ONR NGO Forum - Meeting Minutes   
20 November 2024 (1000-1230) – Teams meeting

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| In Attendance (ONR): | In Attendance (NGO): |
| Rachel Grant (RG) – Director of Strategy and Corporate Affairs (ONR co-chair)  Mark Foy (MF) – Chief Executive and Chief Nuclear Inspector  Sarah Brown (SB) – Head of Policy  Rob Exley - Superintending Inspector – Head of BWRX-300 and Rolls-Royce SMR Generic Design Assessments  Alistair Hillery (AH) – Deputy Director of Regulation – Core Operations and Regulatory Development  Louise Smith – Senior Policy Advisor  Enid Lovelady – Communications Officer  Leanne Weild – Head of Finance and Commercial  Shane Turner – Director of Regulation – Technical Directorate  Dan Hasted – Director of Regulation – Operating Facilities  **Secretariat/organisers:**  Liz Bibby – Policy Advisor | David Cullen (DC) – Nuclear Information Service (NGO co-chair)  Richard Outram - Nuclear Free Local Authorities  Rita Holmes - Ayrshire Radiation Monitoring Group (ARM)  Sue Aubrey - Stop Hinkley campaign.  Jill Sutcliffe (JS) – Low Level Radiation and Health Conference  Katy Attwater (KA) – Stop Hinkley  Peter Banks (PBan) – Blackwater Against New Nuclear  Prof. Andy Blowers (AB) – Blackwater Against New Nuclear  Peter Burt (PB) – Nuclear Awareness Group/Nuclear Education Trust  Paul Collins (PC) – Stop Sizewell C  Alison Downes (AD) – Stop Sizewell C  Allan Jeffrey (AJ) – Stop Hinkley  Tor Justad (TJ) – Highlands Against Nuclear Power  Ian Ralls (IR) – Friends of the Earth Nuclear Network  Jo Smolden (JS) – Stop Hinkley  Trish Whitham (TW) – Nuclear Information Service  Pete Wilkinson (PW) – Together Against Sizewell C  Chris Wilson (CW) – Together Against Sizewell C  Alan McGoff (AM) – Environment Agency |

## Welcome and introductions.

* 1. Rachel Grant (RG) opened the forum by welcoming David Cullen (DC) as the new co-chair and thanked attendees for giving up their time. DC also thanked attendees and ONR for organising the event.
  2. Please see attached presentation for this event:
* ONR NGO Virtual Form – November 2024

