

Office for Nuclear Regulation (ONR)

Site Report for Hinkley Point C

Report for period 01 July – 30 September 2021

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 distributed to members for the Hinkley Point C community forum and are also available on the ONR website (<http://www.onr.org.uk/hlc/>).

Site inspectors from ONR usually attend Hinkley Point C community forum meeting where these reports are presented and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

Table of Contents

1	Inspections	3
2	Routine Matters	4
3	Non-Routine Matters.....	6
4	Regulatory Activity	7
5	News from ONR.....	8
6	Contacts	10

1 Inspections

Dates of inspection

ONR inspectors including ONR-warranted Health and Safety Executive Construction Division inspectors made inspections on the following dates during the report period at the Hinkley Point C (HPC) construction site:

- 07 - 08 July 2021
- 19 July 2021
- 28 - 29 July 2021
- 17 August 2021
- 24 – 25 August 2021
- 9 – 10 September 2021
- 14 September 2021
- 20 – 23 September 2021
- 28 September 2021

2 Routine Matters

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 inspections entail monitoring licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of the HPC site covered the following:

- examination, maintenance, inspection and testing;
- staff training, qualifications and experience;
- plant construction and/or commissioning;
- radiological protection;
- quality assurance and records;
- conventional (non-nuclear) health and safety;
- emergency preparedness; and
- security.

During the reporting period, ONR judged the arrangements made and implemented by the site in response to safety requirements to be generally satisfactory in the areas inspected. Where improvements have been identified, the licensee has made a commitment to address those issues, and ONR inspectors will closely monitor progress during future site inspections. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales. Members of the public, who would

like further information on ONR's inspection activities during the reporting period, can view site Intervention Records at www.onr.org.uk/intervention-records. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

ONR's site interventions include increasing focus on NNB GenCo (HPC) Ltd's ability to adequately control construction and installation at the HPC site.

Other work

ONR continues its engagement with the project via regular site visits and meetings at NNB GenCo (HPC) Ltd's office locations across the following themes:

- Design and Safety Case;
- Organisational Capability;
- Conventional Health and Safety and Fire Safety; and
- Security.

These inspections provide ONR with valuable intelligence on the progress NNB GenCo (HPC) Ltd is making 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.

Matters and events of particular note during the period were:

- NNB GenCo (HPC) identified some anomalies with a small number of radiographs associated with an emergency feedwater tank prior to its installation at the HPC site. In accordance with its arrangements, NNB GenCo (HPC) reported this event to ONR and has completed its own investigation into the matter. In addition, ONR has commenced an investigation to establish the facts surrounding these anomalies.

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' (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, including issuing an Enforcement Notice and other lower-level regulatory communications such as enforcement letters.

- No LIs were issued during the period.
- No Enforcement Notices (Improvement or Prohibition Notices) were issued during the period.
- ONR issued three enforcement letters during the period requiring improvements in the following areas:
 - NNB GenCo (HPC)'s fire safety and hot work permit to work arrangements.
 - Bylor's (NNB GenCo (HPC)'s main civil works contractor) fire safety and hot work permit to work arrangements.
 - TISSOT's (the tier 2 company manufacturing the containment liner) control of welding fume.

5 News from ONR

Insight into ONR's work as an independent regulator of the nuclear industry can be found in ONR's Regulation Matters. The online publication (<http://www.onr.org.uk/regulation-matters.htm>) reports on the key themes and developments in each of ONR's regulatory programmes and provides an update about the ongoing changes at ONR. For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

Enforcement action

- In July, we served an improvement notice on Devonport Royal Dockyard Ltd (DRDL) for shortfalls in its health and safety arrangements. The notice was served after DRDL failed to demonstrate consistent and effective arrangements to control and monitor the risks associated with working at height at its Devonport site. DRDL must comply with the requirements of the improvement notice by 31 March 2022.
- In August, we announced that Morgan Sindall Infrastructure Ltd had complied with an improvement notice served in January 2021 after workers came close to striking a live high voltage electric cable during excavation work at the Sellafeld site.

COVID-19: ONR Position

- We are 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; there has been no significant change to dutyholders' safety and security resilience.
- We have measures in place to try and prevent asymptomatic ONR staff unwittingly conveying the virus onto a regulated site. We require all staff to take a circular 1 health (C1H) antigen test in advance of them visiting a site. In addition to the C1H test, we also require them to take a lateral flow test on the morning of their planned site visit. We are keeping our COVID-19 testing guidance under regular review, in-line with the changing national context and any further developments in industry approaches to testing arrangements.

Other

- In July, our project to become the UK's domestic safeguards regulator was named the public sector's [Project of the Year at the National Project Awards](#).
- In September we invited stakeholders to submit comments on our updated reference papers for Coastal Flood Hazards and Meteorological Hazards for Nuclear Sites. Although supplementary to our normal governance process, we

are doing this due to stakeholder interest in these topics and our commitment to being an open and transparent regulator.

The reference papers provide additional detail on the analysis of the external hazards for nuclear sites and have been produced by our Expert Panel on Natural Hazards, a group of academic and industry technical specialists working under contract to provide us with independent expert advice. You can find out more about how to get involved and comment on these papers on our [website](#).

6 Contacts

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This document is issued by the Office for Nuclear Regulation (ONR). For further information about ONR, or to report inconsistencies or inaccuracies in this publication please visit <http://www.onr.org.uk/feedback.htm>.

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