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| ONR Project Assessment Report  Approval of Issue 21 of the Sellafield Limited Operator Emergency Plan |



ONR Project Assessment Report

**Project Name**: Sellafield Limited – Emergency Arrangements

**Report Title**: Approval of Issue 21 of the Sellafield Limited Operator Emergency Plan

**Report Issue No**.: 1

**Publication Date**: 17 July 2023

**Document ID**: ONRW-2019369590-3408

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# Executive summary

**Project title**

Sellafield Limited Emergency Arrangements.

**Permission requested**

Sellafield Limited has written to the Office for Nuclear Regulation (ONR) to request Approval of an alteration or amendment to its Approved arrangements made under Licence Condition (LC) 11, specifically Issue 21 of the Operator Emergency Plan (OEP), Sellafield Limited Manual (SLM) SLM 2.02.03.

Due to prior ONR Specification, SLM 2.02.03 is an Approved arrangement in accordance with the expectations of Nuclear Site Licence Condition 11.

To maintain compliance with the requirements of LC11(3), Sellafield Limited cannot alter or amend SLM 2.02.03 without the prior Approval of ONR.

**Background**

The licensee’s on-site emergency plan was first subject to Specification (Licence Instrument LI502, under Schedule 2 of Nuclear Site Licence No.83) in March 2008. LI502 specified that Sellafield Limited should submit its plan for Approval by the regulator.

Subsequent Licence Instrument LI908, issued on 5 December 2016 under Schedule 2 of the Nuclear Site Licence No. 31G, granted an Approval of a document titled “Sellafield and Windscale Sites Emergency Arrangements, Emergency Plan SLM 2.02.03”, Issue 17.

In March 2017, ONR granted a single Nuclear Site Licence No.103 upon receiving a request from Sellafield Limited to combine the two prior site licences for Sellafield and Windscale, No.31G and No.83 respectively. Within this relicensing process LI908 was carried over into Nuclear Site Licence No.103.

Since then, Sellafield Limited has identified a need to update SLM 2.02.03 up until Issue 20 of the OEP was Approved by ONR in September 2021 via LI535, supported by Project Assessment Report ONR-SDFW-PAR-20-020.

Issue 20 of SLM 2.02.03 incorporated the requirements of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR) and the Control of Major Accident Hazards Regulations 2015 (COMAH).

On 28 March 2023 Sellafield Limited wrote to ONR to request Approval of Issue 21 of SLM 2.02.03.

Implementation of Issue 21 of SLM 2.02.03 will enable Sellafield Limited to transfer the functions of the primary on-site Site Emergency Control Centre (SECC) into the Main Site Command Facility (MSCF) via a process Sellafield Limited refers to as ‘Command Transition’.

The MSCF is a fully digitised modern facility, created to house the central functions that will oversee an emergency response. The MSCF is acknowledged to provide worthwhile improvements when compared to the pre-existing SECC, by providing co-location of key responders, greater resilience to loss of power events and seismic events, modern standard IT equipment and improved provisions for staff welfare.

**Assessment and inspection work carried out by ONR in consideration of this request**

In consideration of this request, ONR undertook a range of interventions to gain assurance that the plant, people and processes at MSCF are in a suitable state of readiness for safe and secure ‘Command Transition’.

These interventions included – targeted assessment of Issue 21 of the OEP and supporting arrangements, a life fire safety inspection of MSCF, observation of ‘FridEx’ emergency exercises at MSCF, an observation of the Security and Resilience Management Safety Committee and a readiness inspection.

**Conclusion**

I consider that Sellafield Limited has provided an adequate demonstration that the plant, people and processes at MSCF have attained a sufficient level of readiness for ONR to grant Approval of Version 21 of the Sellafield Limited OEP thereby enabling ‘Command Transition’ to be implemented.

