



ONR Project assessment report

**PR-01908 Withdrawal of Nuclear Maintenance
Schedule Preface Approvals & Legacy Licence
Condition Specifications for the Berkeley,
Chapelcross, Dungeness A, Hinkley Point A,
Hunterston A, Oldbury, Sizewell A, Trawsfynydd
and Wylfa NRS Ltd sites**

ONR Project assessment report

Project name: DF&W review of regulatory processes

Report title: PR-01908 Withdrawal of Nuclear Maintenance Schedule Preface Approvals & Legacy Licence Condition Specifications for the Berkeley, Chapelcross, Dungeness A, Hinkley Point A, Hunterston A, Oldbury, Sizewell A, Trawsfynydd and Wylfa NRS Ltd sites

Dutyholder/Applicant: Nuclear Restoration Services (NRS) Ltd

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Executive summary

Permission requested

Nuclear Restoration Services (NRS) Ltd requested the withdrawal of nuclear maintenance schedule preface approvals and legacy licence condition (LC) specifications for the Berkeley, Chapelcross, Dungeness A, Hinkley Point A, Hunterston A, Oldbury, Sizewell A, Trawsfynydd and Wylfa NRS Ltd sites on the basis that continued compliance is bureaucratic and provides no additional safety benefit for the sites, which are well advanced into their decommissioning life cycle phase.

Background to the request

NRS Ltd has conducted a review of its legacy specifications, and identified 88 specifications that it requested ONR to review. This was to ascertain if the specifications are still appropriate for sites which are well advanced into their decommissioning life cycle phase. Ten of these specifications relate to LC 28(4), in which ONR specifies the approval of nuclear maintenance schedule prefaces. These LC 28(5) approvals are considered as part of this assessment because they were created by virtue of a specification requested for review. The other historical specifications requested for review relate to LC 11(2), 13(9), 18(1), 23(4), 30(3), 32(4) and 35(5).

In accordance with government legal advice, the Nuclear Installations Act 1965 (As Amended) Section 4(5) will be used to withdraw the approvals and specifications which have been assessed as being no longer required. Section 4(8) of the Act requires that this be exercisable in writing, which will be provided by means of a single letter withdrawing multiple specifications and approvals across the sites.

Prior to obtaining this legal advice, and due to the wording of LC 1(3)(a), ONR had no clear process for withdrawing specifications. Therefore, the scope of this project is to remove all legacy specifications in light of the legal advice referenced above. Previously, when sites were relicensed, new specifications were issued replicating the intent of an existing specification; therefore, all identified specifications will be withdrawn for completeness.

Assessment work conducted by ONR in consideration of this request and conclusions drawn

From the assessment work undertaken, it was concluded that the continued approval of the nuclear maintenance schedule preface under LC 28(5) for the Berkeley, Chapelcross, Dungeness A, Hinkley Point A, Hunterston A, Oldbury, Sizewell A, Trawsfynydd and Wylfa NRS Ltd sites is unnecessarily bureaucratic and adds no additional safety benefits above those already achieved by site inspection of LC 28

and oversight of changes to licence condition arrangements via the Nuclear Safety Committee minutes as per LC 13(8). Withdrawal is therefore aligned to the Regulatory Reform Act 2006.

The withdrawal of specifications relating to LC 13(9) allows better alignment with the principles of the ONR guidance document 'Nuclear Safety Permissioning' (NS-PER-GD-001) dated October 2023, as the "furnish" wording used in original specifications is no longer recognised as a derived power by this process..

The withdrawal of specifications relating to LC 18(1) reduces the regulatory burden on the dutyholder, as required by the Regulatory Reform Act 2006, as this information is easily sought by alternative arrangements.

The withdrawal of the specification relating to LC 35(5) also reduces the regulatory burden on the dutyholder. ONR's enabling regulation approach, utilising flexible permissioning, supersedes this more historically bureaucratic approach.

The withdrawal of specifications relating to LC 11(2), 23(4), 28(4), 30(3) and 32(4) is administrative, as previously there was a lack of applicable process within ONR.

ONR reserves the right to reintroduce the withdrawn specifications and approvals by means of a licence instrument should it deem it to be necessary in the interests of nuclear safety.

Matters arising from ONR's work

There are no matters outstanding from ONR's assessment.

