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CIVIL NUCLEAR REACTOR PROGRAMME

NEW BUILD LICENSING

HINKLEY POINT C NUCLEAR SITE LICENSING

LICENCE CONDITION 19: CONSTRUCTION OR INSTALLATION OF NEW PLANT

Assessment Report: ONR-CNRP-AR-12-112

Revision 1

17 January 2013

PROTECTIVE MARKING - NONE

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ASSESSMENT REPORT

Site:	Hinkley Point C
Project:	NNB Generation Company Ltd's application for Nuclear Site licence to install and operate two EPR™ units at Hinkley Point C.
Title:	Licence Condition Compliance Arrangements Intervention.
Licence Number:	NA (Pre-licence granting)
Licence Condition(s):	LC19: Construction or Installation of New plant
IIS Rating:	3
COIN Service Order:	N/A

Document Identifier

Identifier	Revision	TRIM Reference(s)
ONR-CNRP-AR-12-112	1	2012/357205

Step-based Document Review

Step	Description	Role	Name	Date	TRIM Revision *
1	Initial draft, including identification and mark-up of SNI/CCI	Author	[REDACTED]	12/08/2012	5
2	Main editorial review	Author			
3	Peer Review in accordance with AST/005 Issue 1	Peer Reviewer	N/A		
4	Assessor update / sentencing of comments and return to Peer Reviewer	Author	N/A		
5	Final editorial / clean draft review - Revision 0	Author	[REDACTED]	21/09/12	9
6	Acceptance review in accordance with AST/003 Issue 4	AUH			
7	Report Sign-off	Author / Peer Reviewer / AUH			

Document Acceptance (Revision 0)

Role	Name	Position	Signature	Date
Author	[REDACTED]	HM Inspector	[REDACTED]	12/08/1012
Peer Review				
Acceptance	[REDACTED]	HM Superintending Inspector	[REDACTED]	21/09/2012

TRIM revision to be identified upon completion of activity and incorporation of any changes to document.

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ASSESSMENT REPORT

Document Acceptance (Revision 1)

Role	Name	Position	Signature	Date
Author	[REDACTED]	HM Inspector	[REDACTED]	03/01/2013
Peer Review for Publication	[REDACTED]	HM Inspector	[REDACTED]	04/01/2013
Acceptance for Publication	[REDACTED]	HM Superintending Inspector	[REDACTED]	17/01/2013

Revision History

Revision	Date	Author(s)	Reviewed By	Accepted By	Description Of Change
0	21/09/12	[REDACTED]	N/A	[REDACTED]	First formal issue.
1	17/01/2013	[REDACTED]	[REDACTED]	[REDACTED]	Minor editorial changes.

Circulation (latest issue)

Organisation	Name
ONR	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]

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EXECUTIVE SUMMARY

Background and Scope.

NNB Generation Company Ltd (NNB GenCo) has formally applied to ONR for a nuclear site licence (NSL) to install and operate two EPR™ reactor units at Hinkley Point C in Somerset.

This report presents the findings of ONR's assessment of NNB GenCo's arrangements for complying with Licence Condition 19 (LC19): Construction or installation of new plant. The assessment was informed by a programme of meetings and intervention spanning the period May 2010 to July 2012.

The scope of this report covers the adequacy of NNB GenCo's arrangements for complying with LC19 - Construction or installation of new plant – for the purposes of supporting its application for a nuclear site licence.

Intervention Strategy

ONR has concluded a programme of intervention that has examined NNB GenCo's arrangements for complying with Licence Condition 19: Construction and installation of new plant. During the intervention ONR has engaged in dialogue which has informed improvements to the procedures that NNB GenCo intends to implement for controlling construction and installation of a two unit EPR™ at Hinkley Point C. The intervention examined procedures and the underlying LC19 compliance thread, training of personnel, implementation of arrangements and self regulation.

Conclusions of Intervention.

NNB GenCo has not yet commenced construction or installation of nuclear safety structures at Hinkley Point C but ONR has examined the proposed arrangements for complying with LC19 and is satisfied that, subject to successful implementation, these arrangements provide a rigorous and robust means of controlling construction and installation.

