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| ONR Assessment Report  Site and licence compliance proportionate reassessment of an application by Sizewell C Limited (SZC Ltd) for a Nuclear Site Licence |



ONR Assessment Report

**Project Name**: Sizewell C Licensing

**Report Title**: Site and licence compliance proportionate reassessment of an application by Sizewell C Limited (SZC Ltd) for a Nuclear Site Licence

**Authored by**:

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# Executive Summary

This report presents the findings of the site and licence condition compliance arrangements aspects of the Sizewell C Limited (SZC Ltd) application for a nuclear site licence to construct and operate two UK EPR™ reactors at Sizewell C (SZC) in Suffolk.

An initial assessment was completed in June 2022. This report presents the findings of a proportionate reassessment, focused on matters that have changed, and does not repeat the earlier assessment. This proportionate reassessment has examined:

* updates and changes to the proposed licence condition compliance arrangements; and
* other relevant health and safety legislation (for example the Construction (Design and Management) Regulations 2015).

The assessment is based on evidence obtained during interactions with SZC Ltd, on specific topics and arrangements, including key project enabling activities. It also draws on the significant cross cutting work carried out by the Office for Nuclear Regulation (ONR) as part of the delivering the proportionate reassessment.

The main points from this work are:

* SZC Ltd has continued with its development of the site arrangements; and
* SZC Ltd has continued its development of the licence compliance arrangements in line with the current stage of the project.

Taking these points into account, the overall judgement is that SZC Ltd has made and implemented adequate arrangements for the current stage of the project, and that from a site and licence condition compliance perspective, it is recommended that a nuclear site licence is granted to Sizewell C Ltd to construct and operate a nuclear power station at Sizewell C.

# List of Abbreviations

|  |  |
| --- | --- |
| CDM 2015 | Construction (Design and Management) Regulations 2015 |
| FAP | Forward Action Plan |
| HSE | Health and Safety Executive |
| HPC | Hinkley Point C |
| LC | Licence Condition |
| NNB | New Nuclear Build |
| NSL | Nuclear Site Licence |
| ONR | Office for Nuclear Regulation |
| OPEX | Operational Experience |
| PAR | Project Assessment Report |
| PC | Principal Contractor |
| PD | Principal Designer |
| SCC | Suffolk County Council |
| SSSI | Site of Special Scientific interest |
| SQEP | Suitably Qualified and Experienced Person |
| SZB | Sizewell B |
| SZC Ltd | Sizewell C Limited |
| SZC | Sizewell C |
| TAG | Technical Assessment Guide |
| TIG | Technical Inspection Guide |
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# Introduction

1. This report presents ONR’s findings from its proportionate reassessment of the site and licence compliance aspects of an application by Sizewell C Limited (SZC Ltd) for a nuclear site licence (NSL) to install and operate a twin EPR™ nuclear power station at Sizewell C (SZC) in Suffolk.

## Background

1. On 30 June 2020, SZC Ltd (then known as NNB Generation Company (SZC) Ltd) applied to ONR for a NSL to install and operate a nuclear installation at a site located at Sizewell on the east coast of England, near Leiston, Suffolk.
2. ONR’s assessment of the evidence provided with the licence application was undertaken during the period from July 2020 to May 2022. That assessment is set out in a series of ONR assessment reports and summarised in a Project Assessment Report (PAR). These reports are all published on ONR’s website ([Sizewell C Licensing Assessment](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c.htm)) and are listed in Appendix 1 of this document.
3. A statement issued on the ONR website on 11 July 2022, noted that:

* the licence assessment concludes that the application has met almost all the regulatory expectations set out in regulatory guidance; and
* there are two outstanding matters which require resolution prior to the formal granting of a licence.