Recommendations

I recommend that:

- This Project Assessment Report be approved;
- In accordance with the Nuclear Installations Act 1965 (As Amended) Section 4(5) the approvals and specifications which have been assessed as being no longer required are withdrawn; and
- In accordance with the Nuclear Installations Act 1965 (As Amended) Section 4(8) a single legal instrument exercisable in writing is issued to NRS Ltd, which will take the form of a single letter withdrawing multiple specifications and approvals across the sites.

Table 1: List of abbreviations

Term/Acronym	Description
DFW	Decommissioning, Fuel & Waste
LC	License Condition
NMS	Nuclear Maintenance Schedule
NRS Ltd	Nuclear Restoration Services Limited
NSC	Nuclear Safety Committee
ONR	Office for Nuclear Regulation
WIReD	Well Informed Regulatory Decisions platform

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1. Permission requested

1. Nuclear Restoration Services (NRS) Ltd requested the withdrawal of nuclear maintenance schedule preface approvals and legacy licence condition (LC) specifications for the Berkeley, Chapelcross, Dungeness A, Hinkley Point A, Hunterston A, Oldbury, Sizewell A, Trawsfynydd and Wylfa NRS Ltd sites on the basis that continued compliance is bureaucratic and provides no additional safety benefit for the sites, which are well advanced into their decommissioning life cycle phase [1].
2. This supports ONR's broader efficiency agenda and aligns with the Regulatory Reform Act 2006 [2], which requires that regulatory activities should be carried out in a way which is transparent, accountable, proportionate and consistent and be targeted only at cases in which action is needed.

2. Background

3. The Office for Nuclear Regulation (ONR) Decommissioning, Fuel & Waste (DFW) subdirectorates has recently conducted a review of regulatory processes and has withdrawn the approval of LC 11 emergency plans for NRS Ltd sites, setting a precedent for the project documented here [3].
4. NRS Ltd has conducted a review of its legacy specifications, and identified 88 specifications that it requested ONR to review. This was to ascertain if the specifications are still appropriate for sites which are well advanced into their decommissioning life cycle phase. Ten of these specifications relate to LC 28(4), in which ONR specifies the approval of nuclear maintenance schedule prefaces. These LC 28(5) approvals are considered as part of this assessment because they were created by virtue of a specification requested for review. The other historical specifications requested for review relate to LC 11(2), 13(9), 18(1), 23(4), 30(3), 32(4) and 35(5).
5. In accordance with government legal advice [4], the Nuclear Installations Act 1965 (As Amended) Section 4(5) [5] will be used to withdraw the approvals and specifications which have been assessed as being no longer required. Section 4(8) of the Act requires that this be exercisable in writing, which will take the form of a single letter withdrawing multiple specifications and approvals across the sites.
6. Prior to this legal advice, and due to the wording of LC 1(3)(a), ONR had no process to withdraw specifications. Following this legal advice the scope of the project is to remove all legacy specifications. New specifications were issued replicating the intent of an existing specification and these will also be withdrawn for completeness. Specifications which are currently not being enforced and were not withdrawn due to a lack of a clear process within ONR will also be withdrawn.
7. The following approvals and specifications issued to these sites were out of scope for the project and remain in force:
 - LC 13(3) Nuclear Safety Committee Terms of Reference Approvals;
 - LC 13(12) Arrangements for Urgent Safety Proposals Approvals; and
 - LC 25(4) Specifications on High Activity Sealed Sources.

3. Assessment and inspection work carried out by ONR

3.1. Withdrawal of LC 28(5) approvals

8. The following LC 28(5) approvals were reviewed for withdrawal.

Current Site Licence	Site	Issued under Site Licence	Licence Instrument No.	Date
92	Berkeley	92	516	25 October 2018
93	Bradwell	93	520	25 October 2018
Sc15	Chapelcross	Sc15	541	25 October 2018
94	Dungeness A	94	516	25 October 2018
95A	Hinkley Point A	95A	512	25 October 2018
Sc16	Hunterston A	Sc16	528	25 October 2018
57A	Oldbury	57A	557	25 October 2018
105	Sizewell A	96	517	25 October 2018
81	Trawsfynydd	81	534	25 October 2018
58A	Wylfa	58A	575	5 October 2020

Nuclear Maintenance Schedule (NMS) prefaces for the Berkeley, Chapelcross, Dungeness A, Hinkley Point A, Hunterston A, Oldbury, Sizewell A, Trawsfynydd and Wylfa NRS Ltd sites were all approved under LC 28(5) following a programme of harmonisation across these sites and a specification instructing the sites to do so under LC 28(4) in October 2018. The prefaces replicate much of the intent in LC 28 with the notable exception being a table of tolerances for nuclear safety maintenance; an example is shown in ref. [6].

