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Office for Nuclear Regulation

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**OFFICE FOR NUCLEAR REGULATION (ONR)
NEW CIVIL REACTOR BUILD
NNB GENCO - WORKSTREAM 10 – NUCLEAR STEAM SUPPLY SYSTEM
PROCUREMENT COMPLIANCE ARRANGEMENTS**

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EXECUTIVE SUMMARY

Background

EDF Energy Nuclear New Build Generation Company Ltd (NNB GenCo) has applied for a nuclear site licence to install and operate a twin European Pressurised Reactor (EPR) nuclear power station at Hinkley Point C (HPC) in Somerset. As part of ONR's assessment of this application, a review of the prospective licensee's arrangements for compliance with the conditions to be attached to the nuclear site licence has been conducted. This report presents the findings of ONR's assessment of NNB GenCo's compliance arrangements for "Procurement of Goods and Services" which forms a sub set of work stream 10 "Nuclear Steam Supply System" (NSSS). The assessment informs a judgement on whether a nuclear site licence should be granted to NNB GenCo to construct, commission and operate a power reactor at Hinkley Point C in Somerset.

The assessment considers the adequacy of the arrangements, and their implementation, for the stage of development that NNB GenCo has reached at this point. It is recognised that the arrangements will continue to evolve as the project proceeds, and continuing ONR interaction with NNB GenCo is anticipated to gain assurance that the arrangements remain fit for purpose and that they are being implemented effectively.

Assessment and Inspection work carried out by ONR

This assessment has been informed by a number of level 4 (working level) meetings plus a targeted intervention which took place between 2 to 5 July 2012. The level 4 meetings provided a forum for dialogue and for influencing the development of NNB GenCo's procurement compliance arrangements.

NNB GenCo were able to demonstrate during the targeted intervention that their arrangements for compliance with procurement of goods and services have the essential elements as defined in international management system requirements, for example IAEA standard GS-R-3 "The management system for facilities and activities Safety Requirements" and ONR Technical Assessment Guide (TAG) reference T/AST/077 "Procurement of Nuclear Safety Related Items or Services".

The ongoing dialogue between ONR and NNB GenCo in support of this work stream (WS 10) over the past year has yielded positive benefits in terms of the approach adopted by NNB GenCo and the design of their arrangements.

This assessment concentrated on the development stage of the procurement systems to meet international management system requirements. Objective evidence of compliance to the documented systems was sought to confirm that key elements of the processes are, or can be, implemented. Other related processes that form part of the management system also inform this assessment, for example, interfaces with the architect engineer (AE), quality management systems (LC17), manufacturing inspection, records management (LC 6), and document control. These are the subject of other Assessment Reports.

The HPC project is in its early phases and the arrangements are still being refined and developed. Implementation is not yet fully mature, however NNB GenCo have made significant progress and have established key attributes of effective arrangements for the procurement of goods and services.

The HPC project lifecycle has a number of key phases such as: design, manufacture, construction, commissioning and operation, shutdown and decommissioning. The procurement compliance arrangements will need to be continually reviewed and revised in order to cope with the varying demands of scale, complexity and technological challenges throughout the HPC lifecycle. As the

project advances there will be increased users across a range of different geographical locations, and ONR will need to seek assurance that arrangements continue to develop appropriate to project lifecycle and that they are implemented effectively.

Matters arising from ONR's work

I have not identified any significant findings that I consider must be completed prior to nuclear site licence (NSL) granting. However I have identified two actions during the targeted intervention which will be tracked to completion in the normal level 4 meetings. I have also identified several observations in the targeted intervention for consideration by NNB GenCo. I will re assess these subjects in future interventions between ONR and NNB GenCo's procurement group.

Conclusion

This report presents the findings of my assessment of NNB GenCo compliance arrangements and their implementation for Procurement of Goods and Services.