ONR is satisfied that the NNB GenCo procedure for controlling regulator approved management arrangements provides adequate control of such part or parts of the LC19 arrangements approved by the Executive (HSE).

ONR concludes that NNB GenCo's arrangements for compliance with LC19 facilitate the Executive's use of primary or derived powers to permission construction or installation.

ONR recognises that the ongoing NNB GenCo initiative to develop the HPC Project Execution Plan has the potential to impact upon the structure of the site construction organisation. Thus ONR accepts that NNB GenCo wishes to implement any consequential changes to its site organisation before delivering the relevant training to site personnel.

ONR concludes that the limited evidence from NNB GenCo's implementation of the procedures "Manage Site Surveillance" and "Define, Manage and Release Key Hold Points" supports ONR's judgement that these elements of the arrangements are adequate for the purposes of granting a nuclear site licence.

ONR concludes that the NNB GenCo arrangements for compliance with LC19 are being, and will continue to be, informed by a structured programme of self regulation.

Recommendations.

ONR should accept that NNB GenCo's proposed arrangements for complying with Licence Condition 19: Construction or installation of new plant; are adequate for the purpose of granting a nuclear site licence.

ONR should continue dialogue with NNB GenCo on:

- the structure, competence and training of site construction organisation personnel;
- application of the arrangements to those early site works which include safety related activities, e.g. the earthworks contract; and,
- Design Authority oversight of construction and installation.

ONR should continue to seek opportunities to influence the continued development of NNB GenCo's arrangements.

LIST OF ABBREVIATIONS

ALARP	<i>As low as is reasonably practicable</i>
BSL	<i>Basic Safety level (in SAPs)</i>
BSO	<i>Basic Safety Objective (in SAPs)</i>
BMS	<i>(ONR) How2 Business Management System</i>
EPR™	<i>Trade Mark of European pressurised water reactor</i>
HSE	<i>Health and Safety Executive (“the Executive”)</i>
IAEA	<i>International Atomic Energy Agency</i>
LC	<i>Licence Condition</i>
ONR	<i>Office for Nuclear Regulation (an agency of HSE)</i>
PCER	<i>Pre-construction Environment Report</i>
PCSR	<i>Pre-construction Safety Report</i>
PID	<i>Project Initiation Document</i>
PSA	<i>Probabilistic Safety Assessment</i>
PSR	<i>Preliminary Safety Report</i>
RGP	<i>Relevant Good Practice</i>
SAP	<i>Safety Assessment Principle(s) (HSE)</i>
SFAIRP	<i>So far as is reasonably practicable</i>
SSC	<i>System, Structure and Component</i>
TAG	<i>Technical Assessment Guide(s) (ONR)</i>
TSC	<i>Technical Support Contractor</i>
WENRA	<i>Western European Nuclear Regulators’ Association</i>

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Table 2: Licence Condition 19: Construction or Installation of New Plant. NNB GenCo Compliance Arrangements

1 INTRODUCTION

1.1 Background

1 NNB Generation Company Ltd (NNB GenCo) has formally applied to ONR for a nuclear site licence (NSL) to install and operate two EPR™ reactor units at Hinkley Point C in Somerset (Ref 1).

2 This report presents the findings of ONR's assessment of NNB GenCo's arrangements for complying with Licence Condition (LC) 19 Construction or installation of new plant. The assessment was informed by a programme of meetings and intervention spanning the period May 2010 to July 2012. Assessment was undertaken in accordance with the requirements of the Office for Nuclear Regulation (ONR) How2 Business Management System (BMS) procedure AST/003 (Ref. 2).

1.2 Scope

3 The scope of this report covers the adequacy of NNB GenCo's arrangements for complying with LC19 - Construction or installation of new plant – for the purposes of supporting its application for a nuclear site licence.

1.3 Methodology

4 The methodology for the assessment follows ONR BMS document AST/003, Assessment Process (Ref. 2), in relation to mechanics of assessment within the Office for Nuclear Regulation (ONR).

5 This assessment focused upon NNB GenCo's arrangements for controlling construction and installation by examining development of the arrangements, identification and training of key personnel, implementation of the arrangements and NNB GenCo's self regulation activities.

