



**Sizewell B Emergency Plan
Approval of Amended Sizewell B Nuclear Licensed Site Emergency Plan**

Project Assessment Report ONR-OFD-PAR-20-027
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EXECUTIVE SUMMARY

Approval of Amended Sizewell B Nuclear Licensed Site Emergency Plan

Permission Requested

The EDF Energy Nuclear Generation Limited (EDF-NGL) nuclear licensed site at Sizewell B has requested ONR to approve, under Licence Condition 11(3), an amended emergency plan which, after approval, will replace the extant plan.

Background

A licence instrument was issued in October 2020 to approve the extant emergency plan which was amended to enable the Station to comply with the new REPPiR 19 regulations. An error has been discovered in this plan regarding the emergency controller's authorisation to direct persons on-site to take stable iodine tablets. At Sizewell B, unlike other EDF sites, the company medical officer authorises the EC to direct persons on the site to take stable iodine and the plan has been amended to reflect this.

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

This assessment and approval have been carried out in accordance with ONR Guidance on the purpose and use of permissioning. I consider the following areas during my assessment but decided no specialist assessments were required to support my decision and recommendations:

- Why Sizewell B is different to the model EDF Emergency Plan.
- Confirmed ONR EP&R specialist had no reasons to preclude approval.
- Confirmed the area for stable iodine distribution was suitably identified.

Matters arising from ONR's work

The matters arising from the work carried out by ONR specialist are summarised as follows. I have confirmed with EDF that the change reflects the current authorisations for taking stable iodine and that the ONR EP&R specialist inspector and the Sizewell B EA Inspector have no reasons not to approve the amended plan.

Conclusions

My assessment concluded the amendment ensures the emergency plan accurately reflects the current authorisations for taking stable iodine tablets and have no adverse effects on Sizewell B's response to a nuclear emergency.

Recommendation

I recommend the Operating Facilities Division Director should approve Sizewell B Nuclear Power Station Emergency Plan SZB EM HBK SEC 1, Revision 016, October 2020 and withdraw approval of the superseded plan.

LIST OF ABBREVIATIONS

ALARP	As low as reasonably practicable
EA	Environment Agency
EC	Emergency Controller
EP&R	Emergency Planning and Response
HOW2	(Office for Nuclear Regulation) Business Management System
IAEA	The International Atomic Energy Agency
ONR	Office for Nuclear Regulation
PAR	Project Assessment Report
PSA	Probabilistic Safety Analysis
RGP	Relevant Good Practice
TAG	Technical Assessment Guide (ONR)

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1 PERMISSION REQUESTED

1. EDF Energy Nuclear Generation Limited (EDF-NGL) nuclear licensed site at Sizewell B has requested ONR to approve, under Licence Condition 11(3), an amended emergency plan [Ref 4] which, after approval, will replace the extant plan.

2 BACKGROUND

2. A licence instrument (LI) [Ref 5] was issued in October 2020 to approve the extant Sizewell B Nuclear Power Station Emergency [Ref 6]. A project assessment report (PAR) supported the Approval [Ref 7]. The plan was amended to enable the Station to comply with the new REPPIR 19 regulations and the EDF generic emergency plan was used as the model.
3. An error was discovered in the extant plan [Ref 6] regarding the emergency controller's authorisation to direct persons on-site to take stable iodine tablets. In line with the NGL model the extant plan stated the Director of Public Health for Suffolk authorises the Emergency Controller (EC) to advise the public and personnel on-site to take stable iodine tablets. However, at Sizewell B the EDF Company Medical Officer authorises the EC to direct persons on the site to take the tablets and section 2.12.2 plan has been amended to reflect this.
4. Section 1.1.3 of the plan has also been amended at the requested of the local authority to reflect the off-site plan is titled the 'Suffolk Resilience Forum Radiation Emergency Plan'.

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

5. This assessment and approval have been carried out in accordance with ONR Guidance on the purpose and use of permissioning (Ref 1).
6. I consider the following areas during my assessment but decided no additional specialist assessments were required to support my decision and recommendations because the change is administrative and corrects an error in the plan:
 - Why Sizewell B is different to the model EDF Emergency Plan.
 - Confirmed ONR EP&R specialist had no reasons to preclude approval.
 - Confirmed the area for stable iodine distribution was suitably defined.

4 MATTERS ARISING FROM ONR'S WORK

7. The matters arising from the work carried out by ONR specialist are summarised as follows.
8. I have confirmed with EDF that the basis for the change dates back to 2007 when health and social care responsibility moved from the NHS to Suffolk County Council. A result of this was the Director of Public Health and Protection authorising the EC to direct the public to take stable iodine tablets and the company medical officer to authorising the EC to direct people on-site to take the tablets. Other stations in the Fleet currently have NHS authorisation for the EC to advise the both the public and on-site personnel to take the tablets but may follow the Sizewell B approach in the future.
9. I have confirmed with the ONR EP&R specialist inspector that they have no reasons not to approve revision 016 of the emergency plan. [Ref 8]
10. I have confirmed the 'the area requiring special protective measure is defined in Appendix A of the emergency plan.

11. I have advised the Environment Agency (EA) that ONR is re-approving the emergency plan and have received confirmation that EA do not have any reasons to preclude approval of the plans [Ref 9].

5 CONCLUSIONS

12. Based on the work I have carried out, I am satisfied that the changes to the emergency plan have been made to correct errors in the document and it now reflects the authorisations which are already in place for advising the public and on-site personnel to take stable iodine tablets.
13. The changes ensure the emergency plan accurately reflects the current arrangements and has no adverse effect on the Sizewell B's response to a nuclear emergency.
14. I conclude that ONR should approve the amended emergency plan [Ref 4] for Sizewell B nuclear licensed site and I have prepared a licence instrument for the Operating Facilities Division Director's consideration [Ref 10].

6 RECOMMENDATIONS

15. I recommend the Operating Facilities Division Director should approve Sizewell B Nuclear Power Station Emergency Plan SZB EM HBK SEC 1, Revision 016, January 2021 and withdraw approval of the superseded plan.

7 REFERENCES

1.	ONR Guide – <i>The Purpose and Use of Permissioning - NS-PER-GD-001 Revision X</i> . Month Year. http://www.onr.org.uk/operational/assessment/index.htm
2.	<i>Safety Assessment Principles for Nuclear Facilities</i> . 2014 Edition, Revision 1. January 2020. http://www.onr.org.uk/saps/saps2014.pdf .
3.	Not used
4.	Sizewell B Nuclear Power Station Emergency Plan SZB EM HBK SEC 1, Revision 016, January 2021 CM9 2021/8533
5.	Sizewell B Licenced Site, Licence Instrument 558 Approval, October 2020 CM9 2020/117135
6.	Sizewell B Nuclear Power Station Emergency Plan SZB EM HBK SEC 1, Revision 015, October 2020 CM9 2020/300920
7.	ONR-OFD-PAR-20-017 Revision 0, Approval of Amended Sizewell B Nuclear Licensed Site Emergency Plan, October 2020 CM9 2020/301384]
8.	ONR EP&R email Sizewell B Nuclear Power Station Emergency Plan SZB EM HBK SEC 1, Revision 016, October 2020 CM9 2021/9836
9.	Approval of Sizewell B Emergency Plan, Environment Agency e-mail, February 2021 CM9 2021/9515
10.	Emergency Plan SZB EM HBK SEC 1 Rev 016 Approval LI 559 CM9 2021/10022