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| 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 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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# 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.

# Background

1. The Office for Nuclear Regulation (ONR) Decommissioning, Fuel & Waste (DFW) subdirectorate 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].
2. 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).
3. 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.
4. 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.
5. 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.

# Assessment and inspection work carried out by ONR

## Withdrawal of LC 28(5) approvals

1. 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 show 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.

## Withdrawal of LC 11(2) specifications

1. 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 |

1. 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.

## Withdrawal of LC 13(9) specifications

1. 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 |

1. 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.
2. 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].

## Withdrawal of LC 18(1) specifications

1. 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 |

1. 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.

## Withdrawal of LC 23(4) specifications

1. 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 |

1. 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.

## Withdrawal of LC 28(4) specifications

1. 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 |

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 The LC28(4) specifications are recommended to be withdrawn if the associated LC 28(5) approvals in Section 3.1 are also withdrawn.

## Withdrawal of LC 30(3) specifications

1. 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 |

1. 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.

## Withdrawal of LC 32(4) specifications

1. 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 |

1. 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.

## Withdrawal of LC 35(5) specifications

1. 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 |

1. 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.

## Internal stakeholder engagement

1. 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.
2. 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].
3. The ONR Civil Nuclear Security and Safeguards purpose was also consulted during the assessment and provided an email of no objection (ref. [15]).

## External stakeholder engagement

1. 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.
2. 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]).
3. 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].

## Verification of license instruments to be withdrawn

1. 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]).

# Matters arising from ONR’s work

1. There are no matters arising from ONR’s assessment.

# Conclusions

1. 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.
2. 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.
3. 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.
4. 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.
5. 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.
6. 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.

# Recommendations

1. 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. |