

Office for Nuclear Regulation (ONR) Site Report for HINKLEY POINT C

Report for period 1 January – 31 March 2020

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are published on the ONR website (<http://www.onr.org.uk/lhc/>).

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1 INSPECTIONS

The ONR nominated site inspector and/or other ONR specialist inspectors including ONR warranted Health and Safety Executive Construction Division inspectors made inspections on the following dates during the quarter at the Hinkley Point C (HPC) construction site:

- 21 January 2020
- 30 January 2020
- 12 February 2020
- 20 February 2020
- 26 – 27 February 2020
- 12 March 2020

2 ROUTINE MATTERS

2.1 Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the Energy Act 2013;
- the Health and Safety at Work etc Act 1974 (HSWA74);
- regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99);
- the Regulatory Reform (Fire Safety) Order 2005; and
- the Nuclear Industries Security Regulations 2003.

ONR has implemented a programme of interventions to:

- secure ONR's regulation of the construction and installation of two UK EPR™ reactor units by NNB GenCo (HPC) Ltd.;
- ensure that NNB GenCo (HPC) Ltd. is complying with its legal responsibilities;
- conduct theme focused interventions and cross-theme team inspections aimed at gathering evidence to form a judgement on the on-going development of NNB GenCo (HPC) Ltd.'s competence and capability and the effectiveness of its management arrangements for controlling procurement, design and manufacture; and
- to inform ONR's judgement on the adequacy of NNB GenCo (HPC) Ltd.'s site construction related compliance arrangements to support ONR's permissioning decisions.

In this period, routine site inspections at the Hinkley Point C construction site covering the following Licence Conditions (LCs) were performed:

- LC 09 – Instructions to persons on the site
- LC 11 – Emergency arrangements

As NNB GenCo (HPC) Ltd.'s construction activity increases at the HPC site, ONR's site interventions will include increasing focus on NNB GenCo (HPC) Ltd.'s ability to adequately control construction and installation at the HPC site in accordance with NNB GenCo (HPC) Ltd.'s justified design.

For LC 11 ONR judged that NNB GenCo (HPC) Ltd. had adequately implemented its licence compliance arrangements with only minor areas for improvement being identified.

For LC 09 ONR judged that whilst NNB GenCo (HPC) Ltd. had clearly expended significant effort in ensuring site personnel's understanding of the meaning of site alarms and the action to be taken in response to them leading to some improvement, based on ONR's sampling this had yet to be fully effective and hence ONR considered that the associated extant regulatory issue could not yet be closed.

ONR continued its engagement with the project via regular site visits and meetings at NNB GenCo (HPC) Ltd.'s office locations across the following themes:

- Design and Safety Case
- Organisational Capability
- Conventional Health and safety and fire safety
- Security

These inspections are providing ONR with valuable intelligence on the progress NNB GenCo (HPC) Ltd. is making to continue developing its competence and capability to manage the design, procurement and construction of HPC.

Towards the end of the period covered by this report, ONR transitioned to remote working wherever practicable in accordance with government advice on Covid-19 (please see the News from ONR section in this report for further details).

3 NON-ROUTINE MATTERS

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

As a result of the Covid-19 pandemic NNB GenCo (HPC) Ltd. has taken a number of steps aimed at ensuring effective social distancing in accordance with Public Health England guidelines. To facilitate this NNB GenCo (HPC) Ltd. has significantly reduced site numbers to allow effective social distancing whilst continuing construction where practicable.

ONR continues to engage with NNB GenCo (HPC) Ltd. and its internal regulator to ensure that appropriate social distancing measures are in place. In addition ONR has put in place enhanced reporting measures to ensure appropriate regulatory oversight during this period of non-routine working.

4 REGULATORY ACTIVITY

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed ‘Licence Instruments’, but can take other forms. In addition, inspectors may issue Enforcement Notices to secure improvements to safety.

ONR issued one Licence Instrument as detailed in table 1 during the period covered by this report. This specification has been issued due to legislative changes regarding the reporting of High Activity Sealed radioactive Sources (HASS).

