

Covid-19 Social Distancing (w/e 03/04/20)

ASSURANCE STATEMENT	RAG	A	DATE	03	/	04	/	2020
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Construction sites operating during the Coronavirus (Covid-19) pandemic need to ensure they are protecting their workforce and minimising the risk of spread of infection. The intent of this emergent assessment is to provide an updated independent review on whether HPC site is doing as much as reasonably practicable to meet with Government guidelines on social distancing, whilst also ensuring that the health and safety requirements of construction activities are not compromised at this time. The site’s compliance is assessed against the Construction Leadership Council’s guidance for sites on social distancing (as of ‘v1’ of this guidance issued 24/03/20 via <http://www.constructionleadershipcouncil.co.uk/news/site-operating-procedures-during-covid-19/>). Bearing in mind that this is a continuously evolving situation, the overall findings of this assessment can be summarised by the following points:

- The workforce seem most concerned about the external bussing arrangements and need to increase social distancing on these, something that the organisation is actively working to address.
- Elsewhere on site, the general feeling (supported by observations made during this assessment) is that changing rooms, canteens, offices and other communal areas are possible to maintain adequate social distancing in.
- Of instances where inadequate social distancing was observed, an estimated 70% of occurrences were unintentional, during transit or social interaction and could have been avoided by greater spatial and social awareness. This requires constant reinforcement to a workforce that is generally very social and used to doing things in a certain way.
- Where social distancing is proving difficult at the point of work, a number of the situations observed during this assessment could again have been avoided through better planning and greater spatial and social awareness by operatives. In cases where social distancing is absolutely not possible due to the nature of the work, further measures will need to be taken.

Overall it should be recognised that the site has taken an unprecedented number of steps to provide the workforce with the best possible opportunity to adhere to social distancing guidelines. A significant factor in future capability to observe these guidelines will be the social compliance of the workforce, something that the organisation can only do so much to influence. Note this assessment will be updated over the coming weeks as industry guidelines and the site response continues to evolve.

B Best Practice	G Compliant	A Requires Improvement	R Non-Compliant
INTEGRATED ASSURANCE ASSESSMENT PROGRAMME REFERENCE NUMBER			Emergent (not programmed)

ESCALATION STATEMENT

This Independent Assessment report and its findings constitute Level 1 advice as per the Provide Formal Advice from Assurance procedure (NNB-OSL-PRO-000163). The findings of this Independent Assessment will be tracked through the appropriate Organisational Learning tool.

SCOPE STATEMENT

The scope of this assessment is detailed in document number 100289778.

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Nuclear Site Licence Conditions Assessed

LC 1		LC 2	X	LC 3		LC 4		LC 5		LC 6	
LC 7		LC 8		LC 9		LC 10		LC 11		LC 12	
LC 13		LC 14		LC 15		LC 16		LC 17		LC 18	
LC 19	X	LC 20		LC 21		LC 22		LC 23		LC 24	
LC 25		LC 26		LC 27		LC 28		LC 29		LC 30	
LC 31		LC 32		LC 33		LC 34		LC 35		LC 36	

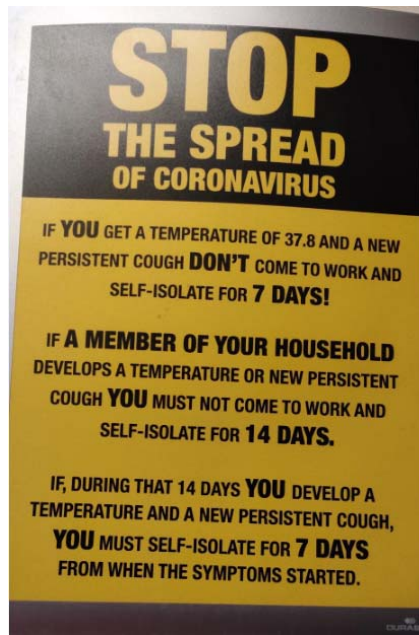
Other Permits and Legislation Compliance Assessed

None.

OLIM REF	FINDING:
See AFIs highlighted inline in report body. These will be raised on OLIM on 06/04/20.	

INTERVIEWED
A number of informal interviews were conducted over 2 days (31/03/20 – 01/04/20) with the HPC site workforce including operatives and supervisors from Bylor, Balfour-Beatty, Tissot and G4S.

ASSESSMENT COMMENTARY
<p>Introduction</p> <p>This is a dynamic and rapidly changing situation, both in terms of best practice guidance and in terms of the site response. Thus it must be recognised that this assessment presents a ‘snapshot’ of the site’s compliance when assessed (31/03/20 - 01/04/20), aligned to the CLC guidance that was current at this time. It should be noted that the CLC guidelines have been updated since this (on 02/04/20) and that the site response has also undergone (and continues to undergo) significant and continuous evolution. That said, the basic principles of social distancing (and majority of guidelines thereon) remain valid.</p> <p>Findings</p> <p>The findings of this assessment (aligned to the headings of CLC guidance v1) follow:</p> <p>1) Arrangements for self-isolation</p> <p>a) <i>Have adequate arrangements been put in place and effectively communicated to ensure that workers are aware of when not to come to site?</i></p> <p>The organisation has in place appropriate arrangements and guidance for symptom identification and self-isolation (whether due to personal or family circumstances). This is clearly articulated on the teamhinky website (accessible by all project personnel) and on posters that are displayed in all change rooms and communal areas on site.</p>



Picture 1: Isolation guidance poster

2) Arrangements for sickness reporting / case management/ site removal

- a) *Do Principal contractor / Tier 1 contractors have arrangements for reporting / case management / site removal (transportation home)? Is this response aligned?*

Both NNB and sample checked Tier 1 organisations were considered to have in place appropriate arrangements for sickness reporting, self-isolation management and the process for site removal. The processes between organisations appear to be aligned and where appropriate collaborative. Statistical information is being provided by all sites contracting organisations and reporting on daily at the site’s Pandemic Working Group meeting.

