



**Springfields Fuels Limited**

**Approval of Amendments to the Springfields On-Site Emergency Plan**

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## EXECUTIVE SUMMARY

### Approval of Amendments to the Springfields Works On-Site Emergency Plan.

#### Permission Requested

This project assessment report relates to a request from Springfields Fuels Limited for an approval of its amended On-Site Emergency plan made under Licence Condition (LC) 11(1) of nuclear site licence No. 79.

#### Background

Springfields Fuels Ltd (SFL) has provided nuclear fuel fabrication services since the mid-1940s. The site's main activities include manufacture of oxide fuels for advanced gas cooled reactors (AGR) and light water reactors (LWR), processing of residues, decommissioning and demolition of redundant plants and buildings. The siting, design, construction, operation and decommissioning of all civil nuclear sites require a nuclear site licence granted by the Office for Nuclear Regulation (ONR). 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 On-Site 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 review of its Emergency Plan following the Radiation (Emergency Preparedness and Public Information) Regulations 2019 coming into force and has 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 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 2019.

ONR has assessed the differences between the proposed new plan and the existing approved plan, informed by ONR guidance on Emergency Arrangements. The changes were minor in nature, with the principal amendments being alignment to Radiation (Emergency Preparedness and Public Information) Regulations 2019, the addition of roles, the removal of the Occupational Health Centre, added notifications to Network Rail and links to Transport Emergency Plan for off-site transport incidents. In addition, throughout the period since the last review, the licensee has continued to achieve adequate performance when demonstrating the On-Site Emergency Plan aspects of the 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 On-Site 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 Springfields Fuels Limited and ONR's assessment, it is recommended that a person with delegated authority within ONR signs and issues licence instrument number 527, a Licence Condition 11(3) Approval of the Springfields On-Site Emergency Plan January 2021 and Licence Instrument 524 be withdrawn.

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## **1 PERMISSION REQUESTED**

1. SFL (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 Springfields On-Site Emergency Plan [Ref 1]. This revision is documented as the "Springfields On-Site Emergency Plan 2020" [Ref 2].
2. The licensee currently has an on-site emergency plan [Ref 3], which was approved by ONR in Licence Instrument 524 [Ref 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 approved via its nuclear safety committee [Ref 5].

## **2 BACKGROUND**

4. Springfields Fuels Ltd (SFL) has provided nuclear fuel fabrication services since the mid-1940s. The site's main activities include manufacture of oxide fuels for advanced gas cooled reactors (AGR) and light water reactors (LWR), processing of residues, decommissioning and demolition of redundant plants and buildings. The siting, design, construction, operation and decommissioning of all civil nuclear sites require a nuclear site licence granted by the Office for Nuclear Regulation (ONR). 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.
5. 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.
6. The On-Site 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.
7. The licensee, as required by its arrangements, has undertaken a review of its Emergency Plan following the Radiation (Emergency Preparedness and Public Information) Regulations 2019 coming into force.
8. The revised plan incorporates a number of changes which are minor in nature, with the principal amendments being alignment to Radiation (Emergency Preparedness and Public Information) Regulations 2019, the addition of roles, the removal of the Occupational Health Centre, notifications to Network Rail and links to Transport Emergency Plan for off-site transport incidents.
9. As required by LC11(3), the licensee has written to ONR to request approval of its revised emergency plan [Ref 1].

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

10. ONR's assessment of the proposed emergency plan considered the differences between the extant emergency plan [Ref 3] and the proposed emergency plan [Ref 2]. The minor changes are noted below:

