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

Report for period 1 April – 30 June 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/llc/).

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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:

- 21 May 2020
- 08 July 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 EPRTM 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
- 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 (HPC) construction site covering the following Licence Conditions (LCs) and other applicable legislation were performed:

- LC19 Construction or installation of new plant
- Health and Safety at Work Act 1974 (HSWA74) Covid-19 control measures

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 both LC19 and HSWA74 (Covid-19) ONR found NNB GenCo (HPC) Ltd. to be complaint with its legal duties with only minor areas for further improvement being identified.

ONR continues its engagement with the project via regular site visits and meetings with staff from 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.

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.

Covid-19

As a result of the Covid-19 pandemic NNB GenCo (HPC) Ltd. has taken a number of steps aimed at ensuring effective social distancing and other control measures in accordance with Public Health England and industry guidance. ONR continues to engage with NNB GenCo (HPC) Ltd. and its internal regulator to ensure that appropriate social distancing measures are in place, including via attendance at the HPC site. In addition ONR has put in place enhanced reporting measures to ensure appropriate regulatory oversight during this period of non-routine working.

ONR staff continue to work primarily from home and where practicable interventions are being carried out remotely. However, this has been underpinned by regular site visits undertaken on an approximately monthly basis to ensure ongoing regulatory oversight at the HPC construction site.

Ground Granulated Blast Furnace Slag (GGBS) Silo Incident

On the 10 June 2020 a non-nuclear safety related silo structure containing GGBS located in the concrete production area (concrete batching plants) suffered a structural collapse spilling the contents of the silo to ground and generating a dust cloud in the vicinity of the plant.

There were no nuclear safety consequences from the incident, no-one was injured and there have been no reported health effects to workers or the public. NNB GenCo (HPC) Ltd. took appropriate steps to make the area safe and report the event to ONR.

NNB GenCo (HPC) Ltd. has initiated an investigation into the event and our assessment of the incident is continuing through close contact with the site and oversight of the licensee's ongoing investigation. At the moment it is too early to speculate on the potential causes of the event.

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 no licence instruments or enforcement notices relating to NNB GenCo (HPC) Ltd. during the period covered by this report.

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

Date	Туре	Ref No	Description
N/A	N/A	N/A	N/A

Reports detailing regulatory decisions taken at HPC can be found on the ONR website at http://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

ONR is continuing to protect society by securing safe nuclear operations during the Covid-19 (coronavirus) pandemic. Our staff continue to work from home, in line with government advice, with a limited number of our inspectors, as key workers, travelling to site as necessary to conduct urgent and essential regulatory inspections. ONR's latest position can be found on our website.

5.2 Enforcement Action

ONR served an Improvement Notice on EDF Energy Nuclear Generation Ltd (EDF Energy) for contravention of the Pressure Systems Safety Regulations (2000) at Heysham 1 Power Station. The notice was served after shortfalls were discovered in the examination and inspection of the Reactor 1 pressure vessel at the Lancashire

plant. EDF Energy must comply with the Improvement Notice and complete the eleven overdue examinations by 18 December 2020.

ONR has granted an extension to an Enforcement Notice served on Urenco UK Ltd, recognising the good progress made so far. The notice was issued in late December 2019, following a fire safety inspection at the Capenhurst Works in Cheshire, which revealed shortfalls in the fire alarm and detection systems at one of the site's facilities. Urenco UK Ltd must comply with the requirements of the extended notice by 30 September 2020

5.3 Regulatory Updates

ONR received an application for a nuclear site licence from NNB Generation Company (SZC) Limited, to construct and operate two EPR $^{\text{TM}}$ reactors, at its proposed development in Sizewell, Suffolk. We will now assess the application, partly informed by our previous assessment of the EPR $^{\text{TM}}$ at Hinkley Point C – including using the relevant lessons from that assessment, while focusing on aspects specifically relevant to Sizewell C.

Whilst we are satisfied that the application is sufficiently complete to proceed to assessment stage, there is still a lot of work to do – and we do not expect to reach a decision, until at least the end of 2021.

6 CONTACTS

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