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| ONR Guidance Document  Guidance on the assignment of dutyholder attention levels |



ONR Guidance Document

Guidance on the assignment of dutyholder attention levels

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Revision Commentary

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| Issue No. | Description of Update(s) |
| 1 | New document. |
| 2 | **Major update:**   * Recognition that ONR is now the safeguards regulator, for, and Control of, Nuclear Materials. * Recognition that dutyholders security arrangements have matured since publication of SyAPS. * Updated templates and guidelines which allow divisions to self-assess the effectiveness of regulatory strategies. |
| 3 | **Major update:**   * Introduction of transport attention levels for nuclear and non-nuclear dutyholders. * Setting of safeguards attention levels. * Revised performance indicators for security purpose. * Reference to NS-INSP-GD-070 within safety leadership and culture attributes. * Enhanced guidance for quality control and moderation of attention level sheets. * Include provision for a change in regulatory attention level throughout the year. * Updated templates in Appendices 1 to 9. |
| 3.1 | **Minor update:**   * Inclusion of section 2.6 ‘Supporting attributers for transport related purposes’. |
| 3.2 | **Minor update:**   * Correction to table header of Table 7. * Minor formatting updates. |

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# Introduction

## Purpose

1. In 2019, the Chief Nuclear Inspector began publishing a comprehensive annual report on the safety, security and safeguards performance of Great Britain’s nuclear industry. The report is underpinned by annual assessments of dutyholder safety, security, safeguards and transport performance across our regulatory purposes. This is informed by ONR’s assessment of regulatory attention levels. Each division/purpose is required to compile an annual assessment of attention level across all licensed sites and other dutyholders were judged to be necessary.
2. This guidance presents a framework for guiding inspectors in assigning attention levels against dutyholders regulated by ONR during the reporting year. The intent for undertaking a structured assessment in the manner set out within this guidance is to better target regulatory effort based on risk and intelligence. The guidance provides enhanced auditability and transparency with which ONR assigns overall regulatory attention levels.

## Scope and applicability

1. Historically a single attention level has been assigned to licensed sites covering all of ONR’s statutory purposes as defined under the Energy Act (2013). To aid in transparency and to better differentiate attention across our purposes, four attention levels will now be assigned to relevant dutyholders.

* Safety purposes covering Nuclear Safety and Nuclear Site Health and Safety (including Conventional Health and Fire Life Safety).
* Security purposes covering Nuclear Security and Transport Security.
* Safeguards purposes covering Nuclear Material Accountancy, Control and Safeguards
* Nuclear Transport Safety

1. The differentiation of attention levels against ONR’s statutory purposes will support internal resource prioritisation and benchmarking ONR’s regulatory strategies.
2. Safety, security, safeguards and transport attention levels may also be assigned on a case-by-case basis to corporate bodies. This recognises the substantial influence such bodies may exert on the prioritisation of resources across their sites. Non-licensed nuclear premises, tenants on licensed sites and approved carriers as defined by the Nuclear Industries Security Regulations (NISR) 2003 will be assigned an attention level for security.
3. Divisions/purposes may choose to assign attention levels against other specific dutyholders on an exceptional basis. This should be considered where an enhanced level of attention may have been required. These may include for example:

* EDF as a corporate body
* Nuclear Decommissioning Authority as the owner of the Sellafield, Magnox Ltd and the wider site restoration estate,
* Non-nuclear Transport carriers,
* Tenants on licensed sites with significant undertakings,
* Other contractors with substantial undertakings on licensed sites.

1. In 2017, ONR published the Security Assessment Principles (SyAPs) [1] as part of the transformation of security regulation to an outcome focused approach. For the period that dutyholders were developing security plans aligned with SyAPs, Civil Nuclear Security and Safeguards (CNSS) operated a reduced Annual Security Review (AnSyR) process. With SyAPs plans now approved, more granular indicators have been reintroduced in [Appendix 2](#_Appendix_2_–). These indicators are based on the fundamental security principles within SyAPs, which have a degree of alignment with the previous security performance indicator framework.
2. In 2023, ONR reviewed and revised its strategy for regulating transport dutyholders. ONR has developed performance indicators for transport to inform assessment of dutyholder performance and regulatory attention levels which have been included in [Appendix 4](#_Appendix_4_–).
3. In 2023, ONR reviewed and revised its strategy for regulating Nuclear Site Health and Safety (NSHS). ONR is developing performance indicators for NSHS to inform assessment of dutyholder performance and regulatory attention levels. This is a key area of regulatory focus and will inform a future update to this guidance.

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# Guidance

1. For each dutyholder that operates licensed sites, four overall attention levels should be assigned. One attention level for each of ONR’s safety, security, safeguards and transport related purposes, where applicable. In the case of dutyholders operating more than one licensed site (such as EDF Energy Nuclear Generation Ltd, Magnox Ltd and AWE Ltd) divisions/purposes should identify attention levels for each licensed site. Attention levels should also be considered for the dutyholder at a corporate level. This may be necessary in cases where dutyholder corporate activities exert significant influence on resources and priorities in safety, security or safeguards enhancements.
2. For non-licensed sites that support the UK’s fleet of nuclear-powered submarines (those operated and authorised by the MoD), ONR’s regulatory responsibility is limited to the Health and Safety at Work etc. Act 1974.
3. Specific derivation of attention levels against each of these sites is therefore not a requirement. However, the annual CNI report and CNI statement for the ARA may be supported by a narrative where ONR has had cause to exert an increased level of attention.
4. Regulation of the civil transport of radioactive and nuclear material (Class 7 dangerous goods) is undertaken by the Transport Competent Authority (TCA). For the Class 7 transport sector (nuclear and non-nuclear), TCA will assign attention levels for transport compliance. For ‘non-nuclear’ transport dutyholders; attention levels only need to be reported by exception where an enhanced level of attention has been assigned against any of the large number of dutyholders operating in Great Britain.
5. Under NISR 2003, all movements of Category I-III quantities of nuclear material must be undertaken by an approved carrier. These duty holders are regulated by CNSS for security. Each approved carrier will be assigned an attention level for security.
6. For other dutyholders, regulatory divisions and purposes may also wish to specifically assign attention levels under exceptional circumstances. Such dutyholders may include NDA; custodians of sensitive nuclear information held of nuclear licensed sites or premises; contractors and/or tenants with undertakings on licensed sites (such as National Nuclear Laboratories and other Tier 1 level contract partners).
7. Non-licensed nuclear premises, tenants on licensed sites and approved carriers (see above) as defined by NISR 2003 will be assigned an attention level for security.
8. The regulatory attention level for safeguards dutyholders will also take consideration of their compliance with statutory regulations, nuclear material inventory reporting and IAEA facilitation to meet the UK's international safeguards obligations.
9. Where appropriate due to limited safeguards activities and risk, a single safeguards assessment may be undertaken for corporate grouping of sites, for example, EDF and Magnox.
10. Dutyholders who have qualifying nuclear facilities with limited operations (QNFLO) as defined by Nuclear Safeguards (EU Exit) Regulations 2019 (NSR19) should be assigned an attention level for safeguards. The assessments should be proportionate to the activities performed and quantity and type of qualifying nuclear material present. This will be presented in a simple table format covering all dutyholders.

## Derivation of attention levels

1. The overall regulatory attention levels assigned for safety, security, safeguards and transport to each dutyholder combines judgements across a range of indicators. Attention ratings against each individual indicator should assist inspectors in their judgement of an overall attention level for a dutyholder for safety, security, safeguards and transport. Ultimately it is for individual divisions to apply their regulatory judgements on the extent to which individual attributes inform the overall attention levels assigned. Consideration of attention level against such attributes may usefully inform inspectors where additional regulatory focus may be warranted even if the overall attention level is designated as ‘Routine’.
2. The following broad definitions apply to four regulatory attention levels that may be assigned for safety, security, safeguards and transport against each dutyholder (Table 1 to Table 3):

Table 1 - Regulatory attention level 3

|  |  |
| --- | --- |
| **3** | **Level 3 – Routine Regulatory Attention** |
| **Safety Purposes** - ONR has undertaken routine planned compliance inspection and nuclear safety permissioning activities and nuclear risks associated with the dutyholder’s activities are well managed in accordance with an adequate and up-to-date safety case. There is not a repeated history of formal enforcement activity. |
| **Security Purposes** - The site is in steady state and generally compliant. Any ONR resource required to support dutyholder activity is minimal (for example, approval of low-level amendments to the security plans or low risk temporary security plans) and regulatory issues managed by CNSS inspectors. |
|  | **Safeguards Purposes** - ONR has undertaken routine planned compliance inspections and assessments of dutyholder Basic Technical Characteristics (BTCs) and Accountancy and Control Plans (ACPs). Nuclear material accountancy reporting is adequate and submitted in a timely manner and dutyholder activities are managed in accordance with an adequate and up to date ACP. Where required, the dutyholder has facilitated IAEA activities in support of the UK meeting its international safeguards obligations. There is not a repeated history of formal enforcement activity. |
|  | **Transport Purposes** - ONR has undertaken routine planned compliance inspection, transport permissioning activities and reviewed other forms of regulatory intelligence and the dutyholder’s activities are well managed in accordance with relevant legislation for the transport of radioactive material (Class 7 dangerous goods). There is not a repeated history of formal enforcement activity. |

Table 2 - Regulatory attention level 2

|  |  |
| --- | --- |
| **2** | **Level 2 – Enhanced Regulatory Attention** |
| **Safety Purposes** - Enhanced regulatory attention describes a higher level of regulatory activity paid to the dutyholder. This may be influenced by:   * An increasing level of risk or hazard profile in the licensee’s undertakings * Recent formal enforcement activity, particularly of repeated nature, * Challenging and complex assessment issues that require enhanced specialist inspector attention * Emergent or long-standing safety issues and/or the risk associated with the facilities in question. |
| **Security Purposes** - Evidence of more significant instances of non-compliance or other issues demanding ONR attention to oversee effective resolution. Alternatively, the site has increased programme activity complex security enhancements or temporary security plans. |
|  | **Safeguards Purposes** - Enhanced regulatory attention describes a higher level of regulatory activity paid to the dutyholder. This may be influenced by:   * An increasing level of safeguards significance in the dutyholders undertakings * Evidence of issues in facilitation of the IAEAs safeguards activities which may impact on the UKs ability to meet its international safeguards obligations * Recent formal enforcement activity, particularly of a repeated nature (including issues with nuclear material accountancy reporting) * Emergent or long-standing safeguards issues and/or the safeguards significance associated with the facilities in question |
|  | **Transport Purposes** - Evidence of significant instances of non-compliance or other issues demanding ONR attention or enforcement to oversee effective resolution (for example, enforcement letters, improvement notices). |