**Recommendation**

I recommend that ONR should grant LI 545 under LC 11(3) to Approve the alteration or amendment that Sellafield Limited proposed to make to its arrangements made under LC 11, specifically the substitution of the last Approved document titled “Sellafield Site Emergency Arrangements, Operator Emergency Plan, Issue 20’ for the document titled “Sellafield Site Emergency Arrangements Operator Emergency Plan SLM 2.02.03, Issue 21.”

Table 2: List of abbreviations

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| Term/Acronym | Description |
| ALARP | As low as reasonably practicable |
| CNC | Civil Nuclear Constabulary |
| CNS | Civil Nuclear Security (ONR) |
| COMAH | Control of Major Accident Hazards Regulations 2015 |
| EA | Environment Agency |
| IOC | Initial Operating Capability |
| LC | Licence Condition |
| LI | Licence Instrument |
| MSCF | Main Site Command Facility |
| NIA | Nuclear Installations Act 1965 |
| NISR | Nuclear Industry Security Regulations 2013 |
| OEP | Operator Emergency Plan |
| OSCF | Off Site Command Facility |
| ONR | Office for Nuclear Regulation |
| REPPIR | Radiation (Emergency Preparedness and Public Information) Regulations 2019 |
| RGP | Relevant Good Practice |
| SAP | Safety Assessment Principle(s) |
| SECC | Site Emergency Control Centre |
| SFAIRP | So far as is reasonably practicable |
| SLM | Sellafield Limited Manual |
| SSC | Structure, System and Component |
| TAG | Technical Assessment Guide |

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# Permission requested

1. On 28 March 2023 Sellafield Limited wrote to ONR requesting Approval of Issue 21 of the Sellafield Operator Emergency Plan, SLM 2.02.03 [1].
2. The on-site emergency plan at Sellafield was originally subject of Specification (Licence Instrument LI502) under Schedule 2 of the Nuclear Site Licence No.83 in March 2008. LI502 required the licensee to submit its emergency plan for Approval by the regulator.
3. A subsequent Licence Instrument (LI908), issued on 5 December 2016 under Schedule 2 of the Nuclear Site Licence No.31G, granted Approval of a document titled “Sellafield and Windscale Sites Emergency Arrangements, Emergency Plan SLM 2.02.03”.
4. In March 2017, ONR granted a single Nuclear Site Licence No.103 to effectively combine the two previous site licences for Windscale and Sellafield, No.83 and No.31G. During this relicensing process, LI908 was carried over into Schedule 2 of Licence No.103. Since that time Sellafield Limited has been obligated to seek ONR Approval of any subsequent amendment to SLM 2.02.03 to maintain compliance with LC11(3) of nuclear site licence No.103.
5. Issue 20 of SLM 2.02.03 was Approved by ONR via Licence Instrument LI535 as supported by Project Assessment Report ONR-SDFW-PAR-20-020 in 2021 [2].
6. ONR-SDFW-PAR-20-020 confirmed that Issue 20 of SLM 2.02.03 adequately incorporated the requirements of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR) and the Control of Major Accident Hazards Regulations 2015 (COMAH).
7. Sellafield Limited is seeking ONR’s approval of Issue 21 of SLM 2.02.03 in line with the Main Site Command Facility (MSCF) commencing operations as the Site Emergency Control Centre (SECC).