3) Travel to Site

- a) *Wherever possible workers should travel to site alone using their own transport; how has this been considered?*

Under HPC’s Development Consent Order, site parking for private transportation is limited to 300 spaces (not including works vehicles). The Project Transport Strategy is intended to limit effects on the local community and the environment from traffic. Current daily site attendance for business critical activities makes the use of private bus transport unavoidable because there is insufficient parking available on site. Available site parking is being actively monitored and reassigned on a daily basis to ensure maximum utilisation.

The HPC management team are in discussions with neighbouring licensed sites and the Local Authority about the use of other local infrastructure such as Pixies Field to increase HPC’s parking availability. These discussions have not yet concluded.

HPC is sited next to the Bristol Channel approximately 10 miles north of the town of Bridgwater. The main access road to the site is the C182. The C182 is a single carriageway road with a high volume of traffic, as it is the main access road to HPC’s neighbouring sites and a number of local communities. The use of the C182 for cyclists has for many years been discouraged, on the basis that it poses a significant personnel safety risk stemming from hazards that include the narrowness of the road, a large traffic volume and the high speed limits. Cycle pathways are only available for part of the journey from Bridgwater to Combwich. Cycling along the road therefore poses a high level of personal safety risk that outweighs the risk from Covid-19 infection from the use of site buses.

- b) *Where use of communal transport is unavoidable, are social distancing measures being adhered to? How has this been communicated and implemented?*

The majority of site travel (both external and internal) is still done using buses. A number of measures have been put in place to enable social distancing from a passenger transport perspective. These are in addition to those put in place by SPS (the bus operator) to protect their personnel. Measures implemented include:

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- At the time of writing, buses were running at half capacity (one individual per seat pair), which is being achieved by active marshalling and marking of unavailable seats with tape. The workforce were observed to be adherent to these measures. Whilst some social distancing of workers is achieved by this, the recommended 2m distance cannot be maintained due to lack of spacing between the seat pairs, something that several members of the workforce shared their concerns about when interviewed in the course of this assessment. This is recognised by the business and a further 61 vehicles are due to arrive to site over the coming week to enable greater spacing by running vehicles at further reduced capacity.
- Painted distance indications on the footpaths and queuing areas of the J23 (main) park and ride facility to indicate 2 metre separation.
- J23 main car parking areas have been allocated to bus services heading to the West and East of site separately to reduce risk of cross-contamination between areas/teams.
- Increased bussing capacity on Secure Bus services from J23 Park and Ride to avoid the workforce having to transfer from external buses at North Plaza before moving to internal service vehicles, enabling the direct delivery of personnel to their designated working areas.
- Shift patterns of Tier One contractors have been adjusted to decrease the numbers of personnel using services at any one time, segregate teams and help enable the measures above.
- SPS Controller/Union personnel located at key nodes on the stopping service to remind passengers to adhere to the social distancing measures on the public highway (noting that public highway stops will be phased out over the coming week).
- Additional vehicle resource secured from SPS JV partners.
- Additional driver resource secured from SPS JV partners.
- Removal of standing space vehicles from internal route is imminent to reduce 'infection contact points'.
- Changes to timetables and strategy are publicised via the teamhinkeyc website and cascaded through team briefings.
- Visual aids detailing expected behaviours are displayed in vehicles and at major stops.
- Dedicated vehicles are in place to remove individual symptomatic members of the workforce from site if necessary (whilst maintaining social distancing).
- Drivers at bulk passengers pick up locations such as J23, J24, Sedgemoor and North Plaza have been directed to leave the bus and stand 2m away prior to passengers during loading and disembarkation.
- Drivers have been issued with bacterial wipes for the driver's cabs. Hand sanitiser has also been installed for driver use on-board and drivers are issued with gloves.



Picture 2: Security camera screengrab showing workforce practising social distancing at an internal bus stop.

c) *Has an enhanced cleaning regime been implemented on communal transport?*

An enhanced bus cleaning regime is in operation and additional resource has been employed to undertake the requirement. A 3-month supply of cleaning material is in stock and additional PPE to support the cleaning team is available. Further control measures are imminent with the bringing in anti-bacterial fogging machines to assist with sanitising the buses.

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d) *Is there provision of hand cleaning facilities at entrances and exits of transportation facilities?*

At the time of assessment, hand sanitiser was reliably available at the main North Plaza bus station after disembarkation. Hand sanitiser is not currently available on the buses, nor at community bus stops (which will be phased out shortly). Provision of hand sanitiser at bus entry points at Park & Ride facilities and accommodation campuses was not checked during this assessment, but it is known that toilet facilities with hand wash are available at these locations. Hand sanitiser was not found to be available in the immediate vicinity of internal bus stops.

AF101: Hand sanitiser should be provided at site internal bus stops, either as a temporary dispenser (on table) or as a dispenser mounted to bus stops.