In my view, NRS Ltd has adequate internal challenge processes, utilising their Nuclear Safety Committee (NSC) arrangements, to ensure these tolerances are not changed without sufficient internal consideration by the NSC. In addition, ONR will continue to receive the NSC minutes as required by LC 13(8). Finally, continued surveillance by ONR inspectors during routine operational inspections of LC28 provides more assurance that appropriate examination, inspection, maintenance and testing is being conducted over that given by approval of the NMS prefaces.

In removing these LC 28(5) approvals, the historical LC 28(7) agreements to the extension of any interval specified in the plant maintenance schedule become

unnecessarily bureaucratic, whilst adding no additional safety benefits. Extensions under LC 28(7) should be managed under NRS Ltd's LC 28(1) arrangements. Given these levels of alternative assurance and the unnecessary bureaucracy of approving these prefaces the withdrawal of LC 28(4) approvals is recommended.

3.2. Withdrawal of LC 11(2) specifications

9. The following LC 11(2) specifications were reviewed for withdrawal:

Current Site Licence	Site	Issued under Site Licence	Licence Instrument No.	Date
92	Berkeley	54	1	25 March 1996
93	Bradwell	53	1	25 March 1996
94	Dungeness A	55	1	25 March 1996
95A	Hinkley Point A	52	1	25 March 1996
57A	Oldbury	57	1	25 March 1996
105	Sizewell A	51	1	25 March 1996
81	Trawsfynydd	56	1	25 March 1996
58A	Wylfa	58	1	25 March 1996
Sc16	Hunterston A	Sc12	1	26 July 2000
92	Berkeley	70	3	16 December 2002
81	Trawsfynydd	72	3	16 December 2002
105	Sizewell A	51	61	17 September 2003

10. The LC 11(2) specifications are recommended to be formally withdrawn to align with the intent of Project Assessment Report ONRW-2019369590-8584 [3], in which they were not listed by licence instrument number but rather by association of the approval being withdrawn.

3.3. Withdrawal of LC 13(9) specifications

11. The following LC 13(9) specifications were reviewed for withdrawal:

Current Site Licence	Site	Issued under Site Licence	Licence Instrument No.	Date
93	Bradwell	53	4	25 March 1996
94	Dungeness A	55	4	25 March 1996
95A	Hinkley Point A	52	4	25 March 1996
57A	Oldbury	57	3	25 March 1996
105	Sizewell A	51	4	25 March 1996
58A	Wylfa	58	4	25 March 1996
81	Trawsfynydd	56	8	11 February 1997
92	Berkeley P.S.	54	15	02 May 1997
92	Berkeley Centre	54	16	02 May 1997
Sc16	Hunterston A	Sc12	6	26 July 2000
92	Berkeley	70	1	16 December 2002
81	Trawsfynydd	72	1	16 December 2002
92	Berkeley	80	501	18 March 2005
Sc15	Chapelcross	Sc15	501	18 March 2005
Sc16	Hunterston A	Sc16	501	18 March 2005
81	Trawsfynydd	81	501	18 March 2005

12. The withdrawal of specifications relating to LC 13(9), is recommended as it allows better alignment with the principles of the ONR guidance document ‘Nuclear Safety Permissioning’ (NS-PER-GD-001) dated October 2023, as the “furnish” wording used in the original specifications is no longer recognised as a derived power by this process.

13. The withdrawal of these specifications was discussed with the Superintending Inspector, the DFW Head of Safety Regulation, whose no objection is recorded in ref. [7].

