



**LLW Repository**

**Approval of Amendments to the LLWR Emergency Plan**

Project Assessment Report ONR-SDFW-PAR-18-042  
Revision 0  
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## EXECUTIVE SUMMARY

### Approval of LLWR Emergency Plan

#### Permission Requested

This project assessment report relates to a request from Low Level Waste Repository Ltd (LLWR Ltd) for an approval of its amended Emergency Plan made under Licence Condition (LC) 11(1) of nuclear site licence No. 82.

#### Background

The Low Level Waste Repository is the national disposal facility for low level radioactive waste, and has been operating since the 1960s. The act of disposing of radioactive waste to the vaults is regulated through the Environment Agency Permit granted under the Environmental Permitting (England and Wales) Regulations 2016. The site was relicensed from Sellafield Ltd in 2007 when LLW Repository Ltd. was set up by the NDA to run LLWR. A nuclear site licence is granted only after ONR has fully satisfied itself that the licensee has an adequate safety case and has made adequate arrangements to manage the site safely.

The implementation of these arrangements is aimed at reducing, to an acceptably low level, both the chance of an accident or emergency that might lead to the release of radioactivity and the subsequent size of any release. It is a condition of each nuclear site licence that there shall be arrangements for dealing with an accident or emergency.

The Emergency Plan is a key document in these arrangements and outlines the necessary actions that will be implemented to protect workers and the public from the effects of an accident or emergency, in the unlikely event that it should occur. Due to its importance, it is ONR policy to approve the Emergency Plan, to ensure that any subsequent changes are assessed for adequacy by ONR.

The licensee has carried out a routine periodic review of its Emergency Plan and identified some minor changes it considers to be necessary. As required by LC 11(3), the licensee has written to ONR to request approval of its revised emergency arrangements that are set out in the Emergency Plan.

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

ONR has carried out a programme of assessment and approval of previous amendments to the licensee's Emergency Plan. The extant emergency plan was last fully reviewed and approved in 2013.

ONR has assessed the differences between the proposed new plan and the existing approved plan, informed by ONR guidance on Emergency Arrangements. The changes are minor in nature, with the principal amendments being clarification with respect to application of the Emergency Plan to security incidents, definition of silent hours and on-call capability, addition of some roles, update to communication capabilities, and removal of redundant or unnecessary references. In addition, throughout the period since the last review, the licensee has continued to achieve adequate performance when demonstrating its LC11 emergency arrangements.

#### Matters arising from ONR's work

There are no matters arising from this project assessment report.

## **Conclusions**

ONR is satisfied that the proposed amendments to the Emergency Plan are minor in nature and that the amended plan meets ONR guidance on Emergency Arrangements. Therefore, ONR concludes that this submission satisfies the requirements of LC11(1).

## **Recommendation**

On the basis of the documentation submitted by LLWR Ltd and ONR's assessment, it is recommended that a person with delegated authority within ONR signs and issues licence instrument number 512, a Licence Condition 11(3) Approval of the LLWR Emergency Plan, EP01 Issue 4 dated November 2018, and Licence Instrument 511 be withdrawn.

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## 1 PERMISSION REQUESTED

1. LLWR Ltd (the licensee) has requested, in line with their arrangements, the Office for Nuclear Regulation's (ONR's) Approval under Licence Condition 11(3) for its proposed changes to the current LLWR Emergency Plan [1]. This revision is documented as the LLWR Emergency Plan EP01 Issue 4, November 2018 [2].
2. The licensee currently has an on-site emergency plan [3], which was approved by ONR in Licence Instrument 511 [4]. Licence Condition (LC) 11(3) requires the licensee to ensure that no alteration or amendment is made to an approved emergency plan unless ONR approves that alteration or amendment. This report presents the basis for ONR approval of the licensee's proposed new arrangements.
3. The proposed amendments to the plan have been subject to the licensee's due governance process and endorsed via its nuclear safety committee [5].

## 2 BACKGROUND

4. The licensee, as required by its arrangements, has undertaken a periodic review of the Emergency Plan. The revised plan incorporates a number of minor amendments, many relating to security matters, which collectively have triggered a revision to the Emergency Plan.
5. As required by LC11 (3), the licensee has written to ONR to request approval of its revised emergency plan [1].

