

**ExQ2: 03 August 2021****Responses due by Deadline 7: 03 September 2021**

<b>Question to:</b>		<b>Question:</b>
<b>R.2 Radiological considerations</b>		
R2.0	The Applicant, ONR	<b>Nuclear Site Licence</b> (i) Please advise on the latest position in respect of the application for the nuclear site licence. (ii) Are you aware of any impediment that may exist that would prevent or delay the granting of the licence? (iii) What is the current timetable that you would anticipate for the conclusions upon the license application being reached?
	<b>Response</b>	<p>The following general progress statement (which will be published on the ONR website in due course) addresses these points:</p> <p style="text-align: center;"><b><i>Progress statement on ONR assessment of the application for a nuclear site licence by NNB GenCo (SZC) Ltd August 2021</i></b></p> <p><i>On 30<sup>th</sup> June 2020, NNB GenCo (SZC) Limited ('NNB GenCo') applied to ONR for a nuclear site licence to permit the construction and operation of two EPR™ reactors at the Sizewell C (SZC) site.</i></p> <p><i>To progress its assessment of the licence application, ONR is implementing a programme of interventions and engagements aimed at gathering evidence to form a judgement on the capability of NNB GenCo and the effectiveness of its management arrangements to:</i></p> <ul style="list-style-type: none"><li>▪ <i>develop a capable organisation and have adequate arrangements to provide the necessary organisational capability to safely deliver and oversee the subsequent stages of the project</i></li><li>▪ <i>develop suitable licence condition compliance arrangements</i></li><li>▪ <i>ensure adequate plans for development of a safety report that supports the SZC construction, installation, and commissioning programme</i></li><li>▪ <i>ensure that the site is suitable in terms of its location and characteristics of the population around the site, external hazards, and suitability of the site for engineering and infrastructure requirements of the facility</i></li><li>▪ <i>comply with relevant conventional safety and nuclear security legislation.</i></li></ul> <p><i>Our current views on the progress on each of these themes is summarised below.</i></p>

**ExQ2: 03 August 2021**

**Responses due by Deadline 7: 03 September 2021**

	<p><b>Organisational capability</b></p> <p><i>ONR has set out its expectations in Licensing Nuclear Installations that a prospective licensee should establish an organisation capable of managing matters relating to nuclear safety and security and discharging the obligations associated with holding a nuclear site licence. ONR expects this capability to be comprised in arrangements covering several key components including:</i></p> <ul style="list-style-type: none"><li>▪ <i>develop and implement a clear strategy and plans that establish the nuclear baseline requirements based on the activities planned to be undertaken. These plans should include the core safety capability of the organisation and their intelligent customer arrangements to safely oversee the delivery of work.</i></li><li>▪ <i>a quality management system that ensures appropriate arrangements relating to safety and security are in-place from policies through to front line procedures. These arrangements should be fit for purpose, understood and followed by the relevant staff.</i></li><li>▪ <i>an effective competency management framework that ensures individuals within the organisation have the appropriate skills and knowledge to safely deliver their work.</i></li><li>▪ <i>the organisation has governance arrangements in-place to ensure effective leadership direction and foster the appropriate safety culture, to enable decisions made at all levels in the organisation, that have the potential to affect safety, to be informed, rational and objective.</i></li></ul> <p><i>NNB GenCo has been progressively developing its organisational capability since nuclear site licence application. Progress is broadly in-line with expectations. NNB GenCo is intelligently adopting the arrangements from Hinkley Point C (HPC) to underpin its quality management system. NNB GenCo has established processes to ensure this adoption is considered and systematic, and where appropriate learning is identified.</i></p> <p><i>NNB GenCo is working with HPC and Nuclear Generation Limited to establish a common nuclear competency framework across EDF Energy; this framework should provide the foundation for NNB GenCo to demonstrate the competency of its organisation. NNB GenCo continues to mature its governance arrangements, informed by its stakeholders.</i></p> <p><i>Shadow working for Sizewell C is currently planned to commence in early 2022; this is a period where NNB GenCo will work to its organisational and management arrangements as if it was a nuclear site licensee, to demonstrate the adequacy of its</i></p>
--	---

