

Office for Nuclear Regulation (ONR)

Site Report for

HINKLEY POINT C

Report for period 1 July 2019 – 30 September 2019

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/hc/>).

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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 HPC construction site:

- 5 July 2019
- 15 July 2019
- 17 – 18 July 2019
- 23 July 2019
- 30 July 2019
- 1 August 2019
- 6 August 2019
- 20 August 2019
- 28 August 2019
- 4 – 5 September 2019
- 12 September 2019
- 19 September 2019
- 24 September 2019
- 26 September 2019

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 Regulatory Reform (Fire Safety) Order 2005
- 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 the controlling procurement, design and manufacture;

- 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:

- LC06 – Documents, records, authorities and certificates
- LC07 – Incidents on the site
- LC17 – Management systems
- LC19 – Construction or installation of new plant (3 inspections)

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

For all LCs under inspection with the exception of LC06 and 07 ONR judged that NNB GenCo (HPC) had adequately implemented its licence compliance arrangements with only minor areas for improvement being identified.

For LC06 ONR identified that improvements were required and consequently it was awarded an AMBER (seek improvement) rating. Whilst ONR found that several site contractors had deployed adequate arrangements for the production and timely transmission of lifetime quality records, ONR identified that improvements were required to NNB GenCo(HPC)'s main civils contractors performance in this area. ONR has raised an associated regulatory issue to ensure appropriate regulatory oversight of NNB GenCo (HPC)'s resolution of this issue.

For LC07 ONR identified that improvements were required and consequently it was awarded an AMBER (seek improvement) rating. ONR found that whilst NNB GenCo(HPC) had made a number of improvements in relation to organisational learning, a number of further improvements are required to ensure that NNB GenCo(HPC) is effectively managing its organisational learning and associated processes. ONR has raised associated regulatory issues to ensure appropriate regulatory oversight of NNB GenCo (HPC)'s resolution of these issues

ONR continues its engagement with the project via regular site visits and meetings at NNB GenCo (HPC)'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) is making to continue developing its competence and capability to manage the design, procurement and construction of Hinkley Point C.

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.

During the reporting period there were no significant non-routine matters at the HPC site.

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.

No Licence Instruments or 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
n/a	n/a	n/a	n/a

REPORTS DETAILING REGULATORY DECISIONS TAKEN AT HINKLEY POINT C CAN BE FOUND ON THE ONR WEBSITE AT [HTTP://WWW.ONR.ORG.UK/PARS](http://www.onr.org.uk/pars)

5 NEWS FROM ONR

5.1 Enforcement Action

A summary of enforcement action is provided below. Further detail is available on [our website](#).

- On 19 July we served [Improvement Notices on the Atomic Weapons Establishment \(AWE\)](#) relating to the way the company undertakes risk assessments for organisational change which may affect safety.
- Following a court hearing on July 23, 2019 at Plymouth Magistrates' Court, [Devonport Royal Dockyard Ltd \(DRDL\) was fined £666,667](#) and ordered to pay costs of £27,611.82. It follows an incident in September 2018 involving a crane at the Devonport 9 Dock facility. During a lifting operation to disassemble a stack of test weights, the weights became detached and fell towards a worker, narrowly missing him. This was a conventional health and safety incident and there was no nuclear or radiological risk to workers or the public
- On 20 August 2019 we provided [EDF Energy Nuclear Generation Ltd with permission for Reactor 4 at Hunterston B to return to service](#) for the next period of operation. Permission is for up to 16.025 terawatt days, which is approximately four months operation.
- Recognising the good progress made so far, on 16 September 2019 we agreed to [extend two Improvement Notices issued to EDF Energy Nuclear Generation Ltd \(EDF\)](#) from the original compliance date of 16 September, 2019, to 16 December, 2019. The notices were served in January 2019 following an incident at Heysham 1 power station. We have been closely monitoring the work to comply with both notices and will continue to do so to ensure full compliance.

5.2 Regulatory Updates

- We have revised our [Licencing Nuclear Installations guidance](#). The revised guidance replaces the 4th edition, published in January 2015. The key changes to the guidance have been made to reflect legal changes as a result of the introduction of new legislation and to include reference to updated processes and procedures.
- Together with the Health and Safety Executive (HSE) we have published a [new Approved Code of Practice \(ACOP\) and guidance](#) to assist dutyholder compliance with the new Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPPIR).

5.3 Stakeholder Engagement

- On 18 September we held our Finance Industry Seminar which brought together finance colleagues from licence holders to discuss how we plan and forecast our charges, as part of our drive to be open and transparent about how we charge for the regulatory services we provide.
- On the week commencing 23 September, we attended an OECD Nuclear Energy Agency Workshop on Stakeholder Involvement: Risk

Communication, as part of a UK contingent which included other regulators, government bodies, supply chain representatives and attendees from nuclear interest and pressure groups. The workshop explored how best to communicate radiation risk and how to ensure stakeholder involvement and participation. Further details about this event can be found here:

<https://www.oecd-nea.org/civil/workshops/2019/stakeholder/>

- On the week commencing 16 September we attended the 63rd International Atomic Energy Agency (IAEA) General Conference in Vienna. The annual General Conference is an opportunity for all IAEA Member States to jointly consider matters related to the IAEA's ongoing work, budget and priorities. This year, over 3000 participants attended, including delegates from 152 of the IAEA's 171 Member States.

5.4 Corporate News

- On 10 July we published our [gender pay report for 2018/19](#). We are committed to improving diversity by promoting and maintaining an inclusive working environment and are pleased to report positive shifts in the gender pay gap indicators, where our mean gap of 27% has reduced by 8.2% since [our second report in 2017/18](#).

All our latest news is available on our website www.onr.org.uk.

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