4) **Site Access Points**

a) *Are arrangements for visitor control in place and being adhered to?*

Satisfactory evidence was reviewed that visitor and delivery management entry onto site has been restricted to all but business critical personnel, with the introduction of an additional authorisation process. Visitors to site can only be authorised by select members of the Site Executive Team. Sample checks undertaken as part of this assessment conclude that the visitor management process is being effectively and stringently applied.

Visitors that meet pre-determined criteria as critical business requirement are also subject to a number of checks on entry to the site. The checks abide by instructions detailed in EDF's self-isolation document. The Site Reception and Delivery Management System Coordinators are empowered to grant or deny both pedestrian and vehicular access to the work site. Additional arrangements are in place should authorised visitors fail entry checks.

b) *Have staggered start and finish times been introduced to reduce congestion and contact at all times?*

Yes. NNB personnel generally operate a semi-flexible working pattern so their start/finish times are naturally spread. In terms of Tier 1 contract partners, Bylor and Balfour Beatty make up the majority of the remaining workforce. Bylor have implemented a staggered start across 2 shifts (0700-1800 and 0830-1930) and further segregated their workforce between the East and West complexes. Balfour Beatty have implemented a 24 hour, three shift pattern for their SCL (Sprayed Concrete Lining) works and a two shift pattern for their TBM (Tunnel Boring Machine) operators.

c) *How are access control points being monitored to enable social distancing; are there sufficient numbers of access points?*

Site access points are being monitored in real time by the full-time site guard force to ensure social distancing. Expected behaviours can be immediately reinforced if there is deviation (and this has been observed being done). The design of the site's Northern Plaza access was identified as a social distancing risk early in the management of social distancing, as it has the potential to create a bottleneck. Mitigation measures were immediately put in place with changes being made to the barrier approaches to improve flow. Other controls such as reduced numbers of personnel on buses and split shift controls have also limited personnel numbers through access points. CCTV evidence reviewed demonstrates that the changes to the entrance layout have been effective in ensuring social distancing.

As an additional control measure, workers (at main entry points) will pass through the field of view of the thermal cameras to allow their temperature to be assessed. Those with elevated temperature will be asked to undergo a further check by Hinkley Health before entering. If the reading is confirmed then Hinkley Health will instruct them to self-isolate, their employer notified and access to site will be denied.

d) *Have entry systems that require skin contact been removed or disabled?*

All pedestrian access points to the site have a PIN and badge requirement. HPC as a Nuclear Licensed Site is subject to additional nuclear safety and security safeguards requirements. PIN verification is defined as a control measure in the Site's Security Plan to limit the risk of unauthorised entry onto site and is therefore essential. To reduce the risk of the transference of Covid-19, an enhanced cleaning regime has been put in place that includes the cleaning of the pin pad and turnstile area on a defined frequency. Hand sanitiser is available before and after entry but its use is has not been mandated and therefore there remains a risk of transference. The site inspection team considers that the cleaning regime for the pin pad entry needs further enhancement and the use of hand sanitiser prior to pin pad use mandated (see **AF103** below).

Both Bylor and Balfour Beatty use systems for platform access / clocking in/out that require touch contact to operate (Bylor's uses facial recognition but requires a PIN to be inputted on a touchscreen, Balfour's requires use of a fingerprint scanner). These were still in use at the time of the assessment with some controls implemented (2m spacing in waiting areas, provision of hand

sanitiser). The use of such systems is not a defined requirement of the HPC Nuclear Site Licence or Security Plan, therefore their use should be discontinued to minimise the risk of transference.

AFI02: Where reasonably practicable, T1 contractors must disable non-essential electronic clocking systems that require personnel contact with a keypad, touchscreen or fingerprint reader.



Picture 3: Bylor clocking station

Picture 4: Bylor waiting area

Picture 5: Balfour-Beatty access

e) *Washing / cleaning stations at site entrance? Is a requirement for all workers to wash or clean their hands before entering or leaving the site in place?*

Hand sanitiser is readily available in prominent locations before and after entry through North Plaza. It was observed to only be available after entry at South Plaza. There is no requirement implemented for personnel to use hand sanitiser at entry points, but personnel were generally observed to be using it without a formal requirement.

AFI03: Hand sanitiser should be provided before the South Plaza turnstiles as well as after. Implementing a requirement for all personnel to use sanitiser before entering and leaving should be considered.

f) *Is social distancing being adhered to by site personnel on people waiting to enter / exit site or contractor compounds?*

General access to the site has already been discussed in Section 4)a). Site contracting personnel do not generally have to wait to enter or exit their compounds. Areas that pose a risk of potential congregation areas include; the site stores and designated smoking areas. Surveillance of the compounds concluded that high volume areas were marked out, to ensure social distancing. In general, social distancing is being adhered to in these areas, accepting that it is difficult for some individuals to break social 'norms'. Two friends/colleagues walking in close proximity to the entry point at North Plaza were observed to be challenged by a security officer and subsequently separate to the required distance.

g) *Is a regular cleaning regime in place for common contact surfaces in reception, office, access control and delivery areas e.g. scanners, turnstiles, screens, telephone handsets, desks?*

Yes, a comprehensive cleaning regime is in place that includes all highly-trafficked areas.