No Enforcement Notices were issued during the period of this report.

Table 1
Licence Instruments and Enforcement Notices issued by ONR during this period

Date	Type	Ref No	Description
11 February 2020	SPECIFICATION	L520	Specification issued under Licence Condition 25(4) specifying that the licensee shall furnish to ONR records of high-activity sources as defined in Schedule 23, Part 5, section 1, paragraph 1 of the Environmental Permitting (England and Wales) Regulations 2016...

Reports detailing regulatory decisions taken at HPC can be found on the ONR website at www.onr.org.uk/pars.

5 NEWS FROM ONR

Below are summaries of key activities over the last three months. Further detail is available on [our website](#).

5.1 Covid-19 (Coronavirus) (ONR position)

ONR is continuing to protect society by securing safe nuclear operations during the Coronavirus pandemic. ONR staff continue to work from home, in line with government advice. We have considered our priorities, have deferred non-critical activities, and are carrying out as much of our work as possible via videoconference, phone and email. Our regulatory focus includes assurance, where appropriate, from site licensees that they are applying the public health measures introduced to reduce the spread of coronavirus.

A limited number of our inspectors can, as key workers, continue to travel to site as necessary to conduct urgent and essential regulatory inspections. Nuclear sites have been reducing non-essential activities so as to protect staff, infrastructure, and the public. As always, we are regulating those activities to ensure they are carried out safely and securely. ONR's latest position [can be found on our website](#).

5.2 Enforcement Action

ONR served an [Enforcement Notice](#) on Urenco UK Ltd following a fire safety inspection at its Capenhurst Works in Cheshire during December 2019. The notice was issued in response to shortfalls identified in the fire alarm and detection systems at one of the site's facilities.

In February ONR announced that [Sellafield Limited had complied](#) with an [Improvement Notice](#) relating to staff training, operating procedures and procedural adherence that they were served with in May 2019.

5.3 Regulatory Updates

In January ONR published an update to its [Safety Assessment Principles](#), to incorporate some relatively minor revisions including typographical corrections and updates to reflect changes to the UK's nuclear regulatory framework since 2014.

In February ONR completed Step 3 of the Generic Design Assessment (GDA) of the UK HPR1000 design, and took the decision to progress to Step 4 of the GDA. During Step 3, ONR increased its regulatory scrutiny and undertook a more detailed assessment of the design, focusing on the methods and approaches used by the GDA Requesting Party to underpin their safety and security claims.

In March we published the Quarterly [Statement of Civil Incidents](#) for the period 1 October to 31 December 2019. During this reporting period there were two civil incidents at nuclear licensed sites within Great Britain that met the Ministerial Reporting Criteria as defined within the Nuclear Installations (Dangerous Occurrences) Regulations 1965 and ONR guidance in relation to notifying and reporting incidents and events.

5.4 Stakeholder Engagement

On 15 January ONR launched a four-week public consultation on its draft 2025 Strategy. Once agreed, the strategy will set our direction and priorities for the next five years. To support the public consultation we held a webinar for NGOs and other stakeholders in which our Chief Executive, Adrienne Kelbie, and Technical Director, Anthony Hart, gave an overview of the strategy and welcomed questions and comments. The strategy is due to be published in May 2020.

In January, ONR achieved Level 3 Disability Confident (Leader) status, recognising our desire to put people first and create an environment in which everyone can thrive. The government-backed scheme encourages employers to think differently about disability and take action to improve how they recruit, retain and develop disabled people.

In February, we announced the appointment of two new members to the ONR Board. Dr Janet Wilson took up the appointment on 1 April 2020 and Tracey Matthews will take up her appointment on 1 June 2020 – both appointments are for five year terms.

In February more than 70 stakeholders involved in the transport of radioactive material attended a conference organised by ONR's Transport Competent Authority (TCA) team. The event provided a good opportunity for the TCA team to share their expectations on compliance with regulations governing the transport of radioactive material.

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Published 05/20

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