## Update from ONR Chief Executive and Chief Nuclear Inspector – Mark Foy

* 1. Mark Foy (MF) began his presentation by outlining the Senior Leadership team changes; Finance Director – Linda Aylmore, Senior Director of Regulation – Paul Fyfe, Technical Director – Shane Turner. There are also current recruitments for HR Director, Permanent Chair and CE/CNI.
  2. MF gave a regulatory update and there were some questions from the NGO participants
  3. MF highlighted details of the CNI annual report, including, overall that the performance of the nuclear industry in 2023/24 remained satisfactory, there was steady improvement at all sites under enhanced and significantly enhanced attention, work and effort has been invested to influence improvements and there was a small increase in higher significance events.
  4. Tor Justad (TJ) mentioned security for Dounreay and MF reiterated that the security at Dounreay is not a concern.
  5. Katy Attwater (KA) noted that a recent report written on Sellafield mentioned budget cuts raising concerns from Trade Unions. She asked whether the staff at Sellafield were still able to provide adequate cover?
  6. MF noted he had had meeting with DESNZ over the settlement figures for Sellafield but they did not share the settlement information with ONR. ONR will be looking at settlement to see if it provides enough funds.
  7. KA followed up noting that the National Audit Office provided a damming report on Sellafield and stated that the clean-up has been massively delayed and asked whether ONR can speed this up?
  8. MF responded that ONR are aware of challenges but the new G6 approach should bring dates forward but that these are long programmes of work. Novel ideas are being explored at Sellafield to speed up the process.
  9. Peter Burt (PB) mentioned enhanced attention at AWE. He noted that Aldermaston will move out of enhanced measures in the CNI report but said that the staff were unsure if this will happen anytime soon.
  10. MF replied that the view of ONR might be to move AWE from enhanced to normal due to enduring improvements but these are only discussions at the moment. ONR expect that by the next CNI Report, Devonport and AWE will move to normal measures.
  11. MF covered several aspects of the GDA process including safety, security and environmental protection but emphasised that GDA does not mean approval to build a reactor.
  12. Richard Outram (RO) – asked if GDA was site specific and if it includes robust justification.
  13. MF explained that a GDA enables the early assessment of a new nuclear reactor design and a GDA design could be located at any site, but the vendor would need to demonstrate how it is safe at a specific site through site licensing.
  14. RO followed his question about what types of vendors have approached ONR.
  15. MF confirmed that some vendors have never worked in the nuclear sector or the UK. There have also been questions on the timelines for GDA and some vendors have been very ambitious in that regard.
  16. MF then covered Hinkley Point C and ONR’s response to NNB GenCo Ltd including a detailed review into the impact of our regulation on the design evolution of the UK EPR (a robust position) and Artificial Intelligence – trilateral report ONR/US NRC/CNSC.
  17. MF also covered the challenges to nuclear safety from armed conflict. He had recently visited Ukraine and obtained a really good understanding of what it is like being a regulator in such conditions. He said that the regulator does have a good handle on radioactive sources within their remit but not so good on sources held by Russia.
  18. Chris Wilson (CW) asked when will size of the site at Sizewell C be confirmed as 32.5 hectares?
  19. MF stated that the site licence has been granted and now the site adjacent to the licensed area is required to aid construction but not for the operating reactor.
  20. CW asked if the construction of the cut off wall can start before a site licence granted? The concern is that work has been done already ahead of the DCO and permitting and was causing environmental damage
  21. Shane Turner (ST) added that additional land is required to build the cut off wall.
  22. Paul Collins (PC) asked what the site licence conditions are for decommissioning for new build.
  23. MF said that the site licence conditions for decommissioning for new build should not be creating legacy issues and there should be solutions in place for each particular juncture to deal with each phase. Gigawatt reactors will be in use for 80 plus years. New SMRs will have different problems e.g. sodium reactors, we would regulate to ensure that the whole lifecycle of the reactors would be managed and point aspirant licences to learn lessons from previous deployments such as Dounreay.
  24. PB asked about the Barrow fire and said there has been no response from ONR Comms and he would like to know if ONR are investigating? MF provided reassurance and said that ONR are investigating and that immediately following the fire an inspector was sent to the site. The following week a fire inspector was also sent. It is not yet decided if ONR will fully investigate. [Improvements required following Barrow fire | Office for Nuclear Regulation](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.onr.org.uk%2Fnews%2Fall-news%2F2025%2F06%2Fimprovements-required-following-barrow-fire%2F&data=05%7C02%7CLiz.Bibby%40onr.gov.uk%7Ce2bf7dc5f94e460739fc08ddae7dfd4e%7C742775df807748d681d01e82a1f52cb8%7C0%7C0%7C638858578329732627%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=EaobLaBpntfH%2BjhxY1g4sZSUpPZ4Vv4MLXQxiBOCT1o%3D&reserved=0)
  25. PB said that considering the situation of war, is nuclear power too risky for the future? MF responded that government is looking at IAEA standards and will be attending meetings with European regulators to discuss. In addition to attending meetings in Europe, MF also chairs WENRA, providing other members with feedback from Ukraine visit.

## ONR’s current and future role in planning – Al Hillery

* 1. Al Hillery (AH) gave a presentation on ONR’s current and future role in planning including ONR’s role in land use planning and siting of new reactors.
  2. TJ mentioned planning with regard to Space Ports and Space Watch UK and asked whether ONR have a role in relation to providing reports on land use and siting of spaceports in the UK and are those reports published?

**Action**: ONR took this question away. See below for follow up answer.

ONR Land Use Planning team confirmed that for most of the spaceports/orbital applications that we receive, we issue a nil response which is sent to the Civil Aviation Authority. These don’t appear to be published on [Spaceflight | UK Civil Aviation Authority](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.caa.co.uk%2Four-work%2Fpublications%2Fpublication-categories%2Fspaceflight%2F%3Fstatusfiltertype%3DAll%26listsorttype%3DTitle&data=05%7C02%7CLiz.Bibby%40onr.gov.uk%7Cee89746233754d1e213308dd897c60e6%7C742775df807748d681d01e82a1f52cb8%7C0%7C0%7C638817889466499641%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=ZrLObgC%2Bd%2F1NCWQLyDqctItIKGxaozvpYRqlh8yTil0%3D&reserved=0). The CAA are required to consult with us due to the consultation process referred to in the section on special cases [Land use planning | Office for Nuclear Regulation](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.onr.org.uk%2Four-work%2Fwhat-we-regulate%2Fother-regulationslegislations%2Fland-use-planning&data=05%7C02%7CLiz.Bibby%40onr.gov.uk%7Cee89746233754d1e213308dd897c60e6%7C742775df807748d681d01e82a1f52cb8%7C0%7C0%7C638817889466522421%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Z8sAukVugDsCkaKrVxkUrGiGDV5P0bMhU%2FjvatWCeGY%3D&reserved=0).

