



Licensing of Inutec Limited

**Initial Approval of the Arrangements for Urgent Safety Proposals and Initial Approval of
Inutec Limited Emergency Plan**

Project Assessment Report ONR-SDFW-PAR-18-039
Revision 0
5 February 2019

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EXECUTIVE SUMMARY

Initial Approval of Inutec Limited Emergency Plan and Initial Approval of the Arrangements for Urgent Safety Proposals

Inutec Limited (the Licensee) has been granted a new nuclear site licence that will come into force on 11 February 2019. In the period between grant of the licence and the licence coming into force Inutec Limited has written to the Office for Nuclear Regulation (ONR) requesting that it approves two of its arrangements. These are for Inutec Limited's arrangements for Urgent Safety Proposals as required by Licence Condition 13(11) and the Inutec Limited emergency plan under Licence Condition 11(2) as Specified by ONR.

Licence Condition 13(11) requires that where it becomes necessary, to obtain consideration of, or advice on, urgent safety proposals (which would normally be considered by a nuclear safety committee) in accordance with appropriate arrangements made for this purpose by the Licensee, considered by the relevant nuclear safety committee and Approved by ONR. Once approved, these arrangements cannot be changed without ONR's approval.

Under Licence Condition 11(1), Licensees are required to make and implement adequate arrangements for dealing with any accident or emergency arising on the site and their effects. Furthermore, Licence Condition 11(2) states that the licensee shall submit to ONR for approval such parts of the aforesaid arrangements as ONR may specify. As it is ONR policy that at every licensed nuclear site, specified parts of the emergency arrangements will be approved prior to a nuclear site licence coming into force. ONR issued a Specification to Inutec Limited immediately following grant of the nuclear site licence, under Licence Condition 11(2) requiring it to submit its emergency plan to ONR for Approval. Once approved by ONR, Inutec Limited's Emergency Plan cannot be changed without further ONR approval.

ONR Approved Inutec Ltd's Nuclear Safety Committee Terms of Reference for routine matters immediately following grant of the nuclear site licence. The first properly constituted Nuclear Safety Committee has provided advice on both the arrangements for Urgent Safety Proposals to the Licensee and the Inutec Limited Emergency Plan. The Licensee has accepted their advice and has written to ONR to request the Approval of both of these arrangements.

This project assessment report recommends that ONR issues licence instrument number 504, a Licence Condition 13(11) Approval of the Inutec Limited arrangements for Urgent Safety Proposals and licence instrument number 505, a Licence Condition 11(2) Approval of the Inutec Limited Emergency Plan.

LIST OF ABBREVIATIONS

| | |
|-----|-------------------------------|
| LC | Licence Condition |
| NSC | Nuclear Safety Committee |
| ONR | Office for Nuclear Regulation |
| PAR | Project Assessment Report |
| ToR | Terms of Reference |

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1 BACKGROUND

1. Inutec Limited (the Licensee) has been granted a new nuclear site licence that will come into force on 11 February 2019. In the period between grant of the licence and the licence coming into force Inutec Limited has written to the Office for Nuclear Regulation (ONR) requesting that it approves two of its arrangements [1]. These are for Inutec Limited's arrangements for Urgent Safety Proposals [2] as required by Licence Condition 13(11) and the Inutec Limited emergency plan [3] under Licence Condition 11(2) as Specified by ONR.
2. Licence Condition 13(11) requires that where it becomes necessary, to obtain consideration of, or advice on, urgent safety proposals (which would normally be considered by a nuclear safety committee) in accordance with appropriate arrangements made for this purpose by the Licensee, considered by the relevant nuclear safety committee and Approved by ONR. Once approved, these arrangements cannot be changed without ONR's approval [4].
3. Under Licence Condition 11(1), Licensees are required to make and implement adequate arrangements for dealing with any accident or emergency arising on the site and their effects [4]. Furthermore, Licence Condition 11(2) states that the licensee shall submit to ONR for approval such parts of the aforesaid arrangements as ONR may specify. As it is ONR policy that at every licensed nuclear site, specified parts of the emergency arrangements will be approved prior to a nuclear site licence coming into force [5]. ONR issued a Specification to Inutec Limited immediately following grant of the nuclear site licence, under Licence Condition 11(2) requiring it to submit its emergency plan to ONR for Approval [6]. Once approved by ONR, Inutec Limited's Emergency Plan cannot be changed without further ONR approval.
4. ONR Approved Inutec Ltd's Nuclear Safety Committee Terms of Reference for routine matters immediately following grant of the nuclear site licence [6]. The first properly constituted Nuclear Safety Committee has provided advice on both the arrangements for Urgent Safety Proposals to the Licensee and the Inutec Limited Emergency Plan. The Licensee has accepted their advice and has written to ONR to request the Approval of both of these arrangements [1].