I am broadly satisfied that NNB GenCo's compliance arrangements for procurement of goods and services have adequately addressed the expectations of the ONR TAG and international management systems standards. Independent assessment and proactive self-assessment, plus benchmarking against international management systems and existing nuclear generation mature processes, gives me confidence that NNB GenCo are sufficiently well advanced for this stage of the project.

NNB GenCo's procurement systems arrangements are still evolving and will be stressed significantly later this year or early next, pending investment decision from the EDF corporate body. Development of large contracts continues in the mean time to enable contract placement when they are required.

Recommendations

My recommendations are as follows:

1. NNB GenCo's arrangements for compliance with procurement of goods and services process requirements and their implementation of these arrangements should be considered adequate to support a decision by ONR to grant a nuclear site licence for Hinkley Point C.
2. ONR should continue to monitor and influence the continued development of NNB GenCo's arrangements sampling implementations as required.

LIST OF ABBREVIATIONS

ALARP	As low as is reasonably practicable
BSL	Basic Safety level (in SAPs)
BSO	Basic Safety Objective (in SAPs)
BMS	(ONR) How2 Business Management System
HSE	Health and Safety Executive
IAEA	International Atomic Energy Agency
LC	Licence Condition
ONR	Office for Nuclear Regulation (an agency of HSE)
PCER	Pre-construction Environment Report
PCSR	Pre-construction Safety Report
PID	Project Initiation Document
PSA	Probabilistic Safety Assessment
PSR	Preliminary Safety Report
RGP	Relevant Good Practice
SAP	Safety Assessment Principle(s) (HSE)
SFAIRP	So far as is reasonably practicable
SSC	System, Structure and Component
TAG	Technical Assessment Guide(s) (ONR)
TSC	Technical Support Contractor
WENRA	Western European Nuclear Regulators' Association

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Annex 1: Summary of Meetings (inc’ teleconferences) Held

1 INTRODUCTION

1.1 Background

1 This report presents the findings of the Office for Nuclear Regulation's (ONR) assessment of EDF Energy Nuclear New Build Generating Company Ltd's (NNB GenCo) procurement of goods and services process, as identified in documentation processes by the prospective licensee. The assessment was undertaken in accordance with the requirements of the ONR How2 Business Management System (BMS) procedure reference; PI/FWD, (Ref. 1). The ONR Safety Assessment Principles (SAP), (Ref. 2), together with supporting Technical Assessment Guide (TAG) (Ref. 3), has been used as part of this assessment.

1.2 Scope

2 This report considers the adequacy of NNB GenCo's arrangements for compliance with those aspects of LC17 relating to procurement of goods and services management requirements. A specific assessment of this area was conducted in view of the significance to safety of procurement arrangements for a major new build project. The assessment has been undertaken before NNB GenCo's arrangements are fully developed but at a point when sufficient progress has been made to enable me to assess their adequacy for this stage of the project. The report sets out the activities that ONR has carried out to date associated with this sub work stream, which forms part of work stream number 10 (WS 10) "Nuclear Steam Supply System" on the subject of Procurement of Goods and Services. The conclusions and work stream findings will contribute to informing ONR's decision on whether to grant a nuclear site licence for Hinkley Point C (HPC).

1.3 Methodology

3 The methodology for the assessment follows ONR BMS document PI/FWD, process (Ref. 1), in relation to mechanics of assessment within ONR.

4 This assessment has been focussed primarily on procurement of goods and services management systems that meet requirements as detailed for example in; IAEA GS-R-3 (ref 5) management system for facilities and activities, and ONR TAG 077.

5 ONR's approach during this period has been to continue to give advice and influence NNB GenCo in the development of their procurement process arrangements to support LC 17 compliance. A targeted compliance intervention was carried out between 02 and 05 July 2012 to confirm the adequacy of process compliance and implementation.

6 An important consideration during ONR assessment is our expectation that the applicant licensee should be able to demonstrate that it is managing for safety effectively at the point when it is granted a nuclear site licence.