3.4. Withdrawal of LC 18(1) specifications

14. The following LC 18(1) specifications were reviewed for withdrawal:

Current Site Licence	Site	Issued under Site Licence	Licence Instrument No.	Date
Sc15	Chapelcross	Sc3C	32	17 August 1992
92	Berkeley	54	7	28 March 1996
93	Bradwell	53	5	27 March 1996
94	Dungeness A	55	5	27 March 1996
95A	Hinkley Point A	52	5	28 March 1996
57A	Oldbury	57	4	28 March 1996
105	Sizewell A	51	5	25 March 1996
81	Trawsfynydd	56	5	28 March 1996
58A	Wylfa	58	5	28 March 1996
Sc16	Hunterston A	Sc12	5	26 July 2000
92	Berkeley	70	2	16 December 2002
81	Trawsfynydd	72	2	16 December 2002

15. The LC 18(1) specifications are recommended to be withdrawn. It is the opinion of the Head of ONR's Radiation Protection and Criticality Specialism that, with strengthened/formalised Level 4 Regulatory Interface meetings in place, the ONR Radiation Protection and Criticality specialism is fully able to continue to regulate NRS site exposures through the restriction of doses and dose limitation requirements in the Ionising Radiations Regulations 2017 without recourse to LC 18 specification submissions. A record of the Superintending Inspector's (Head of Radiation Protection and Criticality specialism) no objection to withdrawal of the LC 18(1) specifications for the sites under review is recorded in ref. [8]. The process of strengthening and formalising all regulatory interface meetings between NRS Ltd and ONR is already underway and will continue to be refined as business as usual.

3.5. Withdrawal of LC 23(4) specifications

16. The following LC 23(4) specifications were reviewed for withdrawal:

Current Site Licence	Site	Issued under Site Licence	Licence Instrument No.	Date
92	Berkeley P.S.	54	2	25 March 1996
92	Berkeley Centre	54	3	25 March 1996
93	Bradwell	53	2	25 March 1996
94	Dungeness A	55	2	25 March 1996
95A	Hinkley Point A	52	2	25 March 1996
57A	Oldbury	57	2	25 March 1996
105	Sizewell A	51	2	25 March 1996
81	Trawsfynydd	56	2	25 March 1996
58A	Wylfa	58	2	25 March 1996
81	Trawsfynydd	56	10	03 September 1997
Sc16	Hunterston A	Sc12	2	26 July 2000
92	Berkeley	70	4	16 December 2002
81	Trawsfynydd	72	4	16 December 2002
93	Bradwell	53	54	19 December 2002

17. The LC 23(4) specifications are recommended to be withdrawn as the associated approvals they established for operating rules have been withdrawn and are a legacy of previously having lacked a clear process to withdraw specifications.

3.6. Withdrawal of LC 28(4) specifications

18. The following LC 28(4) specifications were reviewed for withdrawal:

Current Site Licence	Site	Issued under Site Licence	Licence Instrument No.	Date
92	Berkeley	54	4	25 March 1996
93	Bradwell	53	3	25 March 1996
94	Dungeness A	55	3	25 March 1996
95A	Hinkley Point A	52	3	25 March 1996
105	Sizewell A	51	3	25 March 1996
81	Trawsfynydd	56	3	25 March 1996
58A	Wylfa	58	3	25 March 1996
57A	Oldbury	57	7	21 May 1996
92	Berkeley	54	11	23 May 1996
94	Dungeness A	55	8	20 September 1996
105	Sizewell A	51	13	29 November 1996
58A	Wylfa	58	21	19 March 1997
95A	Hinkley Point A	52	18	01 April 1998
93	Bradwell	53	30	25 November 1998
81	Trawsfynydd	56	18	29 March 1999
Sc16	Hunterston A	Sc12	3	26 July 2000
92	Berkeley	70	5	16 December 2002
81	Trawsfynydd	72	5	16 December 2002
92	Berkeley	86	502	24 September 2008
93	Bradwell	87	502	24 September 2008
94	Dungeness A	88	502	24 September 2008
95A	Hinkley Point A	89	502	24 September 2008
105	Sizewell A	90	502	24 September 2008
105	Sizewell A	90	509	17 December 2010

19. The LC28(4) specifications are recommended to be withdrawn if the associated LC 28(5) approvals in Section 3.1 are also withdrawn.