h) *Is control of attendance at site inductions in place? And being adhered to?*

Occupancy of the HPC Induction Centre (SEIC) has decreased to a small number of office workers and the continuation of only 'Business Critical' induction activities on the HPC Project. The measures implemented are currently observed to be adequate in minimising the risks to SEIC workers and delegates being on-boarded. Only those individuals deemed to be 'Business Critical' by the Site Construction Director are being authorised to attend the HPC Project Introduction. 'Business Critical' has been clearly

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defined by the project as any role or activity that protects the 'Critical Path' of the build and the induction authorisation process applies to both permanent and temporary workers. Additionally:

- Classroom capacity has been reduced by 69% (10 delegates per session from 32) to ensure that delegates meet with social distancing requirements.
- The HPC Project Introduction Refresher has been placed on MyCampus as eLearning for all HPC Tier 1 Partners to reduce numbers of people coming to the Induction Centre.
- The shuttle bus from J23 to the Induction Centre has been temporarily cancelled to eliminate the need for personnel to have to travel communally. All inductees are able to park at the Induction Centre site.
- Additional checks have been implemented to ensure that any person who has been scheduled to attend the HPC Project Introduction has all pre-requisites by 1500 the day before attending. If they do not have all the pre-requisites in place they are cancelled off the course. This control measure further limits the number of times individuals have to attend the HPC Induction Centre.
- The 1st and 2nd floors of the HPC Induction Centre have undergone a deep clean and have now been closed.



Pictures 6, 7, 8: Social distancing measures enacted at HPC Induction Centre

i) Are social distances at Tool box talks / team briefs being implemented and held outdoors wherever possible?

Wherever possible, team talks and briefings are now being held outdoors, with the workforce encouraged to maintain 2m distancing during these. These activities were not observed during the course of this assessment so no comment can be made on the efficacy of these measures.

j) Are drivers remaining and escorts remaining in their vehicles if the load will allow it? Are washing / cleaning facilities available before and after unloading goods and materials?

This activity was not observed during the course of this assessment, so no comment can be made on the efficacy of control measures.

5) Hand Washing, Toilet Facilities and Changing Rooms / Showers

a) Have additional hand washing facilities in addition to the usual welfare facilities been implemented?

With the exception of numerous new hand sanitiser stations, no additional hand washing facilities have been installed on site. It should be noted however that HPC site is equipped with numerous toilet / hand washing facilities and (especially with the recent reduction in workforce) these are viewed to be plentiful for the site's needs.

b) Is soap and fresh water readily available and kept topped up at all times? PC and Tier 1 facilities? Provision of hand sanitiser where hand washing facilities are unavailable?

All facilities checked during the course of the assessment had plentiful stocks of soap and/or hand sanitiser and are replenished during routine cleaning. Fresh water is available to the vast majority of toilet / hand wash facilities on site with the exception of some portable toilets in the field. These were not checked during the course of this assessment.

c) Have cleaning regimes been enhanced? (handles, locks, toilet flushes) Are welfare and toilet facilities regularly cleaned, soap and sanitiser levels checked?

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HPC site has always had a rigorous cleaning regime in place for toilets and hand washing facilities, this continues to be effective and has been enhanced in high contact areas (door handles etc). Toilets are maintained minimum twice daily (more frequent for high traffic areas / when needed) and are documented on posted checksheets.

d) Are suitable and sufficient rubbish bins for hand towels with regular removal and disposal provided?

The majority of toilet facilities on site utilise hand dryers over paper towels. Where paper towels are used, rubbish bins are regularly emptied.

e) Have adequate extra supplies of soap, hand sanitiser and paper towels been ordered? Are they securely stored?

The site has secured adequate supplies the necessary items for several months. These are stored securely.

f) Has enhanced cleaning of all facilities throughout the day and at the end of each day been implemented?

See response to c).

g) Based on the size of each changing facility, has the site determined how many people can use it at any one time to maintain social distancing?

Numerous large-scale changing facilities are available on HPC site. With the reduction in overall workforce and staggering of shifts, it is possible for personnel to maintain social distancing in these facilities. Personnel interviewed expressed no concerns regarding social distancing in changing facilities. From observations of facilities in use, it is clear that entrance vestibules to changing rooms are an area of potential close contact if individuals are arriving and leaving at the same time (particularly in HAN Brown where there is a long corridor entryway). Implementation of a one-way system for entry/exit would prevent this and would be relatively easy to implement given that changing rooms are already laid out with multiple entrances/exits.

AFI04: Consider implementing a one-way system for entry/exit in heavily-trafficked changing rooms.

6) Canteens and Eating Arrangements

a) Have dedicated eating areas been identified on site to reduce food waste and contamination?

Yes, there are dedicated canteens, kitchen areas and converted meeting rooms that personnel may use for eating.

b) Have break times been staggered to reduce congestion and contact at all times?

Yes, as described in 4)b), break times have been adjusted in line with shift patterns, which reduces congestion in eating areas. Opening times of canteen facilities have been amended accordingly.

c) Are hand cleaning facilities or hand sanitiser available at the entrance of any room where people eat and are these used by workers when entering and leaving the area?

Yes, hand sanitiser stations are present and well-stocked at all entrances/exits to canteen facilities.

d) Have the workforce been asked to bring pre-prepared meals and refillable drinking bottles from home?

No, site canteen facilities remain operational, having implemented a number of protective measures.

e) Do workers sit 2 metres apart from each other whilst eating and avoid all contact?

