergency Plan Review Checklist”, with the licensee having detailed within the revised Capenhurst Emergency Plan the response to each of the ONR questions in the “Emergency Plan Review Checklist”, extracted from what was then the extant ONR Guidance document, “NS-INSP-GD-011 (Revision 2) Nuclear Safety Technical Inspection Guide – LC 11 – Emergency Arrangements”. This application letter was withdrawn on 9 January 2015 by Reference 10, below. TRIM reference 2014/428179
6. Letter from ONR to Urenco UK Limited, titled “Confirmation of observations of Level One Emergency Exercise Pine held on 9 December 2014 and request for a response to the exercise observations by the end of April 2015”, UCL70400R, dated 12 January 2015. TRIM reference 2015/5939.
7. Minutes of the Urenco UK Limited Capenhurst Emergency Planning Consultative Committee meeting held at Capenhurst on 12 December 2014. TRIM reference 2014/468656.
8. ONR Approval of the previous Capenhurst Emergency Plan, C(EP-4) Rev 3 (Licence Condition 11), Licence Instrument 530, dated 26 November 2012 attached to ONR letter UCL 70359, dated 27 November 2012. TRIM reference 2012/463011.
9. Letter from ONR to Urenco UK Limited, UCL 70400R, Licence Condition 11 – Emergency Arrangements, titled “Confirmation of observations of Level One Emergency Exercise “Pine” on 9 December 2014 and request for a response to the exercise observations by the end of April 2015”. TRIM reference 2015/5939.
10. Second application letter from Urenco UK Limited to ONR, titled “Capenhurst Emergency Plan – Submission for Approval”, ONR/2015/03R, 9 January 2015. Attached to the letter was Revision 3 of the “Capenhurst Emergency Plan, C(EP-5) Rev3 (Licence Condition 11), dated 5 January 2015. TRIM reference 2015/15265.
11. Urenco UK Limited document No. UMSEC-175, “Emergency Roles Baseline Statement of Resources – 2014” Issue No. 5, dated 5 December 2014. TRIM reference 4.4.2.15022.
12. Urenco UK Limited document No. EP (13)22, “Review of Emergency Training” Issue No.1, April 2015. TRIM reference 2015/138458. This document was reviewed with

the licensee during a site intervention at Capenhurst on 21 April 2015, reported in ONR Intervention Record ONR-DFW-IR-15-006.

13. Reply from consultation with the Environment Agency Site Nuclear Regulator, stating that no issues need to be addressed prior to the issue of an Approval licence instrument by ONR. TRIM reference 2015/153740.
14. ONR Intervention Record No. ONR-DFW-IR-15-006, a report of an ONR site intervention on 21 April 2015, to discuss aspects of emergency arrangements training and related matters, which supported the implementation of the proposed new Capenhurst Emergency Plan. TRIM reference 2015/156798.