	<p><i>organisation. ONR will seek confidence in the adequacy of all elements of its organisational capability throughout this shadow working period to inform our assessment.</i></p> <p><b><i>Licence Condition compliance</i></b></p> <p><i>ONR does not expect NNB GenCo to produce fully developed site management and compliance arrangements for all 36 standard licence conditions at the point of licence grant as some are only relevant to activities that will take place as the project progresses through construction and commissioning. However, fully developed arrangements must be in place for more than half of the standard licence conditions before licence grant.</i></p> <p><i>ONR and NNB GenCo have developed and agreed a programme of Licence Condition compliance targeted discussions, to ensure appropriate development is maintained to support ONR's licensing assessment. NNB GenCo has set up a targeted working group involving representatives from Sizewell C and Hinkley Point C, with the aim of transferring learning from the Hinkley Point C experience into the Sizewell C compliance arrangements.</i></p> <p><b><i>Safety report</i></b></p> <p><i>For site licencing, ONR does not expect NNB GenCo to have produced a specific safety case, however, ONR is engaging with NNB GenCo to understand how the safety case will be produced, and what processes etc will be used post licencing.</i></p> <p><i>ONR understands the safety case will follow closely both the process and content of the HPC safety case for the areas that are to be replicated, with a key section of the future safety case justifying the replication strategy.</i></p> <p><b><i>Site Suitability</i></b></p> <p><i>A key element of ONR's site licensing assessment is the suitability of the site. In accordance with our published guidance (Licensing Nuclear Installations)<sup>1</sup>, before a nuclear site licence is granted the prospective licensee will need to satisfy ONR that:</i></p> <ul style="list-style-type: none"><li>▪ <i>the proposal conforms with Government siting policy.</i></li><li>▪ <i>the location is suitable for the establishment and maintenance of an adequate emergency plan during all phases of the power station.</i></li></ul>
--	--

---

<sup>1</sup> Licensing Nuclear Installations. [www.onr.org.uk/licensing-nuclear-installations.pdf](http://www.onr.org.uk/licensing-nuclear-installations.pdf)

**ExQ2: 03 August 2021**

**Responses due by Deadline 7: 03 September 2021**

	<ul style="list-style-type: none"><li>▪ <i>the proposed nuclear power station is capable of being designed to have robust defences against the site-specific external hazards.</i></li></ul> <p><i>We are satisfied that the requirements of the first two bullets are satisfactorily met. With regard to external hazards, engagement is still ongoing with NNB GenCo in order for ONR to gain confidence in the characterisation of the hazards and to ensure there is no challenge to the suitability of the site.</i></p> <p><b>Conventional health &amp; safety</b></p> <p><i>In accordance with the requirements of the Construction (Design and Management) Regulations 2015 (CDM), ONR seeks assurance that NNB GenCo (SZC) Ltd (NNB) has established management arrangements to secure the health, safety and welfare of persons who will work on the construction site.</i></p> <p><i>NNB GenCo has been developing its organisational capability and is replicating arrangements from Hinkley Point C (HPC), in line with its strategy document "Sizewell C Project: Overarching CDM Strategy" which aims to gather and apply lessons from HPC (and elsewhere). A significant difference from HPC is that it is proposed that the principal contractor will be a Civil Works Alliance (an alliance of 5 companies including NNB GenCo). A Project Delivery Organisation sits below the Client to provide integration across the project. ONRs focus has been on ensuring that appropriate appointments are being made in line with CDM.</i></p> <p><i>NNB GenCo is engaging with other regulators including HSE. Work has been on-going to clarify the extent of the new nuclear build site and the vires of ONR, HSE and other regulators with an interest in aspects of the proposed development.</i></p> <p><i>As the project progresses ONR will seek assurance regarding the constructability of the two EPR units at SZC in relation to conventional health and safety issues.</i></p> <p><b>Nuclear security</b></p> <p><i>NNB GenCo SZC Security staff will continue to develop the SZC Nuclear Site Security Plan (NSSP) and the current schedule for submission of the NSSP to ONR for approval is early 2022. In addition to detailing the security standards, arrangements and procedures during the construction phase of the project, the NSSP should also demonstrate to ONR that NNB GenCo has a comprehensive understanding of what the security regime will be when the facility is operational and how the arrangements will meet regulatory expectations. It is acknowledged that specific details of the security arrangements during the later stages of the project will not yet be confirmed but these will be included in future iterations of the NSSP. In order to benefit from the operational experience gained at Hinkley Point C (HPC), it is anticipated that</i></p>
--	--