* 1. CW asked if justification for siting goes through DEFRA and how does ONR work with other agencies with regard to flood risk?
  2. MF said that justification is led by DERFA. ONR interacts with other agencies and are proactively holding regular meetings, especially with EA.
  3. AH noted ONR has MoUs with all organisations and ONR has ongoing dialogue with other agencies.
  4. KA asked what plans do Somerset council have going forward as they are almost bankrupt and my not be able to keep the workforce to deal with Detailed Emergency Planning Zone (DEPZ) enquires?
  5. AH confirmed that ONR have regular dialogue with all councils and that HPC is not a hazard at the moment. HPA no longer requires a DEPZ. HPB still has a DEPZ in place and ONR look that it meets the plan. ONR are not looking at the funding of Somerset council.
  6. KA asked what would happen if the council had no money.
  7. AH replied that we do not know the funding of Somerset council but when we look at the plan it is adequate.
  8. MF confirmed that for HPA no DEPZ is required. HPB requires no cooling etc for fuel, so no offsite emergency plan required. HPC has no fuel, so no DEPZ required.
  9. KA stated that EDF are refusing to give Somerset council funding and that HPC workforce has increased from 5,000 to 12,000.
  10. Andy Blowers (AB) expressed his surprise at the relaxed attitude from ONR in relation to developer lead siting proposals for EN-7 which provides no strategy behind the siting. He said that ONR do have a role, but it is very unclear how this will take place. Some sites are unsuitable, and everybody knows this but not saying so. The sooner ONR says that the sites are unsuitable the better. ONR need to get their act together.
  11. AH explained that ONR is in contact with the government and its policy on the Draft nuclear policy statement for nuclear power generation (EN-6) which we currently adhere to. EN-7 will be introduced going forward but at the moment currently we still use EN-6.
  12. PW mentioned that the justification process of DEPZ will not look at downsizing, is a complete mess and is developer led. This will affect areas of natural beauty and demographic. Communities need help on what they are facing.
  13. MF replied that ONR will continue to deal with NGO’s and will share consultation on planning and siting.
  14. Jill Sutcliffe (JS) said that the DEPZ is unsuitable for people with disabilities.
  15. Ian Ralls (IR) stated that MF has a healthy scepticism, and that MF gave independent DEPZ advice.
  16. MF replied that DEPZ rely on input from ONR.
  17. CW asked if he could have some greater clarification for the expected timeline for the SZC NSL for the 32.5ha site as at the local stakeholder meeting last month, they thought it would take 1-2 years.
  18. MF responded that ONR can share the details of our comments on the EN-7 consultation.

**Action – ONR to share ONR’s comments on the EN-7 consultation for SZC. See below**

[ONRs-response-to-the-governments-national-policy-statement-for-new-nuclear-power-generation](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.onr.org.uk%2Fmedia%2Fri2eepa5%2Fonrs-response-to-the-governments-national-policy-statement-for-new-nuclear-power-generation-080324.docx&wdOrigin=BROWSELINK)