Table 3 - Regulatory attention level 1

|  |  |
| --- | --- |
| **1** | **Level 1 – Significantly Enhanced Regulatory Attention** |
| **Safety Purposes** - Significantly enhanced attention is based upon the factors above at Level 2 but may also be influenced by:   * Changes in our regulatory strategy to achieve hazard and risk reduction across sites over a shorter period of time * Sustained failure to address long-standing safety issues and/or the risk associated with the facilities in question despite current or previous enhanced regulatory attention |
| **Security Purposes** - Evidence of more significant/serious instances of non-compliance or other issues, particularly on higher hazard sites, which demand ONR attention to oversee effective resolution. Alternatively, the site has increased programme activity for a high hazard site or where proposed arrangements are complex/novel/contentious, major security enhancements or temporary security plans. Oversight of Level 1 regulatory issues is given by the CNSS divisional director and Chief Nuclear Inspector. |
|  | **Safeguards Purposes** - Significantly enhanced attention is based upon the factors above at level 2 but may also be influenced by:   * Changes to our regulatory strategy to achieve safeguards improvements required over a short time period * Sustained failure to address longstanding safeguards issues despite current or previous enhanced regulatory attention * Failure to submit timely and adequate nuclear material accountancy reports * Failures in facilitation of IAEA safeguards activities which means the UK is unable to meet its international safeguards obligations |
|  | **Transport Purposes** - Evidence of serious instances of non-compliance or other issues, which demand ONR attention or enforcement to oversee effective resolution (for example, Prohibition notices). |

## Practical implications of enhanced attention levels

1. The assignment of enhanced attention levels may result in additional regulatory resource allocated to a site to support an enhanced inspection programme or undertake additional specialist assessment.   
   However, enhanced attention may manifest in other ways judged by divisions/purposes to be necessary to secure, where practicable, a return to routine attention:

* Structured Improvement/Action Plans developed by the licensee or dutyholder, overseen by ONR at delivery lead and divisional director.
* Level 1 and 2 regulatory issues where relevant to manage and track progress.

1. For sites or dutyholders assigned significantly enhanced attention level, an ‘Engine Room’ type approach with relevant stakeholders has proven effective in overseeing implementation of improvement plans. This is particularly relevant for long-standing and complex regulatory issues. Such multi-agency groups would typically be attended by the dutyholder, licensee, relevant enforcing authorities and potentially UK and/or devolved Government.
2. Notwithstanding the enabling approach we will always seek to adopt, in cases of non-compliance we apply our formal powers of enforcement proportionately and in line with our Enforcement Policy Statement [2] and Enforcement Management Model [3]. Where the non-compliance is more significant, we will limit the extent to which our inspectors can act in an enabling manner. We will still seek to apply the principles so far as is reasonable, but the fundamental principle of ensuring that the hazards from the nuclear industry are controlled to protect people and society remains inviolable/firm/resolute.

## Supporting attributes for safety related purposes

1. The overall regulatory attention levels assigned for safety combines assessment across three performance attributes, capturing ONR’s safety related purposes. These indicators correlate loosely with ONR’s Nuclear Safety Performance Indicator framework but with greater regulatory emphasis. ONR, in consultation with the Safety Directors Forum, has tailored the safety performance indicator framework [4], which was originally designed with nuclear power plant operations in mind and broadened the application to the wider nuclear industry (Figure 1).
2. The three attributes, with recommended supporting indicators aligned vertically are summarised in Table 4. The indicators are described in more detail in [Appendix 1](#_Appendix_1_–).

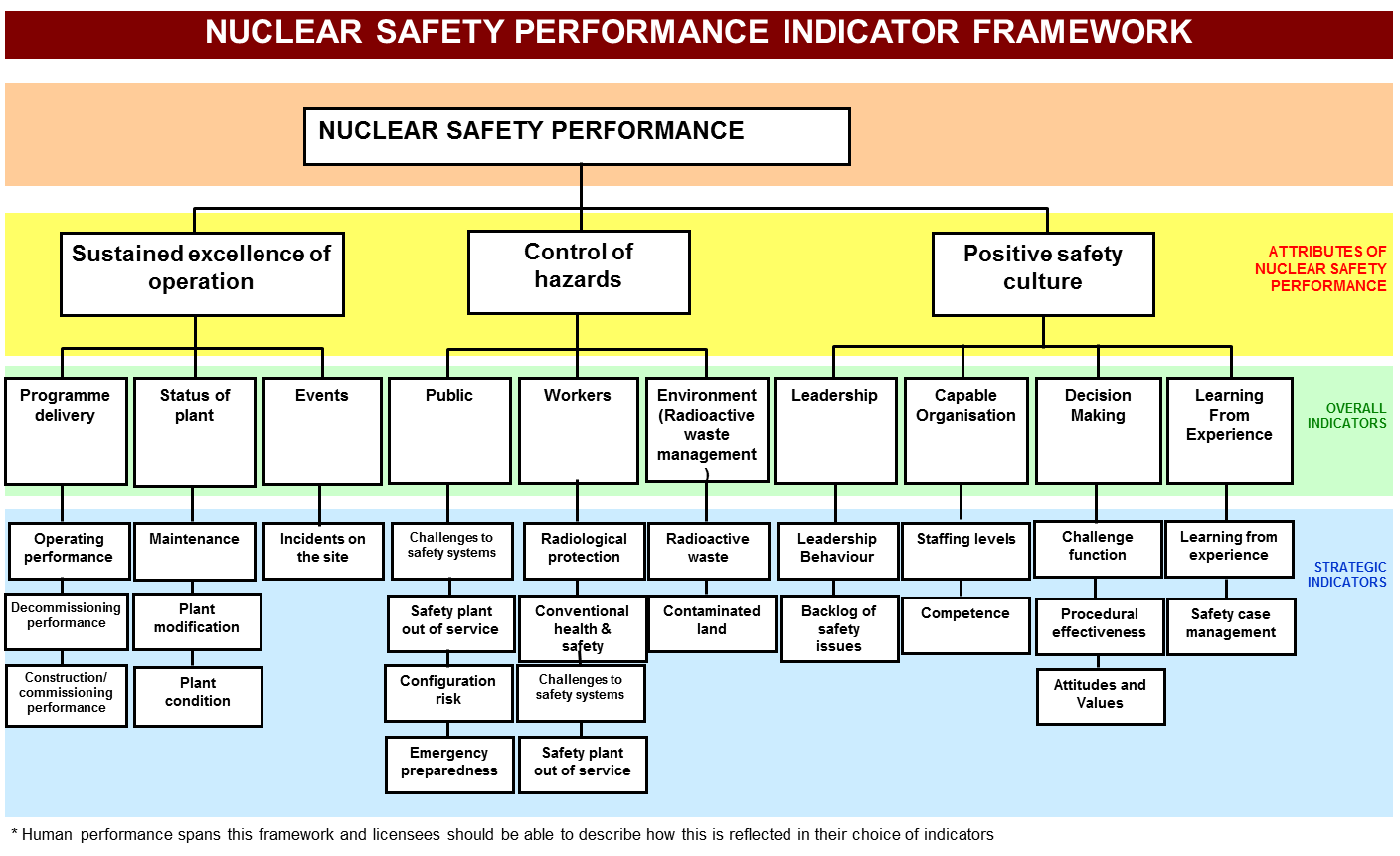


Figure 1 - Nuclear safety performance indicator framework

Table 4 - Safety performance attributes: Overall regulatory attention for safety purposes

| Safety Performance | Control of Hazards and Risks | Safety Leadership and Culture |
| --- | --- | --- |
| Licensee Compliance record | Level of Hazard and Risk posed by the dutyholder’s undertakings | Leadership |
| Number and significance of regulatory issues (nuclear and CHS related) and timeliness of resolution | Nuclear safety case adequacy and currency | Capable Organisation |
| Enforcement action taken or under consideration | Emergency preparedness and response capability | Decision making |
| Number and significance of Nuclear Safety incidents on the site | Maturity of CHS prioritisation and risk profiling | Learning |
| Delivery of agreed Nuclear Safety Enhancements |  | Internal Assurance and Challenge |
| Delivery of Industrial and Fire Life Safety Improvements |  |  |
| Number and significance of CHS INF1/RIDDOR and near miss reports on the site |  |  |
| Plant status (control of modifications and maintenance) |  |  |

2. **‘Safety Performance’** is a product of dutyholder compliance record across the various safety purposes, incidents on the site and delivery against agreed or required safety enhancements. This aligns closely to the ‘sustained excellence of operations’ attribute in the nuclear safety performance indicator framework. Dutyholders maintain a wide variety of metric-based indicators to measure safety performance. For the purpose of attention level assessment, inspector judgement is required taking into account their interactions with and tacit knowledge of the site and its performance in-year. This may take into account the dutyholder’s own performance indicators.
3. The ‘**Control of Hazard and Risk’** attribute is a product of the level of hazard and risk posed by the licensee’s undertakings and the adequacy with which the licensee demonstrates that risks are controlled so far as is reasonably practicable in accordance with an adequate and live safety case. As part of this consideration, the licensee’s onsite emergency preparedness and response capability should be considered in terms of their capability to manage and respond to fault progression within and beyond the design basis. The adequacy of conventional health and safety risk profiling should also be taken into account.
4. ONRs Technical Inspection Guide on ‘Safety Culture Guide for Inspectors’ [5] advocates the use of cultural warning flags as a way of routinely gathering insights from interventions on site. The LMfS SAPS are the basis for the attention level assessment **'Positive Safety Culture**' attribute, and the health of the warning flags can be used to inform the regulatory attention level assessment[[1]](#footnote-2). The outcome from this assessment can be used to inform the 'safety leadership and culture' indicator to reflect those areas that have emerged during engagements with dutyholders.

## Supporting attributes for security related purposes

1. The overall regulatory attention level considers the combined judgements across the three security attributes (Table 5 and Figure 2). The overall regulatory attention levels assigned for security combines assessment across three attributes that cover performance of security strategic enablers, operations and delivery. The attributes relating to strategy and operations are drawn from the ten fundamental security principles within SyAPs. Security delivery can be considered more to be a measure of compliance and closing compliance gaps. In all cases, the attributes correlate loosely with ONR's nuclear security performance indicator framework but with greater regulatory emphasis - as represented by the close relationship to SyAPs.
2. The overall regulatory attention level considers the combined judgements across the three security attributes in Table 5 and [Appendix 2](#_Appendix_2_–).

