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**Hinkley Point B LC30(2) Extension of Operating Period  
Extension to Hinkley Point B Reactor 4 Operating Period  
May 2021 to May 2022**

Project Assessment Report ONR-OFD-PAR-21-002  
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## EXECUTIVE SUMMARY

### **Extension to Hinkley Point B Reactor 4 Operating Period May 2021 to May 2022**

This Project Assessment Report describes ONR's assessment of the safety justification in Engineering Change (EC) 368163 and records the regulatory views and judgements made in consideration of the request. It also contains my recommendations to the Operating Facilities Division.

### **Permission Requested]**

EDF Energy Nuclear Generation Limited (NGL), the licensee for the Hinkley Point B (HPB) nuclear licenced site has requested ONR 'Agreement' under Licence Condition 30(2) to extend the operating period of Reactor 4 (R4) by one year up to 24 May 2022.

### **Background**

Nuclear site licence condition (LC) 30 requires the Licensee to periodically shutdown plant in accordance with the requirements of its plant maintenance schedule (PMS) for the purpose of enabling any examination, inspection, maintenance or testing of any plant or process to take place. The preface to the Hinkley Point B PMS specifies the plant shall be shutdown 3 years after ONR's consent to start-up. ONR has approved the preface under LC28 (4).

ONR's last consent to start up Reactor 4 (R4) was issued on 25 May 2018 so LC 30(1) requires the plant to be shutdown on 24 May 2021 within the three-year interval specified in the PMS preface. In accordance LC 30(2) the licensee has requested ONR's 'agreement' to extend the plant's operating period by twelve months to 24 May 2022, so as to allow R4 to complete two periods of operation (of approximately seven and five months) before the end of generation. The extended operating period will include a graphite inspection outage (GIO) after approximately six months of operation and if time allows a second GIA may be carried out to enable a shorter third period of operation at power up to 24 May 2022. However, a third period of operation is considered unlikely. An extended operating period up to 24 May 2022 will accumulate a maximum time at power of 1011 days which is less than the usual three-year (1095 Days) operating period between statutory outages.

NGL consider that the proposed change does not affect nuclear safety and it is judged by NGL that there are no changes to Nuclear Safety Principles.

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

The licensee proposed a significant extension to the R4 operating period. Therefore, ONR has carried out a programme of work to judge the adequacy of the claims, arguments and evidence presented in the safety documentation. Specialist inspectors have carried out assessments in the following disciplines: Civil, Mechanical, Electrical and Control & Instrumentation to support my permissioning decision. Graphite Integrity, Structural Integrity and Probabilistic Safety Assessment specialists have also been consulted.

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

The assessments concluded the claims arguments and evidence presented in the licensee's safety documentation were adequate and support the claim that "nuclear safety systems will not incur any significant decrease in their reliability or functionality. They also concluded that there will be no significant increase in risk as a result of the deferral of the statutory outage.

### **Conclusions**

I am broadly satisfied with the claims, arguments and evidence laid down within the licensee's safety documentation. ONR's assessments judged the extension of the plants operating period to 24 May 2022 would have no, or negligible, impact on nuclear safety and raised no objections to the recommendation to 'agree' to the extension.

### **Recommendation**

I recommend that, in accordance with LC 30(2) ONR should issue licence instrument 565 to Hinkley Point B Nuclear Licensed Site 'agreeing' to an extension of Reactor 4's operating period to no later than 24 May 2022.

## LIST OF ABBREVIATIONS

ALARP	As low as reasonably practicable
APEX	Appointed Examiner
BSL	Basic Safety level (in SAPs)
BSO	Basic Safety Objective (in SAPs)
C&I	Control and Instrumentation
CNS	Civil Nuclear Security (ONR)
EA	Environment Agency
EoG	End of Generation
GIA	Graphite Inspection Outage
HOW2	(Office for Nuclear Regulation) Business Management System
HSE	The Health and Safety Executive
IAEA	The International Atomic Energy Agency
NDA	Nuclear Decommissioning Authority
OAP	Outage Assessment Panel
ONR	Office for Nuclear Regulation
PCPV	Pre-Stressed Concrete Pressure Vessel
PCSR	Pre-construction Safety Report
PMS	Plant Maintenance Schedule
PSA	Probabilistic Safety Analysis
PSR	Preliminary Safety Report
PSSR	Pressure System Safety Regulations
R4	Reactor 4
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)

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## 1 PERMISSION REQUESTED

1. EDF Energy Nuclear Generation Limited (NGL), the licensee for the Hinkley Point B (HPB) nuclear licenced site has requested ONR 'Agreement' under Licence Condition 30(2) to extend the operating period of Reactor 4 (R4) by one year up to 24 May 2022. [Ref 5]
2. This Project Assessment Report describes ONR's assessment of the safety justification in Engineering Change (EC) 368163 [Ref 5] and records the regulatory views and judgements made in consideration of the request. It also contains my recommendations to the Operating Facilities Division.

