British Energy
PART OF EDF ENERGY

British Energy Generation

Company Specification

Management Of Contractors Performing Work On Power Station Sites

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REVISION	AMENDMENT	IMPACT LEVEL	DATE

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1 PURPOSE

This document outlines the responsibilities for the management of contractors on British Energy (BE) nuclear power station sites. Note: This document also covers work conducted by contractors on sites external to the power station site, but under the responsibility of the Station Director, e.g. district survey laboratories, strategic stores, etc.

This supports the drive for fleet alignment on the management of contractors to achieve high standards of health and safety, quality and environmental performance in line with BEG policies.

2 SCOPE

This document applies to all maintenance, inspection, testing or modification work carried out on British Energy Power Stations. The type of work carried out is distinguished by the area of site in which it takes place; in turn this requires different levels of management and supervision.

Two areas of work

- Intrusive work on operating Plant or work that can affect operating Plant
- Non Intrusive work that cannot affect operating Plant

Two types of work

- Affected by ionising radiation regulations 1999 (IRRs)
- Not affected by IRRs

3 RESPONSIBILITIES

3.1 Station Director

3.2 Licence Condition 26

Site Licence Condition 26 states the licensee shall ensure no operations are carried out which may affect safety except under the control and supervision of Suitably Qualified and Experienced Persons (SQEP) appointed for that purpose by the licensee.

Nuclear Installations Act 1965 places absolute and no-fault liability for any nuclear occurrence with the licensee, which generates the concept British Energy as the 'informed customer' in relation to the use of contractors. This places responsibility for licensee to review, understand and control use of technical work carried out by contractors and for the licensee to be in day-to-day control of activities carried out on plant by contractors.

Standards & 3.3 Codes Of Practice

BEG/SPEC/SHE/COP/019

This code of practice specifies requirements for ensuring that health and safety legislation and other information relevant to the management of health and safety at BE is

- Identified and monitored
- Assessed and used for establishing, implementing and maintaining an effective health and safety system
- Recorded, kept up-to-date and communicated to employees, contractors and other interested parties

The Management Of Health & Safety At Work regulations require the responsible organisation for premises to ensure that hazards in those premises are identified to other employers in those premises. Also employers responsible for premises are required to ensure that others in

those premises cooperate to ensure each can comply with statutory legislation. Every employer, BE or Contractor, must carry out assessment of the risks arising from their business to the health and safety of their own employees, and to anyone else who could be affected. These risk assessments must be recorded.

Additional references
BEG/SPEC/SHE/COP/008
BEG/SPEC/SHE/COP/004

3.4 Maintenance Manager

The maintenance manager is responsible for the standards of all maintenance activities on site in line with BEG/ICP/OPS/016 section 4.13

The maintenance manager is responsible for:

- Ensuring work is controlled in accordance with Work Management processes
- Setting maintenance quality, safety and environmental standards
- Ensuring adequate supervision of work to meet maintenance quality, safety and environmental standards
- Ongoing monitoring of work to meet maintenance quality and safety standards
- Deciding on whether the complexity or safety significance of work requires additional supervision.

Where non plant related work is performed on site, e.g. design work, planning and scheduling, administrative work etc. by contractors or agency staff, the department manager responsible for the work will provide supervision and control of the individuals and work standards

Where contractors or suppliers provide a delivery service, e.g. bulk gas or fuel delivery, the department manager responsible for the activity will provide oversight and control for the activity.

3.5 Supply Chain Manager

The supply chain manager is responsible for all commercial aspects of contractor works, alongside ensuring the contract personnel are suitably qualified and experienced for the task. The supply chain manager is responsible for:

- Contract placement
- Ensuring SQEP contractor resource is contracted to liquidate the work. The specification for what constitutes SQEP resource is the responsibility of the Specifier to provide.
- Mobilising contractor to site• .
- Arranging facilities for contract staff
- Providing commercial support
- Nominating a Contract Manager (responsibilities defined in BEG/SPEC/PRO/011)
- Conducting contract disputes and compensation events
- Managing contract variations and invoice approvals

- Demobilising contractor from site

The responsibility for compliance to CDM regulations will be discharged as defined in BEG/SPEC/SHE/COP/008

- The supply chain organisation will provide support as required.

3.6 Field Supervisor

The Field Supervisor is responsible for supervising work on site to British Energy maintenance standards in safety, quality and environment.

The Field Supervisor is responsible for:

- Ensuring that the work supports safe and reliable operation of the plant and maintains full compliance within agreed quality, safety and environmental standards and expectations.
- Ensuring the relevant safety documents have been issued to the work party under the BE Safety Rules and the associated requirements have been communicated to the work teams
- Ensuring the work party fully understand and comply with the site requirements and procedures for working in Radiation Controlled Areas
- Monitoring the work, and the Health & Safety performance, throughout the duration of the Contract
- Communicating the progress of the work to the Contract Manager
- Ensuring all accidents are reported in accordance with site procedures and arrangements

Note: more detailed responsibilities are outlined in the role profile (BEG/RTP/MNT/001)

4 PRACTICE

4.1 Management of Work

- To ensure compliance to BEG/SPEC/SHE/COP/019 British Energy has implemented a **management of work** process that incorporates the assessment of risk, mitigations, SQEP resources and communications to manage and control work performed onsite.
- An organisational structure of workers and supervisors are in place to ensure compliance of to the management of work process
- This is supported by dedicated health and safety officers that monitor and audit compliance to safety standards
- A safe system to work process is in place to ensure plant is put in a safe state before work is allowed to be performed.

