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| ONR Project Assessment Report  Proposed Changes to the Wylfa Site Accident and Emergency Arrangements |



ONR Project Assessment Report

**Project Name**: Wylfa

**Report Title**: Proposed Changes to the Wylfa Site Accident and Emergency Arrangements

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# Executive Summary

Magnox Ltd, the licensee of the Wylfa site, has written to the Office for Nuclear Regulation (ONR) requesting the Approval of modifications to the Wylfa Site Accident and Emergency Arrangements. ONR has approved successive alterations or amendments to the Wylfa Site Approved Accident and Emergency Arrangements, most recently in March 2020.

The licensee now wishes to make further amendments to the plan following a recent move to a four-day working pattern (from Monday–Friday to Monday-Thursday). There has been no impact to the practical arrangements by this change. Magnox Ltd has also taken the opportunity to make minor administrative changes to the arrangements as part of this update.

ONR has assessed Magnox Ltd’s revised Site Accident and Emergency Arrangements for the Wylfa site. This review was supported by advice from ONR Radiological Protection and Nuclear Security specialist inspectors. Based on this work, ONR is satisfied that the modifications of Wylfa’s Accident and Emergency Arrangements are reasonable. In addition, ONR is satisfied that Wylfa’s emergency response will not be adversely affected by the amendments to the site emergency arrangements. Therefore, ONR should issue Licence Instrument 576 under LC 11(3) for Nuclear Site Licence 58a, giving ONR’s Approval of the Wylfa site emergency plan. There are no matters arising from this work.

Table 2: List of abbreviations

|  |  |
| --- | --- |
| Term/Acronym | Description |
|  |  |
| LC | Licence Condition |
| LI | Licence Instrument |
| mSv | Millisievert |
| NRW | Natural Resources Wales |
| NSC | Nuclear Safety Committee |
| ONR | Office for Nuclear Regulation |
| REPPIR19 | Radiation (Emergency Preparedness and Public Information) Regulations 2019 |

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# Permission Requested

1. Magnox Ltd, the licensee of the Wylfa site, has written to the Office for Nuclear Regulation (ONR) requesting the Approval of modifications to the Wylfa Site Accident and Emergency Arrangements [‎1]. This approval is required under the conditions attached to the site licence as set out in Licence Condition (LC) 11(3): Emergency Arrangements.

# Background

1. The Approved Accident and Emergency Arrangements for the Wylfa site is an approved document under LC 11(2) and cannot be altered or amended without ONR’s approval under LC 11(3). ONR has approved successive alterations or amendments to the Wylfa Site Approved Accident and Emergency Arrangements. The most recent arrangements [‎2] were approved via LI 574. The extant version of the site’s arrangements in version 15.
2. The licensee now wishes to make further amendments to the plan resulting from the Wylfa Site recently moving to a four-day working pattern i.e., the Normal and Extended working hours in Section 4 of the arrangements has changed from Monday to Friday and replaced with Monday to Thursday. The licensee’s submission [‎3] states it has determined there has been no impact to the practical arrangements by this change. This submission is version 17 of the emergency plan[[1]](#footnote-2).
3. An opportunity has also been taken to align the arrangements against the generic arrangements [‎4]. Clarity has been added to acknowledge that a ‘Major Security Incident’ is a Declaration Condition under the arrangements whereas before it was an Alert Condition.
4. The wording of the arrangements has been altered to recognise there is not an Emergency Planning Consultative Committee (EPCC) any longer at Wylfa as REPPIR19 no longer applies and there is no local authority off-site plan.
5. The arrangements have also been de-branded in readiness for a company name change to be announced in the near future.