2 ASSESSMENT STRATEGY

7 The assessment strategy for procurement of goods and services is set out in this section. This identifies the scope of the assessment and the standards and criteria that have been applied.

8 ONR and NNB GenCo have engaged in a series of Level 4 meetings to discuss the arrangements NNB GenCo have been developing to comply with the relevant standards and requirements for Procurement of Goods and services. These culminated in an ONR intervention to assess the status of the arrangements and their implementation as part of the licensing process. This intervention was an opportunity for NNB GenCo to demonstrate how their arrangements are structured and how the discussions at the Level 4 meetings have influenced their development.

9 This assessment judged NNB GenCo's procurement arrangements using established standards and guidance as outlined in several international standards and supported by ONR guidance. The NNB GenCo management system identifies that they comply with several international standards which are taken into account in their documented processes. Compliance to NNB GenCo's own procurement management system processes as documented in their procedures and instructions was also assessed. (See section 6 references)

2.1 Standards and Criteria

10 The relevant standards and criteria adopted within this assessment are principally the Safety Assessment Principles (SAPs) (Ref. 2), internal ONR Technical Assessment Guide, (Ref. 3), relevant national and international standards and relevant good practice informed by existing practices adopted on UK nuclear licensed sites. The key SAPs and relevant technical guides are detailed within this section. National and international standards and guidance have been referenced where appropriate within the assessment report. Relevant good practice, where applicable, has also been cited within the body of the assessment.

2.2 Safety Assessment Principles

11 The key SAPs applied within the assessment are included within Table 1 of this report.

- SAP MS.1 and MS.2 "Leadership and management for safety"

2.2.1 Technical Assessment Guides

12 The following Technical Assessment Guides have been used as part of this assessment, (Ref. 3):

- TAG T/AST/077 "Procurement of Nuclear Safety Related Items or Services"

2.2.2 National and International Standards and Guidance

13 The following international standards and guidance have been used as part of this assessment (Refs 4, 5):

- IAEA GS-R-3 "The management system for facilities and activities";
- IAEA GS-G-3.1 "Application of the management system for facilities and activities";
- IAEA S-G-3.5 "The management system for nuclear installations";
- BS-EN-ISO 9001:2008 "Quality Management Systems – Requirements";

2.3 Use of Technical Support Contractors

14 No supporting contractors were used.

2.4 Out-of-scope Items

15 Contract management after contract award and until contract close out is to be discussed in future level 4 meetings and interventions. Only one contract has actually been issued at the time of this assessment for HPC ground work and this contract is in a very early phase. Work on long lead items (LLI) has considerable involvement by the manufacturing inspection department (MID) which is covered in a separate assessment report.

3 LICENSEE'S SAFETY CASE

16 NNB GenCo has not provided its compliance arrangements for procurement and Licence Condition 17 management systems as a formal safety case; rather they have been presented as a suite of documentation to support the targeted intervention carried out in July 2012. That intervention has formed the basis for this overall assessment. Documents provided by NNB GenCo are recorded in the reference 9, section 6 and are accessible to ONR on the NNB GenCo BC system.

4 ONR ASSESSMENT

17 This assessment has been carried out in accordance with ONR How2 BMS document PI/FWD, "Permissioning Process" (Ref. 1).

18 The assessment was carried out in the period prior to nuclear site licence (NSL) granting. It addressed the procurement of safety significant goods and services and forms part of work stream 10, nuclear steam supply system (NSSS). The procurement arrangements are part of a (prospective) licensee's management system, and are therefore considered to be part of the arrangements put in place to comply with licence condition 17, management systems.

4.1 Scope of Assessment Undertaken

19 The aim of my assessment was to confirm the adequate development of procurement management systems and confirm implementation of the developed process. The assessment of the procurement arrangements sought assurance that adequate arrangements consistent with international standards and expectations are in place for this stage of the project.