## 2 BACKGROUND

3. Nuclear site licence condition (LC) 30 requires the Licensee to periodically shutdown plant in accordance with the requirements of its plant maintenance schedule (PMS) for the purpose of enabling any examination, inspection, maintenance or testing of any plant or process to take place. The preface to the Hinkley Point B PMS specifies the plant shall be shutdown 3 years after ONR's consent to start-up. ONR has approved the preface under LC28(4).
4. Licence Condition 28(1) requires the licensee shall make and implement adequate arrangements for the regular and systematic examination, inspection, maintenance and testing of all plant which may affect safety. LC28(4) requires the preparation of a plant maintenance schedule (PMS) for each plant. The maintenance intervals in the PMS are derived from the safety case required by LC23, other regulatory requirements e.g. Pressure System Safety Regulations (PSSR), and requirements from equipment manufacturers.
5. ONR's last consent to start up R4 was issued on 25 May 2018 [Licence Instrument (LI) 557, CM9 2018/176218], so LC 30(1) requires the plant to be shutdown on 24 May 2021 in accordance with three-year interval specified in the PMS preface.
6. In accordance LC 30(2) the licensee has requested ONR's 'agreement' to extend the plant's operating period by twelve months to 24 May 2022. The licensee submitted engineering Change (EC) 368163 [Ref 5] and a plant area review report [Ref 6] to demonstrate the safety of deferring maintenance on plant which may affect safety for this period.
7. Extending the operating period by twelve months will allow R4 to complete two six-month periods of operation at power before the end of generation (EoG). Six-month operating periods are a requirement of the graphite safety case (EC 366147) which specifies Graphite Inspection Outages (GIA) at approximately six-month intervals (dependent on core burn-up). If time allows a shorter third period of operation at power may be carried out up to 24 May 2022 but this is unlikely. A pre-defueling outage will then be carried out to prepare the plant for the next phase in its lifetime.
8. Permission to implement the graphite safety case (LI 564 CM9 2021/20194) was given on 17 March 2021 and this allowed R4 to start up. Taking into account the GIA the maximum accumulated time at power when the reactor is shut down on 24 May 2022 will be 1011 Days which is less than the maximum three-year (1095 Days) period between the outages specified in the PMS.
9. NGL consider that the proposed change does not affect nuclear safety and it is judged by NGL that there are no changes to Nuclear Safety Principles. The safety justification was presented at category 2 which therefore required a formal independent nuclear safety assessment (INSA). EC 368163 underwent an independent nuclear safety

assessment by NGL's internal nuclear regulator who supported the proposal and issued an INSA Certificate [Ref 5].

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

10. This assessment and approval have been carried out in accordance with ONR Guidance [Ref 1 & 2]. Individual assessments used the guidance in the relevant technical assessment guides [Ref 3] and IAEA guidance [Ref 4].
11. NGL's judgement that the operating period of Reactor 4 can be extended to May 2022 is supported on the basis that no factors have been identified that would challenge the safety case during the extended operating period. The case makes the following claims and arguments.
12. Claim 1: The operational history of Reactor 4 is satisfactory.  
Argument 1: Equipment Reliability Reviews provide evidence that the operational history of Reactor 4 is satisfactory.
13. Claim 2: The inspection reports at the last statutory outage of Reactor 4 in 2018 are satisfactory.  
Argument 2: A review of the Return to Service ECs and "28 day reports" has revealed that inspection reports from the Reactor 4 statutory outage in 2018 are satisfactory.
14. Claim 3: Constraints imposed by the safety case do not affect the deferment of the statutory outage.  
Argument 3: A review of the Living Safety Documents and other relevant documentation has revealed no safety case constraints which would be detrimental to deferring the R4 2021 statutory outage.
15. Claim 4 The proposed changes to the inspection interval are consistent with maintaining an overall risk that is ALARP.  
Argument 4 Deferring the R4 2021 outage to May 2022 is ALARP.
16. A Plant Area Review Report [Ref 6] contains much of the evidence to support the claims and arguments in the safety justification. This report is divided into plant areas as per the Plant Maintenance Schedule (PMS) and supporting appendices comprise of the following areas of review:
  - Identification of MS and EMITS activities required to be undertaken during a statutory outage.
  - Review of issues identified during past MS activities and arising in the current operating period. This is accomplished through a review of recent statutory outage RTS ECs, Station Safety Reports (SSRs) and Equipment Reliability Reviews (ERRs) and through consultation with the relevant HPB System Engineers.
  - Review of other documents that may indicate reasons for why the activities cannot be deferred. This will include reviewing the appropriate Living Safety case Documents.
  - Assessment of the findings in the above reviews to establish if any present nuclear safety issues could be affected by deferring the R4 statutory outage to May 2022.
  - Identification of any work that would be required in order to support an outage deferral.
17. ONR has carried out a programme of work to judge the adequacy of the claims, arguments and evidence presented in EC 368163 [Ref 5]. Specialist inspectors sampled the licensee's safety documentation and have carried out assessments in the