1. The first of those matters related to the ownership (security of tenure) of the land intended for the licensed site area. Our regulatory guidance [Licensing Nuclear Installations](https://www.onr.org.uk/licensing-nuclear-installations.pdf) [1] states that a nuclear site licensee is expected to have ‘full rights of access to and control of’ the site upon which the nuclear site will operate. At that time SZC Ltd did not have such rights to the land proposed for the SZC development and this therefore needed to be resolved prior to licence grant.
2. The second issue relates to the then current shareholder agreement. As the licensee should be able to exercise effective day-to-day control over all activities on the licensed site, it is essential there is clarity on how that responsibility can be exercised. The then current shareholder agreement for the development phase of the SZC project placed control of key policies relating to safety and security with NNB Holding Company (SZC) Ltd, rather than the licence applicant. This is inconsistent with our regulatory expectations, and we would require control of such policies to rest with the applicant prior to the granting of a licence. Consequently, SZC Ltd provided ONR with a commitment letter, which set out how it intended to address the shortfall [2].
3. The ONR statement went on to note that when those matters are resolved, ONR would carry out a proportionate reassessment of the application, focused on the two outstanding matters and any other relevant matters relating to licensing that may emerge during the intervening period.
4. This report sets out ONR’s findings from its reassessment of the construction and site management arrangements and licence condition compliance areas. The report’s findings will inform the PAR which will summarise ONR’s conclusions from its reassessment work and will make a recommendation to the Chief Nuclear Inspector on whether the licence should be granted.

## Scope

1. The scope for this proportionate reassessment is limited to the site and licence condition compliance arrangements, that have progressed or changed since the 2022 assessment. The scope and sampling strategy for the 2022 SZC NSL assessment is detailed in [3].
2. The aim of this reassessment is to review whether the recommendation from the site and licence compliance perspective, a nuclear site licence should be granted, remains valid. Therefore, the site and licence compliance reassessment scope includes:

* updates and changes to the proposed licence condition (LC) compliance arrangements; and
* updates to site management arrangements and relevant health and safety legislation, including the Construction (Design and Management) Regulations 2015.

# Assessment Standards and Interfaces

1. ONR has a range of internal guidance to enable inspectors to undertake a proportionate and consistent assessment of safety submissions. This section identifies the standards which have been considered in this assessment. This section also identifies the key interfaces with other technical topic areas.

## Standards

1. The relevant standards and criteria adopted within this assessment are principally internal Technical Inspection Guides (TIGs), relevant national and international standards and relevant good practice informed from existing practices adopted on UK nuclear licensed sites. The key guidance is identified below and referenced where appropriate within Section 4 of this report. Relevant good practice, where applicable, has also been cited within the body of this report.

### Technical Inspection Guides (TIGs)

1. The following TIGs have been used as part of this assessment [4]:

* NS-INSP-GD-019 (Issue 7.1) LC 19 – Construction or installation of new plant;
* NS-INSP-GD-011 (Issue 7.1) LC 11 – On-site emergency arrangements;
* NS-INSP-GD-008 (Rev 6) LC 8 – Warning notices;
* NS-INSP-GD-009 (Rev 6) LC 9 – Instructions to persons on site;
* NS-INSP-GD-002 (Rev 2) – LC 2 Marking of the Site Boundary.

### National and International Standards and Guidance

* Licensing Nuclear Installations [1];
* Managing health and safety in construction [5].

## Integration with Other Assessment Topics

1. Five cornerstones were identified as part of the licensing assessment. These form an integrated approach to the overall assessment of the adequacy of SZC Ltd’s arrangements. The cornerstones are:

* organisational capability
* nuclear site health and safety and life fire safety
* design and safety case
* security and safeguards
* licensing and legal

1. The outcomes of each of these assessments will be summarised in the PAR.

## Use of Technical Support Contractors

1. No technical support contractors have been used in this assessment.

# Applicant’s Submission

1. This reassessment considered the revised versions of the documents submitted as part of SZC Ltd’s original NSL application.
2. ONR’s sampling strategy, for the development of the arrangements required for licensing, focused on the aspects that could have an impact on the safety of the design, construction and manufacturing activities. This included arrangements for activities that may have an impact on future nuclear safety or quality of the design and the safety of the construction activities. The sampling strategy has been set out in the previous assessment [3].
3. The key references related to the site and licence compliance within SZC Ltd’s original NSL application are also outlined in ONR’s previous assessment [3]. This information is not duplicated in this report and the original assessment should be referenced for the original application and ONR’s assessment.
4. During this reassessment, I have considered any updates or changes to those original arrangements and any relevant additional material provided to ONR post the 2022 assessment [6], primarily:

* progress against relevant actions within the Forward Action Plan, that were targeted to close before NSL grant [7];
* SZC Ltd self-assessment report of applicable licence conditions [8];
* SZC Ltd main site emergency preparedness response and updates relating to fire safety [9];
* SZC Ltd Construction (Design and Management) (CDM) Client Standard [10]; and
* SZC Ltd LC 19 Role Training Profile [11].