# Assessment and Inspection Work Carried out by ONR in Consideration of this Request

1. ONR has assessed Magnox Ltd’s Site Accident and Emergency Arrangements for the Wylfa site. This review was supported by advice from ONR Radiological Protection and Nuclear Security specialist inspectors. The assessment was undertaken on the basis of the submissions received and taking into account the Nuclear Safety Committee (NSC) minutes. The assessment focused on confirming that:

* In the view of the Radiological Protection specialist inspector, Magnox Wylfa has conducted an adequate risk assessment for moving to a four day week [‎5]. He is also content that, in the absence of an EPCC, Magnox Wylfa will maintain communications and engagements via formal planning meetings for their LC11 exercises. [‎6]
* In the view of the Nuclear Security specialist inspector, the events that constitute a Major Security Incident should warrant a Declaration Condition and therefore the proposal by Magnox to acknowledge Major Security Incidents as such is reasonable. [‎7]

1. Additionally, I can see no reason to object to the de-branding of the arrangements in readiness for a company name change to be announced in the near future.
2. I have performed a side-by-side comparison of the proposed [‎1] and the extant arrangements [‎2]. I consider that all proposed changes to the arrangements to align them to the generic arrangements are purely administrative in nature, as is the de-branding of the arrangements in preparation for the upcoming company name change. I therefore consider these changes reasonable and have no objection to these changes.
3. I have also provided the relevant information to the Environment Agency [‎8] and NRW [‎9] who have responded stating they have no objections to the modifications to the arrangements.

# Matters Arising from ONRs Work

1. There are no matters arising from this work.

# Conclusions

1. Based on this work, ONR is satisfied that the modifications of Wylfa’s Accident and Emergency Arrangements are reasonable and in line with the requirement of LC11. ONR is also satisfied that Wylfa’s emergency response will not be adversely affected by the amendments to the site emergency arrangements.

# Recommendations

1. ONR to approve this PAR. Also ONR to issue Licence Instrument 576 under LC 11(3) for Nuclear Site Licence 58a, giving its Approval of the Wylfa site emergency plan, and withdrawing Licence Instrument 574.

# References

1. Letter from Magnox Ltd to ONR requesting the Approval of modifications to the Wylfa Site Accident and Emergency Arrangements. Email dated 18 October 2023. CM9: 2023/54927
2. Wylfa letter WYA52554R dated 2 March 2020. Licence condition 11(3) – Emergency arrangements, request for approval of issue 15 of Wylfa accident and emergency arrangements, document WYA/EMP/001. CM9 2020/66986
3. NP/SC 5430 Revision 1. Proposed Changes to the Wylfa Site Accident and Emergency Arrangements. 6 October 2023. CM9: 2023/54927
4. Generic Arrangements S-901 and supporting form F-024 - Magnox Accident and Emergency Arrangements for Sites in Monitoring and Surveillance in Silent Hours 30 August 2023. CM9: 2023/57578
5. Radiological Protection Inspector’s advice on the amendment to the Wylfa Site Approved Accident and Emergency Arrangements. Email dated 20 October 2023. CM9: 2023/57584
6. Radiological Protection Inspector’s additional advice on the amendment to the Wylfa Site Approved Accident and Emergency Arrangements. Email dated 1 November 2023. CM9: 2023/57584
7. Security Inspector’s advice on the amendment to the Wylfa Site Approved Accident and Emergency Arrangements. Email dated 23 October 2023. CM9: 2023/57586
8. Environment Agency’s email stating no objections to the amendment to the Wylfa Site Approved Accident and Emergency Arrangements. Email dated 3 November 2023. CM9: 2023/58053
9. NRW’s email stating no objections to the amendment to the Wylfa Site Approved Accident and Emergency Arrangements. Email dated 3 November 2023. CM9: 2023/58052

1. Version 16 of Wylfa’s Emergency Plan was submitted to the NSC and, based on comments received, changes were made to the V16 Emergency Plan. Because of site’s internal document process it automatically up versioned to V17, and it was re-submitted to the NSC before being submitted to ONR. Therefore V17 is the version under consideration in this PAR. [↑](#footnote-ref-2)