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| ONR Procedure  Processing and Reporting of Incident Notifications |



ONR Procedure

Processing and Reporting of Incident Notifications

**Process Owner**: Technical Division Director

**Authored by**: Principal Nuclear Safety Inspector

**Approved by**: Head of Regulatory Intelligence and Oversight

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Revision commentary

|  |  |
| --- | --- |
| Issue No. | Description of Update(s) |
| 3 | This revision replaces ONR-OPEX-PROC-001 (Issue 2) and includes clarifications of the reporting to external stakeholders. |
| 3.1 | Minor editorial update. |
| 4 | Major update to incorporate changes to the process to align with the launch of the process in WIReD.  Additional process flow charts added as appendices. |
| 4.1 | Review date extended to January 2024 |
| 4.2 | Minor update to reflect changes to incident notification email address (section 4). |
| 5 | Major update to reflect incorporation of RIDDOR incident notification process |
| 5.1 | Minor formatting updates to Appendix A. |

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# Introduction

## Purpose

Under their arrangements for compliance with The Energy Act 2013 and its relevant statutory provisions, dutyholders, subject to the Act, are expected to notify ONR of incidents, events and occurrences, hereafter referred to as incidents. Notifications allow ONR to determine whether any follow-up action is required and also provide ONR with Operating Experience (OPEX) to inform regulatory strategies, interventions plans and contribute to ONR’s organisational learning.

ONR also reports, to the Department for Energy Security & Net Zero (DESNZ), incidents that have occurred on civil GB nuclear sites or during transport that meet the Ministerial Reporting Criteria (MRC).

For defence sites or other premises where security markings may pertain, consultation with the Defence Nuclear Safety Regulator (DNSR) and the MoD will take place prior to distribution of incident information outside ONR.

The purpose of this procedure is to define the arrangements for the notification of incidents by dutyholders to ONR and where appropriate onward reporting to other government departments.

## Scope and applicability

This procedure applies to all incident notifications in the areas of nuclear safety, radiological safety, security, safeguards, transport safety and nuclear site health and safety (RIDDOR)[[1]](#footnote-2). ONR’s process for incident notifications to ONR (ref. [1]), and its supporting guidance, define the criteria for notification of incidents and occurrences to ONR, the legislative basis and the required timeframes for such notifications.

ONR is also the enforcing authority for nuclear site health and safety on GB nuclear sites, authorised defence sites defence nuclear sites[[2]](#footnote-3) and new nuclear build sites. This procedure also applies to incidents that dutyholders report under RIDDOR 2013 legislation. Such incidents are referred to as “RIDDOR incidents”, and should be directly reported to ONR via the WIReD dutyholder portal.

The procedure excludes notifications of nuclear emergencies received via ONR’s emergency contact telephone number, which are covered by ONR’s Emergency Response Framework (ref. [2]).

The roles and responsibilities for implementation of this procedure are:

**Dutyholders:**

* Required to notify ONR of incidents using the WIReD Incidents portal.

**Assigned Inspectors (AI):**

* Reviewing the incident and forming the initial view of the incident;
* Assigning the governance category;
* Determining whether the Ministerial Reporting Criteria (MRC) have been met;
* Completion of the ONR Incident Reporting Form (INF2) and reporting events to DEZNZ;
* Following up on the event according to governance category; and,
* Close out of the incident on WIReD on receipt of a satisfactory dutyholder follow-up report.

**RIO DDS staff:**

* Ensuring effective and timely processing of incident reports;
* Arranging suitable extensions to reporting timescales where appropriate;
* Sharing Parts A and B of the incident reports with dutyholder and site inspector;
* Ensuring incident reporting information remains compliant with GDPR and   
  [ONR’s privacy notice](https://www.onr.org.uk/access-to-information/privacy-notice/); and,
* Preparing and issuing the Quarterly Incident Statement of incidents that meet the INF2 criteria.

## Definitions

Table 1: Table of definitions

| Abbreviation | Description |
| --- | --- |
| AI | Assigned Inspector – responsible for incident’s follow-up |
| BPF | Business Process Flow |
| CNI | Chief Nuclear Inspector |
| CNS DDS | DDS staff within the Security and Safeguards Divisions who assist RIO DDS in the administrative support to the notification, follow-up, and reporting of security and safeguards incidents |
| DESNZ | Department for Energy Security & Net Zero |
| DDS | ONR Divisional Delivery Support – administrative staff supporting Regulatory Directorate |
| DL | Delivery Lead |
| EDRMS | Electronic Document and Record Management System (‘Content Manager’) |
| DNSR | Defence Nuclear Safety Regulator |
| ESO | Executive Support Office |
| FUR | Follow-up Report |
| GDPR | General Data Protection Regulation |
| HSE | Health and Safety Executive |
| INES | The IAEA International Nuclear and Radiological Events Scale |
| INF(s) | Incident Notification Form(s) |
| MoD | Ministry of Defence |
| MRC | Ministerial Reporting Criteria |
| OPEX | Operational Experience |
| RI | Regulatory Intelligence |
| RIO | Regulatory Intelligence and Oversight |
| RIO DDS | DDS staff within the RIO Team, providing administrative support to the notification, follow-up, and reporting incidents process |
| RIDDOR | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations |
| UKINO | UK INES National Officer |
| WIReD | Well Informed Regulatory Decisions – ONR’s regulatory records database |

# Processing incident notifications

The ONR’s incidents notification and reporting process covers the following key activities:

* Receipt and storage of the information submitted by the dutyholder;
* Inspectors recording regulatory judgements about incident information;
* Governance of the incident follow-up; and
* Reporting to stakeholders.

The [WIReD dutyholder portal](https://onr.powerappsportals.com/) is used by the dutyholders to report incidents to ONR. Incident Notification Forms (INFs) remain available as an alternative back-up notification route, if the WIReD portal is unavailable for long period of time.