Seating on canteen tables has been blocked such that only 2 workers may sit per table, situated diagonally opposite. Additionally, spacing between tables has been increased where possible. It is noted that the current seating arrangements provide marginally less than 2m spacing if fully occupied. The workforce were generally observed to be compliant with social distancing measures in canteen facilities and did not express concerns about these when interviewed.

f) Where catering is provided on site, is it pre-prepared and wrapped food only?

No. Catering provided on site continues to offer a range of hot meals in addition to pre-packaged / wrapped food. It would be logistically difficult for the catering service to support the 24/7 needs of the large workforce using only pre-packaged / wrapped food. Hot meals are served solely by canteen staff. Self-service counters (e.g. salad bar) have been removed from service. It is

noted that the display counters for hot food are open-fronted and therefore vulnerable to contamination from the 'public' side of the counter.

AFI05: Consider installing additional screening on canteen hot food counters to ensure customers cannot contaminate food on display from the 'public' side of the counter.

g) Are payments taken by contactless card wherever possible?

Yes, canteen and shop users are encouraged to use contactless payments wherever possible. Inevitably, some still prefer to pay with cash or need to enter a PIN. Hand sanitiser was observed to be available at till points for this eventuality and till operatives were observed to be wearing gloves.

h) Is drinking water provided with enhanced cleaning measures of the tap and cup mechanisms?

Drinking water is available in canteens and in other communal areas from dedicated water dispensers. The way paper cups for these are distributed requires the user to take a cup and (as they are stacked quite tightly) wrestle it off the stack – inevitably this normally results in placing a hand elsewhere on the cups, on the rims where people would drink from. There is also no sanitiser in the immediate vicinity of the water stations that were observed.

AFI06: Change the way disposable cups are distributed for water dispensers to ensure individuals only make contact with their own cup. Consider provision of hand sanitiser at water stations.



Pictures 9, 10: Water dispensers & cups

i) Are tables cleaned between each use?

A regular cleaning regime is in place for canteen tables. This is done during quieter periods (between main break times) to assist the cleaning staff with social distancing. This does not necessarily mean that every table is specifically cleaned after each user.

j) Is all rubbish put straight in the bin and not left for someone else to clear up?

Yes, a self-clear regime has always been in place at HPC and the workforce are generally adherent to it.

k) Are all areas used for eating thoroughly cleaned at the end of each break and shift?

Yes, a comprehensive cleaning regime is in-place and was observed in action.

7) Work on site – Avoidance of close working

a) Are there situations where it is not possible or safe for workers to distance themselves from each other by 2 metres?

The nature of some site construction activities is such that it is very difficult / impossible to maintain 2m social distancing whilst simultaneously adhering to an agreed safe system of work. It should be recognised that the vast majority (c90 %) of work observed during this assessment was performed in accordance with social distancing guidelines. Some examples of site activities were observed where 2m distancing was not consistent:

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- Four operatives were observed in close proximity within a welding tent. The black hat responsible for the area explained that this should not have occurred, but that two operatives would need to be present during welding activities (albeit with breathing apparatus).
- Numerous separate gangs (in several different locations) of steelfixers were observed in closer than 2m proximity, this was generally where they were working in pairs with one holding a piece of rebar in position with the other tying it in. It is hard to say how this kind of work could be performed differently (perhaps a PPE-based solution could be applied instead of distancing).
- Several lifting operations were observed in which slingers came into closer than 2m proximity. This may have been avoidable with better planning and greater spatial/social awareness but it is understandably difficult for workers who are used to doing things in a certain manner to change this fundamentally and suddenly.
- Surveillance operatives were noted working in close proximity whilst inspecting some rebar, one referring to a drawing with the other holding a torch and pointing to the area of concern. Again this seemed a natural way to work and requires greater awareness in the workforce to avoid.
- A black hat in another area where welding was taking place explained that two personnel in close contact were required to perform the weld effectively, again these would be wearing respiratory protection.
- The ergonomic design of the TBM limits the ability of workers to maintain a two metre social distancing at all times, particularly around the TBM control room.

b) *Has non-essential physical work that requires close contact or skin to skin contact between workers been stopped?*

No works requiring skin to skin contact were observed during this assessment. As described in a), a number of work activities in which social distancing was not maintained were observed. It is assumed that all work currently being performed on site is deemed 'essential' as non-essential personnel and platforms have been demobilised.

c) *Is work being planned to minimise contact between workers?*

Some guidance has been issued by NNB and contract partners but evidence was limited that this has reached the work face. Blue and black hat supervisors questioned had limited knowledge of any additional measures to be taken other than 'trying' to maintain 2m distancing at all times. Additional (adapted) point of work risk assessment could be a useful tool to embed this.

AFI07: Greater effort needs to be made to ensure that guidance on social distancing at the work face is reaching the working level and proving effective.

Evidence of distancing adaptations in working areas was seen including 'passing bays' for getting past each other on tight walkways and spray-painted footprints marking the appropriate distance in congested areas.



Pictures 11, 12: Passing layby constructed on walkway

d) *Is re-usable PPE thoroughly cleaned after use and not shared between workers?*

Yes, operatives questioned regarding PPE use confirmed this to be the case.

e) *Is single use PPE disposed of so that it cannot be reused?*

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Yes, operatives questioned regarding PPE use confirmed this to be the case.

f) *Are stairs are being used in preference to lifts or hoists?*

Yes, although this is not always practicable depending on distances, loads carried and individual fitness. Stairs to the U1 heat sink area that were previously for emergency use only have been returned to general use.

g) *Where lifts or hoists must be used, has capacity been lowered to reduce congestion and contact at all times and are touchpoints, doors, buttons etc. regularly cleaned?*

Yes, markings were observed in U1 heat sink hoist showing acceptable places to stand whilst maintaining distancing.

h) *Has ventilation been increased in enclosed spaces?*

This activity was not observed during the course of this assessment so no comment can be made.

i) *Are vehicle cabs regularly cleaned between use by different operators?*

This was not assessed at this time.

