

Office for Nuclear Regulation (ONR)

Site Report for

HINKLEY POINT C

Report for period 1 July – 30 September 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/hlc/>).

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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:

- 08 July 2020
- 30 July 2020
- 05 August 2020
- 20 August 2020
- 02 September 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 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 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; and
- 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) and other applicable legislation were performed:

- LC6 – Documents
- 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 compliant with its legal duties with only minor areas for further improvement being identified.

For LC6 ONR found that whilst site records for reinforced concrete were being produced to a high standard, there had been delays in producing required lifetime quality records for a number of items such that they did not yet meet NNB GenCo (HPC) Ltd.'s timescales for delivery.

In addition, ONR noted an example where the records for one of the sampled items (core melt discharge channel), as presented did not yet fully demonstrate compliance with expected lifetime quality record requirements.

ONR has an extant regulatory issue regarding lifetime quality record delivery and is monitoring NNB GenCo (HPC) Ltd.'s delivery against the associated improvement hence an additional regulatory issue was not required for this matter. A new regulatory issue requiring NNB GenCo (HPC) Ltd. to review the adequacy of the records associated with the core melt discharge channel (and associated components) was raised.

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.

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 regular 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 is underpinned by regular site visits, undertaken on an approximately monthly basis to ensure ongoing regulatory oversight at the HPC construction 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.

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	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>.

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 (Coronavirus) (ONR position)

ONR is continuing to obtain assurance that nuclear site licensees and other dutyholders are adequately resourced to continue to safely and securely carry out their activities.

We remain satisfied with industry's response at this time and there has been no significant change to dutyholders' safety and security resilience.

As Covid-19 restrictions change, our focus is on the preparedness for the weeks and months ahead and maintaining safe and secure operations in the face of any further escalation in Covid-19 transmission.

ONR staff continue to work at home, primarily. We are increasing our on-site regulatory work in accordance with public health advice. We'll also continue to inspect, assess and permission remotely where necessary to protect staff, workers on site, and the public around sites.

5.2 Enforcement Action

In July we publicised the serving of an Improvement Notice on Rolls-Royce Submarines Ltd (RRSL) for procedural safety breaches at its Derby site. The notice was served after shortfalls were identified against the safety case requirements at a nuclear fuel production facility on the site.

In September we announced that an Improvement Notice had been served on EDF Energy Nuclear Generation Ltd (EDF NGL) for shortfalls in safety procedures at its Heysham 2 Power Station in Lancashire. The notice was served after some of the equipment which is used to measure reactor power was incorrectly configured during the reactor's restart process following a planned outage in April 2020.

In September we announced that an Improvement Notice had also been served on Devonport Royal Dockyard Ltd for shortfalls in maintenance procedures at its Plymouth site. The notice was served after Devonport Royal Dockyard failed to carry out scheduled maintenance tests on an effluent extraction system which is used to support maintenance and repair activities within the licensed site.

In September we publicised our intention to prosecute AWE plc under Section 3 of the Health and Safety at Work etc. Act (1974). The charge relates to an incident on 20 June, 2019, at the AWE Aldermaston site which resulted in a contractor narrowly avoiding injury when a flash over of electricity occurred from a 415V electrical source. The incident was a conventional health and safety matter and took place in a 'non-nuclear' building, so there was no radiological risk to workers or the public.

5.3 Regulatory updates

In July the Government published its response to the International Atomic Energy Agency's final report on the Integrated Regulatory Review Service (IRRS) mission to the UK. The IRRS mission took place between 14 – 25 October 2019, which was hosted by ONR and saw a team of 18 independent experts from across the globe scrutinising the regulation of nuclear and radiological safety.

In August we provided EDF NGL with permission for Reactor 3 at its Hunterston B site to return to service for a limited period of operation (16.425 Terawatt days, approximately six months' operation). In September we also gave permission for Reactor 4 at the same site to return to service for a limited period of operation (16.25 Terawatt days, which is approximately six months operation). The decision to permission the restart of these reactors was given after extensive and detailed assessments of the respective safety cases by specialist ONR inspectors.

5.4 Corporate updates

In July we published our new 2020-25 Strategy, which sets out our direction and priorities for the next five years. It builds on our strengths and continues to focus on protecting society, and addressing the changing demands we will face as the UK's nuclear regulator.

In late September we published our Annual Report and Accounts highlighting our performance and key achievements for 2019/20.

The report notes that we continued to deliver our mission of protecting society by securing safe nuclear operations and that the majority of dutyholders have continued to meet the high standards of safety and security required. Where dutyholders have fallen short of such standards, we are satisfied that their facilities remain safe and that our regulatory focus has had a positive impact on their performance.

During the year, we completed more than 800 compliance inspections across 36 licensed sites during 2019/20, granting permission for 30 nuclear-related activities, serving three improvement notices and instigating one prosecution.

ONR Chair Mark McAllister said: "I am pleased to report that we have again delivered our mission and achieved our 2020 vision. As we look ahead, I have every confidence in our senior leadership team to see through the strategic improvement projects already underway that will enhance the organisation's information and knowledge management system, and successfully deliver the aspirations of our new strategy."

In September we announced that Jean Llewellyn OBE had been appointed to the ONR Board as the new Security Non-Executive member. Jean will take up her appointment on 1 October 2020 for a three year term and will chair ONR's Security Committee.

6 CONTACTS

Office for Nuclear Regulation

Redgrave Court

Merton Road

Bootle

Merseyside

L20 7HS

website: www.onr.org.uk

email: contact@onr.gov.uk

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