The incidents meeting certain criteria are selected for further consideration by ONR may require the use of INF2 for further classification, assessment and engagements with the dutyholder as well as DESNZ.

An INF2 template is provided in [Appendix A](#_Appendix_A_–). The overall process flowchart for INF2 is presented in [Appendix B](#_Appendix_B_–).

To ensure effective and timely process implementation, each activity in the process is bound by a relevant timeframe. Timeframe compliance is monitored by ONR Divisional Delivery Support (DDS) staff, providing administrative support to the Regulatory Intelligence and Oversight (RIO). The RIO DDS will work closely across all ONR divisions and function, as appropriate.

The oversight actions (monitoring, identification of delays, sending reminders, etc.) are progressively being automated in WIReD and the dutyholder portal.

The focal point for relevant communications is RIO DDS [ONR.Incidents@onr.gov.uk](mailto:ONR.Incidents@onr.gov.uk).

## Receipt and storage of the information submitted by the dutyholder

### Incident notification by the dutyholder

The primary means of submitting incident notifications to ONR is via the WIReD Dutyholder Portal[[3]](#footnote-4), although email or telephone (as a contingency alternative) through the established lines of communication remain available (refer to ref. [1] for further information).

The notification is initiated by the dutyholder, by reporting an incident to ONR, providing a brief description of relevant information, an estimate of its significance, a provisional INES rating and a summary of the immediate actions taken by the dutyholder, as appropriate.

The timeframe for reporting incidents depends on the ONR incident category and significance, as defined in ref. [1]. This may vary from “Immediate” to within a “Month”.

For transport incidents involving dutyholders whose organisation is limited in resource, the dutyholder may not have the capability to complete the INF1. In such cases, the Assigned Inspector (AI) may use the provided information to complete INF1 Part A on behalf of the dutyholder.

### Follow-up Report

The Follow-up Report (FUR) presents the outcome of dutyholder’s internal investigation, as well as the protective and preventive actions taken or planned.   
The expectations for FUR’s scope and contents are specified in ref. [1].

The timeframe for FUR provision to ONR is within timescales identified in ref. [1] after the incident was recorded by the dutyholder. For incidents that require more time for investigation and definition of preventive measures (refer to ref. [1]), the dutyholder should agree with the AI to submit an interim FUR. This should be followed by a final FUR, submitted within a mutually agreed timescale with the AI.

In addition to the FUR, the dutyholder may submit to ONR other documents related to the incident investigation and follow-up, such as causal analysis, INES rating justification, plans for remedial/protective works, etc.

**Note:** This step does not apply for RIDDOR incidents.

### Storage of dutyholder’s information

The primary means of reporting an incident by dutyholders is via the dutyholder portal. Where the dutyholder is unable to utilise the portal, the incident should be communicated via an email ([ONR.Incidents@onr.gov.uk](mailto:ONR.Incidents@onr.gov.uk)) or a telephone call to the relevant site inspector.

Upon completion of incident notification, it will automatically becomes an   
“Active Incident” in WIReD, initiating the process of incident governance, including:

* a unique incident number will be generated; and
* an assigned inspector will be allocated to initiate appropriate regulatory response and follow-up the incident to closure.

All INFs and associated documents received from a dutyholder are stored within WIReD. By exception, some documents may be stored in the ONR’s electronic document and record management system (EDRMS). In such case, RIO DDS should indicate the relevant record refence in WIReD.

# Governance of the incident by ONR

## Factual accuracy check of the incident notification

The preparation of INF-Part A is the dutyholder’s responsibility (ref. [1]).

ONR Divisions are to establish and as necessary, update arrangements for effective follow-up of incidents by dutyholders within their areas of accountability, consistent with the guidance on INF categorisation, governance and oversight (ref. [3]).

The AI is to review the Part A of INF upon receipt. If any specific details are missing or incorrectly recorded, the inspector should note such observations in Part B of INF and request the dutyholder to make the relevant amendments before the AI completes Part B.

Any supporting documentation about the changes should be uploaded into WIReD; RIO DDS should be notified in case Part B completion extension is needed.

RIO DDS review regularly the names of inspectors assigned in WIReD for follow-up of notified incidents to confirm that inspectors are appropriately allocated, available and will consult with the relevant Nominated Site Inspector or Delivery Lead (DL) and reassign, as needed.

## Record of ONR’s initial view of the incident

The INF-Part B form provided in WIReD under the incident number is completed by the AI to present ONR’s initial view of the incident significance, provisional INES rating, dutyholders actions, and justified category of ONR’s governance as appropriate (ref. [3]). The AI may seek advice from relevant specialisms and/or colleagues from ONR’s other purposes as needed to make an informed judgement on each field in Part B.

The timeframe for Part B completion is ‘three working days’ of the INF1 being assigned to the inspector. It is expected that the relevant divisions will monitor compliance with this requirement, as appropriate[[4]](#footnote-5). Should the AI be unable to complete Part B on time, DDS should be informed accordingly and arrange up to three working days extension. Consideration should be given to re-assignment of the incident to another inspector in case of longer unavailability.

Incidents that ONR identifies for investigation are special cases. Where the AI decides that an incident warrants investigation (as set out in ONR guidance on conducting investigations (ref. [4])), then the AI should record the relevant investigation reference number in the Part B. To preserve the integrity of the investigation, there is no requirement for the inspector to update the WIReD incident until the investigation has concluded. In addition, DDS should not share any information about these incidents without prior agreement with the AI.

The inspector should assign relevant specialism(s) in Part B of the INF. This will increase of the event for awareness and will help trending and analysis purposes. This is an important mechanism for sharing Operational Experience (OPEX) and learning between sub-divisions and specialisms.

**Note:** A list of ONR’s specialisms and their areas of interest is provided in ref. [3] to help inspectors identify potential allocation(s).