8) Meetings

a) *Do only absolutely necessary meeting participants attend in person?*

Site meetings continue to be held for business and legislative safety requirements and for the management, coordination and cooperation of site works. Links with other company response structures and centres are being maintained with meetings and information transfer delivered via the use of online interactive services such as Skype and video conferencing.

b) *Do attendees remain two metres apart from each other?*

Meetings that have a more co-ordinative element and therefore still require some face to face contact have been reduced to only essential personnel in attendance. Meeting numbers are observed to have been consistently limited to less than half the available capacity of the room. Good behaviours in keeping the required 2 metre social distancing were apparent and consistent in meetings observed.

c) *Are rooms well ventilated / windows opened to allow fresh air circulation?*

All HPC meeting rooms in the main welfare units (HAN, HAW, HAS and HAE) have filtered air conditioning units. Air conditioning inspection regimes have been previously checked in a site inspection and found to align to Workplace Regulations inspection and maintenance requirements. However, not all meeting rooms have fresh air ventilation available.

AF108: Site should introduce additional controls to limit the use of meeting rooms that do not have availability of natural ventilation.

9) Cleaning

a) *Are enhanced cleaning procedures in place across the site, particularly in communal areas and at touch points including: Taps and washing facilities / Toilet flush and seats / Door handles and push plates / Hand rails on staircases and corridors / Lift and hoist controls / Machinery and equipment controls / Food preparation and eating surfaces / Telephone equipment / Key boards, photocopiers and other office equipment.*

Yes, as previously described in 5) and 6), HPC has well-established cleaning regimes that cover the majority of touch points regularly. Enhanced cleaning regimes have been implemented to ensure that contact points such as handrails, lift controls, door handles and push panels get extra attention. A cleaning supervisor who was interviewed confirmed that these arrangements are in place and working well. No issues with cleaning were observed during the assessment.

b) *Have rubbish collection and storage points been increased and emptied regularly throughout and at the end of each day?*

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There has not been a need to increase rubbish collection/storage as HPC already has plentiful provision of these (especially with a reduced workforce). These are emptied regularly and no issues were observed during the assessment.

10) Communications

a) *Is there clear and frequent messaging to workforce on precautions to be taken?*

Business-wide communication has been established that include statements, messages and briefings regarding the developing situation – these are updated daily. Messages contain key objectives and the approaches that HPC is taking to support personnel, site safety and the delivery of the project.

Daily site communications are providing specific site advice and an appropriate level of assurance to the majority of HPC personnel, recognising the risk of infection, its spread and what personnel should be doing or not doing to support mitigation and to promote further containment and prevention.

Early problems existed in ensuring that key communications from HPC management were reaching the front line workforce – this discord was apparent at some of the site coordination meetings. Feedback was directly given by the site inspection team and the site responded by improving the consistency of messaging and increasing the number of interactions at lower levels in the organisation. There is good utilisation of visual and audible aids on site, with messaging on TV screens, notice boards and daily use of the Emergency Broadcast System.

From workplace observations, frontline supervision need to be more actively engaged in delivering and reinforcing the key messages on expectations relating to social distancing and personnel behaviours for their specific work activities and working areas.



FLASH ALERT

**COVID-19
Coronavirus Pandemic (13)**

Our new bus operation arrangements shall start on Monday 06 April.

Pickup and drop off in Bridgwater will ONLY be via J23, J24, Sedgemoor Campus, Quantock Lakes, and Cannington Park & Ride.

From Tuesday 14 April there will be further changes to the other bus routes. Please keep checking teaminhingleyc.com or the [teaminhingleyc](#) app.

By Tuesday 14 April we aim to have over 50 additional buses, which shall again improve the social distancing on our bus fleet and help keep our workforce safe.

Body temperature tests - this morning we tested 447 people, all were confirmed as fit-for-work.

Since we commenced the random body temperature checks we have completed 2,750 body temperature tests, with everyone tested being fit-for-work.

Our new automatic thermal imaging cameras which check body temperature are now operational at J23 Park & Ride, and will be operational (Monday 06 April) at the North Plaza, and the South Plaza. We shall continue performing random body temperature checks at Sedgemoor Campus.

In accordance with the Public Health England advice we now have a total of 177 Site based people in isolation.

Our two new walkways – East Office to North Office and West Office to North Office shall be open on Monday 06 April, when signage will be in place. PPE is required on these walkways.

Due to our social distancing challenges, a further reduction of people on Site shall occur.

Further information shall be cascaded via the respective Local Joint Council meetings.

Rob Jordan,
HPC Site Construction Director,
April 02, 2020

RED LEVEL

ZERO HARM

Construction excellence today provides nuclear safety tomorrow

Picture 13: Information banner and social distancing floor markings

Picture 14: Consolidated daily briefing format

b) Have the needs of Non-English speaking workforce been considered and addressed?