Table 5 - Security performance attributes: Overall regulatory attention for security purposes

| Security Delivery | Security Operations | Security Strategic Enablers |
| --- | --- | --- |
| Dutyholder Compliance record | Physical Protection Systems | Leadership and Management for Security |
| Number and significance of security regulatory issues and timeliness of resolution | Cyber Security and Information Assurance | Organisational Culture |
| Enforcement action taken or under consideration | Workforce Trustworthiness | Management of Human Performance |
| Number and significance of Nuclear Security incidents on the site | Policing and Guarding | Nuclear Supply Chain Management |
| Delivery of agreed nuclear security improvements | Emergency Preparedness and Response | Reliability, Resilience and Sustainability |

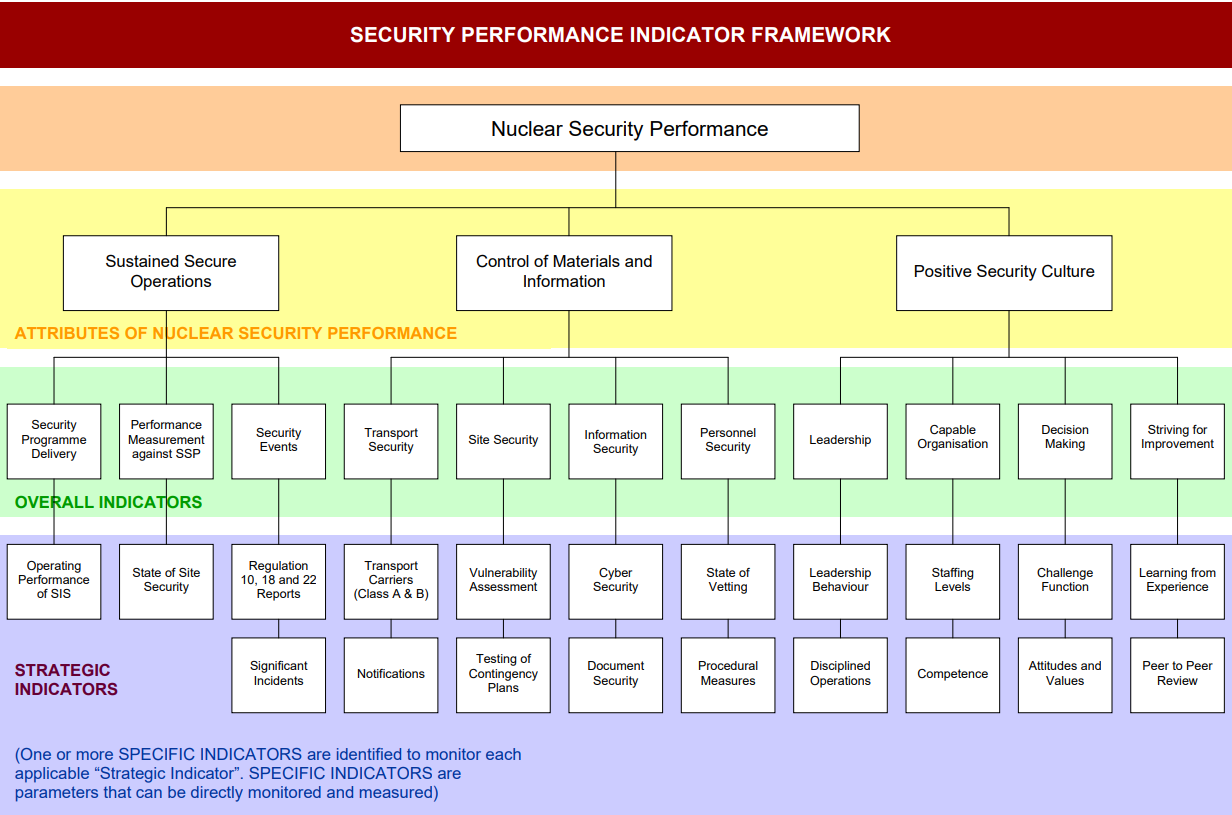


Figure 2 - Security performance indicator framework

## Supporting attributes for safeguards related purposes

1. The overall regulatory attention levels assigned for safeguards combines assessment across four performance attributes, capturing ONR’s safeguards related purpose. These indicators correlate loosely with the statutory safeguards requirements and ONRs Nuclear Material Accountancy, Control and Safeguards (ONMACS) fundamental safeguards expectations (FSE) [6].
2. Evidence to support attributes and indicators should make use of the routine statutory reporting as well as site-based interventions and interactions.
3. The four attributes, with recommended supporting indicators aligned vertically are summarised in Table 6. The indicators are described in more detail in [Appendix 3](#_Appendix_3_–).

Table 6 - Safeguards performance attributes: Overall regulatory attention for safeguards purposes

| Safeguards delivery | Strategic enablers | NMAC system | Nuclear Material Accountancy |
| --- | --- | --- | --- |
| Operator activities  Nuclear safeguards incidents and follow-up  Regulatory issues and operator response  Formal enforcement action  Observations and issues received in formal letters from the IAEA  Delivery of information required by NSR19  Delivery of other required statutory information (NCAs, APs etc) | Leadership and culture  Organisational capability  Internal assurance and challenge | Material control  Reliability, resilience and maintenance  System changes  NMAC documentation and implementation | Records and data processing  NMA reports  Material balance performance |

2. **Safeguards Delivery** is fundamentally a product of dutyholder’s regulatory performance with regards to general compliance with The Nuclear Safeguards (EU Exit) Regulations 2019 (NSR19) and other requirements such as those of Nuclear Cooperation Agreements. For the purpose of attention level assessment, inspector judgement is required taking into account their interactions with and tacit knowledge of the site and its performance in-year. This may take into account the dutyholder’s own performance indicators.
3. **Strategic Enablers** is an assessment of a dutyholder’s capability in implementing a nuclear material accountancy and control (NMAC) system and is a judgement against the expectations described in FSEs 1 – 4 of ONMACS. This assessment should examine the leadership and management for the effective delivery of safeguards requirements.
4. **NMAC Syste**m is the performance of the operator's system for NMAC including the adequacy and implementation of their documentation; accountancy and control plan (ACP) and basic technical characteristics (BTC).
5. **Nuclear Material Accountancy** is the Operator’s performance in relation to accounting and accountancy for nuclear material. Inspectors should work closely with the relevant ONR Safeguards Nuclear Material Accountant.

* Supporting Attributes for Transport Related
* Other contractors with substantial undertakings on licensed sites.

## Supporting attributes for transport related purposes

1. **Transport Delivery** is a product of dutyholder's regulatory performance with regards to general compliance with The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended) (which invokes the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) and the Regulations concerning the International Carriage of Dangerous Goods by Rail (RID) into GB legislation) and the Ionising Radiations Regulations 2017.
2. The three attributes, with recommended supporting indicators aligned vertically are summarised in Table 7. The indicators are described in more detail in [Appendix 4](#_Appendix_4_–).
3. Evidence to support attributes and indicators should make use of dutyholder compliance inspection history and any interactions such as incident reports, whistle-blower concerns etc.

Table - Transport performance attributes: Overall regulatory attention for transport purposes

| Safety Performance | Control of Hazards and Risks | Safety Leadership and Culture |
| --- | --- | --- |
| Dutyholder compliance record | Level of hazard and risk posed by the dutyholder’s undertakings | Leadership |
| Number and significance of regulatory issues and timeliness of resolution | Package Design Safety Report (PDSR) adequacy and currency | Capable Organisation |
| Enforcement action taken or under consideration | Radiation Risk Assessment (RRA) adequacy | Decision making |
| Number and significance of notifiable incidents | Emergency preparedness and response capability | Learning |
|  | Adequacy of Management System for transport of radioactive material | Internal Assurance and Challenge |

# Annual assessments

1. To assist in the timely compilation of the Annual Report of Accounts (ARA) that is published in June each year (and the CNI report published subsequently in the Autumn), each division/purpose is required to compile proportionate annual assessments of safety, security, safeguards and transport attention levels.
2. This section of the guidance sets out suggested expectations for assessment of regulatory attention levels.

## Content of assessments

1. For each attention level assessment, sufficient narrative should be provided to underpin the overall attention level. This narrative should be applied against relevant attributes that support the safety, security, safeguards and transport indicators (judged by the divisions/purposes to be relevant to the dutyholder’s undertakings and nature of hazard and risks). Appendices 1 - 4 set out suggested considerations against each attribute to help guide the assessment team for safety, security, safeguards and transport. Appendices 5, 6, 7 and 8 provide corresponding templates for recording safety, security, safeguards and transport assessments against individual licensed sites and other dutyholders.
2. The dutyholder itself, where it operates more than one licensed site, may also be assigned an overall attention level, supported by a sufficient narrative that considers overall safety, security, safeguards and transport performance across its constituent licensed sites. Where applied, the overall dutyholder narrative should be recorded in the generic template provided in [Appendix 9](#_Appendix_9_–).
3. The overall attention level score should not be interpreted as an aggregation of individual scores assigned to the various indicators. The assessment team should exercise appropriate judgement on how much weighting should be assigned against individual factors in influencing the overall attention score. The assignment of attention scores against each attribute is intended to enhance transparency of the basis with which ONR has made its overall judgement.
4. Divisions/purposes should assign individual attention levels to indicators judged relevant to the dutyholder’s undertakings which are then used to inform the overall attention level. The extent to which supporting narrative is used to support individual indicator scores should be at the discretion of the assessment team.

* For enhanced and significantly enhanced scores more narrative would be expected against those attributes judged to have the greatest influence on the overall attention level. The narrative should include an assessment on the effectiveness of existing regulatory strategies.
* Even if a single indicator is judged to dominate the overall attention level, divisions should assign ratings and supporting narrative against other indicators to provide a balanced picture. This is particularly important for higher hazard and risk sites where to reflect ONR’s wider view of programme delivery.
* For routine attention, supporting statements may be useful as context to emphasise individual attributes that have attracted an enhanced level of attention even if the overall attention level is still routine. This is especially so if there are, for example, prominent permissioning, compliance shortfalls or formal enforcement activity having been undertaken.