# Background

1. Implementation of Issue 21 of SLM 2.02.03 will allow the newly constructed MSCF to become Sellafield Limited’s primary SECC via a process that Sellafield Limited has referred to as ‘Command Transition’. MSCF will then take over from the historic SECC that has operated elsewhere on site since the 1990s.
2. The extant SECC is operating at capacity and was not designed against the current Design Basis Threats. In addition, the extant SECC is situated in a flood plain and is more vulnerable than MSCF to chemo toxic and radiological events primarily due to proximity with facilities that feature hazardous inventories.
3. The MSCF is a digitised modern facility, purposefully designed to house the central functions for Sellafield Limited’s emergency response capability. The design of MSCF has considered learning from events such as 9/11 and 7/7, which led to the creation of the Joint Emergency Services Interoperability Principles (JESIP) and an appreciation of the benefits of co-location of key responders to enable a shared situational awareness.
4. A key purpose of the MSCF programme and the associated Site Security Architecture Upgrade (SSAU) is to fully integrate all the key functions that are required to support emergency response at Sellafield, in respect of both security-related initiators and safety-related initiators – thereby enabling Sellafield Limited to adopt a philosophy of emergency response which is cause agnostic.
5. The MSCF is therefore acknowledged to provide worthwhile improvements when compared to the pre-existing SECC, such as co-location of key functions, a more ergonomic working environment, greater resilience of essential services, greater resilience to credible incident scenarios, modern standard IT equipment and improved provisions for staff welfare.
6. In respect of Security, Sellafield Limited has a regulatory commitment under the Nuclear Industry Security Regulations 2003 (NISR) to deliver an Initial Operating Capability at MSCF by March 2024 that will include transfer of the Police Control Room functionality into the MSCF. Sellafield Limited has recently indicated Initial Operating Capability at MSCF is expected to be delivered by February 2024.
7. Sellafield Limited’s future ability to declare ‘Initial Operating Capability’ at MSCF will be assessed separately by ONR as part of a deliverable against the approved security plan.
8. The proposed changes to the written content of Issue 21 of SLM 2.02.03 are relatively minor in nature [1]. Sellafield Limited has also enacted some changes to the underpinning arrangements that support SLM 2.02.03 [3].

# Assessment and inspection work carried out by ONR in consideration of this request

1. Implementation of Issue 21 of SLM 2.02.03 will allow the MSCF to become Sellafield Limited’s primary Site Emergency Control Centre (SECC) via the process of ‘Command Transition’.
2. The MSCF does not hold a nuclear inventory and is not in itself a high hazard facility.
3. However, if the process of ‘Command Transition’ were to be inadequately conceived or executed, this could render Sellafield Limited unable to execute an adequate response to a site emergency.
4. In considering Sellafield Limited’s request, ONR focussed its attention on a range of interventions to gain assurance that the people, plant and processes at MSCF were in a suitable state of readiness to complete the process of ‘Command Transition’ safely and securely.
5. These interventions aligned to approved WIReD Permissioning plan PR-01251 and included:

* Assessment of Issue 21 of SLM 2.02.03 and supporting arrangements [1] [3];
* A Life Fire Safety Inspection of MSCF, completed in January 2023 [4];
* Observation of emergency exercises held at MSCF on 31st March 2023 [5] and 2nd June 2023 [6];
* An observation of the Sellafield Limited Security and Resilience Management Safety Committee on 25th May 2023 [7];
* A Readiness Inspection of MSCF, carried out on 22 and 23 June 2023 [8]; and
* Obtaining an Environment Agency statement of ‘No Objection’ to ONR’s Approval of Issue 21 of SLM 2.02.03, in accordance with the ONR/Environment Agency Memorandum of Understanding [9]

1. In considering Sellafield Limited’s request, ONR also took assurance from a range of activities related to MSCF ‘Command Transition’ carried out by representatives of the Sellafield Limited Nuclear Independent Oversight function [10] [11] and associated position statement [12]. These elements of assurance were obtained in accordance with the guidance to inspectors found in NS-TAST-GD-080, ‘Nuclear Safety Advice and Independent Challenge’.

# Matters arising from ONR’s work

**Resolution of minor comments relating to COMAH**

1. ONR-SDFW-PAR-20-020 confirmed that Issue 20 of SLM 2.02.03 adequately incorporated the requirements of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR) and the Control of Major Accident Hazards Regulations 2015 (COMAH) [2].
2. In response to the assessment of ONR’s specialist inspector of conventional safety that supported ONR-SDFW-PAR-20-020, Sellafield Limited committed to enact some minor improvements in future revisions of SLM 2.02.03. I ensured these minor comments were adequately addressed by Sellafield Limited in Issue 21 of SLM 2.02.03 [13].