20 The assessment was carried out on the 2000 -6000 series of contracts which are contracts for safety significant plant. It should be noted that at the time of this assessment only one full contract in the 2000 -6000 series of contracts had been awarded, associated with ground work at Hinkley Point C (HPC). Currently work on this contract is in the design development phase.

21 Objective evidence of compliance to the procurement management systems requirements was sought to confirm that key elements of the processes are or can be implemented when required.

22 Procedures used during the assessment are as identified in ref 9 of section 6. All procedures can be found on the NNB GenCo document control system called Business Collaborator (BC).

4.2 Assessment strategy

23 The strategy during this period has been to continue to adopt an open and transparent working relationship, offering constructive advice and guidance in line with ONR's guidance to its Inspectors and commensurate with any requirements of national and international standards and good practice. This has been achieved via Level 4 meetings, which have been held at NNB GenCo's London office. (See Annex 1 for details of meetings held so far). These meetings have been scheduled in conjunction with representatives of the Environment Agency (EA).

24 A targeted inspection was carried out between the 02 and 05 July 2012 at NNB GenCo's London office to confirm adequacy of processes and to sample compliance, refer to report reference: ONR-NNB-GenCo IR-12-110, trim reference 2012/296623.

4.3 Assessment findings

25 I recognise that whilst the documented processes for procurement have been in place for some time in older versions they have only recently evolved into version three (V3) and this version was used as the training base material which was disseminated to the procurement staff and key stake holders in a training package. The interface specification between the Architect Engineer (AE) and NNB GenCo also has only been in place and agreed between the two parties for a few months. As a result, the processes as documented have not as yet been stressed fully.

