

Office for Nuclear Regulation

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Redgrave Court Merton Road Bootle Merseyside L20 7HS

Tel: 0151 951 4000 www.hse.gov.uk/nuclear

PROJECT ASSESSMENT REPORT

Report Identifier:	ONR-CNRP-SZB-PAR-12-047
Revision:	Revision 0E
Project:	Dry Fuel Store
Site:	Sizewell B
Title:	Schedule of construction and commissioning hold points including specification of consent to commence active commissioning
Licence Instrument No.: (if applicable)	LI 531
Nuclear Site Licence No.:	Site Licence 63
Licence Condition:	LC19(1), LC 21(1) and LC 21(4)
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DOCUMENT APPROVAL

Author(s)			
Name	Position	Signature	Date
████████	████████████████	██████	██████
████████	████████	██████	██████

Approval			
Name	Position	Signature	Date
████████	████████████████	██████	██████

Approved for issue
(hard-copy of document signed-off, TRIM version updated with authors / approver names and dates and record finalised)

Name	Position	Signature	Date
████████	████████████████	██████	██████

Approved for publication			
Name	Position	Signature	Date
████████	████████████████		

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REVISION HISTORY

Revision	Date	Description Of Change
0A	8 February 2012	1 st draft for initial discussion with the licensee.
0B	10 February 2012	Incorporating initial comments from the licensee. For submission of HSE Solicitors. (TRIM 2012/362331)
0C	16 April 2012	Draft following advice from HSE Solicitors and removal of the requirement for ONR consent before commencement of active commissioning. Draft sent to relevant ONR SIs prior to consultation with the licensee. (TRIM 2012/157523)
0D	24 April 2012	Draft incorporating SI comments. Circulated to licensee for comment (TRIM 2012/157523).
0E	14 December 2012	Final version including Licensee comments (TRIM 2012/294903) and TSol advice (TRIM 2012/293865 & 2012/422234) (TRIM 2012/363755)

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Sizewell B - Dry Fuel Store

Schedule of construction and commissioning hold points including specification of consent to commence active commissioning

Project Assessment Report: ONR-CNRP-SZB-PAR-12-047

Revision 0E

14 December 2012

EXECUTIVE SUMMARY

Title

EDF Energy Nuclear Generation Ltd – Sizewell B – Licence Instrument 531 - Schedule of construction and commissioning hold points including specification of consent to commence active commissioning of the Dry Fuel Store.

ONR Action

ONR has taken the decision to specify that certain stages in the construction and commissioning of the Sizewell B Dry Fuel Store should not be commenced without the permission of ONR. The licensee has identified appropriate hold points for this purpose in the document titled Sizewell B Dry Fuel Store (Addendum 1) Paper of Principle. This action has been taken in accordance with HSE ONR enforcement policy and the nuclear site licence (Licence Conditions 19(1), 21(1) and 21(4)).

Background

The spent nuclear fuel assemblies arising from operating Sizewell B Nuclear Power Station are currently being stored on site under water, within steel racks located in the Sizewell B Fuel Storage Pond. However, the current rate of accumulation and current safety case restrictions mean that further spent fuel storage capacity will be required from 2015.

The licensee has developed a proposal to construct and commission a dry fuel storage facility at Sizewell B to provide the necessary additional spent fuel storage capacity. The proposals are presented in a Paper of Principle titled Sizewell B Dry Fuel Store (Addendum 1). This paper sets out the strategy by which the safety case for the new facility will be made in a series of stage submission papers. The paper also identifies a number of hold points to provide for adequate control and regulation of the project.

The licensee's arrangements for construction and commissioning of the new facility make provision for the identification and release of hold points by ONR. A hold point is a stage in a project beyond which work may not proceed until cleared by an appropriate authority. The licensee's arrangements also require a number of the safety case stage submission papers to be submitted for the agreement of ONR by issue of a Licence Instrument (LI). In addition, the nuclear site licence provides for more direct regulatory control of progression from one stage of construction or commissioning to the next by specification of a Licence Instrument (LI) known as a Consent.