**Definition of ‘Command Transition’ and relationship to the future milestones of MSCF ‘Initial Operating Capability’ and MSCF ‘Final Operating Capability’**

1. Successful delivery of 'Command Transition' will involve a wide range of stakeholders from across the Sellafield Limited business and the Civil Nuclear Constabulary, with some inherent challenges in respect of integration, commonality of purpose and consistency of understanding.
2. Clarity on the scope of 'Command Transition' and its relationship with the subsequent milestones of 'Initial Operating Capability' and 'Final Operating Capability' is therefore important to achieving the required outcomes.
3. During the readiness inspection of MSCF, ONR sampled a broad range of evidence to confirm that Sellafield Limited had adequately defined and communicated the intended scope of 'Command Transition', which included the MSCF Operations Strategy and Plant Modification Proposals. The full scope of the evidence to be sampled is recorded against WIReD inspection record IR-52784 and uploaded to the ‘Documents’ tab against that WIReD Record.
4. Sellafield Limited provided ONR with a prior definition of 'Initial Operating Capability' in response to a Security Direction issued under the Nuclear Industry Security Regulations 2003. This included establishment of a Joint Intelligence Cell within the MSCF (Level 2 Regulatory Issue RI-9037, Action 8 refers).
5. During the readiness inspection of MSCF, Sellafield Limited advised that the status of the Joint Intelligence Cell had changed from the original definition of a permanent physical location within the MSCF, to one where the Joint Intelligence Cell will be treated as a mobile capability with the option to operate from the MSCF as and when required. Sellafield Limited provided a record of this change through a paper approved at the February 2023 Security and Resilience Delivery Board. On receipt of this evidence, the ONR security Inspector was satisfied that the change of status of the Joint Intelligence Cell had been managed through an appropriate level of Sellafield Limited governance.
6. Based on the evidence sampled, supported by discussions with Sellafield Limited and Civil Nuclear Constabulary personnel during the readiness inspection of MSCF, I was content that the scope of 'Command Transition' and its relationship to the future milestones of 'Initial Operating Capability' and 'Final Operating Capability' had been adequately defined, clearly communicated and was consistently understood by relevant personnel.

**Life fire safety provisions at MSCF**

1. ONR’s specialist Inspector of life fire safety undertook a compliance inspection at MSCF (WIReD Inspection Reference IIS-51071) in January 2023 and subsequently raised a Level 4 (lowest level) Regulatory Issue RI-11196.
2. RI-11196 captured a range of shortfalls in respect of life fire safety provisions at MSCF, the most pertinent of these shortfalls to 'Command Transition' were the provision of escape routes and maintainability of fire dampers.
3. The originally intended life fire safety strategy for MSCF included a 'stay put' policy for the operations floor. Implementation of a 'stay put' policy would rely on successful fire compartmentalisation of MSCF, to provide sufficient resilience to enable personnel to safely remain on the operations floor should a fire be initiated in another area of the building. A key element of the ability to assure the required compartmentalisation is the regular inspection and maintenance of fire dampers. Some of the relevant fire dampers at MSCF were installed in locations with restricted access, such that the required regime of inspection and maintenance had not been carried out.
4. Sellafield Limited has accepted that until such point that the challenges identified in IIS-51071 and captured by Regulatory Issue RI-11196 are addressed, the life fire safety strategy for the MSCF operations floor will need to be that of 'swift evacuation', rather than 'stay put'. Therefore, on sounding of the building fire alarm, all persons within MSCF will be expected to escape from the nearest available exit using all available routes.
5. Shortly after the readiness inspection of MSCF, Sellafield Limited provided a note for the record and Issue C of the MSCF Fire Strategy, suitably approved via the Security and Resilience Management Safety Committee, which adequately documented Sellafield Limited's intentions in relation to life fire safety and the response to RI-11196, particularly the evacuation strategy and resolution of the fire damper issues [14] [15].
6. The ONR specialist Inspector for life fire safety confirmed this additional evidence provided sufficient confidence that adoption of a policy of 'swift evacuation', combined with Sellafield Limited's recognition of the need to address the actions of RI-11196 in a timely manner, will ensure a safe working environment at MSCF and he therefore had no objection to implementation of 'Command Transition' [16].
7. Based on the quoted evidence, supported by discussions with Sellafield Limited and CNC personnel during the readiness inspection of MSCF, I was content that Sellafield Limited was responding adequately to RI-11196 and that the proposed position for 'Command Transition' in respect of the people, plant and processes at MSCF would be compatible with successful resolution of the Regulatory Issue.
8. The operations floor includes provisions for storage of sensitive information and other functions important to nuclear security. A significant level of defence in depth is provided, with several layers of access control from the facility main entrance. During the readiness inspection of MSCF, the ONR Inspector of nuclear security confirmed that adoption of a policy of 'swift evacuation' for the operations floor can be implemented while still maintaining compliance with the Nuclear Industry Security Regulations 2013 [17].
9. Further assurance on the practical effectiveness of 'swift evacuation' at MSCF was obtained from fire drills assessed as adequate by Nuclear Independent Oversight and reported to ONR [11].