1. I have also sampled and reviewed the updated arrangements for the Construction (Design and Management) Regulations 2015 relating to the Principal Designer and Principal Contractor on-site.

# ONR Assessment

## Assessment Strategy

1. ONR’s strategy for the proportionate reassessment of SZC Ltd’s nuclear site licence application [12] affirms that the principles by which ONR would undertake and reach a conclusion on its reassessment would be the same as those applied during the original assessment during 2020-22 [13]. It notes that as we have already undertaken a robust and extensive assessment of SZC Ltd’s case for licence grant, and in undertaking a reassessment we will target our re-examination only on the outstanding matters and those areas of the application where we consider that there are or may be:

* changes in the applicant company impacting the basis for aspects of our previous licensing judgement (e.g., resource, capability, arrangements, tools etc); and/or
* new information that may warrant a re-examination of relevant areas of the application, including relevant operational experience (OPEX) from other EPR™ or relevant new reactor projects.

1. The reassessment strategy is supplemented by a licensing assessment plan [14]. This document provides information and guidance to ONR's specialist inspectors involved in the assessments.
2. The principles set out in the reassessment strategy have informed my sample. I have focused my regulatory footprint on areas that have had a change in SZC Ltd personnel since my assessment or if there has been updates to the arrangements.
3. This report covers the proportionate reassessment of the construction and site management and licence compliance areas identified above.

## Assessment Outcomes

### Construction and Site Management

1. During the period of proportionate reassessment ONR has continued with an integrated approach to regulatory engagements with SZC Ltd on LC compliance and compliance with other relevant health and safety legislation.
2. Of note is SZC Ltd’s compliance with the requirements of the Construction (Design and Management) Regulations 2015 (CDM 2015). Although not directly informing the licensing assessment, during the proportionate reassessment, ONR has continued to engage on the arrangements for the client, the principal designer and the principal contractor under CDM 2015. This ensures ONR has a holistic and integrated approach to regulating all relevant vires from the early stages of the project.
3. During the proportionate reassessment period, I conducted joint interactions with ONR’s nuclear site health and safety inspector [8] [15]. We focused on SZC Ltd’s arrangements for CDM 2015. As part of the interactions, we sampled the client, principal designer (PD) and principal contractor (PC) arrangements against Health and Safety Executive’s (HSE) managing health and safety in construction guidance L153 [5].
4. From a client duties perspective, we found the organisation is proactive and it demonstrated that it can develop at pace. There was clear understanding of priorities and organisational requirements although it was identified that there was a need for further development in the client’s effectiveness in overseeing the PC’s progress of the construction phase plan to ensure key hazards are identified and managed.
5. SZC Ltd has established its PC organisation structure such that the site delivery activities are within the scope of the PC representative, who is responsible for leading the work on site.
6. SZC Ltd has incorporated key learning into its site arrangements. The learning has been brought in from key infrastructure projects such as High Speed 2 (HS2) and Thames Tideway, as well as Hinkley Point C (HPC). SZC Ltd presented its plans for active leadership presence, tours and safety briefs and the use of focus times, where no computers are used in order to facilitate effective interpersonal communication. SZC Ltd was able to present its future plans as the site complexity increases to show how it planned to enhance communication with the site personnel and instil the right safety culture from the early stage of the project by providing examples of the Culture Forum Minutes and Induction pack for the Managers [8].
7. SZC Ltd is considering learning from HPC in various work streams but has not yet demonstrated how learning at all levels is robustly captured and incorporated into the design. This is required to ensure risks are reduced as low as reasonably practicable throughout the lifecycle of the power station, including during the construction phase. This has been captured as part of a Regulatory Issue (RI-10613); resolution of this will be monitored as part of ONR’s ongoing regulatory oversight of the design activities.
8. Another area sampled by ONR was the training standards and requirements for individuals accessing the site; this area is an example of how LC arrangements and CDM arrangements can be integrated. SZC Ltd is setting a minimum standard for training requirements and will be checking individuals meet these standards during their onboarding process. The process is managed in the access management system which has the capacity to prevent access to site when training has expired. SZC Ltd will sample contractor arrangements for managing the skills, knowledge and experience of the teams on site. Given the maturity of the project, this appears reasonable.
9. SZC Ltd is developing organisational capability and structure for the PD function, taking into account aspects such as co-ordination between the three PD representatives and their respective workstreams and how conflict management would be addressed within the arrangements.
10. Given the stage of the project, which is mainly developing its arrangements and progressing design activities and the limited planned site establishment activities, I judge that the development of SZC Ltd’s arrangements for managing the site, is sufficient for this stage of the project. My judgement has been reached against the expectations set out in HSE guidance L153 [5].

