

**Amendment to AWE approved LC 35 arrangements 2021**

**Approval of Licensee Arrangements Under LC 35(4) (Decommissioning) and  
Withdrawal of Existing LC 35(4) Approvals**

Project Assessment Report ONR-OFD-PAR-21-013  
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## EXECUTIVE SUMMARY

### Amendment to AWE approved LC 35 arrangements 2021

#### Permission Requested

The licensee has requested the Office for Nuclear Regulation's (ONR's) approval of an amendment to its arrangements for decommissioning in accordance with Licence Condition (LC) 35(4): *Decommissioning*.

The licensee has also made a request to ONR to withdraw the existing approvals: Licence Instrument (LI) 537 (AWE Aldermaston) and LI 536 (AWE Burghfield).

#### Background

The licensee, Atomic Weapons Establishment plc (AWE), operates two nuclear licenced sites at Aldermaston and Burghfield; AWE's arrangements for compliance with LC 35 apply at both of these sites. LC 35 requires licensees to make and implement adequate arrangements for the production and implementation of decommissioning programmes for each plant. LC 35(3) gives ONR the power to approve such part or parts of the arrangements or programmes as ONR may specify. Furthermore, under LC 35(4), the licensee shall ensure that no further amendment is made to the approved arrangements unless ONR has approved such an amendment.

In 2009, ONR approved part of AWE's LC 35 arrangements under LC 35(3), as the final stage in moving from a regime of approving individual facility decommissioning programmes to one of flexible permissioning. This approach allows ONR to exercise regulatory control and oversight via derived powers provided from the licensee's arrangements for complying with the LCs. The arrangements were further amended by AWE in 2014 and 2018 and approved by ONR under LC 35(4).

AWE has now proposed amending its LC 35 arrangements to ensure they are consistent with other similar management arrangements and to include updated requirements and responsibilities for decommissioning across a facility's lifecycle.

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

I have carried out an assessment of AWE's proposal to amend its decommissioning arrangements. ONR's extant approvals of these arrangements apply specifically to the monitoring arrangements for decommissioning programmes, which are defined in Section 11 in the current arrangements and Section 6 in the proposed amended arrangements. I have assessed the differences between the proposed and extant approved section, informed by ONR's guidance on the purpose and use of permissioning, and consider that there is no impact on the use of flexible permissioning for decommissioning activities.

My assessment has also considered the following aspects:

- Whether AWE's proposal was made in accordance with its own change management arrangements for management system documents;

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- Whether AWE's proposed amendments to the remainder of the LC 35 arrangements that are outside the scope of the extant approvals impact on the monitoring arrangements for decommissioning programmes;
- Removal of the requirement for AWE to submit further amendments to its LC 35 decommissioning arrangements to ONR for approval.

The adequacy of AWE's current decommissioning strategy and programmes for compliance with LC 35 are outside the scope of this assessment.

The proposed amendments have been subject to AWE's due governance process and were endorsed by the Nuclear Safety Committee and Site Governance Meeting.

By comparison of the existing and proposed arrangements, I found that changes to the requirements and responsibilities that support implementation of the monitoring arrangements for decommissioning programmes have resulted in an improvement, when considered against ONR's expectations. Whilst these changes are outside the scope of ONR's approval, I consider that they have minimal impact on the monitoring arrangements for decommissioning programmes.

I have not undertaken any specific inspection activity in support of this assessment; however, I have reviewed AWE's performance in delivering decommissioning since 2018 based on ONR's LC 35-related interventions during this time. I consider that AWE has not made adequate progress in decommissioning and therefore it is appropriate to continue to approve the monitoring arrangements for the decommissioning programme.

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

There are no matters arising from this project assessment report.

### **Conclusions**

I am satisfied that the proposed amendments to the LC 35 arrangements, to ensure they are consistent with other similar management arrangements and to include updated requirements and responsibilities for decommissioning across a facility's lifecycle, have minimal impact on the monitoring arrangements for decommissioning programmes. Therefore, I consider that there is no significant impact on the use of flexible permissioning at AWE.

I consider that AWE has adequately followed its process for changing the LC 35 arrangements and thus the request has been made in accordance with AWE's process.

On this basis, and on the evidence of continuing delays in delivering decommissioning activities, I judge that it is appropriate for ONR to continue to approve part of AWE's LC 35 arrangements at this time.