- Inclusion of notification process to Network Rail.
  - Inclusion of monitor's role.
  - Removal of Occupational Health Centre.
  - Update of Major Accidents To The Environment hazards.
  - REPIR 19 updates – terminology and alignment with off site plan – Appendix showing compliance with Reg 10 and Schedule 6, 7.
  - Link to Transport Emergency Plan for off-site transport incidents as part of Springfields Fuels Limited's Carriage of Dangerous Goods Regs 2019 compliance.
11. These minor changes provide both clarity within the documents and allow for flexibility within the emergency response area. A comprehensive review of the On-Site Emergency Plan [Ref 6] was conducted in 2015 and in 2019 a minor review confirmed the 2015 review still adequately addressed these requirements [Ref 7].
  12. The proposed amendments to the plan have been subject to the licensee's due governance process and approved by the 83<sup>rd</sup> meeting of the Springfields Environmental, Health and Safety Committee' on 14 December 2020 [Ref 5].
  13. The licensee has continued to achieve an adequate performance when demonstrating the On-Site Emergency Plan aspects of the LC11 emergency arrangements, the most recent example being at Emergency Exercise Greystoke observed by ONR on 15 May 2019 [Ref 8].
  14. In addition to LC11, Springfields Fuels Limited is required to comply with REPIR 2019. The consequence report assessed by ONR concluded that there is a potential for radiation accidents on the Springfields Fuels Limited site to result in a radiation emergency. Springfields Fuels Limited therefore requires an off-site emergency plan to comply with REPIR 2019. The responsible local authority, in this case Lancashire County Council, is required to prepare an off-site emergency plan with the purpose of minimising, so far as is reasonably practicable, radiation exposures to those likely to be affected by such an emergency. The ONR Emergency Planning and Response (EP&R) specialism has assessed this proposal [Ref 9], one shortfall was identified by the assessment that the information provided did not demonstrate that the Secretary of State was on the emergency contact list. A level 4 ONR regulatory issue has been raised, reference number 8717, to ensure this is addressed at the next emergency exercise demonstration. The EP&R specialism confirmed that they have no objections to the approval being issued as long as this regulatory issue is raised [Ref 10].
  15. The licensee has continued to achieve an adequate performance when demonstrating the Off-Site Emergency Plan aspects of their emergency arrangements, the most recent example being at Emergency Exercise HERON observed by ONR on 3 October 2018 [Ref 11].
  16. ONR Civil Nuclear Security was consulted concerning the proposed approval of the revised Emergency Plan and have confirmed that they have no objections to the approval being issued [Ref 12].
  17. The COMAH Competent Authority was consulted concerning the proposed approval of the revised Emergency Plan and have confirmed that they have no objections to the approval being issued [Ref 13].

18. The Environment Agency (EA) has been informed of the proposed approval of the UUK Emergency Plan [Ref 14]. However, due to the minor nature of the amendments no formal consultation has been undertaken.
19. Licence Instrument (LI) 527 [Ref 15] has been drafted in response to the licensee's request for the approval of the SFL On-Site Emergency Plan under Licence Condition 11(3). This LI is one of the approved for use formats given within ONR procedures and as such is not required to be reviewed by Government Legal Department (GLD).

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

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

#### **4 CONCLUSIONS**

21. ONR is satisfied that the revised emergency plan introduces only minor changes to the extant arrangements, and that these changes were acceptable and did not affect the adequacy of the plan and continued compliance with LC11(1).
22. The licensee has continued to successfully demonstrate the implementation of the On-Site Emergency Plan since the last review in 2019.
23. ONR therefore concludes that the proposed amendments should be implemented by granting an approval under LC 11(3).

#### **5 RECOMMENDATIONS**

24. On the basis of the documentation submitted by Springfields Fuels Limited 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 527, a Licence Condition 11(3) Approval of the Springfields On-Site Emergency Plan May 2021 and Licence Instrument 524 be withdrawn.



## REFERENCES:

1. Letter from Springfields - Request for ONR approval of SFL On Site Emergency Plan - 26 March 2021 (CM9 Ref. 2021/26199).
2. Springfields On-Site Emergency Plan 2020 – Final (CM9 Ref. 2021/26199).
3. Springfields On-Site Emergency Plan October 2018 (CM9 Ref. 2019/27824).
4. SPR70475N - Springfields Licence Instrument - Approval - LI 524 - Approval of revised On-Site Emergency Plan (CM9 Ref. 2019/33814).
5. Minutes of 83<sup>rd</sup> Springfields Environment, Health and Safety Committee – Meeting held on 14 December 2021 (CM9 Ref. 2021/27933).
6. Approval of On-Site Emergency Plan ONR-SDFW-PAR-16-028 dated 1 December 2016 (CM9 Ref. 2016/452865).
7. Approval of On-Site Emergency Plan ONR-SDFW-PAR-18-040 dated 5 February 2019 (CM9 Ref. 2019/19081).
8. ONR-CNS-IR-19-011 Exercise GREYSTOKE LC11 Emergency Exercise (CM9 Ref. 2019/143654).
9. Assessment of the Springfields Fuels Ltd on-site emergency plan content in relation to The Radiation Emergency Preparedness and Public Information Regulations 2019 (REPP19) (CM9 Ref. 2021/36368).
10. EP&R Reply Springfields on site emergency plan (CM9 Ref. 2021/37286).
11. ONR-SDFW-CR-18-632a Exercise HERON Emergency Exercise (CM9 Ref. 2019/31200)
12. Nominated Site Security Officer Reply Springfields on site emergency plan (CM9 Ref. 2021/27952).
13. COMAH Competent Authority Reply Springfields on site emergency plan (CM9 Ref. 2021/27954).
14. Environment Agency Site Nuclear Regulator E-mail response (CM9 Ref. 2021/26702).
15. SFL LI 527 – Approval of the Springfields On- Site Emergency Plan granted under Licence Condition 11(3) – unsigned (CM9 Ref. 2021/26577).