



URENCO UK (UUK) Limited Emergency Arrangements

Approval of the amended Urenco UK (UUK) Emergency Plan made under LC11

Project Assessment Report ONR-SDFW-PAR-20-013
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EXECUTIVE SUMMARY

Title

Approval of the amended Urenco UK (UUK) Ltd - Capenhurst Emergency Plan made under LC11.

Permission Requested

This project assessment report provides the basis for supporting the recommendation to issue Licence Instrument 543 against LC 11(3) for the Approval of the amended Emergency Plan for the UUK Ltd - Capenhurst Licensed Nuclear Site, Site Licence number 48E.

Background

UUK is a provider of uranium enrichment services to the nuclear energy industry. 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. Nevertheless, it is a condition of each nuclear site licence that there shall be arrangements for dealing with an accident or emergency.

The Emergency Plan is a key document in these arrangements and ensures that necessary actions 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, ONR specify the approval of the Emergency Plan and any subsequent amendments by assessing its adequacy.

To comply with its obligations under Radiation (Emergency Preparedness and Public Information) Regulations (REPPPIR), the licensee has made amendments to the emergency arrangements at Capenhurst which reflect this legislation. UUK Ltd has reviewed the plans and made changes to bring the plans and terminology up to date, including revising arrangements to ensure compatibility with the Emergency Services' Joint Decision Making and Joint Emergency Services' Interoperability Principles.

A Category 'B' Management of Organisational Change (MOC), clarifying the responsibilities and improving the resilience of the emergency response organisation at Capenhurst, was previously submitted by ONR. The Emergency Plan has been amended to reflect these MOC changes which were not previously challenged by ONR and therefore implemented by UUK Ltd.

Post Incident Management arrangements have been added to the Emergency Plan, adding information regarding the recovery stages.

As required by LC 11(3) and in compliance with their arrangements the licensee, UUK Ltd, has written to ONR to request approval of the amended Capenhurst On-Site Emergency Plan, Issue 1.4.

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

The proposed amendments to the Capenhurst Emergency Plan have been assessed by ONR and are considered to adequately address the expectations set out in ONR's guidance

document NS-INSP-GD-011 (Revision 7). The plan has been reviewed and updated in line with Radiation Emergency Preparedness and Public Information Regulations 2019 (REPPIR19) where the main changes include:

- Internal restructure of the emergency roles via Category 'B' Management of Organisational Change (MOC) which was submitted to ONR on 16th September 2020 for consideration (ONR/2020/26N). The purpose of the MOC was to clarify the responsibilities and to improve the resilience of the emergency response organisation at Capenhurst.
- Further details and examples of the emergency states and declarations have been incorporated into the revised Emergency Plan.
- The findings from the Capenhurst Radiation (Emergency Preparedness and Public Information) Regulations 2019 consequence assessment including emergency exposures, Detailed Emergency Plan Zone and Outline Planning Zone have been incorporated
- Post incident management including more supportive information regarding the recovery stages has been added.
- Joint Decision Making and Joint Emergency Services Interoperability Principles have been added.
- Major reformatting of style but minor editorial changes.

To ensure compliance and alignment to Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR) 2019, Control of Major Accident Hazards Regulations 2015, Nuclear Industries Security Regulations 2003, Nuclear Safeguards Act 2018 and other regulations made under the Health and Safety at Work Act 1974/The Energy Act 2013, ONR inspectors specialising in these purposes assessed the Emergency Plan and provided statements supporting an Approval of the amended Emergency Plan.

The licensee has continued to demonstrate adequate performance through routine exercising of the On-Site Emergency Plan, the most recent example being at the Emergency Exercise 'Snowdrop', assessed as adequate by ONR on 14 November 2019. The new emergency plan was exercised in November 2020 during a simulated emergency and observed independently by the UUK Ltd Independent Assurance team and an adequate assessment reported to ONR.

Matters arising from ONR's work

There are no matters arising from this project assessment report.

Conclusions

The proposed amendments to the Emergency Plan have undergone a formal review within the licensee's organisation and have been subject to ONR assessment for compliance with REPPIR19 for an on-site emergency plan. I am satisfied that the revised Capenhurst Emergency Plan adequately addresses the expectations set out within ONR's guidance and consider that there is no technical or regulatory reason to not recommend 'Approval' of the revised Emergency Plan.

Recommendation

I recommend that Licence Instrument 543 be issued under Licence Condition 11(3) of Schedule 2 to Nuclear Site Licence No. 48E for the Approval of the amended Capenhurst On-Site Emergency Plan, Issue 1.4.

LIST OF ABBREVIATIONS

COMAH	Control of Major Accident Hazards Regulations
DFW	Decommissioning, Fuel and Waste
EA	Environment Agency
LC	Licence Condition
LI	Licence Instrument
MOC	Management of Change
NSEC	Nuclear Safety and Environment Committee
ONR	Office for Nuclear Regulation
REPPIR	Radiation (Emergency Preparedness and Public Information) Regulations
UUK Ltd	Urenco UK Limited

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1 PERMISSION REQUESTED

1. UUK Ltd has requested, in accordance with its arrangements, the Office for Nuclear Regulation's (ONR's) "Approval" under Licence Condition 11(3) for its proposed amendments to the UUK Ltd Emergency Plan [Ref **Error! Reference source not found.**]. This revision is documented as the "Capenhurst On-Site Emergency Plan, UUK6162060, Issue 1.4, dated 19th February 2021" [Ref **Error! Reference source not found.**].
2. The licensee currently has an approved on-site emergency plan [Ref 3]. 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.