Assessment and inspection work carried out by ONR

Inspectors from the ONR have held a number of meetings with the licensee, which have included discussions to identify and agree appropriate hold points for various stages of the Dry Fuel Store project.

Matters arising from ONR's work

ONR has identified that the following hold points are necessary to proportionately regulate the construction and commissioning of the Sizewell B Dry Fuel Store:

- ONR Hold Point 1. Commencement of construction of the Dry Fuel Store Building.
- ONR Hold Point 2. Commencement of Category 1 modifications to existing fuel storage and handling facilities.

- ONR Hold Point 3. Commencement of handling containers or casks in the Fuel Storage Building.
- ONR Hold Point 4. Commencement of inactive commissioning of the cask haul path.
- ONR Hold Point 5. Commencement of inactive system commissioning.
- ONR Hold Point 6. Commencement of active system commissioning at the point where spent nuclear fuel is placed into the Dry Fuel Store system.
- ONR Hold Point 7. Commencement of normal operation, as defined in NP/SC 7575 Stage Submission 5.

ONR Hold Point 6 is to be released through issue of an ONR Consent (LI) under Licence Condition 21(4) primary powers granted under schedule 2 of the nuclear site licence.

ONR Hold Points 1, 2, 3, 4, 5 and 7 are to be released by ONR using the licensee's arrangements (LC 19(1) and 21(1)).

Conclusion

An appropriate regulatory strategy has been developed for ONR control of the construction and commissioning of the Sizewell B Dry Fuel Store.

Recommendation

A schedule of construction and commissioning hold points for the Sizewell B Dry Fuel Store should be sent under covering letter, in accordance with the licensee's arrangements.

Specification LI 531 should be issued requiring ONR Consent prior to the commencement of active system commissioning (Hold Point 6), in accordance with LC 21(4) primary powers granted under schedule 2 of the nuclear site licence.

LIST OF ABBREVIATIONS

LI	Licence Instrument
LC	Licence Condition
FSP	Fuel Storage Pond
DFS	Dry Fuel Store
EA	The Environment Agency
HSE	The Health and Safety Executive
PoP	Paper of Principle
ALARP	As Low As Reasonably Practicable
PAR	Project Assessment Report
ONR	Office for Nuclear Regulation
SRD	Safety and Regulatory Division
NGL	EdF Energy Nuclear Generation Limited
SZB	Sizewell B power station

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Attachment 2 – Specification LI 531

1 INTRODUCTION

1 The Sizewell B Dry Fuel Store project is mature and the scope is defined. Consistent with ONR regulatory strategy for such a defined scope of work, it is proportionate to target specific activities within the licensee's programme of work for the purpose of introducing regulatory controls through hold points introduced into that programme of work; and to identify the specific arrangements for the release of such hold points. Hold points are chosen to manage nuclear safety and give transparency of regulatory decision making; providing an auditable trail throughout the duration of a project.

2 Spent nuclear fuel assemblies arising from operating Sizewell B Nuclear Power Station are currently being stored on site under water, within steel racks located in the Sizewell B Fuel Storage Pond (FSP). However, the current rate of accumulation and existing safety case restrictions mean that by the end of Cycle 15, further spent fuel storage capacity will be required. The licensee has therefore developed a proposal to construct and commission a dry fuel storage facility at Sizewell B to provide the necessary additional spent fuel storage capacity. Cycle 15 is currently planned to end in 2017, but the FSP will be required to accommodate the Cycle 16 new fuel delivery before then and time will be required to clear the necessary space. It is therefore proposed that the store will operate from 2015.

3 A proposal for the Dry Fuel Store (DFS) was first presented in a Paper of Principle in November 2009 (PoP1, Reference 1). PoP1 set out the key nuclear safety issues associated with the dry storage of spent fuel and put forward the safety principals that would be used for the facility at Sizewell B. An addendum to PoP1 was produced in November 2011 (PoP2, Reference 2) which provided an ALARP case for the chosen system, plus details of the management arrangements for control of the Sizewell B DFS project. The ALARP case for the chosen DFS system was not fully developed at the time that PoP2 was produced. It was therefore agreed with the licensee that the paper would not be submitted for ONR agreement, as per the arrangements in place at that time.