### **Recommendations**

I recommend that ONR should issue LI 547 (AWE Aldermaston) and LI 545 (AWE Burghfield) approving the substitution of Section 11 paragraphs 31-38 of the document titled Standard for Compliance with Site Licence Condition 35, Authorisation Condition 35, Decommissioning, AWE/MAN.A/21/1876, Issue 6,

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November 2017, for Section 6 paragraphs 16-23 of the document titled Standard for Compliance with Site Licence Condition 35, Authorisation Condition 35, Decommissioning, AWE/MAN.SYS/1876, Issue 7, August 2021.

I also recommend that ONR should withdraw the existing approvals LI 537 (AWE Aldermaston) and LI 536 (AWE Burghfield).

**LIST OF ABBREVIATIONS**

ACR	Asset Change Request
ALARP	As low as reasonably practicable
ARNL	Annual Review of Nuclear Liabilities
AWE	Atomic Weapons Establishment plc
DNSR	Defence Nuclear Safety Regulator
EA	Environment Agency
ESH	Environment, Safety and Health
HOW2	(Office for Nuclear Regulation) Business Management System
HPCP	Hold Point Control Plan
LI	Licence Instrument
NSC	Nuclear Safety Committee
ONR	Office for Nuclear Regulation
RFC	Request for Change
RGP	Relevant Good Practice
SAP	Safety Assessment Principle(s)
SFAIRP	So far as is reasonably practicable
SGM	Site Governance Meeting
TIG	Technical Inspection Guide (ONR)

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## 1 PERMISSION REQUESTED

1. The licensee has requested the Office for Nuclear Regulation's (ONR's) approval of an amendment to its arrangements for decommissioning in accordance with Licence Condition (LC) 35(4): *Decommissioning* [1,2].
2. The licensee has requested ONR withdraw the existing LC 35 approvals: Licence Instrument (LI) 537 (AWE Aldermaston) and LI 536 (AWE Burghfield) under LC 1(3).

## 2 BACKGROUND

3. The licensee, Atomic Weapons Establishment plc (AWE), operates two nuclear licenced sites at Aldermaston (Site Licence No. 77) and Burghfield (Site Licence No. 78a); the LC 35 decommissioning arrangements apply at both of these sites.
4. LC 35 requires licensees to make and implement adequate arrangements for the production and implementation of decommissioning programmes for each plant. LC 35(3) gives ONR the power to approve such part or parts of the arrangements or programmes as ONR may specify. Furthermore, under LC 35(4), the licensee shall ensure that no further amendment is made to the approved arrangements unless ONR has approved such an amendment.
5. Historically, ONR chose to approve individual facility decommissioning programmes using primary powers under LC 35(3), in order to hold AWE to account for delivery to agreed programmes. However, it was found that this system had little flexibility in terms of changes to funding, resources and priorities. Therefore, ONR developed a regulatory approach based on flexible permissioning [3] that was in use for other AWE activities, which allowed more efficient management of changes whilst retaining an appropriate level of control, risk reduction and regulatory oversight via derived powers provided from the licensee's arrangements for complying with the LCs.
6. The flexible permissioning approach applied at AWE is based on the use Hold Point Control Plans (HPCPs) that are endorsed by ONR at Level 3 Regulatory Interface Meetings (RIMs) [4]. AWE incorporated a section on the monitoring arrangements for decommissioning programmes within their LC 35 arrangements, thereby incorporating the use of HPCPs for decommissioning activities. In 2009, ONR's approval under LC 35(3) of AWE's arrangements for decommissioning was the last stage in moving to a flexible permissioning approach [5].
7. AWE updated the LC 35 arrangements in 2014, with no significant changes to the section on monitoring arrangements for decommissioning programmes, which were subsequently approved by ONR under LC 35(4) [6]. This update introduced arrangements for the production of an Annual Review of Nuclear Liabilities (ARNL), in addition to a quinquennial review (QQR) submission.