1. Where an overall enhanced or significantly enhanced regulatory attention has been assigned to a site and/or dutyholder, the assessment should be supported by an action plan (or regulatory strategy) and relevant regulatory issues by which improvement will be sought. For some sites or dutyholders assigned significantly enhanced attention it is recognised that the return to routine attention is unlikely to be practicable for many years. The assessment in these cases should succinctly articulate the overarching strategy by which this will be achieved, and the nature of ONR’s regulatory role in securing this in the long term.

### Other dutyholders

1. For all other dutyholders that do not operate licensed sites, divisional/purpose assessments of attention should be undertaken and reported by exception only where an increased level of attention above ‘Routine’ is anticipated. Due to the wide variety of dutyholders and their undertakings (for example, MoD Authorised Sites, Tier 1 contractors, NDA, non-nuclear transport dutyholders), it would not be practical or proportionate to specify a detailed assessment framework. [Appendix 9](#_Appendix_9_–) provides a general template for recording narrative to support attention levels derived for other dutyholders.

### Mid-year assessments

1. Except for non-nuclear transport dutyholders, divisions/purposes may undertake mid-year assessments of regulatory attention level for sites or dutyholders where an increase or decrease in overall regulatory attention level is anticipated within the next reporting (calendar) year. The exact timing of the mid-year assessments is left to the discretion of the divisions/purposes.
2. Where a change in overall regulatory attention level is proposed the appropriate attention level sheet proforma should be completed and be subjected to divisional/purpose specific review and challenge. The attention level sheet will be submitted to ESO for the attention of EDR in advance of notifying the dutyholder of any change in overall regulatory attention level. The ESO will confirm whether any further evidence should be submitted in support of the change of overall regulatory attention level and will confirm whether EDR endorses the change in overall regulatory attention level.

## Content of assessments for safety purposes

1. The overall regulatory attention level considers the combined judgements across the three attributes. Inspectors should apply judgement and allow factors to influence the attention level such as the nature of hazard and risk posed by the dutyholder’s undertaking, dutyholder attitude, compliance records or whether the situation is improving or worsening. ONR is a sampling organisation, and it may be the case that for some sites/ dutyholders no intelligence or evidence has been collected for a specific indicator, or the indicator is not relevant to the site/dutyholder. In such cases, it is acceptable to state that no evidence has been collected and ascribe a routine level of regulatory attention.
2. The regulatory attention level for the safety purpose includes the NSHS assessment. Site inspectors compiling attention level sheets should seek input from NSHS specialists when assigning attention levels. Increased NSHS input is expected when assessing regulatory attention levels for sites/dutyholders where risks are dominated by conventional rather than nuclear safety.

## Content of assessments for security purposes

1. The overall regulatory attention level considers the combined judgements across the three attributes. Inspectors should apply judgement and allow factors to influence the attention level such as site categorisation and characteristics of any potential vulnerabilities (i.e., hazard and risk), dutyholder attitude, compliance records or whether the situation is improving or worsening. We are a sampling organisation, and it may be the case that no intelligence or evidence has been collected for a specific indicator. In such cases, it is acceptable to state that no evidence has been collected and ascribe a routine level of regulatory attention.
2. In addition to providing the overall regulatory attention level for the site together with the rationale, the Annual Review of Security (ANSyR) should also set out any related regulatory priorities for the year ahead. It should also provide detail of dutyholder successes/improvements, particularly where the attention level has decreased from the previous assessment.
3. Where enhanced or significantly enhanced regulatory attention has been judged necessary as a result of poor performance then it is essential that the ANSyR regulatory priorities include an action plan for ONR to return the dutyholder to a routine level. To enable this to be done effectively, it may be appropriate for a causational analysis to be undertaken in order that attention is focused on addressing the problem rather than the symptom. However, attention levels above routine may also be assigned for issues not related to dutyholder performance or non-compliance. For example, additional ONR resource may be required to support permissioning of major dutyholder scheduled projects such as replacement of the security management system. In such cases, causational analysis will be unnecessary and a brief explanation of why additional ONR resource is anticipated will suffice.

## Content of assessments for safeguards purposes

1. There are a wide range of safeguards dutyholders and reportable qualifying nuclear material (QNM) inventories. To enable meaningful attention levels, the assessment should focus on the performance of the dutyholder not on the QNM inventory.   
   The effect of the inventory will be taken into account during the tasking and resourcing stages when combined with the attention levels:

* A QNFLO dutyholder may be relatively non-compliant and considered in enhanced attention but may only require two days of resource during the year to achieve compliance.
* A large, licenced site may be compliant and in routine attention but due to its large inventory and number of movements may have several inspectors allocated to them.

## Content of assessments for transport purposes

1. TCA regulates a wide range of transport dutyholders including nuclear site licensees, transport package design authorities, industrial, educational and research sites, hospitals and carriers, together with their supply chains. ONR also regulates the civil transport of class 7 dangerous goods (radioactive material) associated with non-licensed sites that support the UK’s fleet of nuclear-powered submarines (those operated and authorised by the MoD). Inspectors should apply judgement and allow factors to influence the attention level such as the nature of hazard and risk posed by the dutyholder’s undertaking, dutyholder attitude, compliance records or whether the situation is improving or worsening. For dutyholders operating multiple sites the attention level will be assigned at a corporate level unless there is a site-specific concern.
2. For ‘non-nuclear’ transport dutyholders; attention levels only need to be reported by exception where an enhanced level of attention has been assigned against any of the large number of transport dutyholders operating in Great Britain.

## Timeline and moderation

### Timeline for assessment of regulatory attention levels

1. Assessments, of initial attention levels for individual licensed sites and to assign corporate attention levels for multi-site licence holders, are undertaken using the attention level sheet templates provided in Appendices 5 to 9 for safety, security, safeguards and transport attention levels.
2. Divisions/purposes should undertake Quality Assurance (QA) checks followed by Division Moderation of the completed ALS before the end of December. Attention levels for other dutyholders should be considered and assigned by exception.
3. Assessments of regulatory attention levels, QA checks and Divisional moderation should be completed in sufficient time to allow all attention level sheets to be submitted to ESO by the end of December each year in advance of the EDR/Director moderation.

### Quality Assurance (QA) checks

1. DLs from divisions/purposes should undertake quality assurance/quality control checks of completed attention level sheets in advance of divisional/purpose moderation.
2. For all attention level sheets, the QA check should:

* Confirm the correct proforma has been used in all instances, including for corporate bodies and tenants on licensed sites with significant undertakings.
* Confirm regulatory attention levels have been assigned for licensed sites and other specific dutyholders as appropriate.
* Review evidence presented against performance indicators, confirm it is evidence based. Conform all issues, plans and regulatory strategies referred to are in place.
* Confirm input has been sought from NSHS for safety assessments and is reflected in the evidence presented.
* Confirm a consistent approach has been adopted to assigning regulatory attention levels for performance indicators and the initial overall regulatory attention level.
* Confirm a brief justification for the initial overall regulatory attention level is presented.

1. For all attention level sheets with an initial overall regulatory attention level above routine, the check should:

* Confirm key evidence associated with a return to routine attention (including Level 1 and 2 issues, plans and regulatory strategies) is referenced.
* Review regulatory strategies to return sites/dutyholders back to routine attention. Confirm the effectiveness of the strategy and record the outcome and state whether a dutyholder action plan is in place or has been requested.
  + Major dutyholders: Review dutyholder action plans and/or strategy and confirm whether implementation will credibly result in a return to routine attention if the dutyholder action plan is complied with.
  + Lower hazard dutyholders: Confirm regulatory issues are in place referencing dutyholder action plans to return the dutyholder to compliance.

### Divisional/purpose specific moderation

1. Divisions/purposes should set attendance for regulatory attention level moderation such that the moderation expectations can be met, and a suitable degree of independent challenge can be applied.
2. For all attention level sheets, divisional/purpose specific moderation should:

* Review attention level sheets and confirm a consistent approach has been adopted for assigning initial overall regulatory attention levels.
* Confirm when the decision on overall regulatory attention level is finely balanced and identify this to the EDR/Director moderation.
* Confirm whether an increase or decrease in overall regulatory attention level is anticipated within the next reporting (calendar) year and record this.
* Record key points from moderation noting whether the initial overall regulatory attention level is endorsed. If not, the key points from moderation should include a justification for the final overall regulatory attention level.

1. For attention level sheets endorsed at above routine overall regulatory attention level, divisional/purpose specific moderation should:

* Review and where necessary challenge the adequacy of regulatory strategies to regulate sites/dutyholders back to routine attention and confirm sufficient resource is in place to support delivery.
* Review and where necessary challenge dutyholder action plans and confirm appropriate governance and oversight is in place to monitor delivery progress.
* In instances where inadequate progress has been made to return to routine attention confirm what actions are planned to revise the regulatory strategy.

### EDR/Director moderation

1. The EDR/Directors will undertake a moderation exercise to consider all attention levels assigned by divisions and purposes. The outcome of this moderation exercise will inform the attention levels specified in the ARA published annually in June and the CNI’s annual report published in September.
2. The scope of the EDR/Director moderation is subject to the judgement and discretion of the EDR/Directors. Typically, it will:

* Review and challenge all attention level sheets where there has been a change of overall regulatory attention level and confirm the change has been adequately justified.
* Identify attention level sheets above routine attention for which the Directors wish to review and challenge the effectiveness of regulatory strategies and adequacy of dutyholder action plans.
* Sample attention level sheets where the attention level is noted as finely balanced, with the purpose of confirming the decision making is suitably justified with underpinning evidence in place and is presented adequately.
* Sample attention level sheets where it is noted an increase or decrease in the overall regulatory attention level is noted as being expected within the next calendar year (a mid-year assessment is expected in these cases).

# References

|  |  |
| --- | --- |
| [1] | ONR, “Security Assessment Principles (SyAPs) for the Civil Nuclear Industry,” 2017. |
| [2] | ONR, “Enforcement Policy Statement (EPS),” 2020. [Online]. Available: http://www.onr.org.uk/documents/2014/enforcement-policy-statement.pdf. |
| [3] | ONR, “ONR-ENF-GD-006: Enforcement”. |
| [4] | IAEA, “TECDOC-1141 - Operational Safety Performance Indicators for Nuclear Power Plants,” 2000. [Online]. Available: https://www.iaea.org/publications/5945/operational-safety-performance-indicators-for-nuclear-power-plants. |
| [5] | ONR, “NS-INSP-GD-070 - Safety Culture Guide for Inspectors (Issue 3 - currently under development)”. |
| [6] | ONR, “ONR-CNSS-MAN-001 - ONR Nuclear Material Accountancy Control and Safeguards Assessment Principles”. |

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# Appendix 1 – Performance indicators for safety purposes

1. The guidance presented below should support inspectors in their consideration of attention level to be assigned against individual indicators in support of each of the three attributes. Divisions should use their own discretion as to the extent to which the guidance and indicators themselves apply. The attention level assessment should be reported using the template at [Appendix 5](#_Appendix_5_–).