### Licence Compliance

1. The LC compliance proportionate reassessment has focused on key changes to the overarching compliance arrangements; I captured my interactions with SZC Ltd in [16]. In-line with the initial licensing assessment, not all licence conditions will be required for the start of the project. I reviewed the applicable LCs required for licensing and by reviewing my initial assessment, I established that it remains valid. I sampled SZC Ltd’s Forward Action Plan (FAP) for developing arrangements for LCs 2, 8, 9, 11, 16 and 19 [7]. Table 2 lists the LCs that are relevant for licensing. This list was developed for ONR’s initial licensing assessment and is detailed in the report in [3].

**Table 2: Licence conditions relevant to NSL assessment**

|  |  |  |  |
| --- | --- | --- | --- |
| LC | Title | Original assessment valid and relevant | Reassessment judgment |
| 1 | Interpretation | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 2 | Marking of the Site Boundary | Implementation of actions in the FAP sampled as part of the proportionate reassessment | Adequate for licensing |
| 3 | Control of Property Transactions | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 4 | Restrictions on Nuclear Matter on the Site | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 5 | Consignment of Nuclear Matter | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 6 | Documents, Records, Authorities and Certificates | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 7 | Incidents on the Site | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 8 | Warning Notices | Implementation of actions in the FAP sampled as part of the proportionate reassessment | Adequate for licensing |
| 9 | Instructions to Persons on the Site | Implementation of actions in the FAP sampled as part of the proportionate reassessment | Adequate for licensing |
| 10 | Training | Updates sampled as part of the proportionate reassessment by organisational capability | Adequate for licensing |
| 11 | Emergency Arrangements | Updates sampled as part of the proportionate reassessment | Adequate for licensing |
| 12 | Duly Authorised and Other Suitably Qualified and Experienced Persons | Updates sampled as part of the proportionate reassessment by organisational capability | Adequate for licensing |
| 13 | Nuclear Safety Committee | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 14 | Safety Documentation | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 16 | Site Plans, Designs and Specifications | Implementation of actions in the FAP sampled as part of the proportionate reassessment | Adequate for licensing |
| 17 | Management Systems | Updates sampled as part of the proportionate reassessment by organisational capability | Adequate for licensing |
| 19 | Construction or Installation of New Plant | Implementation of actions in the FAP sampled as part of the proportionate reassessment | Adequate for licensing |
| 20 | Modification to Design of Plant under Construction | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 28 | Examination, Inspection, Maintenance and Testing | Yes, because there are no changes to arrangements since initial assessment | N/A |
| 36 | Organisational Capability | Updates sampled as part of the proportionate reassessment by organisational capability | Adequate for licensing |