## Follow-up records

The Part C of INF provided in WIReD under the incident number is completed by the assigned Inspector.

Part C documents the incident follow-up state at the time of incident closure in the WIReD Incidents database. It records the inspector’s judgment on the dutyholder’s investigation and the relevant FUR, the final INES rating (if appropriate), any ONR follow-up activities undertaken to date and whether further regulatory action is necessary. Any lessons learned in terms of useful operational or regulatory experience should be identified in the relevant field of the incident record in WIReD.

Inspector’s judgement on each of the above items should be supported by references to documents provided by the dutyholder or generated by ONR in the course of assessment such as, contact/intervention/assessment/investigation records, letters, etc. All applicable documents should be uploaded to the incident record in WIReD under “Documents”.

In case the AI is not satisfied with the dutyholder’s investigation or with the quality of FUR, the inspector should seek further information from the dutyholder. The AI should also consider;

* engaging with identified specialism(s) for advice, prior to closing Part C,
* indicate that the response needs to be provided at the earliest opportunity to allow for timely incident closure, and
* updating the records in WIReD.

In case the inspector has reservations or is not satisfied with the final INES rating, the inspector should seek advice from the UK INES National Officer (UKINO) to resolve the issue according to ref. [5]

Timeframe for Part C completion is ‘28 calendar days’ after the AI is notified that the final FUR has been received[[5]](#footnote-6). When Part C cannot be completed on time, such as, on-going ONR investigation, the AI should inform RIO DDS via [ONR.Incidents@onr.gov.uk](mailto:ONR.Incidents@onr.gov.uk) and arrange for a suitable extension. In case that more time is needed to follow up the dutyholder’s actions, the inspector should consider raising a Regulatory Issue to maintain longer term regulatory focus. This can be addressed by using the “Regulatory Issue” field in WIReD under the incident’s number and then record the progress, as appropriate.

For incidents that ONR has investigated or carried out enforcement action, the inspector should provide relevant references in WIReD.

On completion of Part C, the AI should advance the Business Process Flow (BPF) to lessons learnt to indicate completion of immediate follow-up. This action does not preclude populating the “Lessons learned” field in WIReD at a later date.

The outcome of any governance reviews or any lessons learnt arising from the incident follow-up can be populated at a later date.

Further regulatory activities may then continue as part of normal business or under a Regulatory Issue to ensure follow-up during the time which the dutyholder needs to achieve satisfactory compliance with the relevant regulatory expectations, ref. [6]. The records of any related regulatory engagements should be linked or attach to the incident in WIReD.

Linking ‘Incidents’, ‘Regulatory Issues’ and ‘Inspection Records’ is recommended as WIReD provides facility for integrated visibility of all related regulatory activities.

## Follow-up of RIDDOR incidents

The AI should record the regulatory response to RIDDOR incidents using the INF3 procedure noting that:

* The completion of Part C included in INF3 is at the discretion of the Assigned Inspector. AI should reflect their regulatory response in Part C and indicate lessons learned in the relevant field in WIReD, where considered informative.
* When the AI classifies a RIDDOR event as Category 4, the incident can be closed in WIReD without filling Part C.

## Closure of incidents

### Closure of INF1s

For incidents captured by an INF1, following the completion of Part B, the BPF initiates ‘Part C’. The dutyholders are also required to submit a FUR which is expected to contain information such as detailed description of the incident, actual or potential safety, security or safeguards impact, corrective actions and lessons learned. The FUR is expected to be submitted within the timeframe indicated in Appendix A of ref. [1].

The details of any regulatory activities for the incident, should be added in the relevant fields of the ‘Part C’. This should include any enforcement decision record and/or any related regulatory issue. On completion of ‘Part C’, if the assigned inspector is satisfied that no further action is required, they should progress the BPF to the ‘Lesson Learned’ field, making the incident ‘inactive’.

### Closure of RIDDOR incidents

For RIDDOR incidents, following the completion of Part B, the BPF effectively stalls, as there is no requirement for a FUR from the dutyholder, as such the incident remains ‘active’ on WIReD. The assigned Inspectors should therefore proceed to undertake the following actions, as appropriate;

* On completion of ‘Part B’, if the inspector is satisfied that no further action is required (i.e. treat the event as trend only), the inspector should progress the BPF to the ‘Lesson Learned’ field, making the incident ‘inactive’.
* If the inspector has undertaken any regulatory action for the incident, the details should be added in the relevant fields of the ‘Part C’. This should include any enforcement decision record and/or any related regulatory issue. When the inspector is satisfied that the incident is closed, they should progress the BPF to the ‘Lesson Learned’ field, making the incident ‘inactive’.

**Note**: For **all incidents** with continued regulatory oversight, the assigned inspector should add periodic notes to the ‘Timeline’ and keep the incident ‘**open’** until the inspector is satisfied all relevant regulatory actions have concluded.

# Reporting incidents in ONR

The focal point for incident reporting is the [WIReD portal](https://onr.powerappsportals.com/) - <https://onr.powerappsportals.com>.

The [ONR.Incidents@onr.gov.uk](mailto:ONR.Incidents@onr.gov.uk) email account remains available as an alternative, back-up notification route, if the WIReD portal is unavailable.

After completion of Part B, RIO DDS shares Parts A and B with the relevant dutyholder with copy to Site Inspector.

**Note**: This step is not applicable to RIDDOR incidents.

For incidents, occurred on defence related sites or other premises where security markings may apply, the distribution may be tailored in line with the ‘Need to Know’ principle.

## Access to RIDDOR notifications containing personal data

The RIDDOR incident notifications could potentially contain personal data submitted by the dutyholder. To ensure compliance with the General Data Protection Regulation (GDPR) and organisational privacy policy, ONR has identified a number of fields within the dutyholder portal that contain this data.

Inspectors will have restricted or limited access and visibility to these fields containing personal information which includes: name, address and position of the affected person.