## Attribute 1 – Safety performance

### Nuclear safety incidents

* Review number and nature of INF1 notifications during the year, including INES Level 1 and above reportable incidents.
* Consider developing serious trends (such as repeat events) which may be emerging that warrant further regulatory attention.
* Consider the adequacy with which the dutyholder has investigated and implemented appropriate learning from incidents and emergent trends.

### Industrial safety incidents

* Review number and nature of more serious industrial safety incidents, including RIDDOR reportable incidents.
* Days lost due to work related accidents.
* Number or rate of non-adherence to process safety requirements.
* Number or rate of safety rules (permitry) errors.
* Consider developing serious trends (such as repeat incidents) which may be emerging that warrant further regulatory attention.

### Regulatory issues

* Summarise the Level 1 and 2 issues assigned to the dutyholder’s undertakings and their strategic relevance. The nature and level of regulatory issues assigned to dutyholders should be one of the principal factors indicative of attention level.
* Consider the timeliness with which the dutyholder has responded to regulatory issues on the whole, particularly those assigned as Level 1 and Level 2.

### Formal enforcement action

* Identify recent or anticipated significant enforcement activity such as prosecutions and Improvement Notices or refusal of permission.
* A single Improvement Notice should not necessitate a higher attention level on its own and should be subject to appropriate judgement when assigning an attention level.

### Dutyholder compliance record

* Review the dutyholder’s in-year compliance record (as measured through routine planned and reactive compliance inspection). A more prominent record of Red and Amber ratings (Demand improvement and Seek Improvement respectively) may be indicative of enhanced level of attention.

### Delivery of nuclear safety improvements or enhancements

* Review the timeliness and quality with which the dutyholder implements significant modifications to improve nuclear safety that may be necessary following periodic safety review, following enforcement action, as an underlying commitment following life extension (in the case of operational reactors) or in the interest of hazard and risk reduction.
* A record of sustained failure to implement major safety improvements may necessitate enhanced attention levels.

### Delivery of industrial and Fire Life Safety improvements or enhancements

* Review the timeliness with which the dutyholder implements significant modifications to improve industrial and Fire Life safety.

### Plant status (control of maintenance and modifications)

#### Maintenance

* Number or frequency of events or incidents where deficiencies with maintenance quality identified as a factor.
* Number or frequency of unexpected breakdowns of safety mechanisms devices and circuits.
* Maintenance schedule backlog/defect backlog.

#### Modifications

* Number of events or incidents where deficiency with the plant modification process or practice identified as a factor.
* Modifications implemented out of due process.
* Number of temporary modifications in place over defined period.
* Modifications not closed out within agreed timescales and/or extended repeatedly

## Attribute 2 – Control of hazards and risks

### Level of hazard and risk

* Factors such as emergent or long-standing safety issues and/or the risk associated with the dutyholder’s undertakings should have a principal determining influence on the attention level and the overall attention level assigned to a dutyholder. Divisions should take into account the site-wide level of risk (i.e. the instantaneous and continuous risk against the Basic Safety Level for public and worker safety).
* Furthermore, changes in ONR’s regulatory strategy to achieve hazard and risk reduction across a site over a shorter period of time could result in a site attracting significantly enhanced regulatory attention and effectively dominate the overall attention level. Given the legacy nature of the radioactive inventory across a number of sites and facilities it is envisaged that some could be in either enhanced or significantly enhanced regulatory attention for a number of years.
* The extent to which this attribute influences overall attention level should be an explicit consideration of the assessment team.

### Nuclear safety case - adequacy and currency

* Consider any current regulatory issue over safety case deficiencies or pace with which safety case improvements are being made by the dutyholder.
* Does the safety case employ modern safety case methodologies and if not, what is the gap against required standards?
* Consider the timeliness and quality with which dutyholders submit, where relevant, periodic reviews of safety and implement necessary improvement plans. Substantial delays and/or rework may be indicative of enhanced regulatory attention.

### Maturity of CHS risk - prioritisation and profiling

* Review the evidence used to inform the risk profile of the site’s activities.
* Review the risk management evidence to assess the adequacy of the risk prioritisation process.
* Review effectiveness of systems to control contractors.

### Emergency preparedness and response capability

* Review the adequacy with which the dutyholder is managing emergency preparedness and response, as evidenced through its onsite plan and emergency exercises.
* Emergency response equipment availability.
* Maintenance of emergency response equipment – adherence to schedule.
* Number of significant issues arising from emergency exercises.
* Extent to which emergency scheme posts are filled and whether training of post holders is in date.

## Attribute 3 – Safety leadership and culture

ONR’s TIG Safety Culture Guide for Inspectors’ [5] advocates the use of cultural warning flags as a way of routinely gathering insights from interventions on site. The LMfS SAPS are the basis for the Safety Performance Indicators under Attribute Three, and the health of the warning flags can be used to inform the RAL assessment[[2]](#footnote-3). The outcome from this assessment can be used to inform the ‘safety leadership and culture’ indicator to reflect those areas that have emerged during engagements with dutyholders. This evaluation should be informed by the following headings and be supported by suitable narrative to demonstrate areas where enhanced attention is being exerted to secure improvements in each of these attributes:

### Safety leadership

* Good safety leadership promotes a culture of trust, where safety is prioritised, leaders are visible and trusted (from top down) and are seen to be promoting the behaviours that are necessary for safe performance, including accountability. Where necessary leaders should have a good understanding of nuclear safety and understand consequences of failing to hold individuals to account. There is alignment around organisational priorities and these guide decision-making and the rationale is shared and jointly understood.

### Capable organisation

* An organisation should be able to demonstrate that it has sufficient capacity and capability to deliver its safety requirements. Alongside this it should implement arrangements to manage organisational change.   
  For example, significant changes to leadership, restructuring, merging, outsourcing, relicensing all pose a threat to organisational culture as well as capability shortfalls. Additionally, if changes are poorly managed, not communicated, the risks not understood or mitigated the impact will be greater. Leadership should be engaged in change management and ensure that arrangements are followed and risks appropriately managed.

### Decision making

* Decisions made at all levels in the organisation affecting safety should be informed, rational, objective, transparent and prudent. It is important that decision making processes involve appropriate nuclear competences, are not unnecessarily promoting schedule or cost, and that challenge is used, and conflict managed. The reasons and rationale for decisions should be communicated to avoid cynicism about motives and compromise perceptions of leadership.

### Learning

* This concerns how organisations record and respond to events, including provision of feedback. Lessons should be learned from internal and external sources to continually improve leadership, organisational capability, the management system, safety decision making and safety performance. There are many ways that organisations will fail to glean the benefits from organisational learning; including blame and scapegoating; failing to determine root causes and focusing on individual accountability, and actions fail to have impact or improve performance. These organisational behaviours will lead to disengagement with reporting and can lead to cynicism and a failure to continuously improve, as well as avoiding repeat events or deteriorating performance.

### Internal assurance and challenge

* This element considers the arrangements in place for implementing effective advice and independent challenge capabilities. There should be adequate independent challenge to, and oversight of, nuclear safety leadership, management and decision making at all levels of the organisation, and the establishment of an independent oversight/internal regulation function or suitable alternative. This attribute considers how robust the internal regulator is, as well as how receptive the organisation is to challenge to ensure the adequate and appropriate sentencing of risk management.

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# Appendix 2 – Performance indicators for security purposes

1. The guidance presented below should support inspectors in their consideration of attention level to be assigned against individual indicators in support of each of the three attributes. Divisions should use their own discretion as to the extent to which the guidance and indicators themselves apply. As stated previously, we are a sampling organisation, and it may be the case that no intelligence or evidence has been collected for a specific indicator. In such cases, it is acceptable to state that no evidence has been collected and ascribe a routine level of regulatory attention. The attention level assessment should be reported using the template at [Appendix 6](#_Appendix_6_–).

## Attribute 1 – Security delivery

### Nuclear security incidents

* Review number and nature of INF1 notifications during the year, focussing on those considered to be rated of moderate significance or higher. Inspectors should also review events considered to fall below the reporting threshold by way of a Regulation 7(2) notification.
* Consider developing serious trends (such as repeat events) which may be emerging that warrant further regulatory attention.
* Review the dutyholder’s arrangements for managing events[[3]](#footnote-4), to include:
  + Instilling a positive reporting culture
  + Categorisation of event significance
  + Adequacy of investigation
  + Analysis of trending
  + Implementation of learning and improvements to prevent recurrence

### Regulatory issues

* Summarise the Level 1 and 2 issues assigned to the dutyholder’s undertakings and their strategic relevance. The nature and level of regulatory issues assigned to dutyholders should be one of the principal factors indicative of attention level.
* Consider the timeliness with which the dutyholder has responded to regulatory issues on the whole (i.e. including Level 3 and 4), particularly those assigned as Level 1 and Level 2.

### Formal enforcement action

* Identify recent or anticipated significant enforcement activity such as prosecutions, enforcement letters and security directions.
* A single security direction may not necessitate a higher attention level on its own and should be subject to appropriate judgement when assigning an attention level.

### Dutyholder compliance record

* Review the dutyholder’s in-year compliance record (as measured through routine planned and reactive compliance inspection). A more prominent record of Red and Amber ratings (Demand improvement and Seek Improvement respectively) may be indicative of enhanced level of attention.

### Delivery of nuclear security improvements or enhancements

* Review the timeliness and quality with which the dutyholder implements significant modifications to improve nuclear security that may be necessary following periodic security plan reviews, following enforcement action, as an underlying commitment following life extension (in the case of operational reactors) or in the interest of hazard and risk reduction.
* A record of sustained failure to implement major security improvements may necessitate enhanced attention levels.

## Attribute 2 - Security operations

### Physical protection systems

* Consider any current regulatory issues concerning security plan deficiencies and the pace with which the dutyholder addresses them, including delivery of commitments in security improvement schedules.
* Consider the timeliness and quality with which dutyholders submit, where relevant, periodic reviews of physical security and implement necessary improvement plans. Substantial delays and/or rework may be indicative of enhanced regulatory attention.
* Does the security plan deploy an appropriate methodology for categorisation of theft and sabotage and is the list of facilities up to date?
* Does the security plan reflect relevant good practice for the design and evaluation of physical protection systems as informed by the design basis threat?
* Where relevant, has due consideration been given to adjacent or enclave nuclear premises?