8. In 2018, AWE reflected on the requirement to produce a QQR submission, as well as an ARNL in its LC 35 arrangements. AWE considered that the ARNL met the requirement for a QQR submission, and thus amended the LC 35 arrangements to remove the requirement to produce a QQR submission. ONR reviewed these arrangements and concluded that the arrangements allowed AWE to meet ONR's expectations and remain compliant with LC 35 [7]; therefore, approval was provided, again under LC 35(4).
9. The existing approvals, which were issued under separate Licence Instruments (LIs) 537 (Aldermaston) [8] and 536 (Burghfield) [9] cover Section 11, paragraphs 31 to 38 of AWE's LC 35 arrangements [10], concerning the monitoring arrangements for decommissioning programmes.
10. AWE has requested substituting the current approved paragraphs with Section 6, paragraphs 16 to 23 of the updated arrangements [11]. ONR is thus requested to withdraw LI 537 granted on Nuclear Site Licence 77 [1] and LI 536 on Nuclear Site Licence 78a [2].
11. The key changes to the LC 35 arrangements have been proposed to ensure they are consistent with other similar management arrangements and to include updated requirements and responsibilities for decommissioning across a facility's lifecycle. The majority of these changes, including the updated requirements and responsibilities, are outside of the scope of the extant approval.

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

12. In accordance with the regulatory permissioning strategy for this Project Assessment Report, which is set out in the associated Decision Record [12], I have carried out an assessment of AWE's proposal to amend its approved LC 35 arrangements concerning the monitoring arrangements for decommissioning programmes.
13. The assessment also considers the following aspects:
  - Whether AWE's proposal was made in accordance with its own change management arrangements for management system documents (Section 3.1);
  - Whether AWE's proposed amendments to the remainder of the LC 35 arrangements that are outside of the scope of the extant approvals impact on the monitoring arrangements for decommissioning programmes (Section 3.2);
  - Removal of the requirement for AWE to submit further amendments to its LC 35 decommissioning arrangements to ONR for approval (Section 3.3).

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14. The following key documents were provided by AWE to inform this assessment:
  - AWE's amended arrangements for compliance with LC 35 [11];
  - AWE's Estate Liabilities Strategy [13];
  - AWE's ARNL 2021 [14].
15. The adequacy of AWE's current decommissioning strategy and programmes for compliance with LC 35 are outside the scope of this assessment.
16. This assessment and associated Licence Instruments have been produced in line with the following ONR guidance and instructions:
  - Purpose and use of permissioning [3];
  - ONR Technical Inspection Guide (TIG), LC 35 Decommissioning [15];
  - ONR Safety Assessment Principles (SAPs) [16].

### 3.1 LICENSEE'S DUE PROCESS

17. The proposed amendments to the arrangements for LC 35 have been subject to the licensee's due process under AWE's 'Change of Management System Documentation' [17] and 'Asset Change Process' [18].
18. AWE gave an overview of the process by which management system documents are revised [19] and provided evidence that it has complied with this process in relation to the revised LC 35 arrangements document, as explained below.
19. The Request for Change (RFC) Form was completed by the originator (RFC-1661-06-2021) [20] and the amendments were categorised as a Major change due to the requirement for ONR approval. The review regime is: Environment, Safety and Health (ESH) Surgery, Independent Peer Review, Nuclear Safety Committee (NSC) advice; these steps are documented in the RFC.
20. The Asset Change Request (ACR) was completed by the appointed Asset Change Manager (ACR-020760) [21]; the amendments were categorised as a 'Red Route' modification, again due to the requirement for ONR approval, requiring approval at the Site Governance Meeting (SGM).
21. The proposed amendments been reviewed and approved for publication at Meeting 21/21 of the NSC on 20 July 2021 [22] and the 201<sup>st</sup> SGM on 5 August 2021 [23].
22. I consider that AWE has adequately followed its process for changing the LC 35 arrangements and thus the request has been made in accordance with AWE's process.