2 BACKGROUND

3. UUK is a provider of uranium enrichment services to the world's nuclear energy industry. 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.
4. 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. Nevertheless, it is a condition of each nuclear site licence that there shall be arrangements for dealing with an accident or emergency.
5. The Emergency Plan is a key document in these arrangements and ensures that necessary actions 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, ONR specify the approval of the Emergency Plan and any subsequent amendments by assessing its adequacy.
6. As required by LC11 (3), the licensee has written to ONR to request approval of its revised emergency plan [Ref **Error! Reference source not found.**].

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

7. In my assessment of the proposed emergency plan, I have considered the differences between the extant emergency plan [Ref 3] and the proposed emergency plan [Ref 2]. In my assessment these changes provide both clarity within the documents and allow for flexibility within the emergency response area.
8. The changes to the revised plan are as follows:
 - Internal restructure of the emergency roles via Category 'B' Management of Organisational Change (MOC) which was submitted to ONR on 16 September 2020 for consideration (ONR/2020/26N) [Ref 4]. The purpose of the MOC was to clarify the responsibilities and to improve the resilience of the emergency response organisation at Capenhurst.
 - Further details and examples of the emergency states and declarations have been incorporated into the revised Emergency Plan.

- The findings from the Capenhurst Radiation (Emergency Preparedness and Public Information) Regulations 2019 consequence assessment including emergency exposures, Detailed Emergency Plan Zone and Outline Planning Zone have been incorporated
 - Post incident management including more supportive information regarding the recovery stages has been added.
 - Joint Decision Making and Joint Emergency Services Interoperability Principles have been added.
 - Major reformatting of style but minor editorial changes.
9. The proposed amendments to the plan have been subject to adequate internal challenge using the licensee's processes and have been approved by its Nuclear Safety and Environment Committee (NSEC) [Ref 5].
10. The licensee has continued to achieve an adequate performance when demonstrating the UUK Emergency Plan aspects of the LC11 emergency arrangements, the most recent example being at the emergency exercise "Snowdrop" observed by ONR on 14 November 2019 [Ref 6].
11. I have consulted with ONR Emergency Planning and Resilience, who have produced an assessment note stating the Emergency Plan satisfies the requirements of REPPIR 2019 [Ref 7].
12. I have consulted with ONR Civil Nuclear Security concerning the proposed approval of the revised Emergency Plan. I have obtained confirmation that they have no objections to the approval being issued [Ref 8].
13. I have consulted with ONR Fire Safety Specialist concerning the proposed approval of the revised Emergency Plan. I have obtained confirmation that they have no objections to the approval being issued [Ref 9].
14. I have consulted with ONR COMAH specialist inspector concerning the proposed approval of the revised Emergency Plan. I have obtained confirmation that they have no objections to the approval being issued [Ref 10].
15. I have consulted with ONR Safeguard inspector concerning the proposed approval of the revised Emergency Plan. I have obtained confirmation that they have no objections to the approval being issued [Ref 11].
16. The Environment Agency (EA) has been informed of the proposed approval of the UUK Emergency Plan [Ref 12]. However, due to the minor nature of the amendments no formal consultation has been undertaken.
17. I have drafted Licence Instrument (LI) 543 [Ref 13] in response to the licensee's request for the approval of the UUK Emergency Plan under Licence Condition 11(3). This LI is one of the standard formats given within ONR procedures and so it does not require review by Treasury Solicitor's Department.

4 MATTERS ARISING FROM ONR'S WORK

18. There are no matters arising from ONR's assessment of the revised Emergency Plan.

5 CONCLUSIONS

19. The proposed amendments to the Emergency Plan have undergone a formal review within the licensee's organisation and have been subject to ONR assessment for compliance with REPP19 for an on-site emergency plan. I am satisfied that the revised Capenhurst Emergency Plan adequately addresses the expectations set out within ONR's guidance and consider that there is no technical or regulatory reason to not recommend 'Approval' of the revised Emergency Plan.

6 RECOMMENDATION

20. I recommend that Licence Instrument 543 be issued under Licence Condition 11(3) of Schedule 2 to Nuclear Site Licence No. 48E for the Approval of the amended Capenhurst On-Site Emergency Plan, Issue 1.4.

7 REFERENCES

1. UUK letter requesting Approval of Capenhurst On-Site Emergency Plan Issue 1.4, dated 17th March 2021. CM9 Record: 2021/23188.
2. Capenhurst On-Site Emergency Plan, UUK6162060, Issue 1.4, dated 19th February 2021. CM9 Record: 2021/23188.
3. On-site Capenhurst Emergency Plan C(EP-6), UUK6119113, dated 19th December 2017. CM9 Record: 2021/23188.
4. OFFICIAL SENSITIVE - Letter in from Urenco - UUK CORRESPONDANCE - MOC Emergency response Organisation (ONR/2020/26N) - 17 September 2020. CM9 Record: 2020/275431.
5. Minutes for 180th NSEC Meeting- 4 November 2020. CM9 Record: 2020/306384.
6. ONR Intervention Record of Level One Emergency Exercise Snowdrop held on 14 November 2019 CM9 Record: 2019/351190.
7. Assessment of the UUK (Urenco) on-site emergency plan content in relation to Regulation 10 of The Radiation Emergency Preparedness and Public Information Regulations 2019 (REPP19). CM9 Record: 2021/16738.
8. E-mail response from the Site Security Inspector. CM9 Record: 2021/23236.
9. Email response from the DFW Fire Safety Inspector. CM9 Record: 2021/23525.
10. Email response from the DFW COMAH Competent Authority Inspector. CM9 Record 2021/24993.
11. Email response from the Site Safeguard Inspector. CM9 Record 2021/25101.
12. E-mail response from with the Environment Agency Site Nuclear Regulator. CM9 Record: 2021/23901.
13. Urenco UK Limited LI 543 – Approval of the UUK Site Emergency Plan granted under Licence Condition 11(3). CM9 Record: 2021/25126.