disciplines listed below. The samples taken, the inspectors' findings and recommendations are described in the specialist assessment reports which I have used to inform my permissioning decision:

- Civil Engineering [Ref 7]
  - Mechanical Engineering [Ref 8]
  - Electrical Engineering [Ref 9]
  - Control and Instrumentation [Ref 10]
18. In consultation with the graphite integrity and structural integrity specialists I concluded assessment in these disciplines was not required. The reasons are shown below:
19. Graphite Integrity specialist inspector who carried out the assessment of the graphite safety case (NPSC 7800) in the first quarter of 2021 has reviewed EC 368163 [Ref 5]. Core inspections were carried out in March 2020 and the additional graphite inspection outages are imposed by the graphite safety case at approximately 6-month intervals. The specialist's opinion is that there is no detriment to safety in relation to inspection and dimensional measurement of the core if the scheduled statutory outage is deferred until May 2022 since adequate core inspection is being carried out between statutory outages. The specialist also considered the accumulated core irradiation since the last outage will be less than the normal 3-year operating cycle and in their opinion delaying trepanning of HPB R4 until May 2022 is unlikely to have any significant safety consequence on the understanding of the graphite core behaviour of HPB R4 over its next periods of operation. I therefore agree with the specialist opinion that there is no need to carry out a formal graphite integrity assessment of the safety case EC 368163 for the Hinkley Point B R4 Statutory Outage Deferral from May 2021 to May 2022 because deferral of the statutory outage from April 2021 to May 2002 represents no increase in safety risk in regards to the operation of the graphite core. [Ref 11]
20. A structural integrity specialist reviewed EC368163 and decided that formal structural integrity assessment was not required. The review considered previous issues, degradation in operation, degradation in shutdown and the adequacy of PSSR compliance. This is recorded in a decision record [Ref 12] which concludes that, from a structural integrity perspective, compliance with LC28 and PSSR will be sustained despite postponing the next periodic shutdown of HPB R4 until the 24th of May 2022. I agreed with this decision and a structural integrity assessment was not carried out.
21. A PSA specialist inspector used the HPB reactor PSA to run a sensitivity for extending the Outage interval from 3 years to 4 years. This has an impact on the reliability of components in the PSA modelled as having a test interval aligned with the statutory outage. The overall impact on the risk is small, a DB5 frequency increase from 7.38E-06 to 7.49E-06, which is a 1.5% increase (reactor PSA only). The PSA specialist inspector also looked at the most risk significant components which have a test interval in the PSA aligned with the Stat Outage frequency and listed the most significant to inform other inspectors' assessments. None of the components have a high-risk significance. [Ref 13]
22. A summary of these assessment reports and the recommendations are shown in the sections 3.1 to 3.8 below. Actions show how recommendations were addressed.

### **3.1 CIVIL ENGINEERING ASSESSMENT REPORT**

23. A civil engineering specialist inspector carried out an assessment of EC 368163 which focussed on the civil engineering aspects of the Pre-Stressed Concrete Pressure Vessel (PCPV) [Ref 7]. The assessment included reviewing the claims, arguments and evidence in the case and an in-depth assessment of the PCPV appointed examiners (APEX) report. The assessment also considered PSSR compliance relating to the PCPV. The specialist considered that in terms of the civil engineering aspects of the

EC there would not be a significant increase in overall station nuclear safety risk from this proposed deferral. The specialist considered the proposed deferral would be acceptable. No recommendations were made in the report.