The data will be accessible to ONR staff from the WIReD application interface only. A limited number of individuals have been granted privileged access to these fields. Should any inspector require access to this data to discharge their duties, requests should be made via [ONR.Incidents@onr.gov.uk](mailto:ONR.Incidents@onr.gov.uk) email account providing a brief justification. The RIO DDS will then inform the relevant department to provide access to these fields.

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# Reporting to external stakeholders

The focal point for preparation of reports to stakeholders outside ONR is RIO DDS [ONR.Incidents@onr.gov.uk](mailto:ONR.Incidents@onr.gov.uk).

## Reporting to DESNZ

ONR’s reporting of incidents to external civilian stakeholders is carried out by communication with the Civil Nuclear Safety Team at DESNZ. ONR reports to DESNZ (refer to [Appendix B](#_Appendix_B_–)) each incident that has occurred on a civil nuclear site or involves transport of civilian radioactive material which meets one of the following:

* INES rating ≥1, or
* meets at least one of the Ministerial Reporting Criteria (MRC) (refer to [Appendix C](#_Appendix_C_–)).

The AI is expected to discuss the incident with the relevant DL and RIO prior to a decision whether INF2 completion is required.

The decision whether an incident meets the MRC (f) “Events likely to attract, or that have attracted, significant national media or public attention” should be taken considering the responses to the following supporting questions:

1. Has the event been highlighted by UK national media?
2. Does the event involve a dutyholder currently subject to enhanced media or Government interest?
3. Has the incident generated media interest and media approaches to dutyholder or ONR press teams for comment?
4. Is any enforcement action due for publishing, that could attract significant media interest?
5. Is the event part of a series of reports that constitutes a broader issue, and therefore more likely to attract national media interest?

The AI completes INF2 form to describe the incident, the dutyholder’s response and ONR’s follow-up in Plain English for Publication (PEP) style. An INF2 should avoid technical details and abbreviations to the extent possible. The AI should secure the support of the relevant Nominated Site Inspector if appropriate, and seek approval of the DL.

The AI arranges the review of INF2 by the Division Communications business partner and then sends it the to [ONR.Incidents@onr.gov.uk](mailto:ONR.Incidents@onr.gov.uk) for uploading in WIReD and communication to DESNZ. This will be shared with DESNZ at [nuclear.incident-report@energysecurity.gov.uk](mailto:nuclear.incident-report@energysecurity.gov.uk)

**Note:** The INF2 reflects ONR’s view on the incident, hence factual accuracy check with the dutyholder is not mandatory but could be carried out on AI’s discretion.

The timeframe for INF2 preparation, review and approval is ten working days after the AI has completed INF1 Part B.

In case, the outcome from the dutyholder’s investigation or ONR’s follow-up leads to a change in the INES rating or other important features of the incident, the AI should update the INF2 form accordingly and repeat the review and approval process within ten working days after the modifications.

When an incident has been uprated to INES≥1 or found to meet an MRC after the INF1 Part B been completed (for example, because of an investigation outcome, ONR intervention, etc.), the AI should prepare the INF2 form, arrange review and approval, and send it to RIO DDS within ten working days after the finding.

RIO DDS carries out regular checks on whether the incidents for which INF2 forms have been issued are rated INES≥1 or meet any MRC.

The Chief Nuclear Inspector (CNI)’s Annual Report presents all incidents with INES rating ≥ 1 occurred during the reporting year, including those on MoD sites. The INF2 form is designed to provide the necessary information for the CNI’s Annual Report, hence the AI should prepare such a form for every incident with INES rating ≥ 1 regardless of the site type.

## Ministerial Reporting - ONR's Quarterly Statement of Civil Reportable Incidents

Incidents that have occurred at civil nuclear installations and are judged to meet at least one of the MRC ([Appendix C](#_Appendix_C_–)) will be included in ONR's Quarterly Statement of Civil Reportable Incidents. This is issued by the CNI to the relevant Ministers and incident summaries are published on ONR’s website.

The Quarterly Statement of Civil Reportable Incidents, referred to as “the Quarterly Incident Statement” contains:

* 1. A letter from the CNI, including a list of all incidents which have been identified on civil installations meeting at least one of the relevant MRC.
  2. An Appendix with copies of the INF2(s) for the incident(s) listed in the letter.

The divisions are expected to provide all the relevant INF2s in a timely manner to support the preparation of the ‘Quarterly Incident Statement’. RIO DDS prepare and issue the ‘Quarterly Incident Statement’ following the incident reporting timeline presented in [Appendix D](#_Appendix_D_–).

[Appendix E](#_Appendix_E_–) provides the Quarterly Statement preparation flowchart.

For incidents with an INES rating ≥ 2, the UKINO prepares a publication record, arranges its review and approval by ONR (AI, DL and Communications) and DESNZ safety team, and then publishes it on the IAEA USIE website, according to ref. [5].

## Defence sites

ONR does not normally report incidents on defence facilities to DESNZ.   
Therefore, for defence sites, ONR will consult with the Defence Nuclear Safety Regulator (DNSR) and if so advised, the MoD directly prior to any distribution outside ONR. This may lead to caveats in the distribution message, such as (but not limited to) marking the INF1 ‘NOT TO BE CIRCULATED OUTSIDE ONR’ or redaction of the INF1 prior to distribution. Parts A and B of the INF1s for defence-related sites will however be shared with DNSR.

# Records

All documentation relating to an incident is stored in WIReD under the incident notification number.

By exception, some documents may be stored in ONR’s EDRMS due to the sensitivity of information. In such case, RIO DDS should clearly indicate the relevant record reference in the appropriate WIReD records.

The following types of records are created and stored on WIReD:

* INFs submitted by dutyholders.
* Dutyholders’ FURs and/or other applicable documents submitted to ONR.
* INF2s, if applicable.
* Internal and external e-mails, as appropriate.