The effective delivery of messaging to non-English speaking workforce is largely dependent on frontline supervision and/or translators. Comms are (at present) only being produced in English. Observations at the workplace indicated that this has been difficult with some of the non-English speaking workforce, who have proven difficult to influence (whether through a lack of understanding, their own cultural 'norms' or a general disengagement from the authoritative nature of site comms).

Covid-19 Social Distancing (w/e 03/04/20)

11) Organisational Learning

Additionally to the site observational assessment, entries relevant to the Covid-19 response on the site organisational learning system (SELMa) were reviewed to ensure that no concerns had been raised by the workforce that are not reflected in the current assessment. This investigation found:

- A total of 86 relevant observations have been raised in the past 2 months, demonstrating a high level of engagement in these issues from the workforce.
- The observations are generally a mixture of issues with a simple fix (e.g. hand sanitisers need refilling), concerns with wider and more complex impact (e.g. social distancing on buses) and recognition of good practices (e.g. implementation of social distancing measures).
- Many observations related to hand sanitiser, either lack thereof or recognising correct usage. As more sanitiser stations have been installed around the site in recent weeks, the number of observations of this nature have dropped off significantly.
- More recently, there has been an increase in observations regarding social distancing on buses, something the organisation is actively moving to address.
- No concerns were found in organisational learning reports that have not been adequately identified in this report.

KEY	Areas for Improvement and Non-Conformances (AFIs & NCs) are categorised as Findings , requiring a formal response or action to resolve.
	Opportunities for Improvement, Good Practices and Other Observations (OFIs, GPs & Obs) are categorised as Observations , requiring acknowledgement but not requiring a formal response or action.
The categorisation of non-conformances from independent assessment is determined using the Manage Non-Conformances procedure (NNB-OSL-PRO-000028). Categorisation of other findings follows the Consistent Definition and Application of Assurance Findings document (NNB-OSL-WIN-000136)	

AUTHORED	[Redacted]	Date: 03/04/20 (via Teamcenter)
APPROVED	[Redacted]	Date: 06/04/20 (via Teamcenter)
ISSUED TO	[Redacted]	Date: 03/04/20 (via email)

Additional Distribution List:

[Redacted Distribution List]

[REDACTED]

From: [REDACTED]
Sent: 07 April 2020 11:46
To: [REDACTED]
Subject: FW: INA Social Distancing Review
Attachments: IA Report Covid-19 Social Distancing v1.0.docx

Hi,

Please find attached NNB's social distancing report.

Regards,

[REDACTED]



[REDACTED]
[REDACTED]
[REDACTED]

M: [REDACTED] | **E:** [REDACTED]
Home Mobile: [REDACTED]
4S.2, Redgrave Court, Merton Road, Bootle, L20 7HS

From: [REDACTED]
Sent: 07 April 2020 09:10
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: INA Social Distancing Review

[REDACTED]

Please find attached Assurances approved Social Distancing Report.

The actions should have been placed into OLIM last night, by the OL team. The Site is putting together an action plan in response. However, I'm seeing immediate actions being taken to address the reports findings.

I have a busy day, i'm just trying to field out to my team attend the EPRLG meeting which frees me up at 14.00. I will confirm with an invite shortly.

Kind regards

[REDACTED]

From: [REDACTED]
Sent: 07 April 2020 08:08
To: [REDACTED]
Subject: INA Social Distancing Review

Hi [REDACTED]

Once you have formalised your report please can send it to ONR and arrange a 1 hour telecom with myself to go through its findings and any required improvements.

Thanks,

[REDACTED]



[REDACTED]
[REDACTED]
[REDACTED]

M: [REDACTED] | **E:** [REDACTED]
Home Mobile: [REDACTED]
4S.2, Redgrave Court, Merton Road, Bootle, L20 7HS

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CONTACT RECORD			
Unique Document ID and Revision No:	ONR-NR-CR-20-010 Revision 0	CM9 Ref:	2020/111188
Title / Topic: <i>(include level 1, 2, 3 or 4 if applicable)</i>	HPC Covid 19 Social Distancing Effectiveness INA Assessment		
Visit Reference Number <i>(International visits only)</i>	N/A		
Date of Contact:	07 April 2020		
Date Issued:	14 April 2020		
Completed / Compiled By: <i>(name, programme)</i>	[REDACTED]		
Type of Contact: <i>(*delete not applicable)</i>	Teleconference		
Contact With: <i>(names, position, organisation)</i>	[REDACTED]		
ONR Staff: <i>(names, role, programme)</i>	[REDACTED]		
Summary / Key Points:			
<u>HPC Covid 19 Social Distancing Effectiveness INA Assessment</u>			
<p>This teleconference was arranged for NNB’s internal regulator (Independent Nuclear Assurance - INA) to provide an overview of its assessment of the HPC site’s compliance with Covid 19 social distancing measures. Also in attendance were key member of the site’s leadership team. Site INA explained that it had carried out its assessment utilising the Construction Leadership Council’s Site Operating Procedures version 1 (2020/0107465) as a source of relevant good practice against which, it had assessed the site’s compliance.</p> <p>NNB’s full report can be found at 2020/0107124.</p> <p>The assessment examined the adequacy and effectiveness of NNB’s Covid 19 control measures in the following areas:</p> <ul style="list-style-type: none"> ■ Arrangements for self-isolation ■ Arrangements for sickness reporting / case management/ site removal ■ Travel to Site ■ Site Access Points ■ Hand Washing, Toilet Facilities and Changing Rooms / Showers ■ Canteens and Eating Arrangements ■ Work on site – Avoidance of close working ■ Meetings ■ Cleaning 			

- Communications
- Organisational Learning

INA explained that whilst it was evident that significant improvements have been implemented to ensure appropriate Covid 19 control measures some further work had been identified resulting in it raising 8 areas for improvement (AFI). I have raised the level 4 regulatory issue RI 8015 to ensure appropriately regulatory oversight of NNB's closure of its identified AFIs.