4 PoP2 does however provide an outline of the safety case stage submissions to be produced for the Sizewell B DFS facility and a list of proposed project hold points. The licensee has therefore provided PoP2 to ONR under covering letter (Reference 3) along with a set of revised arrangements (Reference 4), inviting comment on the proposed ONR regulatory hold points and the mechanisms for their release. The proposals for project hold points presented in PoP2 having been developed through discussions between ONR and the licensee.

5 The purpose of this Project Assessment Report (PAR) is to present and justify ONR's regulatory strategy for the Sizewell B DFS project, based on the list of hold points proposed by the licensee.

2 BASIS FOR DECISION

2.1 Licensee's safety case approach

6 The licensee has set out a summary in PoP2 (Reference 2) of how the safety case for the DFS will be made in a series of Category 1 Stage Submissions, as follows:

- Stage Submission 1 Revision 000 – Dry Fuel Store Safety Case. This submission will provide the overall safety case for the Sizewell B DFS and will cover design, analysis, manufacture, construction, training, inspection and testing of the new facility and associated modifications to existing plant. The purpose of this submission is to provide sufficient confidence that an adequate safety case can be made (claims and arguments), but all of the evidence will not be available until Stage Submission 1 Revision 001.
- Stage Submission 2 - Dry Fuel Store Building and Services. This submission will cover the design, construction, operation, inspection and testing of the DFS

building and associated services. The purpose of the submission is to demonstrate that the safety functions of the casks will be supported by the design of the building, including the seismic performance of the floor slab.

- Stage Submission 3 – Fuel and Container Handling and Transfer. This submission will cover: modifications to existing FSP fuel handling equipment; the introduction of new equipment into the existing FSP for container welding and cask drying; the design of cask transporters; and adequacy of the cask haul path and associated handling operations.
- Stage Submission 4 – Inactive Commissioning of the Complete System. This submission will provide the commissioning procedures and training requirements to allow a dummy fuel assembly to be transferred from the FSP to the DFS building.
- Stage Submission 5 – Active Commissioning of the Complete System. This submission will report learning points derived from the inactive commissioning and will provide the commissioning procedures and training requirements to allow seven casks containing active fuel assemblies to be transferred from the FSP to the DFS building.
- Stage Submission 1 Revision 001. - Dry Fuel Store Safety Case. This submission will provide a consolidated safety case for the DFS.
- Project Final Report. This submission will present appropriate final operating procedures, to enable the store to become fully operational.

7 The licensee has set out a schedule of proposed hold points for appropriate stages of the project in Table 1 of PoP2 (Reference 2), as follows:

- Project initiation
- Commencement of construction
- Commencement of implementing modifications
- Commencement of physical modifications to existing fuel storage and handling facilities
- Letting of contract for first 7 casks and containers
- Commencement of handling of casks in the wet fuel facility
- Commencement of commissioning of haul path for transfer cask from fabrication pad to dry store to fuel building
- Commencement of inactive commissioning of the cask haul path
- First site concrete pour for flask manufacture
- Commencement of inactive commissioning
- Commencement of active commissioning
- Start of normal operation

2.2 Regulatory considerations

8 The safety case stage submissions specified for the Sizewell B DFS follow the usual format adopted by the licensee, whereby the safety case structure reflects the various technical aspects of the project. Whereas, Site Licence Conditions 19(4) and 21(4) require the construction and commissioning to be divided into stages, so that the progression from one stage to the next can be appropriately regulated. Therefore, although the safety case stage submissions are at Category 1 and may require ONR agreement in accordance with the licensee's arrangements (Reference 4), this will not provide a suitable mechanism for ONR regulation of the complete project.

9 ONR requirements for the identification of suitable project hold points have been discussed with the licensee at regular project meetings. These discussions have

culminated in the proposed list of hold points identified in Table 1 of PoP2 (Reference 2), which also contains additional requirements identified by the licensee's internal regulator (SRD).