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- 26 There has been a significant amount of work completed to develop the processes and the relationships internally in NNB GenCo and externally with, for example, the AE. It is also recognised that a large amount of work has been completed in developing very large contracts to the current stage which will enable contract award later this year or early next. It should be remembered that only one contract has actually reached contract award stage in this series and that is associated with pre construction earth works at Hinkley Point C (HPC). The long lead items (LLIs) contract, the scopes of which are large forgings for the NSSS, has commenced with a letter of understanding between EDF SA and Areva. The technical aspect of this work is dealt with within the NSSS work stream 10.
- 27 During the July targeted intervention and in our level 4 meetings we have found the procurement arrangements put in place (at version 3) to be rigorous and robust and I consider them to be fit for purpose. Internal independent assessments and self assessment, training plus benchmarking exercises have been carried out by procurement. Findings from these exercises corroborate our findings with only minor changes being made to improve the documented procurement process to the current version, version 3.
- 28 Some of the objective evidence that we have seen in the targeted intervention pre-dates the current documented process. In our sample(s) we are satisfied that sufficient controls have been applied during the early and current procurement process for the work done so far.
- 29 Our expectation is that from this point on, and particularly post licence granting, process compliance in the procurement function and interfaces with other process groups should be applied as documented. When and if corrections or updates are required the process should be updated and approved as soon as possible to accommodate these.
- 30 I have not identified any findings in this assessment that I consider must be completed prior to nuclear site licence (NSL) granting.
- Two actions identified in the targeted assessment will be tracked to completion in the level 4 meetings between ONR and NNB GenCo as normal business, but these are not required to be completed pre-licensing. Actions are tracked on the Joint Project Office (JPO) action schedule and are detailed below, due date for both actions is Dec 2012.
- Action reference number 1406-EDF
- Design acceptance review (DAR) actions and conditions.** Clarify and document the process controls and role responsibilities to be applied for the close out of DAR actions and conditions. The process should also identify how handover of actions will be controlled when contract control moves from one process group to another, for example from DA to Project management.
- Action reference number 1407-EDF
- Lifetime records.** Ensure that procurement processes identify working arrangements and controls to be applied by the whole group for the control of required documents, example; Microsoft V drive and Portal Achats and when (what milestones) each required document is copied to or transferred onto the project life time record management system EDMS in accordance with the lifetime record retention schedule. Extra technical administration support or document control support may be required to ensure any backlog is transferred and a consistent approach is applied going forward.
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- 31 One action from the level 4 meetings remains open which is not due for completion until Dec 2012. The action will be tracked to completion in the level 4 meetings between ONR and NNB GenCo as normal business.
- Action reference number 846-EDF
- NNB to confirm the status of the hold points referred to in the AE Agreement and how these will be managed.
- 32 Several positive points were noted during the assessment:
- Governance and internal self and independent assessments have been robust in identifying findings which are very similar to those identified by ONR in level 4 meetings and interventions which we see as positive going forward. Future positive action on internal assessment findings potentially will prevent ONR from having to issue actions to the project on those subjects.
 - Early controls applied were found to be sufficient to show compliance. Legacy reviews have also been carried out to identify if further actions are required as a result of process developments and updates.
 - Good use of lessons learnt from Flamanville within the GPPS documents.
 - The development of a compliance manager post. Management has recognised the importance of compliance with the development of the procurement compliance management role which we see as a key role in influencing the compliance culture of the team and others to deliver right first time procurement of goods and services. This will also help to ensure the required records to demonstrate compliance are produced and archived. With investment approvals by EDF SA the amount of project work will increase along with a corresponding increase in project management resource. In line with this the numbers of people needed in the compliance role should be considered also.
- 33 Eleven observations were recorded in the targeted intervention in July: these were identified to NNB GenCo in the intervention closing meeting and summarised below. NNB GenCo should consider these and take action as they see fit to prevent them becoming actions in future interventions. The observations and NNB GenCo's response to them will be monitored in future level 4 meetings and interventions.
- It was noted during the inspection that whilst process procedures for procurement V3.1 were signed as approved they were not on the projects document management system (DMS) product called Business Collaborator (BC). The inspection also found that interface points with other groups may need more alignment in future versions as more process documents are developed on the project.
 - The Interim procurement framework document (currently at V2) is considered to be a useful document in explaining controls to be applied in the early procurement period. We recommend that consideration should be given to this either being a standalone status controlled document or forming part of the procurement manual.
 - The procurement manual is in DRAFT form currently. Contents of this document are a useful start point for new people into the procurement group and for others in the project who need to know what procurement do. Consider completing the document and issue it onto the DMS as a controlled document.

- Procurement and the wider project should consider development of induction packages for main processes to identify to all new staff; the project culture expectations, key process points, interfaces and deliverables of the group. Induction is an opportunity to make early contact with people that will require more information about the process.
- Early GPPS documents witnessed during the inspection did not identify which stage they were produced for. Consider authorised amendments to GPPS produced so far to clarify the record stage they have been produced for.
- Terms of reference for PRODEM and procurement process documents (ex NNB-PCP-PRO-000066) need some alignment to identify a consistent approach. PRODEM approval of hold points (HP) 7 sign off for contracts UK4101 and UK 5511 was witnessed in minutes of the meeting. The terms of reference for the PRODEM should identify what constitutes a quorum of people to ensure rigorous review of the decision to approve and release hold points.
- Readiness reviews carried out by project managers and possibly other groups are currently identified in a DRAFT document. These should be completed and issued on the DMS to ensure requirements are understood and a consistent approach to readiness reviews is taken.
- The significant and minor NC identified in internal independent assessments should be progressed to completion and closed out by procurement. Verification of action completion should be carried out by procurement management and a lead assessor of the group who raised them, IACO.
- Consideration should be given to SQEP checks of staff, agency and consultants used on the project to ensure that they are SQEP for the function they are performing. Minimum project requirements should be identified for the different specialists, these requirements to include elements of, qualification, training and experience. Project management should consider how SQEP checks will be carried out on contractors and sub contractor staff. Rigorous SQEP checking of people sent to the construction site should be normal business. Storage of SQEP records to demonstrate compliance needs careful consideration to ensure they are controlled, secure and accessible when challenged.
- Competency assessments have been carried out for procurement of staff however the relationship between these and the role requirements was not clear.
- Consider a high level quality plan for each contract identifying among other things; people who have responsibilities in key supporting groups, key process stages for example hold points, site inaugural meeting, SQEP checking etc. An example plan is used by project division of EN and gives a route map of key steps that needs to be done from start to finish.

