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| ONR Technical Inspection Guide (TIG)  Licensed site annual review meetings |



ONR Technical Inspection Guide (TIG)

Licensed site annual review meetings

**Head of Profession** – Operational Inspection

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Revision commentary

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| Issue No. | Description of Update(s) |
| 4 | Routine update taking into account changes in how site annual review meetings have developed and promoting consistency in approach while recognising the differences between licensees |
| 4.1 | Routine update, removed appendices which were covered in the main body and too specific for the guidance. Changed role names in line with ONR current structure. This guidance is not ONR purpose specific and ensured the language reflected this. |

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# Introduction

1. This document describes ONR’s guidance for conducting Site Annual Reviews (SARs) with licensees. This guidance is to support inspectors in preparing for these meetings which include ONR’s wider regulatory purposes (if applicable to the site) and the Regulators’ Code requirements on efficient means of engagement.
2. SARs provide an opportunity to carry out a stand-back review of the site’s performance during the previous year, lessons learnt and a forward look.
3. The SAR is known by different names depending on the licensee e.g. Annual Regulatory Review of Safety, Security, Safeguards and Environment.

# Purpose

1. From the licensee’s perspective the SAR is a senior level meeting providing a means of:
   1. Reviewing compliance with the legislation regulated by ONR as appropriate, over the preceding period;
   2. Reviewing the extent to which commitments made at the previous SAR or, start-up meeting (where appropriate), have been met;
   3. Applying internal governance to the conclusions of the annual review and providing a strategic forward look over the next year, including what the licensee is committing to achieve, what needs to be accelerated and how; and
   4. Setting out its medium / longer term plans and the challenges that are foreseen and how these will be addressed.
2. From ONR’s perspective the purpose of the SAR is to:
   1. Provide an opportunity for formal regulatory discussions, usually part of the sites regulatory interface meeting structure (either L3 or L2 dependent upon the targeted level of inspector attendance);
   2. Respond to the matters raised by the licensee from the perspective of ONR’s regulatory responsibilities;
   3. Raise any other important regulatory matters, particularly where performance has been poor or progress on resolving Regulatory Issues [Ref 6.1] has been slow.
   4. Acknowledge and encourage the licensee in areas where performance has been particularly good.
   5. Set out ONR’s strategic regulatory focuses for the site over the coming period (year), and highlighting areas where improvements are expected from the licensee.
   6. Promote and reinforce regulatory messages being pursued on an industry-wide basis.
3. From ONR perspective the level of inspector involvement will be proportionate and targeted to the risk profile of the site and the level of regulatory attention being attributed. These meetings can be led by Nominated Site Inspectors to Directors of Regulation dependent on this determination. Where practical, the meeting should be held jointly with other relevant regulators.
4. The extent of the review should be commensurate with the magnitude of the hazard and risks presented by the site and the complexity of its operations. For lower hazard sites owned or managed by a single company, combined SARs covering multiple sites may be convened.
5. Attending site for the SAR also provides an opportunity for a senior ONR member of staff to meet the Site Safety Representatives and (where considered appropriate) other worker representatives and perhaps encompass a site / facility walk down.
6. A separate meeting can if necessary be arranged to meet the Site Safety Representatives. These meetings should:
   1. Precede the SAR (in case matters raised need to also be raised at the SAR);
   2. Enable the safety / worker representatives to raise any concerns or complaints in private [Ref 6.3]; and
   3. Provide an opportunity for ONR to share matters of mutual importance in line with our openness and transparency principles.

# Responsibilities

1. The Nominated Site Inspector is responsible for:
   1. Coordinating ONR’s preparations for the SAR (e.g. attendance, timing, agreeing the proposed agenda with the licensee, comments on the Information Pack, briefings, advising the licensee on ONR expectations, liaising with any other regulators attending etc.) and facilitating its smooth running;
   2. Following the SAR, agreeing minutes of the meeting with the licensee and ensuring an adequate auditable trail is made (including writing the Contact Record (CR) or Intervention Report (IR));
   3. Ensuring the completion of all agreed actions.
2. The Lead Head of Regulation is responsible for:
   1. Leading the ONR team at the SAR, which will likely include Head of Regulation for applicable purposes or ensuring appropriate input from them;
3. Normally the Lead Inspector will be a Head or Regulation, but where the site’s size or hazard potential merit this, the Director of Regulation should lead the team. At lower hazard sites the Head of Regulation may delegate to the Nominated Site Inspector to lead the team.

# Procedure

1. The SAR structure can include the following elements:
   1. An information pack;
   2. A site tour;
   3. A presentation by the licensee based on its own self-reviews;
   4. A presentation by worker representative(s)
   5. A presentation by ONR based on its inspections and assessments of the previous year and ONR’s priorities for inspections during the following year.
   6. Agreed meeting notes and actions.
   7. Sharing the ONR CR or IR with the licensee
2. These elements (and their depth / extent / coverage) should be selected at the discretion of the SAR Lead Inspector taking account of ONR’s regulatory strategy for the site and the extent of other senior level contact with the licensee.
3. The information pack provided by the licensee should be a distilled output from its own internal reviews of aspects such as its legal compliance, incident and events, learning from experience, dose levels, culture etc. The broad format and content of the Pack should be agreed between the SAR Lead Inspector and the licensee in advance of the meeting. It is considered good practice for the information pack to be subject to some form of independent review as part of the licensee’s internal governance process. This may be achieved through being reviewed by the licensee’s internal regulator or Nuclear Safety Committee.
4. The licensee is expected to brigade its outputs into a high level presentation to facilitate the meeting discussions. Use of single overview slides either in place of, or to supplement more detailed Information Packs has been a successful approach at some sites in ensuring the SAR retains a high level focus. Such approaches, which are consistent with ONR’s sampling philosophy, are supported provided the underpinning review conducted by the licensee is suitably detailed. Over-detailed information packs and/or long and complicated licensee presentations should be discouraged.
5. ONR should provide feedback on the licensee’s performance over the relevant period. At a minimum this should be a summary of inspections, regulatory actions relating to permissioning, enforcement and issues. Reflection on regulatory attention level assessment and areas for regulatory focus in the coming year.
6. Attendance at the SAR should be coordinated carefully between the ONR SAR Lead Inspector and the licensee. Experience suggests that having too many people in attendance can lead to a lack of focus. The Lead Inspector should allocate responsibilities within the team to achieve an optimal balance between covering the topics adequately and the numbers attending, and then encourage the licensee to do likewise.
7. Where the site has an internal regulator, they should contribute to the SAR proactively. The internal regulator should:
   1. Be invited to provide an independent opinion on the licensee’s presentation;
   2. Be in a position to comment on the quality (strengths and weaknesses) of the licensee’s underpinning reviews;
   3. Provide any advice or opinions after the licensee’s presentation but before ONR gives its views.
8. The ONR team must be properly prepared before the SAR. In particular each team member should:
   1. Have copies of the Licensee’s Information Pack at least two weeks before the SAR meeting.
   2. Review the Information Pack and prepare their initial feedback response to the ONR SAR Lead Inspector for those aspects where they are leading;
   3. Review the current status of regulatory actions and progress made;
   4. Agree lines to take on contentious matters with relevant team inspectors and the ONR SAR Lead Inspector.
   5. Feedback ONR’s views of the site’s performance.
9. Notes of the meeting should be available shortly after the meeting to be agreed by ONR and the licensee as an accurate reflection of views.
10. The meeting will be recorded in an ONR Intervention Record or Contact Record (which will be shared with the licensee in draft for comment prior to formal issue).