2 ASSESSMENT AND INSPECTION WORK CARRIED OUT BY ONR

2.1 ARRANGEMENTS FOR URGENT SAFETY PROPOSALS

5. Inutec Limited provided ONR with draft arrangements for Urgent Safety Proposals [7] as part of its Nuclear Licence Site application dossier [8]. These were assessed by ONR and it was concluded that they met the expectations of ONR guidance [9].
6. A final pre licensing readiness intervention was undertaken against Licence Condition 13 and assessed by ONR as being adequate [10] against the expectations of ONR guidance for that licence condition [11].
7. The Inutec Limited Nuclear Safety Committee considered the proposed arrangements for Urgent Safety Proposals and its advice recommending submission to ONR for Approval can be found in the minutes of the meeting [12]. The advice of the Nuclear Safety Committee was accepted by Inutec Limited at their Site Governance Meeting [13].
8. ONR compared the arrangements for Urgent Safety Proposals [2] submitted with Inutec Limited's letter requesting Approval under Licence Condition 13(11) with the draft arrangements submitted as part of its nuclear site licence application dossier [8] and were found to be identical apart from a few minor grammatical amendments which add clarity to the procedure.

9. It is therefore recommended that the Head of Decommissioning, Fuel & Waste (DFW) Sub-Division approves licence instrument number 504, a Licence Condition 13(11) Approval of the Inutec Limited arrangements for Urgent Safety Proposals, INUTEC/F/342 - Terms of Reference for the Nuclear Safety Committee When Convening To Consider Urgent Safety Proposals Issue 2, February 2019.

2.2 EMERGENCY PLAN

10. Inutec Limited submitted to ONR a draft of its Emergency Plan [14] as part of its nuclear site licence application dossier [8].
11. ONR assessed Inutec Limited's Emergency Plan INUTEC-P-203 (issue 4) against ONR's guidance on emergency arrangements. The assessment [15] found that the emergency plan identifies the types of possible incidents on the site, as informed by the safety case and the Hazard Identification and Risk Evaluation (HIRE) report, and defines the level of response required to deal with them. ONR considered that the Inutec Limited Emergency Plan adequately meets ONR's guidance [11].
12. A Level 1 emergency exercise demonstration by Inutec Limited was assessed by ONR as being adequate [16] using the Inutec Limited Emergency Plan INUTEC-P-203 (issue 4). Therefore ONR considers an adequate emergency plan has been made and implemented against the guidance for Licence Condition 11.
13. The Nuclear Safety Committee considered the emergency plan to be submitted to ONR and its advice recommending submission to ONR for approval can be found in the minutes of the meeting [12]. The advice of the Nuclear Safety Committee was accepted by Inutec Limited at their Site Governance Meeting [13].
14. The Inutec Limited Emergency Plan [3] submitted with the letter requesting approval under Licence Condition 11(2) was compared with the draft of the Emergency Plan [13] submitted as part of its nuclear site licence application dossier and found to be almost identical apart from a few minor grammatical and formatting amendments, an update to the references which add clarity to the procedure and specific reference to the Transport Emergency Arrangements Plan, INUTEC/P/405 for compliance with the requirements of the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009.
15. In addition to LC11, Inutec Limited is required to comply with The Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR2001). Inutec Limited's extant Operational Safety Case formed part of the Magnox Limited Winfrith HIRE report assessed by ONR [17] when Inutec Limited was a tenant on the Magnox Limited Winfrith nuclear licenced site. The HIRE concluded that there are no reasonably foreseeable radiation accidents on the Winfrith site that would result in a radiation emergency. Inutec Limited does not therefore require an off-site emergency plan to comply with REPPIR2001. This will be subject to further ONR interventions following the planned updates to REPPIR in 2019 [18].
16. It is therefore recommended that the Head of Decommissioning, Fuel & Waste (DFW) Sub-Division approves licence instrument number 505, a Licence Condition 11(2) Approval of the Inutec Limited Emergency Plan, INUTEC/P/203 - Tradebe Inutec Emergency Plan Issue 5, January 2019.

3 MATTERS ARISING FROM ONR'S WORK

17. There are no further matters arising in consideration of whether to issue an Approval of Inutec Limited's arrangements for Urgent Safety Proposals and Approval for the Inutec Limited Emergency Plan.