**Contingency locations should MSCF need to be evacuated**

1. Considering Sellafield Limited's decision to adopt a policy of 'swift evacuation' for the MSCF operations floor, I sought additional assurance that Sellafield Limited had contingency measures in place to ensure that an adequate emergency response capability can be delivered from an alternative location in the event of staff having to vacate MSCF in response to the building fire alarm. This matter was also pertinent to action 1 of Regulatory Issue RI-10929 (Level 4, Alternate MSCF Command and Control Arrangements).
2. Sellafield Limited provided adequate evidence to demonstrate that suitable contingencies were in place, at both the pre-existing SECC and the Off-Site Command Facility (OSCF). Sellafield Limited was able to demonstrate a documented logic for transition between MSCF and the two backup locations. Sellafield Limited had also recognised the need for the OSCF to be tested as part of its programme of regular emergency exercises [18] [19].

**Accuracy of working level procedures at MSCF**

1. Sellafield Limited has developed extensive procedures for the staff based in MSCF that describe the expected actions in the event of internal and external events. At the time of the readiness inspection, some elements of this level of documentation reflected the original design intent of MSCF. For example, the ONR specialist inspector of human factors noted that the alarm response instruction 'MSCF Fire Alarm' still referred to the existence of a 'stay put' policy for staff on the operations floor.
2. This error in the instruction was mitigated by the stated need for staff to confirm whether 'stay put' is safe to implement with the site shift manager.
3. Changing all the working level documentation to align with the temporary adoption of a policy of ‘swift evacuation’ for the operations floor would be an onerous activity that would have to be reversed once the full design intent of MSCF is achieved. Sellafield Limited stated that staff understood the current position and the required actions. During the readiness inspection a broad selection of staff confirmed their understanding.
4. Therefore, in my opinion this is a pragmatic solution in the short term if the status of the relevant systems at MSCF continues to be made clear to all staff.
5. The specialist inspector of human factors was pleased to note that operations procedures at MSCF were being hand marked up prior to a formal update, as this process should ensure that procedures are accurate and clear.
6. Following the readiness inspection of MSCF, the specialist inspector of human factors confirmed that he had no objection to the implementation of ‘Command Transition’. [20]

**MSCF contribution to Sellafield Limited’s emergency management capability case**

1. Level 4 Regulatory Issue RI-8744 was raised by the ONR corporate inspector following an inspection of Sellafield Limited's corporate arrangements for LC11 that took place in May 2021. [21]
2. RI-8744 was subsequently closed, partly on the basis that all actions relating to MSCF found within the emergency management capability case implementation plan would be addressed prior to declaration of an ‘Initial Operating Capability’ at MSCF and that confirmation would be sought within the scope of the readiness inspection that supported this permission. [22]
3. The relevant actions were clearly identified in Tables 1 and 2 of the emergency management capability case implementation plan and referred to:

- MSCF clearance certificates

- Equipment substantiation

- MSCF stakeholder plan

- Review capability case assessments and incorporate MSCF arrangements

- Engineering schedule

1. During the readiness inspection of MSCF, Sellafield Limited summarised the work undertaken to successfully close all the relevant actions, which I verified by considering a sample of evidence referenced in the WIReD Inspection Record IR-52784.
2. Based on the evidence quoted in WIReD inspection record IR-52784, supported by discussions with Sellafield Limited and Civil Nuclear Constabulary personnel during the readiness inspection of MSCF, I was content that Sellafield Limited had responded adequately to RI-8744 and that the proposed position for 'Command Transition' in respect of the people, plant and processes at MSCF was compatible with the basis on which the Regulatory Issue had been closed.

**Decision making processes applied to ‘Command Transition’**

1. Sellafield Limited's primary decision-making forums in respect of 'Command Transition' were:

- Security and Resilience Management Safety Committee

- Security and Resilience End State Sub Committee

- Security and Resilience Commissioning Sub Committee

- Emergency Management Capability Case Review Committee

1. During the readiness inspection of MSCF I sampled a range of evidence to gain assurance that the Security and Resilience Management Safety Committee was constituted and operated in accordance with the Sellafield Limited Company Charter for Management Safety Committees throughout the preparations for ‘Command Transition’.
2. ONR gained further assurance on the efficacy of the Security and Resilience Management Safety Committee by observing the meeting held on 25 May 2023 [7]. ONR also took assurance from NIO’s observations from attendance at several other meetings of the Security and Resilience MSC [11] [12].
3. The dutyholder established an End State Sub Committee (ESSC), reportable to the Security and Resilience Management Security Committee, with the particular purpose of considering the review and signoff of end state criteria evidence packages and any safety or security arrangements relevant to attainment of 'Command Transition'. The ESSC Terms of Reference provided clear evidence that the ESSC had systematically acted on behalf of the dutyholder.
4. During the readiness inspection of MSCF I sampled a range of evidence to gain assurance that the Security and Resilience End State Sub Committee was constituted and operated in accordance with its Terms of Reference throughout the preparations for ‘Command Transition’.
5. Based on the evidence quoted in WIReD inspection record IR-52784, supported by discussions with Sellafield Limited and Civil Nuclear Constabulary personnel during the readiness inspection of MSCF, I was content that the decision-making mechanism Sellafield Limited had applied to 'Command Transition' was adequate and included some evidence of conservative decision making by the dutyholder in the best interests of safety.

**Operability of the MSCF Air Handling Units**

1. At the time of the readiness inspection of MSCF, the facility's four air handling units were out of service, which I noted was also the position at the ‘FridEx’ emergency exercise held at MSCF on 31 March 2023. [5]
2. The air handling units were intended to filter and condition incoming air and maintain the ambient air pressure within MSCF above 1 bar, to allow resident staff to 'stay put' on the operations floor during design basis accidents.
3. The air handling units do not deliver a nuclear safety function during normal business but do contribute to MSCF's resilience against credible scenarios.
4. The root cause of operability issues with the air handling units was described in a commissioning note for the record [23] as repeated premature failure of drive couplings.
5. Sellafield Limited had consulted with the supplier, Airedale, to investigate alternative ventilation arrangements but none were found to be suitable. The proposed next step was to carry out an investigation with condition monitoring equipment, but the commissioning note provided no explicit timescale for resolution.
6. For the purposes of 'Command Transition' Sellafield Limited has adopted a mitigated position in respect of the MSCF air handling units, such that staff will be expected to potentially evacuate the facility in the event of MSCF being impacted by a radiological release, as opposed to implementing the originally intended 'stay put' policy for staff on the operations floor. The mitigated position was consistent with the pre-existing arrangements at the current SECC.
7. ONR noted that the air handling units contribute to habitability of MSCF as they are relied on to provide fresh air to the working areas. The opportunity for fresh air to enter the building by other means is very low, as the MSCF is purposefully a sealed structure with multiple barriers to the access route. Post 'Command Transition' as the building becomes more fully populated, this limitation may be more impactful.
8. Consequently, ONR identified the following regulatory finding:

* Operability of the MSCF air handling units

1. To maintain regulatory oversight of Sellafield Limited’s resolution of this residual matter, I have raised a Level 4 (lowest level) Regulatory Issue, RI-11594.

**Ensure Sellafield Limited was providing an adequate response to pre-existing regulatory issues relevant to MSCF**

1. As a result of prior interventions, ONR raised several Regulatory Issues of relevance to the people, plant and processes at MSCF ahead of receiving this request from Sellafield Limited.
2. Within the scope of the readiness inspection at MSCF, I sought assurance that Sellafield Limited was responding appropriately to all relevant Regulatory Issues and that the proposed position for 'Command Transition' in respect of the people, plant and processes at MSCF would be compatible with successful resolution of those Regulatory Issues, which were:

* RI-11196 (Level 4), MSCF (B\*\*\*\*) Sellafield Limited
* RI-10929 (Level 4), Alternate MSCF command and control arrangements
* RI-8744 (Level 4), Sellafield on-site emergency arrangements, emergency management capability case
* RI-9037 (Level 2), Delivery of initial operating capability for MSCF
* RI-8140 (Level 4), Deliver the site security architecture upgrade to provide for secure and resilient power and data communication aligned to MSCF final operating capability
* RI-8188 (Level 3), Site perimeter monitoring replacement project

1. On the basis of the evidence sampled during the readiness inspection, supported by discussions with Sellafield Limited and Civil Nuclear Constabulary personnel during the inspection, I was content that Sellafield Limited was responding adequately to extant Regulatory Issues of relevance to MSCF (i.e. RI-8140, RI-8188, RI-8744, RI-9037, RI-10929 and RI-11196) and that the proposed position for 'Command Transition' in respect of the people, plant and processes at MSCF was compatible with successful resolution of those Regulatory Issues.

**Basis of evidence relied upon to demonstrate readiness of MSCF**

1. During the readiness inspection of MSCF, ONR sampled a broad range of documentation as evidence to demonstrate the readiness of people, plant and processes at MSCF to deliver 'Command Transition'. The evidence sampled is directly referenced and stored in the WIReD intervention record IR-52784.
2. The Cyber Security Operations Centre (CSOC) relocated to MSCF in March 2023 with staff taking up positions at new workstations on the operations floor. The CSOC manager confirmed all personnel had undergone MSCF induction training and the operations carried out from the MSCF to date were effective.
3. The MSCF dutyholder noted that at the time of the readiness inspection, a small scope of work, necessary to implement 'Command Transition', was outstanding. Some of this work related to changes to telephony systems and could only be completed on the day of 'Command Transition' to give continuity of the site shift manager contact numbers.
4. At the point of 'Command Transition' the Civil Nuclear Constabulary operational inspector will relocate to MSCF and take up position on the operations floor “bridge” alongside the site shift manager, Sellafield fire and rescue service watch commander and the MSCF operations team leader.
5. The Civil Nuclear Constabulary confirmed all MSCF familiarisation and induction training was completed.  ONR noted that Sellafield Limited’s evidence pack included several ‘Position Statements’ including from the site shift managers and the NIO, that were provided to the Security and Resilience Management Safety Committee. However, although Civil Nuclear Constabulary provided verbal assurances in respect of its state of readiness during the readiness inspection, the Civil Nuclear Constabulary had not provided a similar position statement to the Security and Resilience Management Safety Committee. ONR identified the following regulatory advice:

* It was agreed that a formalised position statement to confirm the readiness of the Civil Nuclear Constabulary to relocate its operational inspector into MSCF would be provided by Civil Nuclear Constabulary to Sellafield Limited prior to ‘Command Transition’.