2 ASSESSMENT STRATEGY

6 The assessment strategy for NNB GenCo's arrangements for complying with LC 19 - Construction or installation of new plant - is set out in this section. This identifies the scope of the assessment and the standards and criteria that have been applied.

2.1 Standards and Criteria

7 The relevant standards and criteria adopted within this assessment are set down in the ONR inspection guide T/INS/019 (Ref 3), which identifies relevant related inspection guidance. The assessment is also informed by the author's knowledge of relevant good practice exercised by mature licensees.

2.2 Intervention Strategy

8 The assessment followed ONR's Intervention Strategy (Ref 4), and was informed by a programme of level 4 dialogue which aimed to examine:

- NNB GenCo's compliance matrix and compliance thread for each condition sub clause;
- communication of arrangements to relevant personnel, i.e. training;
- implementation of arrangements;
- dialogue on NNB GenCo's self regulation activities.

9 The intervention gave particular attention to the following key requirements of the licence condition.

- The arrangements for controlling construction and installation activities;
- The arrangements for dividing the construction and installation phase into stages;
- The arrangements for controlling progress from one stage to the next.

2.3 Integration with other licence Conditions

10 LC10 requires the licensee to make and implement arrangements for the training of all those staff that have responsibilities for any operations which may affect safety. Licence Condition 1 – Interpretation – does not include construction and installation in the definitions of "operations" but ONR expects a licensee's arrangements for training to extend to its control of construction and installation.

11 LC20 requires the licensee to make and implement arrangements for managing modification to the design of a plant under construction. Thus ONR expect NNB GenCo arrangements for LC19 to include appropriate links to its LC20 arrangements.

12 Fundamentally LC 17 requires the licensee to establish and implement management systems which give due regard to safety. NNB GenCo's arrangements for complying with LC17 are the subject of a separate ONR assessment.

2.4 Out-of-scope Items

13 None identified.

3 LICENSEE'S SAFETY CASE

- 14 NNB GenCo is not required to present a formal safety case for its arrangements for complying with conditions attached to the nuclear site licence.
- 15 Part 4 of the application (Ref 1) entitled Nuclear Site Licence Compliance Matrix: Hinkley Point C (Ref 5) identifies those procedures and documents within NNB GenCo's Integrated Management System (IMS) that achieve compliance with the licence conditions attached to the standard nuclear site licence. The Compliance Matrix identifies two groups of licence conditions.
- Group 1 – Licence Conditions required for activities that NNB GenCo expect to undertake during the construction and installation phases of the project. ONR expect the arrangements for these LCs to be developed sufficiently to be fit for purpose at the time of NSL granting.
 - Group 2 – Licence Conditions required for activities that NNB GenCo will undertake during commissioning, operation and decommissioning phases of the project. NNB GenCo has provided a commitment to develop the necessary arrangements for complying with these LCs in the future.
- 16 LC 19 Construction or installation of new plant is designated Group 1 and therefore ONR expects NNB GenCo to have fit for purpose arrangements at the time of Nuclear Site Licence (NSL) grant.

4 ONR ASSESSMENT

4.1 Scope of Assessment Undertaken

17 The aim of the intervention that informed this assessment was to judge the adequacy of NNB GenCo's arrangements for controlling and installing a new nuclear installation. The principal objective is to inform ONR's decision on whether to grant NNB GenCo a nuclear site licence. Thus ONR's intervention strategy (Ref 4) comprises the following elements:

- Development of arrangements. Examine NNB's Compliance matrix entry (procedures) and the underlying compliance thread (supporting arrangements, guidance etc.).
- Competence and Training. Examine the arrangements for developing training material and identifying the target roles and functions. Sample training packages and observe training.
- Implementation. Seek opportunities to inspect implementation of arrangements.
- Self Regulation. Discuss key findings and lessons learned from NNB GenCo's own self assessment of its arrangements.

18 The extent of ONR's consideration of the above elements is dependent upon NNB GenCo's project schedule. NNB GenCo is yet to fully develop its site construction organisation and is not scheduled to start nuclear safety related construction before licence grant. Therefore, ONR's intervention was limited to development of arrangements, a limited examination of competency and training, some aspects of implementation and the outcome of self regulation.