4.4 Comparison with Standards, Guidance and Relevant Good Practice

34 I consider that NNB GenCo's processes are clearly defined and documented and have the essential features expected from a procurement management system as defined in Technical Assessment Guide T/AST/077 (Ref 3) "Procurement of Nuclear Safety Related Items or Services"

35 Process procedures for procurement have been produced and benchmarked against international standards for example, IAEA GS-R-3 (ref 5), ONR Technical Assessment Guide (TAG) T/AST/077 (Ref 3) and EDF Energy existing nuclear procurement processes.

4.5 IIS Rating LC17 Management Systems

36 NNB GenCo procurement has made significant progress over the past year which has been reflected in the Level 4 meetings and the recent targeted intervention in July. A process for procurement of goods and services is now in place; internal assessments and benchmarking exercises have been completed with findings incorporated in the process; and implementation has started. In recognition of the success that has been achieved and the strong positive forward momentum an **IIS rating of 3 adequate is allocated.**

5 CONCLUSIONS AND RECOMMENDATIONS

5.1 Conclusions

37 NNB Generation Company Ltd (NNB GenCo) has applied for a nuclear site licence to install and operate a twin EPR nuclear power reactor at Hinkley Point C in Somerset. As part of ONR's assessment of this application, a review of the prospective licensee's arrangements for compliance with the conditions to be attached to the nuclear site licence has been conducted. This report presents the findings of ONR's assessment of NNB GenCo's compliance arrangements for those aspects of Licence Condition 17 (LC17) relating to procurement of goods and services. The assessment considers the arrangements themselves, which are documented in process and procedural documentation; and the level of implementation up to the end of July 2012. The assessment has been based on the requirements set out in established standards and guidance including GS-R-3, BS-EN-ISO 9001 and the ONR Technical Guide T/AST/077.

38 The assessment considers the adequacy of NNB GenCo's arrangements, and their implementation, for the stage of development that they have reached at this point. It is recognised that the arrangements will continue to evolve as the project proceeds, and continuing ONR interaction with NNB GenCo is anticipated to gain assurance that the arrangements remain fit for purpose and that they are being implemented effectively.

39 NNB GenCo have made significant progress in building up resource and processes in the last year or so. They have designed, documented and are beginning to implement adequate procurement arrangements for this stage of the project. They are aware of the need to review and develop arrangements as the project progresses. The requirement to develop arrangements should reduce in time as the HPC project reaches maturity.

40 During the July targeted intervention NNB GenCo demonstrated their systems for procurement of goods and services from the management systems manual (MSM) to process procedures and instructions. I was satisfied with their commitment to compliance and developing adequate arrangements that are fit for purpose.

41 The granting of a site licence will enhance rather than diminish ONR's ability to influence NNB GenCo's progress in developing further the arrangements. The arrangements are judged to be adequate for this stage of the project and will provide a sound platform for development as the project proceeds.

42 To conclude, I am satisfied that NNB GenCo's compliance arrangements for procurement of goods and services are addressing the expectations of relevant ONR and international standards. The arrangements and their implementation are still evolving, and there is a strong forward momentum within the company to carry this development forward. This gives confidence that they are sufficiently far advanced for this stage of the project.

5.2 Recommendations

43 My recommendations are as follows;

- NNB GenCo's arrangements for compliance with procurement and their implementation of these arrangements should be considered adequate to support a decision by ONR to grant a nuclear site licence for Hinkley Point C.
- ONR should continue to monitor and influence the continued development of NNB GenCo's arrangements.