All other related documents could be uploaded by RIO DDS or the assigned inspector.

# Further guidance

The following documents provide further guidance on incidents reporting:

* ONR Technical Inspection Guide on Licence Condition 7 (ref. [7]) provides guidance for inspectors and expectations from dutyholders regarding the notification and reporting of incidents.
* IAEA General Safety Guide – GSG-13 (ref. [8], section 3.34) contains good practices for notification of events by authorised parties and their follow-up by regulatory bodies.

# References

|  |  |
| --- | --- |
| [1] | ONR, “ONR-RIO-PROC-002 - Process for Incident Notifications to ONR”. |
| [2] | ONR, “ONR-EP-FW-001 - ONR’s Emergency Response Framework”. |
| [3] | ONR, “ONR-RIO-PROC-004 - Governance and Oversight of Incidents”. |
| [4] | ONR, “ONR-ENF-GD-005 - Conducting Investigations”. |
| [5] | ONR, “ONR-OPEX-GD-002 - The Role of the UK International Nuclear & Radiological Event Scale (INES)”. |
| [6] | ONR, “ONR-RI-GD-003 - Management of Regulatory Issues”. |
| [7] | ONR, “NS-INSP-GD-007 - LC7 Incidents on the Site”. |
| [8] | IAEA, “IAEA General Safety Guide (GSG) 13 - Functions and Process of the Regulatory Body for Safety,” IAEA, Vienna, 2018. |

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# Appendix A – ONR Incident Reporting Form (INF2)

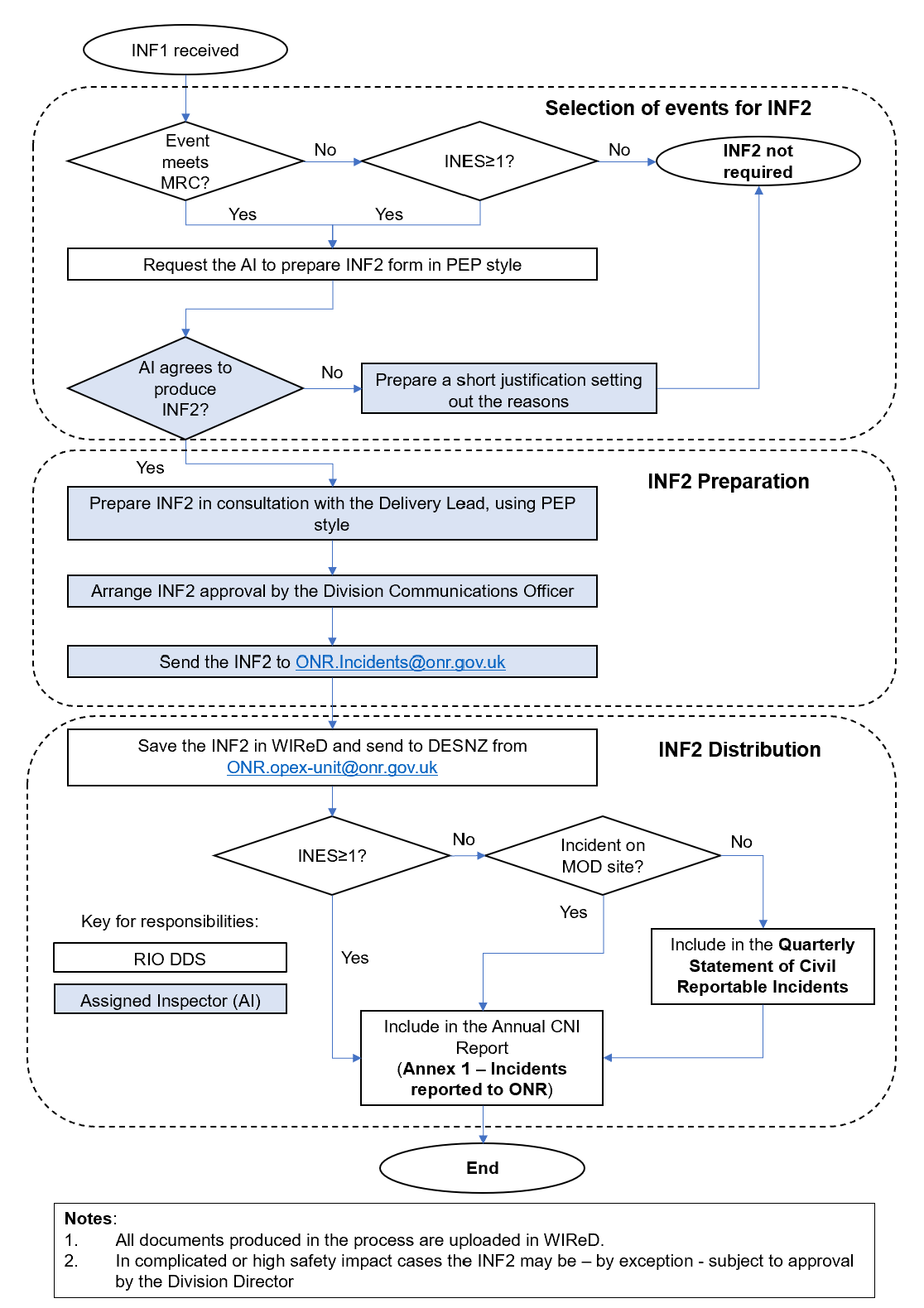
**Note:** Guidance is included within this as highlighted text. Authors should remember to delete the guidance prior to submitting the form for peer review/approval.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Incident ID | Site / Consignor | Date of Occurrence | ONR Incident Category | Final INES Rating | ONR Governance Category | |
| YYYY/NNNN | Name | DD/MM/YYYY | ABNM1 | N Type**2** | Nx**3** | |
| Incident Description | Summary of the Description from INF1 Part A  **Note**: Do not share details of defence related incidents – just a high-level summary. | | | | | |
| Duty-holder’s Response | Summary of the Duty-holder’s immediate response to the incident - from INF1 Part A. | | | | | |
| ONR’s Action | Summary of ONR’s suggested regulatory actions, usually described in INF1 Part B. | | | | | |
| Ministerial Reporting Criterion | Indicate which Ministerial Reporting Criterion applies and explain why or explain why, if none apply. | | | | | |
| Completed By  Name and signature of Inspector completing the INF2 | Signature: | | | | | Date: |
| Print Name: | | | | |
| Reviewed by DL  Name and signature of Delivery Lead completing the INF2 review.  Signed INF2 confirms that the description of the event is factually / technically accurate. | Signature: | | | | | Date: |
| Print Name | | | | |
| Reviewed by Comms  Name and signature of Comms Business Partner completing the INF2 publication review.  Signed INF2 confirms the clear English summary of the event written in an appropriate manner for a non-technical audience | Signature: | | | | | Date: |
| Print Name: | | | | |