19 ONR's assessment was informed by dialogue with NNB GenCo during the course of the programme of L4 meetings listed at Table 1.

4.2 Assessment

4.2.1 Development of Arrangements – Compliance Matrix and Compliance Thread

20 ONR guidance (Ref 3) expects a licensee's arrangements for complying with LC19 to provide a system of rigorous and appropriate control of changes to plant during the construction and installation phases. The arrangements are required to provide ONR with appropriate regulatory control of construction and installation. Table 2 lists the NNB GenCo procedures that comprise its arrangements for complying with LC19.

4.2.1.1 LC19(1).

21 The compliance matrix identifies a suite of eight procedures for managing construction and installation and any changes occurring during these phases of the project. These procedures include arrangements for managing: the surveillance of construction and installation activities; contractors' non-conformances; contractors' technical queries (clarification requests); contractors' requests for change; design evolution following issue of "for execution" documents to contractor; and the record of the "as built" plant.

22 The procedures are connected by a complex compliance thread and NNB GenCo is developing a Compliance Pack to aid understanding of the interdependencies of these procedures and thus secure clearer evidence that the procedures will achieve compliance with the licence condition. An early draft version of this Compliance Pack illustrates that the suite of documents aims to ensure that construction and installation will comply with the issued "for execution" documentation. However, should the contractor wish, or is required, to deviate from the issued documentation the arrangements direct the licensee

to the design evolution procedure, which in turn requires changes to be managed in accordance with arrangements for compliance with LC20: Modification to design of plant under construction.

- 23 LC19(4) requires that arrangements under LC19(1) shall, where appropriate, divide the construction or installation into stages. The NNB GenCo company procedure “Define Manage and Release Key Hold Points” describes the arrangements for complying with this requirement with each hold point marking the transition between successive stages. This important procedure was the subject of dedicated L4 meetings aimed at ensuring that it provided NNB GenCo with a rigorous and robust means of controlling the progress of construction and installation from one stage to the next. The procedure identifies hold points (stages) covering a variety of project risks but clearly identifies those that relate to nuclear safety as well as those that have been identified for the purposes of LC19. The procedure also identifies hold points for the purposes of LC21: Commissioning.
- 24 NNB GenCo’s list of hold points is a live document and will remain open for further development as required by the project. The ongoing L4 dialogue between NNB GenCo and ONR Pre-Construction Safety Report (PCSR) topic leads has, for the purposes of NSL granting, achieved an acceptable level of consensus on NNB GenCo list of hold points for the early phases of construction and installation.
- 25 The procedure includes the requirement to produce a Management Expectation Document (MED) that sets out the key enablers and criteria that NNB GenCo is required to address in order to seek internal approval to release a hold point. LC19(4) requires the arrangements under LC19(1) to include the provision of adequate documentation to justify the safety of the proposed construction or installation. ONR has reviewed a draft MED and is satisfied that the release of a hold point requires the production of the appropriate safety and design justification.
- 26 **NNB GenCo has not yet commenced construction or installation of nuclear safety structures at Hinkley Point C but ONR has examined the proposed arrangements for compliance with LC19 and is satisfied that, subject to successful implementation, they aim to provide rigorous and robust arrangements for controlling construction and installation.**

4.2.1.2 LC19(2) and LC19(3).

- 27 These LCs give the Executive primary powers to approve arrangements. The compliance matrix refers to the procedure for control of regulator approved management arrangements.
- 28 **ONR is satisfied that the NNB GenCo procedure for controlling regulator approved management arrangements provides adequate control of such part or parts of the LC19 arrangements approved by the Executive.**

4.2.1.3 LC19(4).

- 29 In addition to dividing the construction or installation into stages, discussed above, this sub clause gives the Executive the primary power to specify that a licensee “...shall not commence nor thereafter proceed from one stage to the next of the construction or installation...” without the consent of the Executive. The compliance matrix entry refers to the relevant NNB GenCo procedure for responding to ONR’s use of this primary power.

