



Sizewell A operating rules

Proposal to delete approved operating rule 1, glossary and preface

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EXECUTIVE SUMMARY

Proposal to delete approved operating rule 1, glossary and preface

Permission requested

Magnox Limited, the licensee, has requested the Office for Nuclear Regulation (ONR) withdraw the approval of its remaining approved operating rule (OR) for Sizewell A.

Background

Sizewell A currently has one ONR-approved OR, OR 1.1. OR 1.1 states “no more than two control rods may be absent from the core at any time”. The term “absent” is defined in the OR glossary as “a control rod is considered to be absent if it is latched or if a hand-wind is connected to its associated drive mechanism or if it has been removed from the reactor”. This definition is now the only entry in the OR glossary, which is also approved by ONR.

In addition to OR 1.1 and the OR glossary, ONR has approved the OR preface. The OR preface introduces the ORs, their purpose, the associated philosophy of their use alongside operating instructions, and the arrangements for their modification or suspension.

Sizewell A has now completed defuelling; criticality is no longer possible. The licensee has therefore prepared a justification that OR 1.1 is therefore no longer required, and has written to ONR asking that approval of OR 1.1, the OR glossary and the OR preface be withdrawn.

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

I have assessed the licensee’s justification, which was considered and endorsed by the licensee’s nuclear safety committee.

The licensee argues that OR 1.1 was introduced to control criticality, and that with the reactor defueled (and with no means of back-loading fuel in the spent fuel pond back into the reactor) the rule becomes redundant; further, without OR 1.1 the OR preface and OR glossary no longer serve any purpose. I concur. I have satisfied myself that the reactor and dry fuel route are defueled. I note also that the last of the spent fuel was shipped from the site in August 2014. I therefore consider it appropriate to withdraw approval of OR 1.1, the OR preface and the OR glossary.

Conclusions

I am satisfied that the reactor is defueled; that reactor criticality is therefore no longer possible; and that as a result OR 1.1 no longer serves any purpose.

Recommendation

I recommend that Licence Instrument 510 be issued under Licence Condition 1(3)(a) to withdraw approval Sizewell A’s OR 1.1, OR preface and OR glossary.

LIST OF ABBREVIATIONS

ONR	Office for Nuclear Regulation
OR	Operating Rule

TABLE OF CONTENTS

1	PERMISSION REQUESTED	6
2	BACKGROUND	6
3	ASSESSMENT AND INSPECTION WORK CARRIED OUT BY ONR IN CONSIDERATION OF THIS REQUEST	6
4	MATTERS ARISING FROM ONR'S WORK.....	6
5	CONCLUSIONS	6
6	RECOMMENDATIONS.....	6
7	REFERENCES	7

1 PERMISSION REQUESTED

1. Magnox Limited, the licensee, has requested the Office for Nuclear Regulation (ONR) withdraw the approval of its remaining approved operating rule (OR) for Sizewell A.

2 BACKGROUND

2. Sizewell A currently has one ONR-approved OR, OR 1.1. OR 1.1 states “no more than two control rods may be absent from the core at any time”. The term “absent” is defined in the OR glossary as “a control rod is considered to be absent if it is latched or if a hand-wind is connected to its associated drive mechanism or if it has been removed from the reactor”. This definition is now the only entry in the OR glossary, which is also approved by ONR.
3. In addition to OR 1.1 and the OR glossary, ONR has approved the OR preface. The OR preface introduces the ORs, their purpose, the associated philosophy of their use alongside operating instructions, and the arrangements for their modification or suspension.
4. Sizewell A has now completed defuelling; criticality is no longer possible. The licensee has therefore prepared a justification [1] that OR 1.1 is therefore no longer required, and has written to ONR [2] asking that approval of OR 1.1, the OR glossary and the OR preface be withdrawn.

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

5. I have assessed the licensee’s justification, which was considered and endorsed by the licensee’s nuclear safety committee [3].
6. The licensee argues that OR 1.1 was introduced to control criticality, and that with the reactor defueled (and with no means of back-loading fuel in the spent fuel pond back into the reactor) the rule becomes redundant; further, without OR 1.1 the OR preface and OR glossary no longer serve any purpose. I concur. I have satisfied myself that the reactor and dry fuel route are defueled [4]. I note also that the last of the spent fuel was shipped from the site in August 2014. I therefore consider it appropriate to withdraw approval of OR 1.1, the OR preface and the OR glossary.

4 MATTERS ARISING FROM ONR’S WORK

7. There are no matters arising from this assessment.

5 CONCLUSIONS

8. To conclude, I am satisfied that the reactor is defueled; that reactor criticality is therefore no longer possible; and that as a result OR 1.1 no longer serves any purpose.

6 RECOMMENDATIONS

9. I recommend that Licence Instrument 510 be issued under Licence Condition 1(3)(a) to withdraw approval Sizewell A’s OR 1.1, OR preface and OR glossary.

7 REFERENCES

1. NP/SC 5233 Revision 1 Sizewell A Site: Proposal to Amend (Delete) HSE Approved Operating Rule 1, Glossary and Preface. 17 July 2014 (TRIM ref. 2014/299842)
2. SZA 51989R SIZEWELL 'A' SITE NP/SC 5233 REVISION 1: PROPOSAL TO AMEND (DELETE) HSE APPROVED OPERATING RULE 1, GLOSSARY AND PREFACE. 28 August 2014 (TRIM ref. 2014/324904)
3. Minutes of the Joint Meeting of the Magnox Limited Oldbury, Sizewell A and Wylfa Nuclear Safety Committees held on Tuesday 24 June 2014 at Oldbury Technical Centre. 9 July 2014 (TRIM ref. 2014/260581)
4. ONR-DFW-IR-14-129 Revision 0 Sizewell A LC 11 and 23 compliance inspection / fuel free verification inspection. 1 September 2014 (TRIM ref. 2014/321585)