4 CONCLUSIONS

18. This Project Assessment Report recommends that ONR issues Approval of Inutec Limited's arrangements for Urgent Safety Proposals under Licence Condition 13(11) and Approval for the Inutec Limited Emergency Plan under Licence Condition 11(2) based on the documentation sampled and the site interventions undertaken.

5 RECOMMENDATIONS

19. On the basis of the documentation submitted by Inutec Limited and ONR's assessment, it is recommended that:
 - The Head of Decommissioning, Fuel & Waste (DFW) Sub-Division approves this PAR.
20. A person with delegated authority within ONR signs and issues Inutec Limited Licence Instrument 504 which grants Approvals under Licence Condition 13(11) of Inutec Limited's Arrangements for Urgent Safety Proposals, INUTEC/F/342 - Terms of Reference for the Nuclear Safety Committee When Convening To Consider Urgent Safety Proposals Issue 2, February 2019.
21. A person with delegated authority within ONR signs and issues Inutec Limited Licence Instrument 505 which grants Approvals under Licence Condition 11(2) of the Inutec Limited Emergency Plan, INUTEC/P/203 - Tradebe Inutec Emergency Plan Issue 5, January 2019.

6 REFERENCES

- 1 Inutec Letter Reference NSL102-002 dated 4th February 2019 - Request for Approval Under Licence Condition 11(2) of the Inutec Limited Emergency Plan and Approval under Licence Condition 13(11) of the Arrangements for Urgent Safety Proposals. (2019/12404)
- 2 INUTEC/F/342 - Terms of Reference for the Nuclear Safety Committee When Convening to Consider Urgent Safety Proposals Issue 2, February 2019 attached to Inutec Letter Reference NSL102-002 dated 4th February 2019. (2019/12404)
- 3 INUTEC/P/203 - Tradebe Inutec Emergency Plan Issue 5, January 2019 attached to Inutec Letter Reference NSL102-002 dated 4th February 2019. (2019/12404)
- 4 Licence Condition Handbook. ONR. February 2017.
www.onr.org.uk/documents/licence-condition-handbook.pdf
- 5 The processing of licence applications for new nuclear sites. ONR-NS-PER-IN-003 Revision 4. (2016/168956)
- 6 Licensing Part of the Magnox Limited Winfrith Licensed Nuclear Site to Inutec Limited. ONR-SDFW-PAR-16-013 Revision 0. (2016/303486)
- 7 Email from ONR to Inutec Limited, dated and timed 9 May 2015, 15:59, Licensing of Inutec Limited, Winfrith - Nuclear Safety Committee Information 6 May 2015. (2015/172285)
- 8 Formal Licence Application Dossier: List of Documents and Status as at 8 April 2016. (2016/150991)
- 9 Email from ONR to Inutec Limited, dated and timed 24 May 2015, 11:16, Licensing of Inutec Limited, Winfrith - Nuclear Safety Committee Information 11 June 2015. (2015/315328)
- 10 ONR Intervention Report IR ONR-SDFW-IR-18-116 - Inutec Limited (Winfrith) Compliance Readiness Inspections of LC 2 and LC 13 - 11th October 2018. (2018/338106)
- 11 ONR Technical Inspection Guides
http://www.onr.org.uk/operational/tech_insp_guides/index.htm
LC11 Emergency Arrangements, NS-INSP-GD-011 Revision 5. ONR, July 2017.
LC13 Nuclear Safety Committee, NS-INSP-GD-013 Revision 4. ONR, July 2016.
- 12 NSC Minutes from 4 February 2019 attached to Inutec Letter Reference NSL102-002 dated 4th February 2019. (2019/12404)
- 13 Inutec Limited Site Governance Meeting Minutes of 4 February 2019 attached to Inutec Letter Reference NSL102-002 dated 4th February 2019. (2019/12404)
- 14 Tradebe Inutec Emergency Plan. INUTEC/P/203. Issue 4 Draft F. April 2016. (2016/151043)
- 15 Email ONR internal, dated and timed 7 June 2017, 16:20 Inutec Limited Emergency Plan - INUTEC-P-203 Issue 4. (2017/220234)
- 16 ONR Intervention Report ONR-SDFW-IR-18-067 - Inutec Limited (Winfrith) Pre Licensing Emergency Demonstration Exercise North - 31 July 2018 (2018/247187)
- 17 ONR-COP-PAR-15-022 Winfrith REPPIR Project Assessment Report. (2016/122769)
- 18 ONR-NGO Meeting – 11 October 2018 - Update on Basic Safety Standards Directive Implementation – REPPIR from Chief Nuclear Inspector on 11 October 2018.
<http://www.onr.org.uk/documents/2018/onr-ngo-bssd-briefing-10-18.pdf>