4.2.1.4 LC19(5).

30 This sub-clause gives the Executive the primary power to direct the licensee to halt construction or installation. The compliance matrix refers to the relevant NNB GenCo procedure for responding to ONR's use of this primary power and the procedure for introducing and managing the resulting Hold Point.

4.2.1.5 ONR use of Primary and Derived Powers to Permission Construction or Installation.

31 ONR intends to use the primary powers embodied in LC19(4) to permission, i.e. **consent** to, NNB GenCo progressing between successive stages of construction or installation, e.g. placement of first concrete for a nuclear safety related structure.

32 ONR also expects the licensee's arrangements under LC19(1) to include derived powers that permit the Executive to specify that a licensee shall not commence nor proceed from one stage to the next of the construction or installation without the **agreement** of the Executive". The NNB GenCo procedure Define, Manage and release Key Hold Points gives the Executive the appropriate derived powers.

33 ONR does not expect to exercise such derived power as a matter of course. However, should ONR conclude that NNB is failing to exercise appropriate control of the construction or installation it may, as a last resort and only after exhausting all other means at its disposal, exercise this derived power.

34 **ONR concludes that NNB GenCo's arrangements for compliance with LC19 facilitate the Executive's use of primary or derived powers to permission construction or installation.**

4.2.1.6 Comparison with Guidance and Relevant Good Practice

35 ONR has assessed NNB GenCo's arrangements for Licence Condition 19 Construction or installation of new plant against the requirements of the ONR Technical Inspection Guide T/INS/019 (Ref 3).

36 ONR judges that NNB arrangements have addressed the expectations of the ONR guidance and are therefore adequate for the purposes of granting a nuclear site licence.

4.2.2 Competence and Training of Site Organisation.

37 ONR has engaged in dialogue with NNB GenCo personnel based at Hinkley Point C (HPC) on the structure of the site based construction organisation. The arrangements for compliance with LC19 identify the roles and responsibilities of both site functions and key posts. However, the final structure of the site organisation is subject to the outcome of the ongoing NNB GenCo initiative to develop the HPC Project Execution Plan (PEP) and is unlikely to be finalised before October 2012.

38 From the outset ONR's dialogue with the HPC based personnel has explored how the arrangements will secure appropriate oversight by the NNB GenCo's Design Authority (DA). Such oversight is critical to the DA discharging its intelligent customer role. ONR noted that the DA did not feature in the original site organisation. However, NNB GenCo now recognises that the DA has an important role at the site. ONR expects the post PEP organisation to confirm that that the Design Authority will have a permanent presence on site, and will co-locate together with the Construction Team in an "integrated" group which will work in a coordinated manner to manage and control the construction processes.

39 NNB GenCo has developed Practitioner Training for its LC19 arrangements for the control of construction and candidate roles to receive this training include: Design Authority,

Delivery Managers, Manufacturing Inspection Department and Assurance. NNB continues to develop its proposals for the training of core roles in the HPC Site Organisation. The latter may be progressed following the PEP informed updates to the site organisation

40 **ONR recognises that the NNB GenCo Project Execution Plan has the potential to impact upon the structure of the site construction organisation. Thus ONR accepts that NNB GenCo wishes to implement any necessary changes to its site organisation before delivering the relevant training to site personnel. Should a nuclear site licence be granted ONR will seek an early opportunity to continue the dialogue on competency and training in relation to compliance with LC19.**

4.2.3 Implementation of LC19 Arrangements.

41 **HPC Construction Surveillance Programme – Earthworks Contract.** NNB has yet to undertake any safety related construction at site and therefore implementation to date is limited to the preparation, by the site construction organisation, of the Hinkley Point C construction surveillance programme for the NNB GenCo earthworks contract. ONR has seen an early draft of the surveillance programme which defines the surveillance objectives, minimum surveillance frequency and applicable surveillance guidelines for the following identified safety related activities.

- Preparation of the formation for safety classified buildings.
- Installation of the in-ground earthing network.
- Placing mass concrete below safety classified buildings.

NNB GenCo explained how the DA is a stakeholder in the development of this programme via the design review and acceptance arrangements and ONR noted that the DA will be a signatory to the final approved surveillance programme.