### **3.2 MECHANICAL ENGINEERING ASSESSMENT**

24. The mechanical engineering specialist sampled the mechanical structures, systems and components they judged important to nuclear safety and subject to extra operational demand due to the statutory outage deferral [Ref 9]. These were the gas circulators, reactor gas safety relief valves and the arrangements to ensure plant preservation during the extended graphite inspection outage. The specialist was satisfied with the claims, arguments and evidence within the Licensee's safety case EC368163 Rev 03 and supports ONR agreeing to an extension of the operating period of Hinkley Point B Reactor 4 to 24th May 2022. Two recommendations were raised and are addressed as follows:
25. The Outage Assessment Panel decision making process on 29 March 2021 is raised through the ONR Site Inspector with the HPB Management Lead Team to agree they are satisfied that the correct decision has been taken, and that they are satisfied with the outage assessment panel decision making process, confirming why by the end June 2021.
26. As part of normal business the nominated site inspector is discussing a number of decision making processes with the Station Lead Team and the discrepancies in the Outage Assessment Panel's decision making process has been incorporated into this intervention and is ongoing.
27. The HPB Management Lead Team should confirm if the commitment, to inspect the Gas Circulator motor mounting bolts should the End Closure Plate be removed, will continue for the duration of the deferral period and acknowledgement of that expectation should be confirmed by 24 May 2021.
28. In accordance with its arrangements the Station has raised a 'action report' (AR) [ref 14] to confirm the examination requirements for the Motor Bolts and if this is required to provide the means for carrying out the examination. This will be monitored and tracked through the usual action tracking arrangements.

### **3.3 ELECTRICAL ENGINEERING ASSESSMENT**

29. An Electrical Engineering Specialist Inspector carried out an assessment of the claims arguments and evidence presented in EC 368163 [Ref 9]. A number of level 4 meetings were held to discuss the case and the assessment included sampling plant preservation, equipment reliability reviews and the exchange of a gas circulator. The assessment reports recommendations supported ONR agreeing to extending the operating period of Reactor 4 to 25 May 2022.
30. The assessment noted that prior to returning to power a gas circulator which was exhibiting abnormal vibrations was exchanged for a replacement unit. This was a conservative decision taken to mitigate the risks to generation. It is not an issue for extending the operating period. The assessment report recommended that ONR and the Station should hold regular update meetings to monitor and discuss progress with the fault investigation. The Station and ONR specialist have arranged the meetings.

### **3.4 CONTROL & INSTRUMENTATION ENGINEERING ASSESSMENT REPORT**

31. The control and instrumentation specialist focussed on: ensuring the plant area review report had been developed with sufficient input from suitably qualified and experienced persons. It also included sampling the adequacy of the approaches and actions taken to address the recommendations in the plant area review report, and that cliff edge effects and drift/degradation had been adequately covered in NGL's safety documentation.
32. Based on the samples taken the specialist is satisfied with the claims, arguments and evidence presented in the safety case and has not identified anything of safety significance from a C&I perspective and recommends ONR 'agreement' to extending the operating period until no later than 24 May 2022. There were no other recommendations.

### **3.5 ENVIRONMENT AGENCY (EA)**

33. The EA site inspector for Hinkley point B was informed that ONR intended to issue an LI giving its agreement to the extension of the plant operating period. EA confirmed that it had no objections to the deferral proposal and ONR issuing an agreement to extend the R4 operating period (CM9 2021/14874).

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

34. The matters arising from the work carried out by ONR specialist are summarised as follows.
35. The strategy for the assessments focussed on judging the adequacy of the safety documentation which justifies extending the plant operating period. The requested extension to the operating period is for an additional 12-month period up to 24 May 2022. The operating period will include a graphite inspection outage after approximately 6 months of operation. By the end of the extended operating period the reactor will have been at power for less than 1011 days since the last statutory outage. The usual 3-year operating period is 1090 days. The assessment of the safety justification and ALARP arguments in EC 368163 therefore focussed on plant area review report [Ref 6], plant preservation activities and maintenance schedule tasks which underpinned the justification for extending the operating period.
36. The team of specialist inspectors listed above considered the claims arguments and evidence presented in EC 368163. They concluded they were adequate and supported the licensee's claim that nuclear safety systems will not incur any significant decrease in their reliability or functionality, and there will be no significant increase in nuclear safety risk as a result of deferring the statutory outage.
37. Based on the specialist inspectors' recommendations, the licensee's own safety justification and the ALARP arguments I am of the opinion that the proposal to extend the operating period to 24 May 2022 will result in a negligible increase in safety risk. I consider the ALARP arguments are appropriate showing negligible safety benefit in completing the outage in May 2021 and articulating clear safety benefits in deferring the outage in terms of better planning, greater scope, reduced timescales and less opportunity for the transmission of the COVID 19 virus.
38. Reasonably practicable measures to reduce risks have been considered and undertaken such as replacing a gas circulator to remedy vibration detected by performance monitoring, undertaking plant preservation, and minimising the number of PSSR postponements.
39. The specialist inspectors' judgements were supported by the evidence that:
  - NGL had sought input from the stations system engineers and other relevant suitably qualified and experienced personnel;

- Agreement was reached with the PSSR competent person regarding any proposed postponements of inspections.

