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| ONR Technical Inspection Guide (TIG)  LC 6 – Documents, records, authorities and certificates |



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LC 6 – Documents, records, authorities and certificates

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Revision commentary

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| Issue | Description of update(s) |
| 5 | Routine Review |
| 5.1 | Minor update - Document simplified/duplication removed, no major change to outcomes or intent. |

# Introduction

1. Technical Inspection Guides (TIGs) assist inspectors in making regulatory judgments and providing advice on Licence Conditions (LCs). Most LCs are goal-setting, leaving the specifics of arrangements to the dutyholder, who is ultimately responsible for safety. This guidance aims to support consistent inspection of LC 6 – Documents, records, authorities and certificates.
2. While not exhaustive or mandatory, the guidance offers a clear framework for inspectors to assess the adequacy of compliance. Additional relevant information on record management is available in the Technical Assessment Guide (TAG) on “Management of records” [1] and the TIG for LC 25 [2].
3. Inspectors should also refer to the ONR procedure on Risk-Informed and Targeted Engagements (RITE) [3], which guides risk-based prioritisation in regulatory interventions and supports decisions on engaging with dutyholders.

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# LC 6 – Documents, records, authorities and certificates

1. 6 (1) The licensee shall make adequate records to demonstrate compliance with any of the conditions attached to this licence.
2. 6 (2) Without prejudice to any other requirements of the conditions attached to licence the licensee shall make and implement adequate arrangements to ensure that every document required, every record made, every authority, consent or approval granted and every direction or certificate issued in pursuance of the conditions attached to this licence is preserved for 30 years[[1]](#footnote-2) or such other periods as ONR may approve.
3. 6 (3) The licensee shall submit to ONR for approval such part or parts of the aforesaid arrangements as ONR may specify.
4. 6 (4) The licensee shall ensure that once approved no alteration or amendment is made to the approved arrangements unless ONR has approved such alteration or amendment.
5. 6 (5) The licensee shall furnish to ONR copies of any such document, record, authority or certificate as ONR may specify.

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# Purpose and outcomes of LC 6

1. The purpose of LC 6 is to ensure that the licensee makes and holds adequate records for a suitable period to demonstrate historical compliance with licence conditions.
2. The main regulatory outcomes of LC 6 are to:
   1. Ensure that licensees maintain all necessary safety documentation and design and construction records throughout the plant’s lifecycle.
   2. Ensure licensees have operational records available for the statutory number of years after cessation of operations for the purpose of assisting any claims for damage to health as a result of exposure to ionising radiation (refer to LC 25 [2]).
   3. To provide ONR the power that the licensee provides copies of documents, record, authority or certificate that ONR may specify.
3. Inspectors may consider the requirements of The Nuclear Safeguards (EU Exit) Regulations 2019 (NSR19) and the related ONR Guidance for Nuclear Material Accountancy, Control and Safeguards (ONMACS) [4]. Safeguards-specific inspection guidance is provided in this document’s appendix.
4. Other relevant standards, such as ISO 9001 and GSR Part 2, set out basic requirements for records, while IAEA safety guide GS-G-3.5 offers additional records management guidance[[2]](#footnote-3).

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# Guidance on inspection of arrangements for LC 6

1. It is likely that the dutyholder’s procedure(s) setting out their LC 6 arrangements will also address the requirements for LC 25 - Operational records [2], this guidance will be pertinent and should be referred to when carrying out inspections of LC 6 arrangements.
2. Sampling of for LC 6 arrangements to confirm that they:

* Are readily available and remain current, are authorised by an appropriate senior manager and controlled under the quality management system to comply with the requirements of LC 17 [5].
* Identify the types records required to demonstrate compliance with licence conditions.
* Ensure that every document required, record made, authority, consent or approval granted and every direction or certificate issued in pursuance of the conditions attached to the licence is preserved for thirty years.
* Recognise that ONR can approve other periods for preserving records, and can approve the arrangements as we may specify LC 6(3).

1. The arrangements may be achieved by producing a schedule of records. The schedule should detail the type of records to be kept along with their retention periods. The record schedule should be subject to routine review by the dutyholder to ensure its on-going suitability.

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# Guidance on inspection of implementation of arrangements for LC 6

1. Sampling of implementation of the LC6 arrangements may include:
   1. That the records of the issues, changes or withdrawals of licence instruments are up to date and available at all times.
   2. The status of any restrictions placed on the dutyholder’s activities by ONR by way of licence instruments is known and accessible to personnel controlling these activities.
   3. That relevant correspondence with ONR and other statutory bodies is recorded and retrievable.
   4. That ONR issues are tracked and records of their progress to close out are adequately maintained.
   5. That the security requirements for access to records and archives are defined and implemented to prevent unauthorised access to sensitive records and / or prevent uncontrolled alteration to records.
   6. That drawing registers are up to date, that current drawings are available and superseded drawings are archived and retrievable.
   7. The record repository typically contains various document formats, such as microfilm, photographs, and radiographs. Inspections should address the administrative control of records, including receipt, indexing, access, filing, retrieval, and copying between media. Confirm how dutyholders check for record deterioration, the competence of staff, and ensure appropriate storage conditions (temperature, humidity, light, fire protection) to prevent damage.
   8. Computer-based and cloud-based record systems may be used for managing documentation, plant modifications, permits, drawings, and logs. Inspectors should verify the control of these systems, including testing, modifications, access rights and plans for data migration to new platforms as technology evolves. Security against malware, corruption, and hacking must be ensured for both local and cloud platforms.
      1. Inspectors should review back-up arrangements for records management, focusing on frequency, redundancy, recovery, and ensuring failover to UK-based infrastructure. Ideally, both primary and back-up data centres should be in the UK. Cyber Security and Information Assurance Team inspectors can provide further advice or inspection synergies
      2. The use of uncontrolled electronic systems, such as spreadsheets, is common for storing records like discharge data, waste handling, design calculations, and record indexes. When spreadsheets are used for site licence condition compliance, inspectors should ensure they are properly configured and controlled.