42 **Design Authority Earthworks Surveillance Plan– Earthworks Contract.** Although not formally part of NNB GenCo's LC19 arrangements, the DA Surveillance Plan identifies the "intelligent customer" activities that include surveillance of Architect Engineer and site contractor deliverables. ONR accepts that the plan aims to secure appropriate DA oversight of the earthworks contract.

43 **Hold Point Control - Procurement.** NNB GenCo has not yet had the opportunity to apply its arrangements for managing the release of hold points to construction or installation activities. However, ONR's assessment in the topic of structural integrity (Ref 6) reports on NNB GenCo's application of the arrangements to the procurement of long lead items. The assessment judged the hold point release process to be comprehensive in scope and to have been conducted according to NNB GenCo's published procedures.

44 **ONR concludes that the limited evidence from assessment of NNB GenCo's implementation of the procedures "Manage Site Surveillance" and "Define, Manage and Release Key Hold Points" supports ONR's judgement that these elements of the arrangements are adequate for the purposes of granting a nuclear site licence.**

4.2.4 Self Regulation.

45 NNB GenCo's has undertaken a Self Assessment of the LC19 Construction Process which made several recommendations, reported areas of best practice and identified one significant non-conformance (NC) and 3 minor NCs. The assessment also confirmed that NNB has closed all actions from a previous Independent Assessment. NNB GenCo advised that its Organisational Learning Information Management (OLIM) tool has recorded all relevant NCs, recommendations and areas of best practice and it has raised

Learning Reports (LRs) where appropriate. NNB advised that it is currently scheduled to clear all non-conformances and LRs by quarter one 2013.

- 46 Looking forward, NNB GenCo has a programme of self regulation comprising periodic assessments of implementation of its LC19 arrangements for construction or installation by both the HPC project and its Independent Assessment Challenge and Oversight (IACO) function.
- 47 **ONR concludes that the NNB GenCo arrangements to control construction or installation of new plant in compliance with LC19 are being, and will continue to be, informed by a structured programme of self regulation.**

5 CONCLUSIONS AND RECOMMENDATIONS

48 ONR has concluded a programme of intervention that has examined NNB GenCo's arrangements for complying with Licence Condition 19: Construction and installation of new plant. During the course of a programme of meetings ONR has engaged in dialogue which has informed improvements to the procedures that NNB GenCo now intends to implement for controlling construction and installation of a two unit EPR™ at Hinkley Point C. The intervention has informed ONR's judgement on the adequacy of NNB GenCo's proposed arrangements and leads to the following conclusions and recommendations.

5.1 Conclusions

49 NNB GenCo has not yet commenced construction or installation of nuclear safety structures at Hinkley Point C but ONR has examined the proposed arrangements for compliance with LC19 and is satisfied that, subject to successful implementation, they aim to provide rigorous and robust arrangements for controlling construction and installation.

50 ONR is satisfied that the NNB GenCo procedure for controlling regulator approved management arrangements provides adequate control of such part or parts the LC19 arrangements approved by the Executive.

51 ONR concludes that NNB GenCo's arrangements for compliance with LC19 facilitate the Executive's use of primary or derived powers to permission construction or installation.

52 ONR recognises that the NNB GenCo Project Execution Plan has the potential to impact upon the structure of the site construction organisation. Thus ONR accepts that NNB GenCo wishes to implement any consequential changes to its site organisation before delivering the relevant training to site personnel.

53 ONR concludes that the very limited evidence from NNB GenCo's implementation of the procedures "Manage Site Surveillance" and "Define, Manage and Release Key Hold Points" supports ONR's judgement that these elements of the arrangements are adequate for the purposes of granting a nuclear site licence.

54 ONR concludes that the NNB GenCo arrangements to control construction or installation of new plant in compliance with LC19 are being, and will continue to be, informed by a structured programme of self regulation.

55 .

5.2 Recommendations

56 This intervention makes the following recommendations.

- ONR should accept that NNB GenCo's proposed arrangements for complying with Licence Condition 19: Construction or installation of new plant; are adequate for the purpose of granting a nuclear site licence.
- Following granting of a nuclear site licence for Hinkley Point C, ONR should continue dialogue with NNB GenCo on:
 - the structure, competence and training of site construction organisation personnel;
 - application of the arrangements to those early site works which include safety related activities, e.g. the earthworks contract; and,
 - Design Authority oversight of construction and installation.