- 10 The licensee has written inviting ONR to comment on regulatory hold points for the Sizewell B DFS project (Reference 3), in accordance with the licensee's arrangements (Reference 4). The hold points identified by the licensee in Table 1 of Reference 2 have been reviewed. Consideration has also been given to the assessment programme identified by the licensee's internal regulator (Reference 5).
- 11 The identification and release of hold points under the licensee's LC19(1) and LC21(1) arrangements is essentially a voluntary agreement to provide a flexible approach to permissioning. Consideration has been given to the need for the use of primary powers in accordance with the nuclear site licence to underpin this arrangement and advice sought from Solicitors (HSE Advisory Team). The introduction of nuclear matter into the DFS system is the most significant step in the construction and commissioning programme. Consequently commencement of active commissioning was considered as a candidate for requiring ONR consent in accordance with LC21(4). Solicitor's initial advice was however that all stages of commissioning would need to be specified for consent, rather than a single stage (References 6 and 7). This level of regulation was considered to be unnecessary and disproportionate. As an alternative, consent to start of normal operation under LC21(8) was also briefly considered, but not pursued on the basis that all significant activities affecting nuclear safety will have already been permissioned under the licensee's arrangements by that stage.
- 12 The Solicitor's advice (References 6 and 7) concerning LC21(4) was considered by the ONR new build project to assess the impact on LC19(4) given the Chief Inspector's view that for new installations it is a disproportionate use of primary powers to expect a licensee to seek ONR's consent for all stages. Further advice on ONR's interpretation of LC19(4) was sought from the Solicitor's office (Reference 8). Having considered the guidance note at Reference 8, the Solicitor gave revised advice that ONR should have the ability to mandate hold points to the extent necessary to ensure that construction or installation is conducted safely. To do that does not necessarily mean that ONR needs to approve every transition from one stage to the next. This interpretation of LC19(4) is also applicable to LC20(4), LC21(4) and LC35(5). It is therefore proposed that regulation of the DFS project will be conducted mainly using derived powers under the licensee's LC19(1) and LC21(1) arrangements but that the commencement of active commissioning (i.e., introduction of spent nuclear fuel into the DFS system) will require an ONR Consent under LC21(4). This is judged to provide proportionate and targeted regulatory control, consistent with other ONR regulatory decisions, and which is ultimately underpinned by LC19(5) and LC31 primary powers granted under schedule 2 of the nuclear site licence. The Solicitor's office provided a draft for the Specification Licence Instrument (Reference 9) which has been included as Attachment 2 to this report.
- 13 Following discussion with the Unit 1A Superintending Inspector, the use of the term "nuclear matter" within the Specification Licence Instrument was seen to be too generic and could lead to an unintended consequence that radiological sources used in radiography inspection techniques would also require ONR Consent before use. The Specification LI wording was therefore changed to identify "spent nuclear fuel" as the specific nuclear matter requiring ONR Consent to introduce into the SZB DFS system. This revised wording was reviewed by the Solicitor's office (Reference 10) who did not have any further specific comment on the changed wording. Within the scope of this project is the potential storage of irradiated core components. Inclusion of reference to such components within the Specification Licence Instrument was considered but not included since they represent a much lower potential radiological contamination hazard than spent nuclear fuel.

The reasoning for selection of ONR hold points from the licensee's proposed list and the mechanisms for their release are set out as follows:

