



# Office for Nuclear Regulation (ONR) Site Report for Hinkley Point B Power Station

Report for period 1 October to 31 December 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 distributed to members for the Site Stakeholder Group and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Site Stakeholder Group meetings 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.

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## 1 INSPECTIONS

### 1.1 Dates of inspection

1. The ONR site inspector made inspections on the following dates during the report period:
  - 28 - 30 October 2019
  - 18 - 21 November 2019
2. In addition, ONR specialist inspectors undertook inspections on the following dates during the quarter:
  - 18 - 21 November (Turbine protection Systems)
  - 19-20 November (LC17)

## 2 ROUTINE MATTERS

### 2.1 Inspections

3. 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).
4. The inspections entail monitoring the 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.
5. In this period, routine inspections of Hinkley Point B covered the following:

#### LC36: Organisational Capability

6. This Inspection was carried out against Licence Condition 36 (Organisational Capability). The purpose of this licence condition is to ensure the licensee provides and maintains adequate financial and human resources to ensure the safe operation of the licensed site, and make and implement arrangements to control any change to its organisational structure or resources which may affect safety.
7. The inspection focussed on how the headcount had changed over the previous year and how the licensee has managed replacement of staff that had left over the year. I am satisfied that the licensee remains in compliance with their baseline and are managing the replacement of staff in accordance with the requirements of their arrangements under LC36. I am satisfied that an IIS rating of **green** against LC36 is merited.

#### LC17: Management Systems

8. A specialist ONR inspector carried out inspections against the requirements of Licence Condition 17 (Management Systems). The purpose of this licence condition is to ensure that all the licensee's management systems give due priority to safety so that any actions or decisions taken do not have an adverse effect on safety. It also requires the licensee to apply quality management principles to all activities that may affect safety. This includes those associated with the procurement, design, construction, manufacture, commissioning, operation and decommissioning of the installations on the site including the preparation and review of safety documentation.
9. The ONR specialist inspected the System Engineer's role in supply chain and QA, including the Informed/Intelligent Customer (IC) role, the QA and Supply Chain arrangements and how they give due priority to nuclear safety.
10. The Inspector concluded that the QA and supply chain arrangements take cognisance of the safety case limits and that adequate records are being maintained and was satisfied that an IIS rating of **green** against LC17 was merited

### System Based Inspections (SBI)

11. In addition to our compliance inspections based on the conditions attached to the nuclear site licence, ONR inspectors also inspect operating reactors against safety related systems. Each site has a safety case that demonstrates how it operates safely. For advanced gas cooled reactors, each of approximately thirty key systems will be inspected against the claims made upon them by the safety case. The aim is to systematically inspect all the significant safety related systems within a five-year cycle. ONR believes that this will provide more robust assurances of the site's safe operation and how the safety case is being implemented. Each of these system based inspections considers the relevant licence conditions below:

- Licence condition 10: Training
- Licence condition 23: Operating rules
- Licence condition 24: Operating instructions
- Licence condition 27: Safety mechanisms
- Licence condition 28: Examination, inspection, maintenance and testing
- Licence condition 34 (if applicable): Leakage and escape of radioactive material and radioactive waste

12. In this period one system based inspection (SBI) was carried out:

#### Turbine protection Systems (SBI 18)

13. The aim of this inspection was to confirm that the Turbine Protection Systems, with their associated operating instructions and maintenance schedule, are able to meet the safety case functional requirements. The inspection identified three areas for improvement, which were raised as formal level 4 regulatory issues. These related to oversight of contractors and adequacy of records. The Inspection concluded that the parts of the Turbine Protection Systems that were inspected met the requirements of the safety case and were adequately safe and LCs 10, 23, 24, 27 and 28 were rated as green. LC34 was not applicable to this inspection.

## **2.2 Other work**

14. No other relevant planned work was carried out this quarter.

### 3 NON-ROUTINE MATTERS

15. 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.
16. During this period a contractor was injured by an excavator which resulted in ONR carrying out some preliminary enquiries. We interviewed a number of the contractor’s members of staff, visited the scene of the incident and observed a security video which captured the incident.
17. The contractor cooperated fully with the enquiries and although we concluded that there were a number of shortfalls, we decided that a formal investigation would not be warranted, but that we would consider whether formal enforcement action was appropriate against the contractor. It was concluded after consideration of the ONR Enforcement Management Model that formal enforcement action was appropriate and this is outlined below.