### Cyber security and information assurance

* Consider any current regulatory issues concerning security plan deficiencies and the pace with which the dutyholder addresses them, including delivery of commitments in security improvement schedules.
* Consider the timeliness and quality with which dutyholders submit, where relevant, periodic reviews of cyber security and information assurance and implement necessary improvement plans.   
  Substantial delays and/or rework may be indicative of enhanced regulatory attention.
* Does the security plan demonstrate that cyber security and information assurance risk is managed effectively? For example:
  + Has an appropriate risk management framework been adopted?
  + Are information assets appropriately identified and classified?
  + Has operational technology been appropriately categorised?
  + Are controls applied proportionate to the asset classification and categorisation?
* Does the security plan consider the design basis threat and reflect relevant good practice for the protection of:
  + the confidentiality, integrity and availability of sensitive nuclear information?
  + Nuclear technology and operations
* Does the security plan detail adequate arrangements for cyber security incident response?
* Are the cyber incident response plans subject to an adequate exercise regime and do the results indicate the dutyholder is adequately prepared?

### Workforce trustworthiness

* Consider any current regulatory issues concerning security plan deficiencies and the pace with which the dutyholder addresses them, including delivery of commitments in security improvement schedules.
* Consider the timeliness and quality with which dutyholders submit, where relevant, periodic reviews of workforce trustworthiness and implement necessary improvement plans. Substantial delays and/or rework may be indicative of enhanced regulatory attention.
* Does the security plan detail arrangements that ensures cooperation of departments with responsibilities for delivering workforce trustworthiness?
* Does the plan reflect standards required to deliver pre-employment screening and national security vetting?
* Does the plan incorporate arrangements that reflect relevant good practice for delivery of ongoing personnel security management that provides continued assurance that the risk of insiders is being mitigated?

### Policing and guarding

* Does the security plan have adequate arrangements that ensure the CNC can achieve the required security outcome?
* Does the security plan have arrangements for facilitating the provision of support from the local police force?
* Does the plan incorporate arrangements that reflect relevant good practice for the delivery of effective guarding services?

### Emergency preparedness and response

* Do security contingency plans reflect relevant good practice?
* Do response arrangements appropriately reflect the design basis threat, including blended attacks incorporating cyber vectors?
* Are the security emergency response plans subject to an adequate exercise regime and do the results indicate the dutyholder is adequately prepared?
* How effective are command, control and communications arrangements during and post a nuclear security event?

## Attribute 3 – Security strategic enablers

### Leadership and Management for Security (LMfSy)

The Leadership and Management for Security (LMfSy) principles in SyAPs are aligned with the LMfS SAPs and therefore it may be beneficial for any annual ONR evaluation of dutyholder performance against these principles to be done using an integrated safety and security approach. Where this is done, inspectors may use the outcome from this assessment to directly inform this indicator. This evaluation should be informed by the following and be supported by suitable narrative to demonstrate areas where enhanced attention is being exerted to secure improvements in each of these attributes:

* Directors, managers and leaders at all levels should focus the organisation on achieving and sustaining high standards of security and on delivering the characteristics of a high reliability organisation.
* The organisation should have the capability to secure and maintain the security of its undertakings.
* Decisions made at all levels in the organisation affecting security should be informed, rational, objective, transparent and prudent.
* Lessons should be learned from internal and external sources to continually improve leadership, organisational capability, the management system, security decision making and security performance.
* There should be evidence-based assurance processes in place to information strategy though the governance process, which welcomes challenge from across the organisation.
* Substantial intervention requirements by ONR on internal assurance or challenge capability may be an indicator of enhanced attention.

### Organisational culture

* How mature are the dutyholder’s arrangements to encourage an organisational culture that recognises and promotes the importance of security and how well are they embedded?
* Does the dutyholder recognise that a credible threat exists, that nuclear security is important and the role of the individual is key in maintaining it?
* Are security expectations and standards established, clearly communicated and understood by staff through appropriate security education and awareness programmes?
* Consider the dutyholder’s approach to ensuring that its culture supports both its business and security objectives, balancing potential conflicts such as those that may arise between safety and security.
* Referring back to a dutyholders approach to reporting and managing incidents, does this reflect positively or negatively on their culture?

### Management of human performance

As with LMfSy, the SyAPs principles regarding management of human performance for security are aligned with those for safety in SAPs (specifically those relating to human factors). Again, it therefore may be beneficial for any annual ONR evaluation of dutyholder performance against these principles to be done using an integrated safety and security approach. The following are areas for consideration:

* Do the dutyholder’s arrangements ensure tasks important for nuclear security are identified and analysed such that they can be effectively delivered?
* Does the dutyholder’s approach ensure that are people of sufficient numbers and competence to deliver the required security plan functions?
* Are arrangements in place to ensure that workspaces, equipment and user interfaces required to deliver security functions are designed to match human capabilities?
* Do the dutyholders arrangements include sufficient procedures and administrative controls that minimise the likelihood of human error and support reliable delivery of security plan functions?

### Nuclear supply chain management

* Does the dutyholder maintain an intelligent customer capability for all security work carried out on their behalf by suppliers?
* Does the dutyholder have mature and embedded security plan arrangements for ensuring:
  + That potential suppliers of work that may impact on security have the organisational and technical capability, capacity and culture to deliver that work effectively?
  + That they conduct effective oversight and assurance of their supply chain?
  + That before bringing into operation or returning to service any facility, system or process that may affect security, it is subject to testing and a commissioning plan?

### Reliability, resilience and sustainability

The SyAPs principles relating to reliability and resilience; and Examination, Inspection, Maintenance and Testing (EIMT) are aligned with those for safety in SAPs (in particular EMIT). As in other areas, it therefore may be beneficial for any annual ONR evaluation of dutyholder performance against these principles to be done using an integrated safety and security approach. The following are areas for consideration:

* Do the dutyholder’s security plan arrangements demonstrate that security structures, systems and components are designed incorporating appropriate levels of reliability and resilience through incorporation of redundancy, diversity and segregation?
* Does the dutyholder’s security plan include contingency arrangements to cover any failure?
* Does the dutyholders plan include arrangements to ensure that security structures, systems and components receive regular and systematic EIMT?
* Do the dutyholder’s arrangements ensure that the constituent parts of its security regime are sustained and supported over time to ensure it continues to achieve the required security plan outcomes?

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# Appendix 3 – Performance indicators for safeguards purposes

1. Inspectors should consider each of the following attributes and supporting indicators. A rating should be provided against attribute and supporting comments for each of the indicators.
2. Evidence to support indicators and attributes should make use of the routine statutory reporting as well as site-based interventions and interactions.
3. The judgements should be based on known evidence and performance, and not on perceived risks or concerns that might happen and are not substantiated.
4. The attention level assessment should be reported using the template at [Appendix 7](#_Appendix_7_–), and should identify the dutyholder, site and material balance areas (MBAs) are being reported on. For large dutyholders, for example, Sellafield, reports should be raised for each area or value stream and an overall corporate report produced using the template at [Appendix 9](#_Appendix_9_-).

## Attribute 1 – Safeguards delivery

Inspectors should provide a brief summary of the operator’s regulatory performance with regards to general compliance with The Nuclear Safeguards (EU Exit) Regulations 2019 (NSR19) and other requirements such as those of Nuclear Cooperation Agreements. Inspectors should take the following indicators into account:

### Operator activities

* Review the current and previous operator Programme of Activities (POA) for the MBAs in question.
* Consider whether any changes in the BTC merit an increase or decrease in resource to regulate those qualifying nuclear facilities.
* Consider any new facilities under construction, their significance, and whether they will require additional safeguards resource for example, BTC inspection or assessment

### Nuclear safeguards incidents and follow-up

* Review number and nature of INF1 notifications during the year.
* Consider developing serious trends (such as repeat events) which may be emerging that warrant further regulatory attention, i.e. themes.
* Consider the adequacy with which the operator has investigated and implemented appropriate learning from incidents and emergent trends. Inspectors may wish to refer to the expectations in FSE 4 of ONMACS.
* Consider the outcomes of any ONR follow-up action that was deemed necessary.

### Regulatory issues and operator response

* Summarise the Level 1, 2 issues assigned to the operator where they bear relevance to safeguards. Inspectors should consider regulatory issues from ONR’s other purposes, but only highlight them where relevant to safeguards. The nature and level of regulatory issues assigned to operators should be one of the principal factors indicative of the overall safeguards attention level.
* Consider the timeliness and responsiveness of the operator in addressing safeguards regulatory issues, particularly those assigned as Level 1 and Level 2.

### Formal enforcement action

* Identify recent or anticipated enforcement activity such as Enforcement Letters or Improvement Notices.
* A single Improvement Notice should not necessarily lead to an enhanced attention level on its own and should be subject to appropriate judgement and justification when assigning an attention level.

### Observations and issues received in formal letters from the IAEA

* Review the number of formal letters containing observations or issues received from the IAEA relating to the operator of designated MBAs.
* Review the operator’s responsiveness in addressing IAEA observations and issues.
* A record of negative IAEA inspection findings may necessitate enhanced attention levels.

### Delivery of information required by NSR19

Under NSR19 operators must provide ONR with specific safeguards information. Inspectors should note where any information has not met the timeliness and basic content requirements of NSR19. Note this should not be a reflection from ACP or BTC assessment activity:

* Basic Technical Characteristics (BTC)
* Programme of Activities
* Accountancy and Control Plan (ACP)
* Special Reports
* Advance Notifications

### Delivery of other required statutory information (NCAs, Aps, etc.)

Under the various Nuclear Cooperation Agreements (NCAs) and Additional Protocols (APs) that the UK has, ONR is required to provide reports to their signatories and the IAEA. To do this ONR will request key information from UK operators. It is crucial that when requested, operators respond with complete and correct information in a timely fashion so that the UK might fulfil its international obligations under these agreements.