- Project initiation – NP/SC 7575 Add 1 (PoP2, Reference 2) is a Paper of Principal and as such does not seek to fully justify any activities that may affect safety. Nor does this paper provide a fully developed ALARP case for the chosen DFS system. It was therefore agreed with the licensee that the paper would not be submitted for ONR agreement and the licensee's arrangements have been modified accordingly (see Reference 4). ONR has therefore chosen not to permission project initiation.
- Commencement of construction of the Dry Fuel Store Building – Safety case claims will be made on the DFS building that will house the casks. This new building will need to meet the performance requirements set out in the safety case and any modifications necessary to meet regulatory requirements are likely to be difficult to back-fit. The safety function of the casks will be specified in Stage Submission 1 Rev 000, although it will not be possible to agree this incomplete paper. The performance of the DFS building will be contained in Stage Submission 2. Therefore it is proposed that ONR should request Hold Point 1 under the licensee's arrangements, requiring that construction of the Dry Fuel Store Building shall not commence without submission of Stage Submission 1 Rev 000 and ONR agreement (LI) to Stage Submission 2. It is proposed that ONR release of Hold Point 1 will be by letter.
- Commencement of implementing modifications – This Hold Point has been identified by EDF/SRD and requires SRD permission to commence the first implementing modification. Relevant activities would include modifications to car parks and construction of the cask fabrication pad. It is judged that ONR do not require this hold point to exercise appropriate regulatory control.
- Commencement of Category 1 modifications to existing fuel storage and handling facilities – The new DFS facility will require modifications to be made to existing FSP handling equipment and services. It is considered that Category 1 modifications to existing facilities should not commence until an adequate safety case for the new DFS has been made. It is also important that the safety case for the existing FSP facility is not compromised. Therefore it is proposed that ONR should request Hold Point 2 under the licensee's arrangements, requiring that Category 1 modifications to existing fuel storage and handling facilities shall not commence without submission of Stage Submission 1 Rev 000 and ONR agreement (LI) to Stage Submission 3. It is proposed that ONR release of Hold Point 2 will be by letter.
- Letting of contract for first 7 casks and containers – This hold point has been identified by EDF/SRD and requires SRD permission to issue the purchase order for the construction of the container and cask following detailed design. It is judged that this hold point is essentially an economic matter and that other hold points identified by ONR will provide adequate regulatory control.
- Commencement of handling containers or casks in the Fuel Storage Building – Handling of DFS casks or containers in the Fuel Storage Building is safety significant, due to the potential threat to the existing inventory of spent fuel. The safety case for this activity is to be presented in Stage Submission 3, which must be cleared at ONR Hold Point 2 and before cask or container handling in the Fuel Storage Building commences. Nonetheless, it is judged that this activity is sufficiently important to justify provision of a separate hold point. Therefore, it is proposed that ONR should request Hold Point 3 under the licensee's arrangements, requiring that the handling of casks or containers in the Fuel Storage Building shall not commence without: clearance of Hold Point 2;

satisfactory completion of an ONR readiness inspection; and release of this Hold Point 3 by letter.

- Commencement of commissioning of haul path for transfer cask from fabrication pad to dry store to fuel building - This hold point has been identified by EDF/SRD and requires SRD permission to commence movement of a completed cask from the fabrication pad. It is possible that some handling of casks may be necessary to enable cask manufacture on site, but which may not affect safety. It is judged that ONR only requires Hold Point 4 to exercise appropriate regulatory control.
- Commencement of inactive commissioning of the cask haul path – The cask and transporter system may impose greatly increased loading on road surfaces, with a potential risk to nuclear safety from damage to trenches or pipe tunnels. ONR should therefore request a suitable hold point. Commissioning of the cask haul path may take place before ONR Hold Point 2. Therefore, it is proposed that ONR should request Hold Point 4 under the licensee's arrangements, requiring that inactive commissioning of the cask haul path shall not commence without: ONR agreement (LI) to Stage Submission 3; completion of an ONR readiness inspection; and release of Hold Point 4 by letter. Noting that further hold points may be necessary if multiple routes are developed for the cask haul path.
- First site concrete pour for flask manufacture – The licensee has identified this potential hold point on the basis that the DFS casks are to be manufactured on site. It is not proposed to request an ONR hold point here, on the basis that there are opportunities to reject inferior units prior to inactive and active commissioning.
- Commencement of inactive system commissioning – This is a key stage in the commissioning process that will involve manoeuvring a dummy fuel assembly and cask from the FSP to the DFS building. This activity may introduce additional risks not previously assessed. It is also important that the activity fully tests proposed operational procedures prior to active commissioning. Therefore, it is proposed that ONR should request Hold Point 5 under the licensee's arrangements, requiring that inactive system commissioning shall not commence without ONR agreement (LI) to: Stage Submission 4; satisfactory completion of an ONR readiness inspection; and release of this hold point by letter.
- Commencement of active system commissioning at the point where spent nuclear fuel is placed into the Dry Fuel Store system – The introduction of spent nuclear fuel into the DFS system is a key step in the construction and commissioning programme. It is also essential that a fully developed safety case is in place for the DFS system, before this activity commences. Therefore, it is proposed that ONR should Specify (LI) Hold Point 6 under LC21(4) primary powers granted under schedule 2 of the nuclear site licence, requiring that active system commissioning shall not commence without ONR Consent (LI) under LC21(4) primary powers granted under schedule 2 of the nuclear site licence. ONR Consent (and thus release of Hold Point 6) will be on the basis of agreement to: Stage Submission 5; Stage Submission 1 Revision 001; and satisfactory completion of an ONR readiness inspection.
- Commencement of normal operation, as defined in NP/SC 7575 Stage Submission 5 – Normal operation will be defined by limiting the number of casks in the active commissioning programme to the first campaign, as specified in Stage Submission 5. ONR agreement to the final report will be a pre-requisite for moving into normal operation. Any necessary approval by ONR of operating rules under LC23(4) should also take place prior to normal operation. Therefore, it is proposed that ONR should request Hold Point 7 under the licensee's arrangements, requiring that normal operation, as defined in Stage Submission 5, shall not commence without: ONR agreement (LI) to NP/SC 7575 Project Final

