

Office for Nuclear Regulation (ONR)

Site Report for Hinkley Point B Power Station

Report for period 1 October to 31 December 2021

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 distributed to members for the Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/lrc/>).

Site inspectors from ONR usually attend Site Stakeholder Group meetings where these reports are presented and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

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1. Inspections

1.1. Dates of Inspection

The ONR site inspector made inspections on the following dates during the report period:

- 16 to 17 November 2021 (LC36)
- 18 November 2021 (System Based Inspection of Shut Down Systems)
- 14 to 15 December 2021 (LC15)

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 Act 1974 (HSWA74); and
- 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 inspections entail monitoring licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of Hinkley Point B Power Station covered the following:

Organisational Changes

This inspection covered LC36 (Organisational Capability). The aim of the inspection was to gain assurance that there are sufficient human resources to maintain nuclear safety while preparations are made for end of generation and that the management of organisational change is being controlled adequately.

We found that the dutyholder could neither provide a justification for the baseline organisation, which identifies the number of posts that are required to operate safely, nor explain the fleet-defined reference baseline used as the basis for the site baseline. A suitably underpinned baseline, which is understood by the dutyholder on site, is fundamental in allowing changes in organisation to be assessed and categorised effectively.

Although there is an existing issue on the adequacy of HPB's nuclear baseline it was our opinion that the shortfall was more fundamental than originally understood and that more urgent action is required as the station has seen significantly reduced headcount and experience since the last inspection, which has not been fully assessed against a substantiated baseline.

Consideration of the 2020 annual baseline statement identified several minor shortfalls that should have been identified through both station and fleet governance.

We found that each of the station Management of Change (MoC) assessments carried out in 2021 contained shortfalls and the majority fell significantly below the expectations of both ONR guidance and Relevant Good Practice (RGP). None of the MOC process role holders interviewed demonstrated sufficient understanding of the requirements and expectations of the LC36 process, however in mitigation they were able to describe the basis of the change and the underpinning logic. It was my opinion that there was an inadequate level of competence in all MoC process role holders that I consider to arise from shortfalls in EDF NGL's management arrangements and associated training package. It was recommended that two new fleet regulatory issues be raised to address these issues.

The inspection was rated as amber, as in our opinion there was a significant shortfall against an identified relevant good practice when compared with appropriate benchmarks.

System based Inspection of Shutdown Systems

The shutdown systems are the systems that are required for safe shutdown of the reactor. As Hinkley Point B is approaching end of generation in 2022, a full System Based Inspection (SBI) was not considered proportionate, and the inspection focussed on emergency shutdown provision against Licence Conditions 10 (Training), 27 (Safety Mechanisms) and 28 (Examination, Inspection, Maintenance and Testing).

The inspection was conducted by means of a desktop review of documentation and a MS Teams engagement.

The inspection sampled and examined the applicable safety case claims, through a combination of document reviews, discussions with the dutyholder and computer interrogation through MS Teams.

Licence Condition 10 (Training) - the training records for personnel fulfilling roles associated with shutdown systems were sampled. The dutyholder informed ONR that there is no specific training programme relating to shutdown systems and that training consists of engineering training and on the job training, ensuring that individuals have the required skills for shutdown systems. All of the individuals sampled had completed the required essential training for the tasks sampled. We therefore assigned a rating of Green (no formal action) for LC10.

Licence Condition 27 (Safety Mechanisms) – ONR examined compliance records ensuring that Safety Mechanisms are appropriately in place and delivering their safety functions. We therefore assigned a rating of Green (no formal action) for LC27.

Licence Condition 28 (Examination, Inspection, Maintenance and Testing) – based on the sampled documentation, including Work Order Cards, system review records and surveillance records, we judged that dutyholder has adequate arrangements in place for compliance with LC28. We therefore assigned a rating of Green (no formal action) for LC28.

From the evidence sampled during the SBI, it was judged that there were no matters that have the potential to impact significantly on nuclear safety. Consequently, an

overall rating of Green was awarded for the primary shutdown system. ONR considers the dutyholder adequately demonstrated ownership and implementation of the primary shutdown system safety case to ensure and maintain nuclear safety.

Periodic safety reviews

The purpose of the inspection was to ensure that significant actions from the last Periodic Safety Review (PSR) had been completed, or were being adequately tracked and that suitable preparations were in place for the carrying out of the next PSR.

The key findings from the inspection were that the significant actions arising from the last PSR were either complete or being monitored, but that the dutyholder's arrangements for periodic reviews did not currently meet the requirements for the next round of PSRs, in that they did not provide the flexibility that may be required for a station in the defueling or deconstruction phases. I noted that EDF NGL are in the process of developing arrangements for the next PSR and raised a regulatory issue to ensure that these arrangements are delivered in a suitable timescale.

I concluded that although the current arrangements are not adequate for a station in defuelling or deconstruction, that EDF NGL were developing new arrangements and there was sufficient time for these to be completed before the next PSR was due. On this basis I rated the inspection as green.

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records on our website www.onr.org.uk. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

2.2. Other Work

Although there continues to be risks from the coronavirus pandemic during the reporting period visits to site have now returned to normal. ONR will continue to monitor the situation and adapt its approach as necessary.

During visits to site the site inspector observes the compliance with of the site with its Covid arrangements. No significant issues or trends have been identified during the visits.

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.

There were no such matters or events of significance during the period.

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' (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

- No LIs, Enforcement Notices or Enforcement letters were issued during this period.

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

| Date | Type | Ref. No. | Description |
|------|------|----------|-------------|
| None | | | |

Reports detailing the above regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

5. News from ONR

For the latest news and information from the Office for Nuclear Regulation, please read and subscribe to our regular email newsletter 'ONR News' at www.onr.org.uk/onrnews

6. Contacts

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