* Confirm that the operator has provided all information required of it for the UK’s NCA and AP reports
* Consider the operator’s responses to any queries or requests for further information with regards to NCAs, material obligations and APs

## Attribute 2 – Strategic enablers

Inspectors should provide a brief summary of operator performance against the strategic enablers for implementing an NMACS system as described in FSEs 1 – 4 of ONMACS, (copied below for reference). The evidence for these indicators should be found in the safeguards inspection and assessment reports for that operator:

### Leadership and culture – FSE 1 and FSE 2

* Operators should implement and maintain organisational capability for NMACS underpinned by strong leadership, robust governance, adequate management and accountability of NMACS arrangements incorporating internal and independent evidence-based assurance processes.
* Operators should encourage and embed an organisational culture that recognises and promotes the importance of NMACS.
* Consider whether the operator has the capability and capacity to implement and maintain the NMACS arrangements for its safeguards undertakings.

### Organisational capability – FSE 3

* Operators should implement and maintain effective arrangements to manage the competence of those with assigned NMACS roles and responsibilities.

### Internal assurance and challenge – FSE 4

* Operators must implement and maintain arrangements for the timely and accurate reporting of information required by NSR19. Arrangements for the investigation, resolution and reporting of discrepancies and anomalies must be in place.
* Consider both the operator’s internal safeguards incident reporting and follow-up performance and the adherence to the ONR’s INF1 process.   
  Are Safeguards incidents that require an INF1 reported in a timely manner with good communication to the ONR safeguards inspector?

## Attribute 3 - NMAC system

Inspectors should provide a brief summary of the performance of the Operator’s system for NMAC utilising evidence from all relevant ONR inspection and assessment activity:

### Material control – FSE 6 and FSE 7

Inspectors should review the ability of the operator’s NMAC system to control qualifying nuclear material. The inspector should:

* Consider whether the operator has adequate arrangements in place to know the quantity and location of all its QNM under its responsibility at any time. Inspectors should be cognisant of the expectations of FSEs 6 and 7 in ONMACS.
* Consider the outcomes of relevant ONR inspections and assessments, such as:
  + Accountancy-focused inspections
  + Relevant SBIs (both safeguards and safety) – Any SBIs on systems which enable the tracking (FSE 7) or measurement (FSE 6) of QNM
  + Relevant safety or security inspections for example, against compliance inspection on Licence Conditions 4 and 5

### Reliability, resilience and maintenance – FSE 5

Operators should take adequate measures to ensure the reliability, resilience, and maintenance of their NMAC system. Inspectors should:

* Consider whether the operator has ensured adequate availability of the primary nuclear material accountancy and control systems, structures and components (SSCs) of its NMAC system
* Consider whether the operator has designed and supported their NMACS regime to ensure it is reliable, resilient, sustained and remains relevant and proportionate throughout the entire lifecycle of the facility.
* Consider the outcomes of relevant ONR inspections and assessments, such as:
  + (FSyP 7) inspections – The impact of cyber-attacks on an operator’s digital accountancy and control systems should be considered integral to the reliability and resilience of the NMAC system
  + Safety or safeguards SBIs that cover SSCs of the NMAC system

### System changes

Inspectors should consider whether the operator is planning any major changes to their system for accountancy and control that would attract additional regulatory attention. This could include changes such as development of a new records management system or changing the way they measure material, for instance.   
If these changes are significant, inspectors should consider applying a higher RAL.

### NMACS documentation and implementation

Inspectors should consider the adequacy of the operator’s ACPs and BTCs, where these have been assessed, and how the documented arrangements reflect the NMACS procedures and the implementation of those arrangements.

## Attribute 4 – Nuclear material accountancy

Inspectors should provide a brief summary of the operator’s performance in relation to accounting and accountancy for nuclear material. Inspectors should work closely with the relevant ONR safeguards nuclear material accountant, utilising evidence from all relevant ONR inspection and assessment activity:

### Records and data processing – FSE 8

The expectations of FSE 8 in ONMACS should be noted here.

* The inspector and accountant should consider whether operators have implemented and maintained data processing systems that are capable of producing the NMACS reports and records required under NSR19 that incorporate technical and procedural controls to protect the confidentiality, integrity and availability of sensitive nuclear information.
* Evidence for this should be found in relevant ONR inspections and assessments, such as:
  + Accountancy-focused compliance inspections
  + PIV/PITe inspections
  + Safeguards Systems Based Inspections – Where it covers the data processing or records management systems
  + Consider the outcomes of LC 6/25/32 compliance inspections

### NMA reports

Operators must provide ONR with nuclear material accountancy (NMA) reports within the specified timeframes in regulations 12-15 of NSR19.   
The content must also conform to the requirements of NSR19.

Taking a proportionate approach, and in consultation with the relevant ONR safeguards nuclear material accountant, Inspectors should review operator performance for the timeliness and quality of content of the NMA reports submitted to ONR. The inspector and accountant should:

* Review the accountancy check-sheets for the NMA reports – these will contain information on timeliness and violations
* Consider any trends with regards to report violations or timeliness of submission
* Consider the outcomes of relevant ONR inspections and assessments, such as:
  + Accountancy-focused compliance inspections
  + PIV/PITe inspections

### Material balance performance – FSE 9

The expectations of FSE 9 in ONMACS should be noted here. The inspector and accountant should seek evidence that the operator is adequately tracking material on and off site, carrying out physical inventory taking (PIT), and evaluating any non-zero inventory balances.

The inspector and accountant should seek to identify trends in cumulative Inventory Differences (ID) and Shipper-Receiver Differences (SRD) which can help identify systematic issues within the operator’s NMAC system.

The operator is expected to carry out material balance evaluation to explain any non-zero inventory balances. For bulk facilities there should also be in place a technically justified Inventory Difference Action Level (IDAL) or SRD Action Level. Breaches of either should have been reported to ONR as an INF1.

The inspector and accountant should seek evidence for material balance performance by:

* Reviewing the Material Balance Reports (MBRs) from that operator
* Reviewing the content of the reports from the annual Special Material Accounts Committees (SMAC) for that operator
* Considering the outcomes of relevant ONR inspections and assessments, such as:
  + Accountancy-focused compliance inspections
  + PIV/PITe inspections
* Reviewing INF1s relating to material balance for example, for breach of an IDAL

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# Appendix 4 – Performance indicators for transport purposes

1. Inspectors should consider each of the following performance indicators providing evidence and supporting commentary against each. The evidence and commentary should be based on known evidence and performance, and not on perceived risks or concerns that might happen and are not substantiated. The judgements formed should be informed by the duties delivered by the dutyholder and site-specific activities i.e., Designer, Consignor, Carrier and Consignee.
2. An overall regulatory attention level should be assigned; individual performance indicators do not have to be assigned a regulatory attention level.
3. The attention level assessment should be reported using the template at [Appendix 8](#_Appendix_8_–), identifying the dutyholder and the duties it undertakes.

## Attribute 1 – Safety performance

### Dutyholder compliance record

* Review the dutyholder’s past and in-year compliance record (as measured through routine planned/reactive compliance inspection and permissioning inspections).

### Regulatory issues

* Consider the timeliness with which the dutyholder has responded to regulatory issues overall, particularly those assigned as Level 1 and Level 2

### Formal enforcement action

* Identify any recent or anticipated enforcement action taken and the adequacy of the response to address the shortfalls identified.

### Notifiable incidents

* Review number and nature of INF1 notifications since the last compliance inspection, including INES Level 1 and above reportable incidents.
* Consider the adequacy with which the dutyholder has investigated and implemented appropriate learning from incidents and emergent trends.

## Attribute 2 – Control of hazards and risks

### Level of hazard and risk

* Factors such as radiological content of transport packages, frequency of consignments, mode of transport and type of package being transported should be considered.

### Safety case adequacy and currency

* If applicable, consider any current regulatory issues over Package Design Safety Report (PDSR) deficiencies or pace with which PDSR improvements are being made by the dutyholder.

### Radiation risk assessment Adequacy

* Review the outcome of inspection and permissioning activities to verify the adequacy, scope and effective implementation of Radiation Risk Assessments.

### Emergency preparedness and response capability

* Review the adequacy with which the dutyholder is managing emergency preparedness and response, as evidenced through its emergency and contingency plans and testing of both types of plans.

### Management system

* Review the outcome of inspection and permissioning activities to verify the adequacy, scope and certification of the management system.
* Identify any intelligence indicating that the management system is achieving expected outcomes and that any changes to management system are adequately controlled.

## Attribute 3 – Safety leadership and culture

Consider the same performance indicators defined for Attribute 3 for safety performance in [Appendix 1](#_Appendix_1_–_1).

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# Appendix 5 – Template for recording safety purpose attention levels assessment for licensed sites

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Name of Dutyholder and Licenced Site** | | | | | | | | | | |
| **Overall Safety Attention Level** | | **Previous** | **Initial** | **Final** | **Moderation Outcomes** | | | | | |
| *Record previous level here* | *Record attention level here* | *Record attention level here* | **Pre-moderation QA/QC checks undertaken** | | | *Yes/No (delete as appropriate)* | | |
| **Key points from moderation** | | | *To include:*   * *Whether the dutyholder’s current performance suggests escalation of overall RAL is likely in the forthcoming year.* * *Whether the dutyholder’s current performance suggests de-escalation of overall RAL is likely in the forthcoming year.* * *Whether the decision on overall RAL was finely balanced.* | | |
| **Evidence Underpinning Attention Level** | | | | *Insert text here, to include:*   * *Underpinning basis for level of ONR regulatory attention* * *Any enforcement activity and intelligence: INF1s, RIs, ELs etc* * *For enhanced and significantly enhanced scores the narrative should include an assessment of the existing regulatory strategies* * *Dutyholders successes and improvements* | | | | | | |
| **Action Plan *(only required for attention levels 1 and 2)*** | | | | *Insert text here, to include:*   * *Regulatory action to be taken to return dutyholder to Routine attention level.* * *Reference to ONR strategy or plan and dutyholder improvement/action plans* * *Any current or new Regulatory Issues to be raised, and recorded on WIReD, to track the dutyholder’s improvement progress.* | | | | | | |
| **Safety Performance** | | | | | | **Control of Hazards and Risks** | | | **Safety Leadership and Culture** | |
| Dutyholder compliance record | Provide succinct narrative to justify enhanced or significantly enhanced Attention Level assigned to each attribute, where relevant.  Divisions may wish to record narrative to support Routine Attention at their discretion. | | | | | Level of Hazard and Risk posed by the dutyholder’s undertakings |  | | Leadership |  | |
| **Record Previous Attention Level here (1, 2 or 3)** |  |  |
| **Record Assigned Attention Level here (1, 2 or 3)** |  |  |
| Number and significance of Nuclear Safety Incidents |  | | | | | Nuclear safety case adequacy and currency |  | | Capable Organisation |  | |
|  |  |  |
|  |  |  |
| Number and significance of Industrial Safety incidents and RIDDOR reportable events |  | | | | | Maturity of CHS risk prioritisation and profiling |  | | Decision making |  | |
|  |  |  |
|  |  |  |
| Number and significance of regulatory issues and timeliness of resolution |  | | | | | Emergency preparedness and response capability |  | | Learning |  | |
|  |  |  |
|  |  |  |
| Enforcement action taken or under consideration |  | | | | |  |  | | Internal Assurance and Challenge |  | |
|  |  |  |
|  |  |  |
| Plant status (control of modifications and maintenance) |  | | | | |  |  | |  |  | |
|  |  | | | | |  |  | |  |  | |
|  |  | | | | |  |  | |  |  | |
| Delivery of agreed Nuclear Safety Enhancements |  | | | | |  |  | |  |  | |
|  |
|  |
| Delivery of Industrial and Fire Safety Improvements |  | | | | |  |  | |  |  | |
|  |  |  |