3.7. Withdrawal of LC 30(3) specifications

20. The following LC30(3) specifications were reviewed for withdrawal:

Current Site Licence	Site	Issued under Site Licence	Licence Instrument No.	Date
Sc15	Chapelcross	Sc3C	9	04 March 1991
93	Bradwell	53	6	27 March 1996
94	Dungeness A	55	6	27 March 1996
95A	Hinkley Point A	52	6	28 March 1996
57A	Oldbury	57	5	28 March 1996
105	Sizewell A	51	6	25 March 1996
58A	Wylfa	58	6	28 March 1996

21. The LC 30(3) specifications are recommended to be withdrawn as the associated consent they established for reactor start-up are no longer relevant for reactor well into their decommissioning life cycle phase and are a legacy of having previously lacked a clear process to withdraw specifications.

3.8. Withdrawal of LC 32(4) specifications

22. The following LC 32(4) specification was reviewed for withdrawal:

Current Site Licence	Site	Issued under Site Licence	Licence Instrument No.	Date
Sc16	Hunterston A	Sc12	7	26 July 2000

23. The LC 32(4) specification is recommended to be withdrawn as it has already been complied with and is a legacy of having previously lacked a clear process to withdraw specifications.

3.9. Withdrawal of LC 35(5) specifications

24. The following LC 35(5) specification was reviewed for withdrawal:

Current Site Licence	Site	Issued under Site Licence	Licence Instrument No.	Date
92	Berkeley	54	8	28 March 1996

25. The LC35(5) specification is recommended to be withdrawn as it specifies that approval is needed to move from one decommissioning stage to another. This is only in place at Berkeley and is not consistent with other NRS Ltd sites. This does not align with ONR's enabling regulation approach, and the Berkeley site has a well-developed hold point control plan [9] utilising flexible permission which supersedes this more historically bureaucratic approach.

3.10. Internal stakeholder engagement

26. The validity of the government legal advice (ref. [4]) was confirmed with the ONR Legal Liaison team to ensure it remained extant. Their response is recorded in ref. [10]. This confirmed Section 4(5) and Section 4(8) of Nuclear Installations Act 1965 (As Amended) allows the bulk withdrawal of approval and specifications by a single legal instrument as ONR has no process for withdrawing multiple specifications or approvals. The Legal Liaison team were of the opinion that the approach is not novel, but rather efficient.

27. The ONR nominated site inspectors representing the sites and relevant specialisms have been consulted regarding the implementation of the requested withdrawals. This was during internal governance meetings and by means of an email of no objection as recorded in refs. [11], [12], [13] and [14].

28. The ONR Civil Nuclear Security and Safeguards purpose was also consulted during the assessment and provided an email of no objection (ref. [15]).

3.11. External stakeholder engagement

29. NRS Ltd worked with ONR in developing the request letter to align with the processes available in ONR for efficiently and effectively withdrawing the recommended approvals and specifications.

30. I ensured that adequate internal consultation within NRS Ltd had been undertaken, in particular with the Site Directors affected and with their Engineering Managers, who are responsible for compliance of the sites with the conditions attached to the site licence (ref. [16]).

31. The Environment Agency (for English and Welsh sites) and the Scottish Environment Protection Agency (for Scottish sites) have also been informed about the proposed withdrawals. Their records of no objection are recorded in refs. [17] and [18].

3.12. Verification of license instruments to be withdrawn

32. The original licence instruments for the approvals and specifications requested for withdrawal have been individually checked to ensure the withdrawal is accurate and aligned to this project assessment. A copy of all the licence instruments is stored in the WIRed documents for this project (ref. [19]).