Report; ONR approval of operating rules where considered necessary; and release of Hold Point 7 by letter.

- 15 It is acknowledged that certain stages in the construction and commissioning of the DFS could be adequately controlled by means of agreement to Category 1 papers (e.g. commencement of inactive commissioning). However, hold points have been specified at all significant stages for the purposes of clarity.
- 16 It is also acknowledged that the hold points on handling casks in the FSP (Hold Point 3) and commissioning the cask haul path (Hold Point 4) could be coincident with commencement of inactive system commissioning (Hold Point 5). However separate hold points have been identified to permit flexibility in the licensee's programme.
- 17 It is anticipated that Project Assessment Reports (PARs) will be produced to support: ONR agreement to Stage Submissions; ONR Consent (LI) to commence active commissioning; and the Final Report. The justification for issue of letters to release hold points under the licensee's arrangements will be supported by file notes. Letters for the release of hold points will however need to comply with ONR arrangements for delegated authority.
- 18 The proposed schedule of hold points are presented at Attachment 1. This schedule has been discussed and agreed with the licensee, who will issue a confirmatory letter to ONR upon receipt. A note has been added to the schedule under prerequisites that additional requirements may be specified by ONR and agreed with the licensee by exchange of letters as the project progresses. ONR will request that the identified hold points are reflected in the licensee's project quality plans.
- 19 ONR has provided to the Sizewell B Environment Agency inspector, ONR Transport inspector and ONR Security inspector (Reference 11); details of ONR's Sizewell B Dry Fuel Store project hold points schedule for information. In addition, hold points are an agenda item at the regular level 4 programme meetings held between EdF, ONR and the Environment Agency. No concerns or comment on the hold point schedule have been raised by the Environment Agency, Transport or Security inspectors.

3 CONCLUSION

- 20 An appropriate regulatory strategy has been developed for ONR control of the construction and commissioning of the Sizewell B Dry Fuel Store.

4 RECOMMENDATION

- 21 A schedule of construction and commissioning hold points for the Sizewell B Dry Fuel Store should be sent under covering letter.
- 22 Specification LI 531 (Reference 12) should be issued requiring ONR consent prior to the commencement of active system commissioning, in accordance with LC 21(4) primary powers granted under schedule 2 of the nuclear site licence.

5 REFERENCES

1. NP/SC 7575. Sizewell B Dry Fuel Store, November 2009. TRIM 2010/81394.
2. NP/SC 7575 (Addendum 1). Sizewell B Dry Fuel Store, November 2011, TRIM 2012/24943.
3. SZB 50696N. 6 January 2012. TRIM 2012/24943.
4. SZB/LI/001/019. Control arrangements for construction or installation of new plant under Licence Condition 19. TRIM 2012/24943.
5. SRD Assessment Programme. Sizewell B Dry Fuel Store Project. TRIM 2012/41024.