**Definitions:**

* **Incident ID** – Number allocated to INF1 form generated in ONR’s Incidents Database for this incident
* **Site / Consignor** – Name of the site where the incident occurred, or Name of the consignor for Transport incidents
* **ABNM1 -** ONR Incident Category estimated by the dutyholder and recorded in part A of the INF1 – as per ref. [1]​, for example, NS05
* **N Type2** - INES rating (Number and Type) of the incident at the time of reporting to BEIS – as per the IAEA INES Manual, for example, 1 Anomaly
* **Nx3 -** ONR Governance Category, decided by the Assigned Inspector and recorded in Part B of the INF1 - as per [3]​, for example, 2a – Preliminary enquiries.

# Appendix B – INF2 process flowchart



# Appendix C – Ministerial Reporting Criteria (MRC)

The following tables provide a description of the MRC, origin of the legislation and naming convention;

## Appendix C.1 – **MRC** - **General**:

**Reporting times for all criteria listed in the table below are IMMEDIATE**

|  |  |  |
| --- | --- | --- |
| Description of Criteria | Origin of Legislation (ONR Guidance) | MRC Naming |
| Events likely to attract, or that have attracted, significant national media or public attention. | (AN01) | MRC-MEDIA |
| Events that are categorised as INES level 2 and above. | (INES) | MRC-INES |

## Appendix C.2 – Area of Regulation **– MRC - Nuclear Site Health and Safety:**

**Reporting times for all criteria listed in the table below are IMMEDIATE**

|  |  |  |
| --- | --- | --- |
| Description of Criteria | Origin of Legislation (ONR Guidance) | MRC Naming |
| Events reportable to ONR under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 which resulted in either: One or more deaths at a nuclear licensed site  OR Two or more persons (workers or non-workers) suffer non-fatal but RIDDOR reportable injuries. | RIDDOR'13 (AN01) (HS01, 02 & 03) | MRC-CHS |
| A major accident meaning an occurrence such as a major emission, fire, or explosion resulting from uncontrolled developments in the course of the operation of any establishment to which the Control of Major Accident Hazards (COMAH) Regulations 2015 apply, and leading to serious danger to human health or the environment (whether immediate or delayed) inside or outside the establishment, and involving one or more dangerous substances. | COMAH'15 |

## Appendix C.3 – Area of Regulation **– MRC - Nuclear Safety and Radiological Safety:**

**Reporting times for all criteria listed in the table below are IMMEDIATE**

| Description of Criteria | Origin of Legislation (ONR Guidance) | MRC Naming |
| --- | --- | --- |
| 3(a) any occurrence on a licensed site involving the emission of ionising radiations or the release of radioactive or toxic substances, causing or likely to cause death, or serious injury, on or off the site. | NI(DO)R'65 (RS01) | MRC-SAF-01 |
| 3(b) any occurrences during transport causing or likely to cause death or serious injury or the breach of containment of a transport package. | NI(DO)R'65 (TS01) |
| 3(c) any explosion or fire on a licensed site affecting or likely to affect the safe working or safe condition of the nuclear installation. | NI(DO)R'65 (NS01) |
| 3(d) any uncontrolled criticality excursion. | NI(DO)R'65 (NS02) |
| Confirmed exposure to radiation of individuals which exceed or are expected to exceed, the dose limits specified in Schedule 3 to the Ionising Radiation Regulations (IRRs) 2017. | NI(DO)R'65 (RS08) | MRC-SAF-02 |
| Any incident that meets either of these criteria:   * 1. Any operations that identify defects or misconfigurations with higher classification safety Systems, Structures and Components (SSC) that prevent performance of the SSC’s safety case defined nuclear safety functions (NS08).   **Or**   * 1. Any safety analysis and/or quality assurance activity that identifies higher safety classification Systems, Structures and Components cannot perform their safety case defined nuclear safety functions (NS12). **and** the overall impact means that an adequate safety case to continue operations cannot be made. | NI(DO)R'65 (NS03) | MRC-SAF-03 |
| Abnormal occurrences leading to a confirmed release to atmosphere or spillage of a radioactive substance which exceeds or is expected to exceed, the limits set out in Column 5 of Part 1 of Schedule 7 to the IRRs 2017, except where the release is in a manner specified in an Authorisation under the Environmental Permitting Regulation 2010 or Environmental Authorisations (Scotland) Regulations 2018 (EASR18). | NI(DO)R'65 (RS02) | MRC-SAF-04 |
| Abnormal occurrences leading to a release or suspected release or spread of radioactivity, on or off site, which requires special action or special investigation by the Operator. | NI(DO)R'65 (RS03) | MRC-SAF-05 |