### 3.2 DECOMMISSIONING ARRANGEMENTS

23. ONR's extant approvals apply specifically to the section on monitoring arrangements for decommissioning programmes. As such, I have compared Section 11 in the current arrangements [10] with Section 6 in the amended document [11]. The section on monitoring arrangements remains substantially unchanged, with the following minor changes:
- Added references to pre-existing documents;
  - Added reference to Annex A, which describes the requirements for compliance with LC 35 and defines which AWE roles have responsibility for implementation, taking account of the stages in a nuclear facility lifecycle;
  - Removal of wording relating to the updating of the 'Overarching HPCP'.
24. The amended LC 35 arrangements, which are the subject of ONR's approval, require the production of an ARNL [14], facility-specific decommissioning programmes and a decommissioning strategy.
25. Key nuclear activities, including decommissioning, are controlled via the selection of Hold Points that are agreed with ONR and captured on the HPCP, which is monitored through the RIM structure. Management of the HPCP is covered by a separate procedure, reference to which is made in the LC 35 arrangements [4]. New requirements relating to Hold Points have been added to Annex A, which I consider should ensure that the Overarching HPCP is updated accordingly.
26. I have also considered whether the proposed amendments to Annex A of the arrangements impact on the intent of the approved section; whilst Annex A is outside the scope of the extant approvals, reference to this has been added in the approved section. Annex A defines which AWE roles have responsibilities for the implementation of the requirements that are subject to approval in Section 6 [11]. The specific requirements to which Section 6 refers relate to the production of the ARNL and individual facility 'Detailed Decommissioning Plans' and thus I have compared the AWE roles that have responsibility for implementing these requirements in the extant and proposed arrangements.
27. There is no change to the responsibility for producing the ARNL, which remains the responsibility of the Head of Estate Liabilities. The responsibility for producing decommissioning plans has been expanded to reflect the requirement for production of a plan at the design stage of a facility and its maintenance throughout the facility's lifecycle. Therefore, responsibility changes with the various phases of the facility's lifecycle. I consider this clarification to be an improvement on the current arrangements as it now reflects the expectations in SAPs DC.1 and DC.4 relating to design for decommissioning and the maintenance of decommissioning plans throughout the lifecycle of a facility, respectively [16].

28. Subsequent to the licensee's initial requests [1,2], AWE advised that one of the reference documents is being upgraded from supporting guidance to a Management System Procedure (MSP) [24], adherence to which will be mandatory. AWE requested advice on whether a change could be made in the LC 35 arrangements document to reflect this. In my opinion, the change has no material effect on the section that is subject to approval and, with the agreement of ONR's Superintending Inspector for Weapons [25], I have advised AWE that the change can be made in accordance with their arrangements.
29. I consider that the changes to the arrangements as a whole have minimal impact on the monitoring arrangements for decommissioning programmes. Therefore, I judge that there is no significant impact on the use of flexible permissioning [3].

### **3.3 CONSIDERATION OF THE REQUIREMENT TO APPROVE AWE'S LC 35 ARRANGEMENTS**

30. ONR's historical decision to approve AWE's decommissioning plans, and subsequently its arrangements, originates from a record of slow progress in delivering decommissioning. ONR has continued to approve AWE's LC 35 arrangements because of continued delays in delivering decommissioning on the site.
31. The last time the arrangements were subject to approval in 2018, ONR mooted that consideration should be given to removing the requirement for AWE to submit further amendments to the LC 35 arrangements for approval [7], based on AWE's response to RI 6063 (Safety justification for decommissioning work). Subsequently, AWE provided adequate evidence to demonstrate that it was progressing with decommissioning and ONR closed RI 6063 [26].
32. However, whilst the underlying intent of RI 6063 was met, a recent LC 35 inspection [27] found that AWE has not made any further progress with high-hazard decommissioning. As a result of the inspection, ONR raised RI 9029, seeking improvements in both AWE's timely delivery of high-hazard decommissioning and how its progress and performance shortfalls are reported to the AWE Executive.
33. Although the majority of the UK's licensed sites do not have approved LC 35 arrangements, there is precedent whereby ONR has approved part of another licensee's arrangements relating to the production and maintenance of Key Decommissioning Milestones (KDMs).
34. On the basis of this information, I judge that it is appropriate for ONR to continue to approve AWE's LC 35 arrangements. However, ONR may consider a revised approach dependent on the licensee's response to RI 9029.

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

35. There are no matters arising from the work carried out by ONR in its consideration of AWE's requests that would preclude ONR's approval of AWE's amended LC 35 arrangements, specifically the section related to the monitoring arrangements for decommissioning programmes.