# Appendix A – Nuclear safeguards records

1. Many LC 6 requirements directly support compliance with NSR19 and ONMACS [4], particularly regarding record-keeping, staff competence, and adequate procedures. Inspectors should be aware of distinctions between “nuclear matter” and “qualifying nuclear material” (QNM), with QNM defined in legislation as natural, depleted, and enriched uranium, thorium, and plutonium.
2. For records the link with NSR19 is with regulations 10 and 11, which refer to operating and accounting records respectively. The part of ONMACS of particular relevance to LC 6 is Material Accountancy and Control Expectation (MACE) 8.3 “Records Management”.
3. Procedures reviewed under LC 6 may serve both safeguards and safety purposes, allowing for inspection synergies. For example accountancy-focused compliance inspections primarily involve reviewing operating records which underpin nuclear material accountancy. For further guidance on ONR Safeguards inspection please see the Safeguards TIG [6].
4. The key areas for inspectors to be cognisant of in this TIG are as follows:
   1. MACE 8.3 expects that operators have appropriate and effective arrangements to manage and control safeguards documentation and data. MACE 8.3 doesn’t specify the same detail as this TIG. Though there is overlap in what a Safeguards inspector would consider appropriate arrangements and effective management and control of safeguards documentation and data, such as timeliness of retrieval and traceability of data.
   2. The expectations for IT-based systems broadly align with the guidance in this TIG. For safeguards, the records management system should be capable of reconstructing the previous five years of material accounts in the event that the system is destroyed or rendered ineffective. ONR Safeguards would expect there to be adequate back-up arrangements to achieve this.
   3. ONMACS [4] does not specifically mention spreadsheet based records; however the operator’s records systems (including spreadsheets) will be considered adequate for safeguards if they are appropriate to the Basic Technical Characteristics (BTC) of the particular qualifying nuclear facility, (QNF) as defined in NSR19. Spreadsheets may be used as part of the safeguards records system, but ONR Safeguards would still expect them to meet with the expectations of MACE 8.3. In which this TIG is in alignment with safeguards expectations.

# References

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| [1] | ONR, “[NS-TAST-GD-033 - Management of Records](https://prodonrgov.sharepoint.com/sites/HOW2Hub/Shared%20Documents/NS-TAST-GD-033%20-%20Management%20of%20records.docx?web=1)”. |
| [2] | ONR, “[LC25 Operational Records Technical Inspection Guide (NS-INSP-GD-025)](https://prodonrgov.sharepoint.com/sites/HOW2Hub/Shared%20Documents/NS-INSP-GD-025%20-%20LC%2025%20-%20Operational%20records.docx?web=1)”. |
| [3] | ONR, “[Risk Informed and Targeted Engagements (ONR-RD-POL-002)](https://prodonrgov.sharepoint.com/sites/HOW2Hub/Shared%20Documents/ONR-RD-POL-002%20-%20Risk-Informed%20and%20Targeted%20Engagements%20(RITE)%20Policy.docx?web=1)”. |
| [4] | ONR, “[ONR Nuclear Material Accountancy Control & Safeguards (ONMACS)](https://prodonrgov.sharepoint.com/sites/HOW2Hub/Shared%20Documents/ONR-SAF-FW-001%20-%20ONR%20Nuclear%20Material%20Accountancy%20Control%20and%20Safeguards%20Assessment%20Principles%20(ONMACS).docx?web=1)”. |
| [5] | ONR, “[LC17 Management Systems Technical Inspection Guide (NS-INSP-GD-017)](https://prodonrgov.sharepoint.com/sites/HOW2Hub/Shared%20Documents/NS-INSP-GD-017%20-%20LC%2017%20-%20Management%20Systems.docx?web=1)”. |
| [6] | ONR, “[Safeguards Technical Inspection Guide (SG-INSP-GD-001)](https://prodonrgov.sharepoint.com/sites/HOW2Hub/Shared%20Documents/SG-INSP-GD-001%20-%20Safeguards.docx?web=1)”. |
| [7] | ONR, “[NS-INSP-GD-005 - LC5 Consignment of Nuclear Matter](https://prodonrgov.sharepoint.com/sites/HOW2Hub/Shared%20Documents/NS-INSP-GD-005%20-%20LC5%20-%20Consignment%20of%20nuclear%20matter.docx?web=1)”. |

1. It should be noted that for LC 5(3) [7] additionally requires that, for nuclear matter “..stolen, lost, jettisoned or abandoned…” the record shall be preserved for a period of 50 years from the date of the theft, loss, jettisoning or abandoning. [↑](#footnote-ref-2)
2. Also IAEA – GS-G-3.1, ‘Application of the Management System for Facilities and Activities’. There are other IAEA publications that provide more specific guidance on records management covering topic areas such as decommissioning and waste packaging records. Relevant British standards are: BS ISO 30301:2019 is an auditable standard for a records management system; ISO 15489:2016 is the foundation standard that codifies best practice for records management operations; BS 10008-1:2020 can be used to identify controls to ensure authenticity when converting physical records to electronic format; BS ISO/IEC 27001:2013 can be applied to the information security aspects of records management; BS EN 16893: 2018 covers requirements for long term storage of records for an archive facility. [↑](#footnote-ref-3)