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

6. ONR's assessment of the proposed emergency plan considered the differences between the extant emergency plan [3] and the proposed emergency plan [2]. The minor changes are noted below:
  - Inclusion of the Building Controller, Guard Force Team Leader, and Security Manager and deputy roles.
  - Clarity on the scope of the Emergency Plan in relation to security incidents.
  - Clarity on definition of 'silent hours' and on-call capability.
  - Update to communication capabilities and notification list.
  - Removal of redundant or unnecessary references.
  - Consideration of REPPIR assessment for emergencies caused by malicious intent.
7. These minor changes provide clarity within the Emergency Plan and improve the arrangements from the perspective of integrated response to safety and security events. This is considered to be a positive move by LLWR given the reducing safety hazard at the site and increasing recognition of delivering the necessary security outcome.
8. The previous 2013 review of the Emergency Plan [6] conducted an in depth review of the arrangements, as triggered by the change in emergency services provision, from utilising Sellafield Fire and Rescue to direct support from Cumbria Fire and Rescue Service. This current update of the arrangements represents a much less significant change.
9. ONR is content that LLWR continue to meet the requirements of the guidance on Emergency Arrangements [7] and these minor amendments do not impact nuclear safety.

10. The proposed amendments to the plan have been subject to the licensee's due governance process and were endorsed at the 49th meeting of the LLWR Environmental, Health and Safety Committee (NSC) on 14 September 2018 [5].
11. The licensee has continued to achieve an adequate performance when demonstrating the Emergency Plan aspects of the LC11 emergency arrangements, the most recent example being at Emergency Exercise '██████████', a combined safety and security incident, observed by ONR on 14 July 2016 [8].
12. ONR Civil Nuclear Security and Safeguards (CNSS) was consulted concerning the proposed approval of the revised Emergency Plan and have confirmed that they have no objections to the approval being issued [9].
13. The Environment Agency (EA) has been informed of the proposed approval of the LLWR Emergency Plan and has confirmed no objection [10].
14. Licence Instrument (LI) 512 [11] has been drafted in response to the licensee's request for the approval of the LLWR Emergency Plan under Licence Condition 11(3). This LI is a routine LI for which a standard approved template is provided within ONR guidance on the Preparation and Issue of Licence Instruments [12], and as such is not required to be reviewed by Government Legal Department (GLD).

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

15. There are no matters arising from this project assessment report.

#### **5 CONCLUSIONS**

16. I am satisfied that the revised emergency plan introduces only minor changes to the extant arrangements, and that these changes are adequate and acceptable.
17. The licensee has continued to successfully demonstrate the implementation of the Emergency Plan since the last review in 2013.
18. ONR therefore concludes that the proposed amendments should be implemented by granting an approval under LC 11(3).

#### **6 RECOMMENDATIONS**

19. On the basis of the documentation submitted by LLWR Ltd and ONR's assessment, it is recommended that:
  - The Head of Decommissioning, Fuel & Waste (DFW) Sub-Division approves this PAR.
  - A person with delegated authority within ONR signs and issues licence Instrument number 512, a Licence Condition 11(3) Approval of the LLWR Emergency Plan EP 01 Issue 4 dated November 2018, and Licence Instrument 511 be withdrawn.

## 7 REFERENCES

- 1 LLWR Letter to ONR, FC-LLWR-ONR-OG-0119, 19 November 2018. 2018/373995.
- 2 LLWR Emergency Plan, EP 01 Issue 4, November 2018. 2018/373999.
- 3 LLWR Emergency Plan, EP 01 Issue 3, July 2013. 2013/333674.
- 4 Licence Instrument 511, LC11(3) Approval, 19 September 2013. 2016/106454
- 5 LLWR EHS Committee Meeting 49 – (NSC) Quarter 3 2018, 14 September 2018. 2018/325454.
- 6 Approval of amendment to LLWR Site Emergency Plan, ONR-LLW-PAR-13-051, September 2013. 2013/334463.
- 7 LC 11 – Emergency Arrangements, NS-INSP-GD-011, Revision 5, July 2017. 2017/263535.
- 8 ONR-SDFW-IR-16-050 Revision 0, July 2016. 2016/298272.
- 9 Email to Site Inspector from CNSS regarding Emergency Plan Approval, 18 March 2019. 2019/82920.
- 10 Email from Environment Agency Site Regulator to ONR Site Inspector regarding Emergency Plan Approval, 18 March 2019. 2019/79983.
- 11 Licence Instrument 512, LC11(3) Approval. 2019/76111.
- 12 Preparation and Issue of Licence Instruments, NS-PER-IN-001, Revision 8, January 2017. 2017/8970.