#### **5 CONSULTATION WITH OTHER GOVERNMENT DEPARTMENTS**

36. The Memorandum of Understanding between ONR and the Environment Agency commits both parties to consult each other at the earliest opportunity, and with the fullest of information, during the process of formal regulatory decision making taking full account of each other's views [28].
37. The Letter of Understanding between the Defence Nuclear Safety Regulator (DNSR) commits ONR to utilise inputs from DNSR when making regulatory judgements and considering ALARP issues, taking into account the through-life safety requirements of the nuclear reactor or nuclear weapon and defence needs [29].
38. As part of my consideration of AWE's request for approval of its amended arrangements for decommissioning, I have consulted with the Environment Agency and DNSR [30].
39. The Environment Agency has reviewed the revised arrangements and has confirmed that the amendments appear to be reasonable [31]. DNSR has reviewed the revised arrangements, which also demonstrate compliance against Authorisation Condition 35, and has confirmed it has no objection to AWE's requests [32].

#### **6 CONCLUSIONS**

40. Based on the work carried out by ONR, I am satisfied that the proposed amendments to the LC 35 arrangements, to ensure they are consistent with other similar management arrangements and to include updated requirements and responsibilities for decommissioning across a facility's lifecycle, have minimal impact on the approved section on monitoring arrangements for decommissioning programmes.
41. AWE's LC 35 arrangements still require the production of facility-specific decommissioning programmes and a decommissioning strategy. Key activities are controlled via the selection of Hold Points that are agreed with ONR and captured on the HPCP, which is monitored through the RIM structure.
42. The proposed amendments have been subject to AWE's internal governance process and have received the appropriate level of approval. Additionally,

neither the Environment Agency nor DNSR have any objections to ONR's approval of the amendments proposed by AWE.

43. Whilst the underlying intent of RI 6063 on progressing decommissioning activities has been met, evidence of further delays to delivery of decommissioning has resulted in ONR raising RI 9029, which seeks improvement in both AWE's timely delivery of high-hazard decommissioning and how its progress and performance shortfalls are reported to the AWE Executive.
44. Therefore, I judge that it is appropriate for ONR to continue to approve AWE's LC 35 arrangements at this time.

## **7 RECOMMENDATIONS**

45. I recommend that ONR should issue LI 547 (AWE Aldermaston) and LI 545 (AWE Burghfield) approving the substitution of Section 11 paragraphs 31-38 of the document titled 'Standard for Compliance with Site Licence Condition 35, Authorisation Condition 35, Decommissioning, AWE/MAN.A/21/1876, Issue 6, November 2017', for Section 6 paragraphs 16-23 of the document titled 'Standard for Compliance with Site Licence Condition 35, Authorisation Condition 35, Decommissioning, AWE/MAN.SYS/1876, Issue 7, August 2021'.
46. I also recommend that ONR should withdraw the existing Approvals LI 537 (AWE Aldermaston) and LI 536 (AWE Burghfield).

## 8 REFERENCES

- 1 AWE Letter, *Update to the Request for an Amendment to the Approved Decommissioning Arrangements under Licence Condition 35(4) of Schedule 2 Attached to Nuclear Site Licence 77 (Aldermaston)*, AWE Ref. ONR 035-056a, dated 7 December 2021 [2021/89097].
- 2 AWE Letter, *Update to the Request for an Amendment to the Approved Decommissioning Arrangements under Licence Condition 35(4) of Schedule 2 Attached to Nuclear Site Licence 78a (Burghfield)*, AWE Ref. ONR 035-057a, dated 7 December 2021 [2021/89099].
- 3 ONR, *The Purpose and Use of Permissioning*, NS-PER-GD-001 Revision 5, May 2021 [2021/32823].
- 4 AWE, *“Flexible Permissioning” Through Hold Point Control Plans*, AWE/MAN.A, ESH-MSP-921 Issue 3, September 2018 [2021/88131].
- 5 ONR, *Approval of Licensee Arrangements under LC35, Monitoring Arrangements for Decommissioning Programmes, and withdrawal of existing LC35 (3) Approvals*, PAR No. 2008/40, January 2009 [2008/689717].
- 6 ONR, *Approval of Licensee Arrangements under LC35, Monitoring Arrangements for Decommissioning Programmes, and withdrawal of existing LC35(3) Approvals*, ONR-DEF-PAR-14-026 Revision 0, December 2014 [2014/460704].
- 7 ONR, *Amendment to AWE approved LC35 arrangements 2018*, ONR-OFD-PAR-17-016 Revision 0, July 2018 [2018/30203].
- 8 ONR, *Licence Instrument Number 537 (Aldermaston), LC 35(4) Approval*, 1 August 2018 [2018/255449].
- 9 ONR, *Licence Instrument Number 536 (Burghfield), LC 35(4) Approval*, 1 August 2018 [2018/255448].
- 10 AWE, *Management System Standard, Compliance with Site Licence Condition 35, Authorisation Condition 35, Decommissioning*, AWE/MAN.A/21/1876 Issue 6, November 2017 [2021/87415].
- 11 AWE, *Management System Standard, Compliance with Site Licence Condition 35, Authorisation Condition 35, Decommissioning*, AWE/MAN.SYS/1876 Issue 7, August 2021 [2021/87416].
- 12 ONR, *Decision Record Part 1, Amendment to AWE approved LC35 arrangements 2021*, ONR-OFD-DR-21-060 Revision 0, November 2021 [2021/80270].
- 13 AWE, *Estate Liabilities Strategy 2020*, AWEAAGQ-120534999-12 Issue 1.1, July 2020 [2021/87424].
- 14 AWE, *Annual Review of AWE’s Nuclear Liabilities 2021*, AWEAAGQ-120534999-181 Issue 1, September 2021 [2021/70820].