## Break

## How we regulate Small Modular Reactors (SMRs) – Rob Exley

* 1. Rob Exley (RE) explained that Great British Nuclear (GBN) is running a competition to identify which SMR technology the government should back. GBN have indicated that they want to select two technologies. GBN will not be the licensee, but will establish the “development companies” (devcos) and fund them to the point of financial investment with a view to investors coming in. This decision is expected in 2025. ONR is not involved in the technology or the site selection but has been asked to undertake generic design assessments (GDAs) on the technologies and provide advice to GBN on the capability the devcos will need to get a nuclear site licence. There is no legal requirement to carry out a GDA and ONR does not licence the design however a GDA can be beneficial to backers.
  2. TJ asked about the size of SMRs, what waste do we expect from SMRs and if the waste is higher quantity but less radioactivity. Also, what happens if in the Scottish political elections in 2026 labour reverse SNP decision on nuclear power.
  3. RE responded that the SMRs currently being proposed for the UK, in the GBN competition, are not that small and similar size of a Magnox reactor. The waste will be very similar to Sizewell B and what is proposed for HPC, and if there is a fleet on a site, potentially in similar quantities.
  4. MF commented that ONR do not really focus on the change of Scottish government. If there is a change of government in 2026 it is unlikely to make any changes until 2030. ONR’s strategy will run from 2025 to 2030 so this will take place later so ONR not making any assumptions about Scotland at present.
  5. Ian Fell (IF) asked if SMRs require greater enriched fuel than they do now and RE explained that this wasn’t the case.
  6. Jill Sutcliff (JS) asked if the number of designs would be too much for ONR staff to deal with.
  7. MF explained that the designers have to pay ONR for a GDA so money for staffing is not an issue. When planning ahead we will inform DESNZ of our required staffing numbers. The likelihood is that if two of the SMRs do not get through the GDA process that they will go abroad with the design.
  8. AB stated that ONR must be confused by GBN and asked if ONR constantly point out to government what happens if SMRs don’t go the distance?

1. MF replied that we will be very clear in deploying our resources in the UK and that current sites take priority. New technologies we will take to DESNZ and if new technologies are do not have a realistic chance of being deployed then we will not undertake the work.
   1. RO asked if ONR also has justification for resource as the developer does not pay but the UK taxpayer does. MF replied that justification is not massive for ONR.

## Update on recently concluded climate change workshops – Sarah Brown and Katy Attwater

* 1. Sarah Brown (SB) explained that following the previous workshops we had agreed with the NGO planning group to focus on implementation and used the latest workshop to help ONR examine the level of visibility, openness and transparency within our regulatory processes relating to climate change. KA commented on how impressed she was with the recent workshop and gave thanks to all involved in organising the workshops. She went on to say that part of the reason for the workshops was ONR’s commitment to openness and transparency.

**Action – ONR to share climate change minutes with NGO climate change committee.**

* 1. RG also thanked all those involved for their time and input.
  2. PW mentioned that the terms of reference had still not been agreed and SB assured him that it was on ONRs to do list.

## Development of ONR’s strategy 2025 – 2030 – how can NGOs get involved? – Sarah Brown

* 1. SB led the session and explained that ONR’s Strategy for 2025 – 2030 is currently being drafted and that we would appreciate input from the NGOs to produce our final draft. Ideally, we would like to hold a workshop with NGOs in early 2025 to discuss what we have so far and would appreciate any comments or suggestions that the NGOs have to improve the draft. This would also enable NGOs to have their say in what they expect from ONR going forward.

## AOB - All

* 1. AB mentioned a recent communication between himself and MF which MF agreed to look at again and address any issues.
  2. The following questions were also raised in the Teams chat during the meeting:
  3. RH asked whether ONR is aware of problems at HNA regarding SEPA issuing a prohibition order on the radiochemistry lab and concern that HNA is not taking its responsibility with regard to liquid and aerial discharges seriously?
  4. CW – Having seen UK government commit £8bn of public funds to SZC prior to FID, I am horrified at the plan for GBN to fund SMRs to FID – what is the budget?
  5. Alison Downes (AD) said that on emergency planning they understand that Suffolk County Council has no hard copy leaflets available due to lack of funds. AH earlier replied that we do not know the funding of Somerset council but when we look at the plan it is adequate.
  6. CW asked whether there could be some greater clarification for the expected timeline for the SZC NSL to cover the full 32.5 site as at the local stakeholder meeting last month, they thought it would take 1-2 years.

## Summary and close – David Cullen and Rachel Grant

* 1. DC and RG thanked everyone for their attendance and giving up their time.

## Summary and Close

1. Meeting closed at 12.30.

**Summary of Actions**

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| ONR to check whether ONR have a role in relation to providing reports on land use and siting of spaceports in the UK and are those reports published? | **Completed** |
| MF to share ONR comments on EN7 consultation. | **Completed**  [ONRs-response-to-the-governments-national-policy-statement-for-new-nuclear-power-generation](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.onr.org.uk%2Fmedia%2Fri2eepa5%2Fonrs-response-to-the-governments-national-policy-statement-for-new-nuclear-power-generation-080324.docx&wdOrigin=BROWSELINK) |
| ONR to share climate change minutes with NGO climate change committee. | **Completed** |