- ONR should continue to seek opportunities to influence the continued development of NNB GenCo's arrangements.

6 REFERENCES

- 1 NNB GenCo letter ONR-OSL-RIO-000061 dated 29 July 2012. Application for Nuclear Site Licence for Hinkley Point. TRIM 2011/442090
- 2 *ONR How2 Permissioning Reports*. AST/003 Issue 4. HSE. August 2011.
www.hse.gov.uk/nuclear/operational/assessment/index.htm.
- 3 T/INS/019 Issue 2 LC19: Construction or installation of new plant. July 2009.
- 4 CNRP New Civil Reactor Build. NNB GenCo Ltd's Application for a Nuclear Site Licence to Install and Operate Two EPR Reactor Units at Hinkley Point. ONR Intervention Strategy. TRIM 2012/61973.
- 5 NNB GenCo Company Document Nuclear Site Licence Compliance Matrix: Hinkley Point C. NNB-OSL-PRO-000046, (Part 4 to Ref1).
- 6 Hinkley Point C – Structural Integrity Topic Report. ONR Assessment Report ONR-CNRP-AR-12-065. TRIM 2012/313490.

Table 1

Level 4 Meetings and Interventions to Discuss LC19: Construction or Installation of New Plant

Date	Location	Topic	CR/IR No.	TRIM Ref.
Pre-NSL Application				
13/05/10	London	L4 Design, Design Change and Change Control	CR10028	2010/271579
09/09/10	London	L4 Design, Design Change and Change Control - L19	CR10090	2010/449120
02/03/11	London	L4 Hold Point Procedure (LC19)	CR11019	2011162022
17/03/11	Bootle	L4 Review of LC19 Compliance Arrangements	CR11060	2011/237422
Post-NSL Application				
04/10/11	Bootle	L4 Hold Points (LC19)	IR11187	2011/582048
13/10/11	London	L4 LC17/LC19 Arrangements	IR11190	2011/581870
11/01/12	London	L4 LC19 Hold Points Meeting	IR12215	2012/100562
24/01/12	HPC	L4 LC19 Compliance for ONR NSL intervention	IR12248	2012/100836
20/03/12	HPC	L4 LC19 Compliance for ONR NSL intervention	IR12049	2012/191554
14/05/12	QUBE	L4 Hold Points Meeting (LC19)	IR12049	2012/ 299279
22/05/12	HPC	L4 LC19 Compliance for ONR NSL intervention	IR12125	2012/289379
18/06/12	QUBE	L4 Hold Points and MED (LC19)	IR12120	2012/319383
17/07/12	HPC	L4 LC19 Compliance for ONR NSL intervention closure	IR12168	2012/348504

Table 2

**Licence Condition 19: Construction or Installation of New Plant
NNB GenCo Compliance Arrangements**

LC Clause	NNB GenCo Procedure	Document Reference
19(1)	Define manage and Release Key Hold Points	NNB-OSL-PRO-000012
	Manage Site Surveillance	NNB-PCP-PRO-000082
	Manage Site Contractors Non-Conformance	NNB-PCP-PRO-000081
	Manage Construction Change – Clarification request	NNB-PCP-PRO-000093
	Manage Construction Change – Field Change request	NNB-PCP-PRO-000094
	Manage Construction Change – Design Evolution Notice	NNB-PCP-PRO-000095
	Control Construction Documents	NNB-PCP-PRO-000077
	Manage Non-Conformance	NNB-OSL-PRO-000028
19(2)	Control Regulator Approved Management Arrangements	NNB-FIN-PRO-000079
19(3)	Control Regulator Approved Management Arrangements	NNB-FIN-PRO-000079
19(4)	Define manage and Release Key Hold Points	NNB-OSL-PRO-000012
	Management of Interfaces with Regulators	NNB-OSL-PRO-000061
19(5)	Management of Interfaces with Regulators	NNB-OSL-PRO-000061
	Define manage and Release Key Hold Points	NNB-OSL-PRO-000012