## Appendix C.4 – Area of Regulation **– MRC - Transport:**

**Reporting times for all criteria listed in the table below are IMMEDIATE**

| Description of Criteria | Origin of Legislation (ONR Guidance) | MRC Naming |
| --- | --- | --- |
| A radiation emergency: a situation arising during the course of the carriage of a consignment of class 7 goods that requires urgent action in order to protect workers, members of the public or the population (either partially or as a whole) from exposure;  **Or**,  Any occurrence during the carriage of nuclear matter, causing or likely to cause death, or serious injury to persons by reason of the radioactive properties of such nuclear matter. **Or**, Emergency arrangements have been initiated in relation to class 7 goods even if, in the event, no intervention was made pursuant to those arrangements. | CDG'09 NI(DO)R'65 (TS01) (TS03) | MRC-TRAN-01 |
| Theft or loss of High Consequence Radioactive Material in carriage (High Consequence Radioactive Material (HCRM) is defined in ADR 1.10.3.1.3.) | CDG'09 (TS02) | MRC-TRAN-02 |
| An occurrence during loading, carriage or unloading of class 7 dangerous goods involving:   * 1. any release of activity greater than A2 (IAEA SSR6 Table 2) of radioactive material from the packages or from the conveyance if being transported unpackaged;   **or**   * 1. exposure leading to a breach of the limits set out in IRR17 to workers or members of the public. | CDG'09 (TS04) | MRC-TRAN-03 |
| An occurrence during loading, carriage or unloading of class 7 dangerous goods, where there is reason to believe that there has been a significant degradation in any Type B(U), Type B(M), Type C or Fissile package safety function (containment, shielding, thermal protection, or criticality) that may have rendered the package unsuitable for continued carriage without additional safety measures. (As defined in ADR 6.4). | ADR NI(DO)R'65 (TS05) | MRC-TRAN-04 |
| An occurrence where class 7 dangerous goods have been transported with any non-compliance regarding radiation or contamination levels where those levels are greater than ten times the prescribed regulatory limits (as set within ADR); excluding where material activity is within excepted package limits. | ADR (TS06) | MRC-TRAN-05 |

## Appendix C.5 – Area of Regulation **– MRC - Safeguards**:

**Reporting times for all criteria listed in the table below are IMMEDIATE**

|  |  |  |
| --- | --- | --- |
| Description of Criteria | Origin of Legislation (ONR Guidance) | MRC Naming |
| An event affecting the health and safety of IAEA safeguards personnel, This includes conventional health and safety injuries, unexpected radiological exposure/dose and any other accidents or rule breaches that have a negative impact on the individual’s health and safety. | IAEA VOA (SG01a/i) | MRC-GUARD-01 |
| Denial or restriction of IAEA inspector access to a facility/site/location where access would be expected in accordance with the UK/IAEA Voluntary Offer Safeguards Agreement (VOA) (INFCIRC/951) or the UK Additional Protocol Agreement (INFCIRC/951 Add. 1). | IAEA VOA (SG01a/ii) | MRC-GUARD-02 |
| IAEA safeguards seals on equipment or plant deliberately detached by non-IAEA staff, lost or showing signs of deliberate tampering, or evidence of tampering with IAEA equipment. | IAEA VOA (SG01a/iii) | MRC-GUARD-03 |
| A discrepancy involving 1 significant quantity (as defined in NS(EU)R'19) or more of qualifying nuclear material resulting from material unaccounted for (MUF), or shipper-receiver differences (SRD). | NS(EU)R'19 (SG01b/i) | MRC-GUARD-04 |
| Failure to locate a discrete ‘item’ containing qualifying nuclear material as it is reported in the operator’s nuclear material accountancy system. | NS(EU)R'19 (SG01b/ii) | MRC-GUARD-05 |

## Appendix C.6 – Area of Regulation **– MRC - Security**:

**Reporting times for all criteria listed in the table below are IMMEDIATE**

| Description of Criteria | Origin of Legislation (ONR Guidance) | MRC Naming |
| --- | --- | --- |
| Any malicious unauthorised incursion on to the premises or any attempted or suspected such incursion. | NISR'03 (SC10a) | MRC-SEC-01 |
| Any incident occurring on the premises involving an explosive or incendiary device or suspected such device, or a firearm or replica firearm. | NISR'03 (SC10b) | MRC-SEC-02 |
| Any theft or attempted theft, or any loss or suspected loss, or any unauthorised movement: of any nuclear material used or stored on the premises or in transit to or from them, or in the case of premises which are or form part of a nuclear site, of any other radioactive material used or stored on them. | NISR'03 (SC10e) | MRC-SEC-03 |
| Any theft or attempted theft, or any loss or unauthorised disclosure, of sensitive nuclear information classified as SECRET or above or any suspected such theft, loss or disclosure. | NISR'03 (SC10f & 22a) | MRC-SEC-04 |
| Any unauthorised access to sensitive nuclear information classified as SECRET or above or any attempt to gain such access | NISR'03 (SC10g & 22b) |
| Any other event or matter which might affect the security of any sensitive nuclear information classified as SECRET or above | NISR'03 (SC22c) | MRC-SEC-05 |
| Any confirmed cyber attack that resulted in compromise of:   * 1. information classified as Sensitive Nuclear Information (SNI);   2. operational technology that has a security affect or consequence; and/or   3. IT and/or associated network(s) handling SNI. | NISR'03 (SC10j) | MRC-SEC-06 |