4. Matters arising from ONR's work

33. There are no matters arising from ONR's assessment.

5. Conclusions

34. I conclude that from the assessment work undertaken that the continued approval of Nuclear Maintenance Schedule Prefaces under LC 28(5) for the Berkeley, Chapelcross, Dungeness A, Hinkley Point A, Hunterston A, Oldbury, Sizewell A, Trawsfynydd and Wylfa NRS Ltd sites is unnecessarily bureaucratic and adds no additional safety benefits above that already achieved by site inspection of LC 28 and oversight of changes to licence condition arrangements via the Nuclear Safety Committee minutes as per LC 13(8). Withdrawal is therefore aligned to the Regulatory Reform Act 2006.
35. The withdrawal of specifications relating to LC 13(9) allows better alignment with the principles of the ONR guidance document 'Nuclear Safety Permissioning' (NS-PER-GD-001) dated October 2023, as the "furnish" wording used in the original specifications is no longer recognised as a derived power by this process.
36. The withdrawal of specifications relating to LC 18(1) reduce the regulatory burden on the dutyholder, as required by the Regulatory Reform Act 2006, as this information is easily sought by alternative arrangements.
37. The withdrawal of the specification relating to LC 35(5) also reduces the regulatory burden on the dutyholder, as required by the Regulatory Reform Act 2006. ONR's enabling regulation approach, utilising flexible permissioning, supersedes this more historically bureaucratic approach.
38. The withdrawal of specifications relating to LC 11(2), 23(4), 28(4), 30(3) and 32(4) are administrative, as previously there was a lack of a clear process for withdrawal of specifications within ONR.
39. The following approvals and specifications issued to these sites were out of scope for the project and remain in force:
- LC 13(3) Nuclear Safety Committee Terms of Reference Approvals;
 - LC 13(12) Arrangements for Urgent Safety Proposals Approvals; and
 - LC 25(4) Specifications on High Activity Sealed Sources.

6. Recommendations

40.I recommend that:

- This Project Assessment Report be approved;
- In accordance with the Nuclear Installations Act 1965 (As Amended) Section 4(5) the approvals and specifications which have been assessed as being no longer required are withdrawn; and
- In accordance with the Nuclear Installations Act 1965 (As Amended) Section 4(8) a single legal instrument exercisable in writing, which will be provided by means of a single letter withdrawing multiple specifications and approvals across the sites, is issued to NRS Ltd (ref. [20]).

References

- [1] ONR Letter NRS 32707R (ONRW-2019369590-15242), December 2024.
- [2] Legislative and Regulatory Reform Act 2006, <https://www.legislation.gov.uk/ukpga/2006/51/contents>.
- [3] ONR Project Assessment Report Withdrawal of Approval under LC11(3) of emergency plans for former reactor and lower level waste management sites (ONRW-2019369590-8584), November 2024.
- [4] Email from GLD Legal Advice - replacing a Specification (ONRW-2019369590-14546), 28 November 2019.
- [5] Nuclear Installations Act 1965, <https://www.legislation.gov.uk/ukpga/1965/57/contents>.
- [6] Magnox Ltd Berkeley Nuclear Maintenance Schedule Preface Issue 1 (ONRW-2019369590-14811), 2018.
- [7] Email of No objection from Head of Safety Regulation-DFW on withdrawal of LC13(9) Specifications (ONRW-2019369590-14611), 11 November 2024.
- [8] Hd of RP - Re No objection response requested for the removal of NRS Ltd legacy LC18(1) specifications (ONRW-2019369590-15705), 18 December 2024.
- [9] NRS Ltd Berkeley - Regulatory Schedule May 2024 (ONRW-2019369590-14813), May 2024.
- [10] Email from ONR Legal Liaison Team (ONRW-2019369590-14555), 8 November 2024..
- [11] Email from NRS Ltd SW NSI - Re No objection response ONRW-2019369590-15247, 3 December 2024.
- [12] Email from NRS Ltd SE NSI - Re No objection response ONRW-2019369590-15257, 4 December 2024.
- [13] Email from NRS Ltd Welsh NSI - Re No objection response ONRW-2019369590-15248, 3 December 2024.

- [14] Email from NRS Ltd Scottish NSI - Re No objection response ONRW-2019369590-15377, 9 December 2024.
- [15] Email from ONR CNNS - Re No Objection response ONRW-2019369590-15274, 4 December 2024.
- [16] Email from NRS Ltd Confirming Internal Stakeholder Engagement (ONRW-2019369590-15875).
- [17] EA - Re No objection response requested for the removal of NRS Ltd legacy approvals and specifications (ONRW-2019369590-15640), 17 December 2024.
- [18] SEPA - Re Request for a no objection response for ONR (ONRW-2019369590-15626), 16 December 2024.
- [19] Email from NRS Ltd Licence Instruments by Licence Condition (ONRW-2019369590-14663).
- [20] ONR Letter ONR-SDFW-NRS-90065N-Withdrawal of Nuclear Maintenance Schedule Preface Approvals & Legacy Licence Condition Specifications (ONRW-2019369590-14809), December 2024.