1. LC 10, 12, 17 and 36 were assessed as part of the organisational capability topic stream and the details of the assessment is captured in AR-01401 [17].
2. I sampled SZC Ltd’s implementation of cross site interface arrangements, as part of compliance with LC 2. The engagements with Sizewell B (SZB) are now mature and there are arrangements in place to ensure effective cross site communication [18].
3. I also sampled the control of access commitment included in the LC 2 Forward Action Plan. I conducted my sample review against the expectations set out in NS-INSP-GD-002 Revision 2. Overall, SZC Ltd has established an effective access management system to site and the Main Construction Area (MCA) fencing is in progress. SZC Ltd was also able to show that the drawing capturing the site boundary co-ordinates remains valid from the original assessment in 2022.
4. Given the status of the project and the work carried out on site I am content that SZC Ltd has made and implemented adequate arrangements for LC 2.
5. As part of my proportionate reassessment I targeted LC 8 and 9 arrangements. This is because these two LCs are part of the early suite of arrangements that communicate key site risks to personnel and are utilised from the early construction phase.
6. I sampled SZC Ltd’s resolution of actions captured in the FAP for LC 8 [19], which included the post implementation effectiveness review and production of a common standard for contractor supplied temporary notices. I conducted my sample review against the expectations set out in NS-INSP-GD-008 Revision 6. These actions have been effectively managed with the site operations team. I also sampled the progress and resolution of the forward action plan for LC 9 [19]. I conducted my review against the expectations set out in NS-INSP-GD-009 Revision 6.2. I reviewed the action to update the induction materials to effectively identify the site boundary. The induction effectively identifies the site boundary areas. My sample of the LC 8 and 9 arrangements, shows that for this stage of the project the licensee has made and implemented adequate arrangements.
7. I sampled SZC Ltd’s resolution of relevant actions in the FAP for LC 16 arrangements [7]. I conducted my sample review against the expectations set out in NS-INSP-GD-016 Issue 6. My sample identified no gaps in the arrangements and their implementation.
8. I sampled SZC Ltd’s resolution of relevant actions in the FAP for LC 19 arrangements. I conducted my sample review against the expectations set out in NS-INSP0GD-019 Issue 7.1. SZC Ltd provided an overview of the processes which are in place to implement its LC 19 arrangements. These processes are the same as those that were assessed during ONR’s original licensing assessment. SZC Ltd conducted a self-assessment of the arrangements in July 2023. Progress with the FAP actions have been monitored by SZC Ltd’s Nuclear Site Licence Oversight Group.
9. I sampled the linkage between the LC 19 arrangements to the arrangements for compliance with LC 12, as required in ONR guidance, NS-INSP0GD-019 Issue 7.1. I sampled this area because the LC 19 manager had changed roles and was not part of my original assessment sample. I reviewed the LC 19 manager’s role training profile [20], required as part of SZC Ltd’s LC 12 arrangements. Based on my sample, I am content that SZC Ltd has appropriate oversight of the development and implementation of the arrangements for this stage of the project.
10. I have conducted a targeted sample of the development of the site emergency plan, in response to an off-site event from SZB. I have engaged with Suffolk County Council (SCC) [21], and I was informed that the existing approved emergency plan will be updated ahead of any significant increases in work complexity or numbers on the site. Any significant changes (to the work complexity or numbers on the site) would not occur unless an adequate plan is in place ahead of time. Any future plans would be required to take into account changes or improvements in the local infrastructure. I consider this approach appears reasonable and will ensure adequate emergency plans are developed in time and are in place when needed. This approach is consistent with that adopted by Hinkley Point C.
11. SCC informed ONR that the next update to the emergency plans will be in June 2024. The update will consider the current state of the Sizewell C site and the future requirements as the population on site increases. ONR will follow up on this as a matter of routine regulatory engagement.
12. I have observed SZC Ltd’s response to SZB’s level 1 emergency exercise [22]. I observed its approach to muster and sheltering, the distribution of potassium iodide tablets and communication with the neighbouring facility. Overall, I noted that SZC Ltd was able to utilise the access management system to account for people on site. Areas for improvement were identified and will be progressed as part of routine engagements.
13. As part of the emergency arrangements, I have considered the access to the site via the site of special scientific interest (SSSI) crossing. I have considered the external hazards review of site suitability [23]. The external hazards assessment has considered the current plans for the SSSI crossing height, and recognises that it bounds the high extreme still seawater level, including reasonably foreseeable climate change for both 2110 and 2140 values. ONR intends to engage on the SSSI design requirements as part of normal regulatory engagements post any licensing decision to ensure future emergency arrangements requirements are adequately addressed and revised power station milestones are taken into account.