INA explained that three main areas of focus had been identified, these being:

- Social distancing on buses
- Culture and behaviour regarding social distancing
- Point of work social distancing

Social distancing on buses

INA explained the reduction in site personnel had aided social distancing on the buses and currently the buses are operating at 50% capacity with half of the seats marked as out of use. However INA stated that whilst this represented an improvement this had not yet achieved the full 2m social distancing.

I noted that whilst NNB had not raised an AFI on social distancing on buses (internal and external) it had identified that further work is required to improve the social distancing on the buses. NNB explained that it was in the process of securing 60+ additional buses to improve social distancing and in addition it is examining the option of removing buses completely from site. Whilst this is not listed in NNB's list of AFIs it is clear that NNB is actively addressing this issue, however for completeness this activity will be captured in ONR's regulatory issue to ensure appropriate regulatory oversight.

Culture and behaviour regarding social distancing

INA observed that NNB has expended significant effort in making sure that staff and contractors understand the required Covid 19 control measures. This has included leadership from the site construction director and involvement of union representatives/safety representatives. I do however note that one of NNB's AFIs focuses on further improvements to ensure that staff at the working level understand the role they play in implementing Covid 19 control measures.

In addition INA highlighted that continued effort would be required to ensure that the significant behavioural changes required as a result of Covid 19 continue to be rigorously applied and implemented. I explained that given the significance of the changes expected from staff the requirement for ongoing coaching and reinforcement activities is to be expected and NNB should continue this as part of its new "normal business" ways of working.

Point of work social distancing

NNB explained that it and its contractors are carrying out risk assessments for construction activities where required social distancing cannot be maintained to see whether a particular task is necessary, can be modified or where this is not the case what further control measures can be implemented. In support of this NNB explained that it had introduced a "mask policy" (2020/0108599) which requires masks to be worn in a number of circumstances including where social distancing cannot be maintained due to the nature of a particular task. Where masks are required to control Covid 19, NNB explained that a graded approach would be implemented optimising mask selection dependent on a risk assessment.

I note that NNB stated that in addition to Covid 19 related masks, it retains sufficient masks for normal business activities where they are required as part of normal conventional health and

safety requirements.

Social Distancing in the Site Canteen

I note that whilst NNB has implemented social distancing measures in its canteens it has identified that current diagonal seating arrangements is not yet achieving the required 2m social distancing guidelines. NNB explained that further improvements to this matter are being implemented to achieve social distancing requirements. This has not been captured as an AFI in INA's report and as such I have captured this required improvement in ONR's regulatory issue to ensure appropriate regulatory oversight.

Other Notable Items and Risk Reduction Measures

NNB explained that the Delivery Director has written to site to set out expectations in relation to the implementation of Covid 19 control measures and NNB's role as principal contractor. These expectations have been cascaded down into the tier 1s and below.

NNB explained it had taken significant steps to reduce contact risk on entry to site, however I note that two of the major contractors still had clocking in/out systems requiring physical contact in service at the time of INA's assessment. However I am reassured by the fact that INA has raised this as an AFI requiring site contractors to remove these requirements where practicable.

NNB explained that at all times it was ensuring that the implementation of Covid 19 control measures was considered holistically to ensure that other aspects such as conventional health and safety are not negatively impacted.

I asked the Head of Site Nuclear Compliance and the Head of Health Safety and Environment to give their assessment of site compliance with Covid 19 control measures. Both explained that they were of the view that significant improvements were evident whilst recognising the existence of some areas for further improvement.

Follow-up Activities

INA explained that it would be completing a follow-up assessment in the week commencing 13 April 2020 to assess progress with addressing its AFIs. In addition ONR has reinforced to INA that it wishes it to examine ongoing compliance in the following areas: social distancing on buses, in the canteen and during high personnel traffic periods – start of shift/end of shift times. ONR has requested that in addition to its written report INA provide photographic evidence of the effectiveness of the measures in the aforementioned areas.

Conclusions

Overall it is evident that NNB INA has carried out what appears to be a thorough and comprehensive review. Furthermore It is evident that NNB has expended significant effort in improving controls relating to the management of Covid 19 and is generally in accordance with construction leadership council guidelines (noting the identified areas for improvement). Once INA has completed its follow on assessment (which should also address the additional items captured in ONR's regulatory issue) I will review the evidence to determine whether it justifies closure of the associated regulatory issue.

1 ISSUES

1.1 Issues Raised

No	Issue Title	Category	Issue Level	Licensee/Duty Holder Role	Owner (Inspector)	Completion /Review Date
8015	HPC Covid 19 Social Distancing Effectiveness	Compliance	4	NNB	[REDACTED]	22 April 2020

1.2 Issues Closed

No	Issue Title	Category	Issue Level	Licensee/Duty Holder Role	Owner (Inspector)	Completion /Review Date

Circulation List

Organisation	Name / Responsibility	Date
Office for Nuclear Regulation	[REDACTED]	14 April 2020
NNB GenCo	[REDACTED]	14 April 2020