### 4 REGULATORY ACTIVITY

18. 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, to include issuing an Enforcement Notice.
19. During the period an enforcement letter was sent to Allen (Fencing) Ltd, the employer of the contractor injured by the excavator. The letter required Allen (Fencing) Ltd to take a number of actions to bring themselves into compliance with the Section 2(1) of the Health and Safety at Work Etc Act 1974, The Construction (Design and Management) Regulations 2015 and the Management of Health and Safety at Work Regulations 1999.
20. A Licence Instrument was also issued in December 2019, for an increase in the operational allowance for the graphite cores. The assessment took account of the previous assessments that had been carried out for Hunterston B. Following engagement with the dutyholder it was concluded that a licence instrument could be issued which would allow operation of both reactors until the next graphite outages. The full Project Assessment Report is available on the ONR website.

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

21. Date	Type	Ref No	Description
Dec 19	Agreement	560	JUSTIFICATION FOR AN INCREASE IN THE OPERATIONAL ALLOWANCE FOR THE HINKLEY POINT B GRAPHITE CORES FOR CORE AGES UP TO 17.2 TWD – REVISION 000 PROPOSAL VERSION No: 009

Reports detailing regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

### 5 NEWS FROM ONR

#### 5.1 Enforcement Action

22. EDF Energy has complied [with two ONR Improvement Notices](#) relating to the way it maintains auxiliary steam systems and instructs staff operating these systems. The Notices were issued in January 2019 following a serious incident at Heysham 1 power station in November 2018, when a valve failed on a steam system resulting in injury to three EDF employees. Further details are available on our [website](#).

## 5.2 Regulatory Updates

23. In October, our Chief Nuclear Inspector (CNI) Mark Foy published his view on the performance of Great Britain's nuclear industry during 2018/19. In the first [report](#) of its kind, the review provides an independent, authoritative view of safety, security and safeguards performance across the nuclear industry over the last year. The report is accessible via our website homepage [www.onr.org.uk](http://www.onr.org.uk).

24. Throughout October we hosted an [Integrated Regulatory Review Service Mission](#) that saw a team of 18 independent experts from across the globe scrutinising the regulation of nuclear and radiological safety across 15 different regulatory bodies. The final report is expected in February/March 2020.

25. Along with the Environment Agency and Natural Resources Wales (NRW) we have published [new Generic Design Assessment \(GDA\) guidance](#) for Requesting Parties. It reflects the changes seen in the nuclear industry in the decade since GDA was introduced, in particular the Nuclear Sector Deal and the potential for Small Modular Reactor (SMR) designs to enter GDA in the future. The new guidance also incorporates lessons learnt from previous GDAs.

26. Together with the Environment Agency, we have also published a [joint annual report](#) on our scrutiny of Radioactive Waste Management's (RWM) work to develop geological disposal. This report summarises our work relating to the geological disposal of radioactive waste.

27. We have formally concluded the [licence revocation for the Cardiff Nuclear Licensed Site](#) in Wales, thereby de-licensing the site. This follows many years of nuclear site decommissioning and work to clean up the site and is the first time ONR has de-licensed a site completely, although several sites have been de-licensed by ONR's predecessor organisation, the Nuclear Installations Inspectorate.

## 5.3 Stakeholder Engagement

28. In November, we hosted our second NGO Forum of the year and were delighted to welcome 18 NGO attendees from 14 different organisations. Agenda items included our work at Sellafield, ageing management of reactors and our relationship with the Defence Nuclear Safety Regulator. Presentations and minutes from all our [NGO Forum meetings](#) are made available on our website. If you represent an NGO group and would like to get involved with our NGO Forum, please get in touch with our Communications team ([contact@onr.gov.uk](mailto:contact@onr.gov.uk)) for further details.

## 6 CONTACTS

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