- 15 ONR, *LC35 Decommissioning*, NS-INSP -GD-035 Revision 6, April 2019 [2020/209712].
- 16 ONR, *Safety Assessment Principles*, 2014 Edition revision 1 (January 2020).
- 17 AWE, *Change of Management System Documentation*, AWE/MAN.SYS/5552 Issue 4.1, July 2021 [2021/87431].
- 18 AWE, *AM(PE) 6020 – Asset Change Process*, AWE/MAN.SYS/4921 Issue 5.1, November 2021 [2021/88146].
- 19 ONR, *AWE NLR Meetings November 2021 site week*, ONR-OFD-CR-21-715 Revision 0, November 2021 [2021/86889].
- 20 AWE, *RFC-1661-06-2021*, AWE/MAN.SYS/5553 Issue 4.0, Date raised: 18 June 2021 [2021/87430].
- 21 AWE, *ACR-020760*, MER-OPS-00356788 Issue 2 Draft C, Date raised: 18 June 2021 [2021/87430].
- 22 AWE, *Minutes of Meeting 21/21 of the AWE plc Nuclear Safety Committee held on 20 July 2021*, NSC/4580, dated 3 August 2021 [2021/59350].
- 23 AWE, *Site Governance Meeting – Record of the Meeting (SGM 201 held on 5 August 2021)*, O1AAIG-1933802637-2039, via email dated 26 November 2021 [2021/87431].
- 24 Email: AWE to ONR, *RE: Evidence Supporting ONR 035-056 and 057 on Approval of MSS1535 Decommissioning*, dated 30 November 2021 [2021/87734].
- 25 Email: **B. Archer to K. Chandler**, *RE: Evidence Supporting ONR 035-056 and 057 on Approval of MSS1535 Decommissioning*, dated 1 December 2021 [2021/87740].
- 26 ONR, *Meetings with AWE Aldermaston*, ONR-OFD-CR-18-316 Revision 0, August 2018 [2018/268884].
- 27 ONR, *Waste, Decommissioning and Transport – LC 35 Compliance Inspection*, ONR-OFD-IR-21-075 Revision 0, October 2021 [2021/76874].
- 28 *Memorandum of Understanding between the Office for Nuclear Regulation and the Environment Agency on matters of mutual interest in England*, 2015 [[onr.org.uk/documents/2015/mou-onr-ea-180815](http://onr.org.uk/documents/2015/mou-onr-ea-180815)]
- 29 *Letter of Understanding between the Office for Nuclear Regulation and the Defence Nuclear Safety Regulator setting out their intentions for coherent, complete and seamless regulation of the Defence Nuclear Programme*, 2015 [[onr.org.uk/documents/2015/onr-dnsr-letter-of-understanding](http://onr.org.uk/documents/2015/onr-dnsr-letter-of-understanding)]
- 30 Email: ONR to EA and DNSR, *FW: AWE Regulatory Correspondence - ONR035-056 & ONR035-057*, dated 12 November 2021 [2021/87435].
- 31 Email: EA to ONR, *RE: AWE Regulatory Correspondence - ONR035-056 & ONR035-057*, dated 25 November 2021 [2021/87439].



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- 32 Email: DNSR to ONR, 20211116 RE: AWE Regulatory Correspondence -  
ONR035-056 & ONR035-057, dated 16 November 2021 [2021/87437].