**ExQ2: 03 August 2021****Responses due by Deadline 7: 03 September 2021**

		<p><i>NNB GenCo will use the principles of 'intelligent replication' and adopt and adapt some of the security arrangements currently employed at HPC.</i></p> <p><b>Summary</b></p> <p><i>Overall, ONR is satisfied with the progress made towards the target of completing its licensing assessment by mid-2022.</i></p>
<b>G.2 General and Cross-topic Questions</b>		
G.2.16	ONR	<p><b>Policy and Need</b></p> <p>In relation to the identification of Sizewell as a strategically suitable site within the NPS EN-6, the initial SoCG between the ONR and the Applicant [REP2-078], refers to ONRs written representation [REP2-160] which provides details of the Nuclear Site Licensing assessment procedure. ONR indicates that it is currently assessing this application and expects to be able to grant a licence, subject to the successful completion of [its] assessment, by mid-2022.</p> <p>(i) Please can ONR provide an update on its position on matters which are noted in the NPS?</p> <p>(ii) In particular has the ONR now received the JSSR and the SDSR from the Applicant?</p> <p>(iii) Please provide an update as regards the progress of the site suitability work including in relation to Government siting policy, flood risk, and non-seismic ground conditions.</p> <p>(iv) Since the submission of written representations to the Examination, has the ONR identified any shortcomings that might prevent the grant of a nuclear site licence to the Applicant in due course, or to subsequently permit the commencement of nuclear construction?</p> <p>(v) Does the ONR still expect to be able to grant a licence, subject to the successful completion of the assessment, by mid-2022?</p>
	<b>Response</b>	<p>(i) ONR written representation REP2-160 provided a position statement on a number of items in the NPS relating to site suitability based on our assessments up to April 2021. As explained in our answer to ExQ1 R2.0, we are satisfied the demographic features are acceptable and that there is the potential to put in place adequate emergency planning. With regard to the other factors set out in the NPS relating to site suitability ONR has not identified any matters which would change the position we set out in REP2-160.</p>

**ExQ2: 03 August 2021****Responses due by Deadline 7: 03 September 2021**

		<p>(ii) We have not yet received updated versions of the documents but expect to receive these later this year.</p> <p>(iii) With regard to government siting policy, we are satisfied that the local demographics meet the acceptability criteria. On flood risk, engagement is ongoing with further clarity on flooding studies provided by NNB GenCo. ONR has identified no major issues at present. The position on non-seismic ground conditions has not changed from that set out in ONR's written representation REP2-160.</p> <p>(iv) No, we have not. Our answer to ExQ2 R2.0 amplifies on this.</p> <p>(v) ONR anticipates completing its licensing assessment by mid-2022. If that assessment is supportive, granting the licence would depend on the licence applicant confirming that the project is expected to go ahead and providing ONR with a date by which it needs the licence to be in place.</p>
<b>CC.2 Climate change and resilience</b>		
CC.2.8	ONR?	<b>Climate Change Adaptation</b> The ONR in response to ExQ1 CC.1.3 (i) [REP2-159] states that information shared to date suggests it is likely that the Applicant's approach to assessing and managing climate change, including adaptation measures, will meet ONR's expectations for nuclear site licensing. Please indicate whether that remains the position at this stage of the ONR assessment?
	<b>Response</b>	There has been no change to the position on this matter set out in ONR's answer to CC.1.3 (i) in REP2-159.