### Other matters considered

1. Although not part of the licensing process, to ensure future clarity, I have considered ONR’s regulatory vires for the wider construction site if ONR was to grant a NSL.
2. Regulation 2A of the Health and Safety (Enforcing Authority) Regulations 1998 defines a New Nuclear Build (NNB) site, as a site which:

* (a) is immediately adjacent to a GB nuclear site (“the associated site”)
* (b) is, or forms part of, a construction site where construction work is being carried out wholly or mainly for the purpose of the installation of one or more nuclear installations on the associated site; and by or on behalf of the person to whom the nuclear site licence for the associated site has been granted.

1. Regulation 4A(1)(b) of the regulations establishes ONR as the enforcing authority for premises which are or are on a NNB site.

The SZC site will be made up of: the main construction area (which encompasses the nuclear licensed site area) and a temporary construction area where activities associated with the main construction area (such as concrete batching and reinforcement cage assembly) take place. Reference [24] considers the regulatory vires across the different site areas and recommends that ONR vires within the main construction area and the temporary construction area, and will exclude the construction of the tunnels, jetty and the railway.

# Conclusions and Recommendations

## Conclusions

1. This report presents the proportionate reassessment of the site and compliance area of SZC Ltd’s application for a NSL.
2. My conclusions are that:

* SZC Ltd has made and implemented adequate arrangements for construction and site management and licence compliance; and
* SZC Ltd is ready to be granted a nuclear site licence for the proposed development at Sizewell C.

## Recommendations

1. Based on my proportionate assessment of the site and construction management and licence condition compliance areas, I recommend that a licence is granted to SZC Ltd to permit the construction and operation of a twin EPR™ power station at Sizewell C.

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| [10] | Sizewell C Ltd, “Sizewell C Ltd's approach to the Construction Design Management Regulations: Client Standard (CM9 2024/16468)”. |
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| [12] | ONR, “Re-assessment Strategy for SZC Ltd Licensing (CM9 2023/39194)”. |
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| [23] | ONR, “External Hazards Assessment Report, WiReD number AR-01422,” 2024. |
| [24] | ONR, “ONR-NRD-SZC - Regulation of the new nuclear build at Sizewell C 2024/8134”. |

# Appendices

Appendix 1: ONR licensing assessment 2020/22

ONR assessment reports available at [www.onr.org.uk/civil-nuclear-reactors/sizewell-c/assessment-reports.htm](file:///C:/Users/CPotter/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/I9QLS3DL/www.onr.org.uk/civil-nuclear-reactors/sizewell-c/assessment-reports.htm)

1. [Electrical engineering assessment - ONR-NR-AR-21-001](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-001.docx)
2. [Mechanical engineering assessment - ONR-NR-AR-21-003](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-003.docx)
3. [External hazards assessment - ONR-NR-AR-21-005](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-005.docx)
4. [Civil engineering assessment - ONR-NR-AR-21-006](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-006.docx)
5. Nuclear site [health and safety/life fire safety assessment - ONR-NR-AR-21-007](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-007.docx)
6. [Assessment of the safety case delivery strategy - ONR-NR-AR-21-008](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-008.docx)
7. [Site activities and licence compliance - ONR-NR-AR-21-009](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-009.docx)
8. [Organisational capability assessment - ONR-NR-AR-21-010](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-010.docx)
9. [Licensing and legal assessment - ONR-NR-AR-21-011](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-011.docx)
10. [Internal hazards assessment - ONR-NR-AR-21-035](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-035.docx)
11. [Management of nuclear matter and liabilities - ONR-NR-AR-21-037](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/ONR-NR-AR-21-037.docx)
12. [Security arrangements assessment - ONR-CNSS-AN-22-002](https://www.onr.org.uk/civil-nuclear-reactors/sizewell-c/onr-cnss-an-22-002.docx)