## **5 CONCLUSIONS**

40. This report presents the findings of my assessment of EDF-NGL's request to extend the operating period of R4 at Hinkley Point B to 24 May 2022 and contains my recommendation to the Operating Facilities Division regarding the permissioning decision.
41. To conclude, I am broadly satisfied with the claims, arguments and evidence laid down within EC 368163. ONR's assessments judged the extension of the plants operating period to 24 May 2022 would have no, or negligible, impact on nuclear safety and raised no objections to the recommendation to 'agree' to the extension.

## **6 RECOMMENDATIONS**

42. I recommend that, in accordance with LC 30(2) ONR should issue licence instrument 565 to Hinkley Point B Nuclear Licensed Site 'agreeing' to an extension of Reactor 4's operating period to no later than 24 May 2022.

## 7 REFERENCES

1.	ONR Guide – <i>The Purpose and Use of Permissioning - NS-PER-GD-001 Revision 4</i> . Month Year. <a href="http://www.onr.org.uk/operational/assessment/index.htm">http://www.onr.org.uk/operational/assessment/index.htm</a>
2.	<i>Safety Assessment Principles for Nuclear Facilities</i> . 2014 Edition, Revision 1. January 2020. <a href="http://www.onr.org.uk/saps/saps2014.pdf">http://www.onr.org.uk/saps/saps2014.pdf</a> .
3.	ONR Technical Assessment Guides, Identified in individual assessment reports. <a href="http://www.onr.org.uk/operational/tech_asst_guides/index.htm">http://www.onr.org.uk/operational/tech_asst_guides/index.htm</a>
4.	IAEA guidance – Identified in individual assessment reports <a href="http://www.iaea.org">www.iaea.org</a>
5.	EDF e-mail containing: <ul style="list-style-type: none"> <li>• Letter NSLHPB51442 Requesting Extension of Hinkley Point B Reactor 4 Operating Period.</li> <li>• EC 368163 000 Proposal Version No 03, Hinkley Point B R4 Statutory Outage Deferral from 2021 to 2022, January 2021.</li> <li>• EC 368163 000 Proposal Version No 03 INSA Statement CM9 2021/6579</li> </ul>
6.	EDF-NGL email containing <ul style="list-style-type: none"> <li>• EC 368163 000 Proposal Version No 03, Hinkley Point B R4 Statutory Outage Deferral from 2021 to 2022, January 2021.</li> <li>• EC 368163 000 Proposal Version No 03 Appendices 1, 2 &amp; 3, January 2021.</li> <li>• EC 368163 000 Proposal Version No 03 INSA Approval Statement, January 2021.</li> <li>• EC 368163 000 Plant Area Review Report, DAO/REP/JICC/082/HPB/20, November 2020. CM9 2021/5007</li> </ul>
7.	ONR-OFD-AR-20-114 Revision 0, Civil Engineering Assessment of the Pre-stressed Concrete Pressure Vessel, March 2021 CM9 2021/22591
8.	ONR-OFD-AR-21-004 Revision, Mechanical Engineering Assessment of EC368163 Rev 03, 'Hinkley Point B: Reactor 4 Statutory Outage Deferral from 2021 to 2022', May 2021 CM9 2021/32769
9.	ONR-OFD-AR-21-007 Revision 0, Electrical Engineering Assessment Report, Hinkley Point B Reactor 4 Statutory Outage Deferral from 2021 to 2022 - EC 368163 – Revision 0 Version 3, May 2021 CM9 2021/32732
10.	ONR-OFD-AR-21-001 Revision 0, Control and Instrumentation (C&I) Assessment of EDFNGL's Nuclear Safety Justification for Deferring the HPB R4 Statutory Outage from May 2021 until May 2022 (Engineering Change (EC) 368163, Proposal Version No. 03), May 2021 CM9 2021/32406
11.	Graphite Structural Integrity Assessment – Specialist Inspectors email CM9 2021/12442
12.	ONR-OFD-DR-21-074 Revision 0, Postponing the next periodic shutdown of Hinkley Point B Reactor 4. DR for structural integrity, Structural integrity decision record, March 2021 CM9 2021/23945
13.	PSA Sensitivity Assessment – Specialist Inspectors email CM9 2021/8201

14. Hinkley point B Action Report – AR – 10226393 – Requirement to NDT Gas Circulator Motor Studs  
CM9 2021/32738