6. Solicitor's comments. Email 16 March 2012. TRIM 2012/137284
7. Solicitor's comments. Email 2 April 2012. TRIM 2012/145709
8. Solicitor's comments, Email 24 July 2012. TRIM 2012/293865
9. Solicitor's comments, Email 30 October 2012. TRIM 2012/422234
10. Solicitor's comments, Email 7 December 2012. TRIM 2012/489994
11. Email, 9 November 2012, Introduction of hold points into EdF's SZB Dry Fuel Store project programme. TRIM 2012/438740
12. LI 531, Specification Licence Instrument. TRIM 2012/434549

Attachment 1 - Sizewell B Dry Fuel Store, ONR Hold Point Schedule

Reference	Hold point	Prerequisites ⁽¹⁾	Release Mechanism
ONR Hold Point 1	Commencement of construction of the Dry Fuel Store Building.	Submission of NP/SC 7575 Stage Submission 1 Rev 000 - Dry Fuel Store Safety Case ONR agreement to NP/SC 7575 Stage Submission 2 – Dry Fuel Store Building (and Services), by issue of a Licence Instrument.	ONR Letter
ONR Hold Point 2	Commencement of Category 1 modifications to existing fuel storage and handling facilities.	Submission of NP/SC 7575 Stage Submission 1 Rev 000 - Dry Fuel Store Safety Case ONR agreement to NP/SC 7575 Stage Submission 3 – Fuel container handling and transfer, by issue of a Licence Instrument.	ONR Letter
ONR Hold Point 3	Commencement of handling casks or containers in the Fuel Storage Building.	Clearance of Hold Point 2 Satisfactory completion of an ONR readiness inspection	ONR Letter
ONR Hold Point 4 ⁽²⁾	Commencement of inactive commissioning of the cask haul path.	ONR agreement to NP/SC 7575 Stage Submission 3 – Fuel container handling and transfer, by issue of a Licence Instrument. Satisfactory completion of an ONR readiness inspection	ONR Letter

Reference	Hold point	Prerequisites ⁽¹⁾	Release Mechanism
ONR Hold Point 5	Commencement of inactive system commissioning.	ONR agreement to NP/SC 7575 Stage Submission 4 – Inactive commissioning of the complete system, by issue of a Licence Instrument. Satisfactory completion of an ONR readiness inspection.	ONR Letter
ONR Hold Point 6	Commencement of active system commissioning at the point where spent nuclear fuel is placed in to the Dry Fuel Store system.	ONR agreement to NP/SC 7575 Stage Submission 5 – Active commissioning of the complete system, by issue of a Licence Instrument. ONR agreement to NP/SC 7575 Stage Submission 1 Revision 001 - Dry Fuel Store Safety Case, by issue of a Licence Instrument. Satisfactory completion of an ONR readiness inspection.	Consent LI under LC21(4) primary powers granted under schedule 2 of the nuclear site licence.
ONR Hold Point 7	Commencement of normal operation, as defined in NP/SC 7575 Stage Submission 5.	ONR agreement to NP/SC 7575 Project Final Report, by issue of a Licence Instrument. ONR approval of operating rules for the Dry Fuel Store, if considered necessary by ONR.	ONR Letter

Note 1 – Additional prerequisites may be requested by ONR and agreed by exchange of letters as the project proceeds.

Note 2 – Further hold points may be necessary in the case of multiple routes for the cask haul path.

Attachment 2 – Specification LI 531

Site Licence No: 63

Licence Instrument No: 531

December 2012

NUCLEAR INSTALLATIONS ACT 1965 (AS AMENDED)

SPECIFICATION

Granted under Condition 21(4) of

Schedule 2 attached to

Nuclear Site Licence No. 63

SIZEWELL B

The Health and Safety Executive, for the purposes of Condition 21(4) of Schedule 2 attached to Nuclear Site Licence No. 63, hereby specifies that the licensee shall not commence active system commissioning of the Sizewell B Dry Fuel Store without the consent of the Executive.

For the purposes of this Licence Instrument, “active system commissioning of the Sizewell B Dry Fuel Store” is commenced by placing spent nuclear fuel into any part of the Dry Fuel Store system.

Dated: December 2012

For and on behalf of the Health and Safety Executive:

Signed:



A person authorised to act in that behalf