# Appendix D – Quarterly Statement timeline

## Appendix D.1 - Process for engaging with the Department and communicating relevant incidents

| Step | Title | Period \* | Description |
| --- | --- | --- | --- |
| 1a | In-quarter prompt reporting | Qtr. N | Incidents reported to ONR that are likely to attract significant national media interest will be communicated to DESNZ by ONR (RI&O) at the earliest opportunity. |
| 1b | In-quarter preparation of INF2s | Qtr. N  W1,M1> W4,M3 | ONR Sub-Divisions prepare INF2s.  INF2 wording cleared through sub-divisional Policy & Communications (P&C) Team  Completed INF2s sent to RIO. |
| 2 | End of quarter cut off | Qtr. N+1  W1,M1 | The Ministerial Reporting of Incidents letter is produced quarterly. The cut off dates for the reporting periods are: 31st March, 30th June, 30th September and 31st December. |
| 3 | End of quarter review | Qtr. N+1  W1>2, M1 | RIO team meet with ONR Delivery Leads to discuss updates to existing INF2 or identify new INF2s. |
| 4 | ONR Meeting with DESNZ | Qtr. N+1  W4, M1 | ONR will provide details of all INF2 produced in the period.  ONR and DESNZ will meet to discuss all INF2s and agree which meet the MRC for formal reporting to Ministers. |
| 5 | ONR prepares Ministerial Report | Qtr. N+1  W1, M2 | ONR will prepare the Ministerial report of Incidents including covering letter.  Report will be cleared through ONR P&C Team ahead of Approval by CNI/CEO. |
| 6 | ONR submits Ministerial Reporting of Incidents letter to DESNZ and devolved Governments | Qtr. N+1  W3, M2 | Report of incidents that meet the MRC issued under a covering letter to relevant recipients.  Changes to distribution list to be agreed with DESNZ. |
| 7 | ONR Quarterly Incident Report published | Qtr. N+1  W1, M3 | ONR publishes the quarterly incident report on the ONR website. |

\* Periods listed in the table are for indicative purposes only; ONR and DESNZ reserve rights for minor deviation from the timeline table in unforeseen circumstances like changes in personnel, national holidays, etc.,

## Appendix D.2 - Illustration of process for engaging with the Department and communicating relevant incidents

**3. End of quarter review**

RIO meeting with DLs to discuss updates to existing INF2s,

or identifies any new INF2s

**4. ONR meeting with DESNZ**

Consideration of material to be included in the Ministerial report

**5. ONR Internal governance**

Reviews by RIO, Comms & CEO/CNI

**6. Ministerial report submission**

Letter sent to Ministers

**7. Quarterly incidents report publication**

Incidents published on ONR website

**2. End of quarter cut off**

**1b. INF2 Updates**

Sub-Division reviews INF2.

If necessary, INF2 updated to reflect latest position. INF2 cleared through local P&C business partner. Updated INF2s sent to RIO

**1a. New INF2**

Sub-Division prepares INF2s and clears through local P&C business partner.

INF2s sent to RIO

Quarter N

W

1

M

1

W

2

W

3

W

4

W

1

M

2

W

2

W

3

W

4

W

1

M

3

W

2

W

3

W

4

Quarter N + 1

W

1

M

1

W

2

W

3

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W

4

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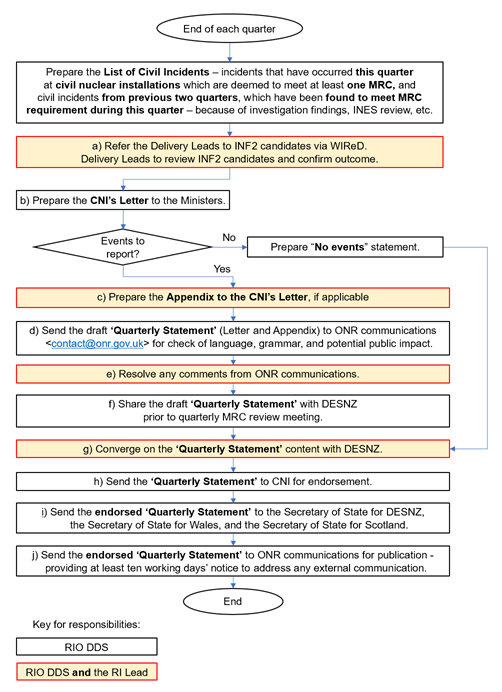
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4

## Appendix D.3 - Process of managing changes to Ministerial Reporting Criteria

| Changes to MRC identified by DESNZ | | Changes to MRC identified by ONR | |
| --- | --- | --- | --- |
| Step | Action | Step | Action |
| 1 | DESNZ identifies a need to add / amend one or more Ministerial Reporting Criteria | 1 | ONR identifies a need to add / amend one or more Ministerial Reporting Criteria |
| 2 | DESNZ communicates the details of the need to change the MRC to ONR | 2 | ONR communicates the details of the need to change the MRC to DESNZ |
| 3 | DESNZ shares suggested changes to MRC with ONR for discussion at quarterly incidents review meeting | 3 | ONR shares suggested changes to MRC with DESNZ for discussion at quarterly incidents review meeting |
| 4 | DESNZ writes to ONR (Head of Regulatory Intelligence), formally proposing changes to MRC | 4 | ONR writes to DESNZ (Nuclear Protection Directorate Policy Lead), formally proposing changes to MRC |
| 5 | ONR writes to DESNZ accepting changes | 5 | DESNZ writes to ONR accepting changes |
| 6 | ONR updates relevant guidance and shares with DESNZ | 6 | ONR updates relevant guidance and shares with DESNZ |
|  |  | 7 | Communicate the changes to the dutyholders |

# Appendix E – Quarterly Statement preparation flowchart



1. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 [↑](#footnote-ref-2)
2. Pursuant to an agreement between the ONR and the Health and Safety Executive under Section 13(3) of the Health and Safety at Work Act 1974 and Section 90(1) of the Energy Act 2013. [↑](#footnote-ref-3)
3. This is applicable to both registered and public access users of the ONR dutyholder portal. [↑](#footnote-ref-4)
4. Considerations are to be given to automated reminders within WIReD as part of its future enhancements. [↑](#footnote-ref-5)
5. The future WIReD development plan includes issuing a reminder to the AI one calendar week before the Part C completion due date. [↑](#footnote-ref-6)