

Ensuring a licensable organisation for New Reactor Build in the UK

Peter Ackroyd

Leadership & Management for Safety Specialist Inspector

Office for Nuclear Regulation

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Route map

- Background to New Build in the UK
- What is a ‘licensable organisation’ ?
- ONR’ s approach
- Experiences of licensing a new NPP
- Lessons learned

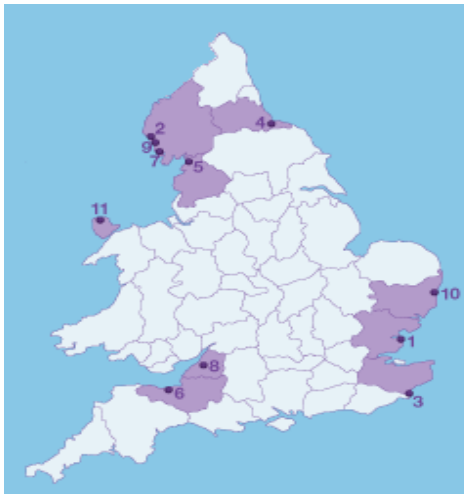
New Build – Background

- 2008 - UK Government white paper on nuclear power
 - nuclear power should have a role to play in this country's future energy mix.
- 2008 - Planning Act
 - introduces new, streamlined, process for decisions on the acceptability of major infrastructure developments including NPPs
- 2011 - Nuclear National Policy Statement (NPS)
 - lists sites assessed as strategically suitable for new nuclear power stations

ONR Approach to licensing a new nuclear facility

Regulators must consider 3 key elements:

- reactor design ‘safety case’
- Site suitability
- **Organisational capability to be a nuclear licence holder**



Key Challenges

- NNB GenCo a new company:
 - Part of the EdF group but NNB GenCo had to develop capability to hold the licence - therefore;
 - Building resources, knowledge, competence, people, processes etc from zero
- ONR had not:
 - Issued a new licence for over 20 years
 - Considered a New Build project for a new licensee

ONR's Approach

Licence applicant must have **organisational capability** to be in control of safety at point of licensing. ONR:

- Provided clarity on ONR's expectations to applicants and other stakeholders
 - Detailed statement of licensing process¹
 - Requirement for a safety management prospectus as part of licence application
 - the '*Organisational safety case*' to support decision on licensing
 - Suite of assessment guides on key organisational capability topics² e.g.:
 - Design authority
 - Core capability & Intelligent customer
 - Procurement
 - Organisational resourcing or "baseline"
 - Organisational Change management
 - Internal advice and challenge
- Encouraged early engagement with prospective licensee
 - Promote shared understanding of expectations
 - Draw out potential problems, including relationship issues, at early stage

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¹<http://www.hse.gov.uk/nuclear/licensing-nuclear-installations.pdf>

²http://www.hse.gov.uk/nuclear/operational/tech_asst_guides/index.htm

Some Focus Areas (1)

- **Leadership & governance:**
 - Relationship with parent bodies
 - Board level governance
 - Establishment of nuclear safety committee
 - Development of internal regulation capability
 - Evidence of measures to foster a strong safety culture

Some Focus Areas (2)

- **Design Authority**

- Development of DA capability to provide effective oversight of, & decisions on, nuclear safety
- Development of DA relationship with ‘Responsible Designer’ (RD)

- **Intelligent Customer**

- Development of IC capability to:
 - Specify requirements
 - Supervise work
 - Review outputs

Some Focus Areas (3)

- **Development of resources & competencies**
 - Establishing a “nuclear organisational baseline”
 - Populating the baseline with adequate resources
 - Developing an adequate approach to training and competence assurance
 - Managing continuing organisational change & development
 - Working with Industry & National bodies

Some Focus Areas (4)

- **Procurement**

- Supply chain quality key to successful delivery of safe & reliable plant
- Key early focus area in order to support procurement of “long lead items”
 - Arrangements for effective management of supply chain
 - Intelligent customer capability in place
 - Inspection & oversight of manufacturing

New Build – Where are we now

- **NNB applied for nuclear site licence in July 2011**
 - ONR conducted rigorous assessment of organisational capability, site suitability and site-specific safety submissions
 - ONR expended 2700+ inspector days (>12 years) of assessment and inspection activity effort
- **Nuclear site licence granted December 2012**
 - Start of nuclear-related construction requires further regulatory permission
- **ONR maintains oversight of continued organisational development**

Lessons Learned

- Early engagement is key
- Open and honest relationship vital to “avoid surprises”
- Good communication essential
- Anticipate resource needs early & plan – both applicant and regulator
- Make regulatory expectations clear
 - issue guidance early