1. Based on the evidence sampled, supported by discussions with Sellafield Limited and Civil Nuclear Constabulary personnel during the readiness inspection of MSCF, I was content that the basis of evidence used by Sellafield Limited to demonstrate that MSCF had attained sufficient readiness to achieve 'Command Transition' was adequate.

# Conclusions

1. Based on the interventions carried out by ONR, including a readiness inspection of MSCF completed on 22 and 23 June 2023, I judge that Sellafield Limited has provided an adequate demonstration that the plant, people and processes at MSCF have attained a sufficient level of readiness to safely and securely implement 'Command Transition' thereby allowing ONR to grant Approval of Issue 21 of the Sellafield Limited OEP.
2. Sellafield Limited has openly acknowledged the presence of shortfalls in respect of operability of the air handling units and provisions for life fire safety at MSCF and adopted an adequately mitigated position. The overall capability of MSCF to provide an emergency response is at least equal to that of the pre-existing SECC.
3. Further work is required for MSCF to fully achieve its design intent. Based on Sellafield Limited's extant plans, these residual matters should be resolved prior to attainment of 'Initial Operating Capability' the target date for which is February 2024.

# Recommendations

1. I recommend that ONR should grant LI 545 under Condition 11(3) of Schedule 3 attached to Nuclear Site Licence No. 103 to Approve the alteration or amendment to Sellafield Limited’s arrangements made under LC11, specifically the substitution of the last Approved document titled “Sellafield Site Emergency Arrangements, Operator Emergency Plan, Issue 20” for the document titled “Sellafield Site Emergency Arrangements Operator Emergency Plan SLM 2.02.03, Issue 21.”
2. Given the existence of residual matters at MSCF I recommend that ONR should continue to provide regulatory oversight in respect of the future milestone of ‘Initial Operating Capability’.

# References

[1] Sellafield Limited Request Letter; Issue 21 of the Operators Emergency Plan SLM 2.02.03, 28th March 2023, CM9 2023/0038258

[2] ONR Project Assessment Report ONR-SDFW-PAR-20-020, Approval of Sellafield Operator Emergency Plan Issue 20, September 2021, CM9 2021/59474

[3] Documentation to Support Issue 21 of SLM 2.02.03, CM9 2023/38261

[4] Life Fire Safety Compliance Inspection of the Sellafield Main Site Command Facility against the Regulatory Reform Fire Safety Order 2005, January 2023, WIReD Inspection Reference IIS-51071

[5] ONR-SDFW-CR-22-992, Observation of FridEx at Main Site Command Facility, 30th March 2023, CM9 2023/25852

[6] ONR-SDFW-CR-23-127, Observation of FridEx at Main Site Command Facility, 2nd June 2023, CM9 2023/35698

[7] ONR-SDFW-CR-23-107, Observation of the Sellafield Limited Security and Resilience Management Safety Committee, 25th May 2023, CM9 2023/35148

[8] Readiness Inspection of MSCF, carried out on 22nd and 23rd June 2023, ONR WIReD Inspection Record IR-52784

[9] Environment Agency notice of ‘No Objection’ to ONR’s Approval of Issue 21 of the Sellafield Limited Operators Emergency Plan SLM 2.02.03, CM9 2023/38287

[10] Main Site Command Facility, Readiness for Command Transition, Assurance activities carried out by Sellafield Limited Nuclear Independent Oversight (NIO), CM9 2023/37472

[11] Main Site Command Facility, Sellafield Limited Nuclear Independent Oversight, Evaluation of Building Fire Drill, June 2023, CM9 2023/37121

[12] Main Site Command Facility, Readiness for Command Transition, Position Statement from Nuclear Independent Oversight to the Security and Resilience Management Safety Committee, CM9 2023/37342

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