- Resources are trained in health and safety aspects and human performance tools to ensure a clear understanding of the risks and how to mitigate for it.

4.2 Supervision

All work on site must be subject to supervision and monitoring by an appointed **Field Supervisor** (FS) to ensure safety, quality, environmental performance and productivity. The appointment of the FS is the responsibility of the maintenance manager, and is dependent on the complexity and location of the works

The four types of work are defined below with guidance on the appointment of the appropriate FS:

1. **Work performed by internal SQEP resource**

BE Team Leader supervising BE resource

2. **Work performed by a specialist contractor without onsite management or supervisory structure**

   A BE FS must be appointed to supervise the contractor resource

3. **Work carried out by contractors with on-site management and supervisory structure within the maintenance manager standards**

   Contract Partner FS supervising contractor resource

   Note:

   Contract Partner Field Supervisors can only supervise their own company resource, or associated sub contractor staff.

   When the management structure and work supervisors have been assessed as adequate by the maintenance manager, in accordance with this specification, work is carried out by contractors with the appointed contractor FS responsible for quality and safe execution of work.
   Until contractor management structure and supervisors are judged to be adequate, work will be supervised as for category 2 tasks above.

4. **Project Division resources (BE or Contract) performing work on a BE site**

   Project Manager (PM) or project engineer should be appointed as the FS supervising work on site

4.3 Location of Work

The SQEP requirements of the nominated FS are dependent on the location of the works:

○ For works that take place in areas involving ionising radiation, the training profile for FS (Level 3) is the minimum requirement (BEG/RTP/MNT/001)

- For works taking place on other Operational Plant with the requirement for safety documents, then the training profile for FS (Level 2) is the minimum requirement (BEG/RTP/MNT/001)
- For works taking place on Non Plant areas without the requirement for safety documents, then the training profile for FS (Level 1) is the minimum requirement (BEG/RTP/MNT/001)

The appointment of the FS by the maintenance manager must include assessment of the individual against the appropriate competences articulated in the relevant role / training profile.

The maintenance manager will issue a letter of appointment to the individual for a specific scope of work and time frame through BEG/SPEC/TRNG/800 and BEG/TRNG/AI/A302

4.4 Resource to support the Role

In order to meet the resource requirements for the appointment of FS for all maintenance, inspection, testing, modification or other works, sufficient personnel from both BE and the resident contract partners must be trained to appropriate levels. The Station Director has the responsibility to identify and ensure availability of resources to support this role.

Both Maintenance manager and contract manager (and operations Duly Authorised Persons), jointly and separately, have duty to stop work where there is any doubt over whether it is adequately supervised or performed.

4.5 Feedback / Audit

For tasks where the nominated Contract Partner FS is supervising Contract personnel, there needs to be formal feedback / audit of the contractor quality and safety performance to the maintenance manager.

This is to be conducted by the BE contract manager in supply chain or by a nominated 3rd

party, at a minimum one assessment per calendar year, by the completion of an F12 Contractor Performance Report in line with BEG/SPEC/PRO/011 Section 5.6.

To ensure that Field Supervisors, BE or contract personnel, conduct the role to the expected standards and expectations, the BE task observation process will be used. BE leaders and QA personnel will have task observation targets built into the station accountability process to ensure sufficient number of observations on field supervisors are conducted.

4.6 Approval of Work

All contractor technical work, including drawings, is technically reviewed by BE SQEP before use (BEG/ICP/ENG/002). Where technical work is captured in Work Order Cards (WOC) / Method Statements, these need to be approved by BE SQEP staff (BE Work Order Task Approver).

Field Supervisors must ensure that no work proceeds unless the relevant reviews and approvals have been completed.

5 DEFINITIONS

BEG	British Energy Generation
CDM	Construction (Design and Management) Regulations 2007
IRR	Ionising Radiation Regulations
SQEP	Suitably Qualified and Experienced Personnel
DAP	Duly Authorised Person
PM	Project Manager
WOC	Work Order Card
FS	Field Supervisor

6 REFERENCES

6.1	BEG/SPEC/SHE/COP/019	Compliance With Health & Safety Legislation
6.2	BEG/SPEC/SHE/COP/004	Health & Safety Management Of Contractors
6.3	BEG/SPEC/SHE/COP/008	Construction Design & Management Health & Safety Planning For Outages And Other Projects
6.4	BEG/ICP/OPS/016	Conduct Of Maintenance At Nuclear Power Stations
6.5	BEG/ICP/QUA/004	Graded Application Of Quality Assurance
6.6	BEG/SPEC/PRO/011	Acquire Goods and Services
6.7	BEG/ICP/QUA/006	Records
6.8	BEG/SPEC/TRNG/800	Management Of Authorisations
6.9	BEG/ICP/ENG/002	The Verification and Technical Review Process
6.10	BEG/TRNG/AI/A302	Authorisation to role of Field Supervisor
6.11	BEG/RTP/MTN/001)	Role and Training Profile – Field Supervisor

7 RECORDS

Record Title	Form No./ Identifier	Retention Period	Record Originator	Where records are retained
FS authorisation letter		Three years	Maintenance Manager	Site contract manager or project manager
Contractor authorisation self supervising appointment letter		Three years	Maintenance Manager	Site contract manager or project manager
Records of years contractor health and safety and organisation review			Contract Manager	Site contract manager or project manager
Periodic independent			Field	Maintenance

feedback/audit on contractor safety & quality performance			Supervisor	manager

Records associated with this SPEC shall be controlled, stored and archived in accordance with the requirements of BEG/ICP/QUA/006 (Ref 6.7).