6 REFERENCES

1	ONR How2 Business Management System. Assessment Process. PI/FWD Permissioning – Purpose and Scope of permissioning, Issue 3. HSE. www.hse.gov.uk/nuclear/operational/assessment/index.htm .
	SAP MS.1 & 2 “Leadership and management for safety” <i>Safety Assessment Principles for Nuclear Facilities</i> . 2006 Edition Revision 1. HSE. January 2008. www.hse.gov.uk/nuclear/SAP/SAP2006.pdf .
3	Technical Assessment Guide: T/AST/077 “Procurement of Nuclear Safety Related Items or Services” www.hse.gov.uk/nuclear/operational/tech_asst_guides/index.htm .
4	<i>Western European Nuclear Regulators’ Association. Reactor Harmonization Group. WENRA Reactor Reference Safety Levels</i> . WENRA. January 2008. www.wenra.org .
5	GS-R-3 “The management system for facilities and activities Safety Requirements”; GS-G-3.1 “Application of the management system for facilities and activities”; GS-G-3.5 “The management system for nuclear installations Safety Guide”; IAEA. Vienna. 2000. www.iaea.org .
6	BS-EN-ISO 9001:2008 “Quality Management Systems – Requirements”;
7	BS EN ISO 14001:2004 “Environmental management systems. Requirements with guidance for use”;
8	NNB-OSL-MAN-000004. Version 2. “Management Systems Manual”.
9	NNB GenCo procedures access via NNB GenCo Business Collaborator (BC) NNB-PCP-PRO-000059 Procurement Route Indicator NNB-PCP-PRO-000060 Procurement Overview NNB-PCP-PRO-000062 Contract Kick-Off Meeting NNB-PCP-PRO-000063 Sourcing and PPQ Preparation NNB-PCP-PRO-000065 Supplier Pre Qualification NNB-PCP-PRO-000066 Invitation to Tender NNB-PCP-PRO-000067 Tender Evaluation NNB-PCP-PRO-000068 Negotiation and Selection NNB-PCP-PRO-000069 Contract Award

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Table 1

Relevant Safety Assessment Principles Considered During the Assessment

SAP No.	SAP Title	Description
MS.1	<p>Leadership and Management for Safety Paragraph 51: The QMS should be based on national and international standards or other defined documents and should be reviewed periodically. Consideration should be given to the adoption of a single company wide management system ensuring that the principle of continuous improvement is maintained.</p>	<p>Leadership Directors, managers and leaders at all levels should focus the organisation on achieving and sustaining high standards of safety and on delivering the characteristics of a high reliability organisation.</p>
MS.2	<p>Leadership and Management for Safety Paragraph 54 The organisational structure, roles and responsibilities should secure effective co-ordination and collaboration between all those involved, including contractors. Roles, responsibilities, accountabilities and performance standards for safety at all levels should be clear and avoid conflict with other business roles, responsibilities, accountabilities and objectives. All those with responsibilities for safety should have authority and access to resources to discharge those responsibilities effectively. This should ensure that proportionate control and supervision of safety at all levels is achieved. The design of jobs, processes, and procedures should take account of those factors that affect reliable performance of the organisation.</p>	<p>Capable organisation The organisation should have the capability to secure and maintain the safety of its undertakings.</p>

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Annex 1

Summary of Meetings (inc teleconferences) Held

Date	Location	Topic	Contact Report TRIM Ref no
23/01/12	Qube London	Procurement level 4	2012/93920
02/03/12	Qube London	Procurement level 4	2012/156903
04/04/2012	Qube London	Procurement level 4	2012/201813
02/05/12 to	Qube London	Procurement level 4	2012/219094
02 to 05/07/12	Qube London	Procurement compliance intervention	2012/296623