# Appendix 6 – Template for recording security purpose dutyholder attention levels assessment

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Name of Civil Nuclear Security Dutyholder** | | | | | | | | | | |
| **Overall Security Attention Level** | | **Previous** | **Initial** | **Final** | **Moderation Outcomes** | | | | | |
| *Record previous level here* | *Record attention level here* | *Record attention level here* | **Pre-moderation QA/QC checks undertaken** | | | *Yes/No (delete as appropriate)* | | |
| **Key points from moderation** | | | *To include:*   * *Whether the dutyholder’s current performance suggests escalation of overall RAL is likely in the forthcoming year.* * *Whether the dutyholder’s current performance suggests de-escalation of overall RAL is likely in the forthcoming year.* * *Whether the decision on overall RAL was finely balanced.* | | |
| **Evidence Underpinning Attention Level** | | | | *Insert text here, to include:*   * *Underpinning basis for level of ONR regulatory attention* * *Any enforcement activity and intelligence: INF1s, RIs, ELs etc* * *For enhanced and significantly enhanced scores the narrative should include an assessment of the existing regulatory strategies* * *Dutyholders successes and improvements* | | | | | | |
| **Action Plan *(only required for attention levels 1 and 2)*** | | | | *Insert text here, to include:*   * *Regulatory action to be taken to return dutyholder to Routine attention level.* * *Reference to ONR strategy or plan and dutyholder improvement/action plans* * *Any current or new Regulatory Issues to be raised, and recorded on WIReD, to track the dutyholder’s improvement progress.* | | | | | | |
| **Security Delivery** | | | | | | **Secure Operations** | | | **Strategic Enablers** | | |
| Dutyholder compliance record | Provide succinct narrative to justify enhanced or significantly enhanced Attention Level assigned to each attribute, where relevant.  Divisions may wish to record narrative to support Routine Attention at their discretion. | | | | | Physical protection systems |  | | Leadership and management for security |  | |
| **Record Previous Attention Level here (1, 2 or 3)** |  |  |
| **Record Assigned Attention Level here (1, 2 or 3)** |  |  |
| Number and significance of nuclear security incidents |  | | | | | Cyber security and information assurance |  | | Organisational Culture |  | |
|  |  |  |
|  |  |  |
| Number and significance of security regulatory issues and timeliness of resolution |  | | | | | Workforce trustworthiness |  | | Management of human performance |  | |
|  |  |  |
|  |  |  |
| Enforcement action take or under consideration |  | | | | | Policing and guarding |  | | Nuclear supply chain management |  | |
|  |  |  |
|  |  |  |
| Delivery of agreed security improvements |  | | | | | Emergency preparedness and response capability |  | | Reliability, resilience and sustainability |  | |
|  |  |  |
|  |  |  |

# Appendix 7 – Template for recording safeguards dutyholder attention levels assessment

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Name of Dutyholder and MBAs** | | | | | | | | | | | |
| **Overall Safeguards Attention Level** | | **Previous** | **Initial** | **Final** | | **Moderation Outcomes** | | | | | |
| *Record previous level here* | *Record attention level here* | *Record attention level here* | | **Pre-moderation QA/QC checks undertaken** | *Yes/No (delete as appropriate)* | | | | |
| **Key points from moderation** | *To include:*   * *Whether the dutyholder’s current performance suggests escalation of overall RAL is likely in the forthcoming year.* * *Whether the dutyholder’s current performance suggests de-escalation of overall RAL is likely in the forthcoming year.* * *Whether the decision on overall RAL was finely balanced.* | | | | |
| **Evidence Underpinning Attention Level** | | | | *Insert text here, to include:*   * *Underpinning basis for level of ONR regulatory attention* * *Any enforcement activity and intelligence: INF1s, RIs, ELs etc* * *For enhanced and significantly enhanced scores the narrative should include an assessment of the existing regulatory strategies* * *Dutyholders successes and improvements* | | | | | | | |
| **Action Plan *(only required for attention levels 1 and 2)*** | | | | *Insert text here, to include:*   * *Regulatory action to be taken to return dutyholder to Routine attention level.* * *Reference to ONR strategy or annual safeguards intervention plan (ASIP) and dutyholder improvement/action plans* * *Any current or new Regulatory Issues to be raised, and recorded on WIReD, to track the dutyholder’s improvement progress.* | | | | | | | |
| **SAFEGUARDS DELIVERY** | | | | **SAFEGUARDS STRATEGIC ENABLERS** | | | | **NMAC SYSTEM** | | **NUCLEAR MATERIAL ACCOUNTANCY** | |
| **Record Previous Attention Level here (1, 2 or 3)** | |  | | --- | | * Operator Programme of Activities: | | * Nuclear safeguards incidents and follow-up: * Regulatory Issues and operator response: * Formal enforcement action: | | * Observations and issues received in formal letters from the IAEA: * Delivery of information required by NSR19: * Delivery of other required statutory information (NCAs, APs etc): |   *Insert justification here, to include:* | | | **Record Previous Attention Level here (1, 2 or 3)** | |  | | --- | | * Leadership and Culture: | | * Organisational Capability: | | * Internal Assurance and Challenge: | | | | **Record Previous Attention Level here (1, 2 or 3)** | |  | | --- | | * Material Control: | | * Reliability, Resilience and Maintenance: * System Changes: | | * NMACS documentation (ACP & BTC) and their implementation | | **Record Previous Attention Level here (1, 2 or 3)** | |  | | --- | | * Records and Data Processing: | | * NMA Reports: | | * Material Balance Performance: | |
| **Record Assigned Attention Level here (1, 2 or 3)** | **Record Assigned Attention Level here (1, 2 or 3)** | **Record Assigned Attention Level here (1, 2 or 3)** | **Record Assigned Attention Level here (1, 2 or 3)** |

# Appendix 8 – Template for recording attention levels for transport dutyholders

|  |  |  |
| --- | --- | --- |
| **Name of Dutyholder** | | |
| **Previous Attention Level** |  | |
| **Assigned Attention Level** |  | |
| **Moderation outcome** | Pre-moderation QA/QC checks undertaken | *Yes/No (delete as appropriate)* |
| Key points from TCA Moderation | *To include:*   * *Whether the dutyholder’s current performance suggests escalation of overall RAL is likely in the forthcoming year.* * *Whether the dutyholder’s current performance suggests de-escalation of overall RAL is likely in the forthcoming year.* * *Whether the decision on overall RAL was finely balanced.* |
| **Supporting Justification** | Provide succinct narrative to justify the overall regulatory attention level against the following performance indicators:   * Consider any current regulatory issues over Package Design Safety Report (PDSR) deficiencies or pace with which PDSR improvements are being made by the dutyholder. * Review the dutyholder’s in-year compliance record (as measured through routine planned/reactive compliance inspection and permissioning inspections). * Review number and nature of INF1 notifications during the year, including INES Level 1 and above reportable incidents Review the adequacy with which the dutyholder is managing emergency preparedness and response, as evidenced through its emergency and contingency plans and testing of emergency plans/ * Consider any enforcement action taken with the dutyholder and the adequacy of the response to address the shortfalls identified. * Consider the timeliness with which the dutyholder has responded to regulatory issues overall, particularly those assigned as Level 1 and 2. | |
| **Outline action plan by which ONR will secure (where relevant) a return to Routine attention** | Completed for Enhanced and Significantly Enhanced Attention Levels only. | |
| **Proposed or existing Regulatory Issues for tracking dutyholder progress** | Completed for Enhanced and Significantly Enhanced Attention Levels only | |

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# Appendix 9 – Template for recording attention levels for other dutyholders (including licensee corporate bodies)

This template should be used to assess and assign attention levels for any other dutyholder that does not operate a licensed site. Specific assignment of an attention level should be undertaken by exception only where an increased level of regulatory attention is anticipated. This template should also be used to record the narrative and justification for an overall attention level assigned to a dutyholder that operates more than one licensed sites in its undertakings.

|  |  |  |
| --- | --- | --- |
| **Name of Dutyholder** | | |
| **Previous Attention Level** |  | |
| **Assigned Attention Level** |  | |
| **Moderation Outcome** | **Pre-moderation QA/QC checks undertaken** | *Yes/No (delete as appropriate)* |
| **Key points from Moderation** | *To include:*   * *Whether the dutyholder’s current performance suggests escalation of overall RAL is likely in the forthcoming year.* * *Whether the dutyholder’s current performance suggests de-escalation of overall RAL is likely in the forthcoming year.* * *Whether the decision on overall RAL was finely balanced.* |
| **Supporting Justification** | Provide succinct narrative to justify enhanced or significantly enhanced Attention Level. | |
| **Outline action plan by which ONR will secure (where relevant) a return to Routine attention** | Completed for Enhanced and Significantly Enhanced Attention Levels only. | |
| **Proposed or existing Regulatory Issues for tracking dutyholder progress** | Completed for Enhanced and Significantly Enhanced Attention Levels only | |

1. The Safety Leadership and Culture performance indicator descriptors are informed by the specifications for the safety culture warning flags that align with those indicators. Consideration will be given to increasing the number of performance indicators in a future revision of this document to reflect the full list of safety culture warning flags, in accordance with Issue 3 of ONRs Technical Inspection Guide (TIG) on ‘Safety Culture Guide for Inspectors’ [5] (currently under development). [↑](#footnote-ref-2)
2. The attribute three performance indicator descriptors are informed by the specifications for the safety culture warning flags that align with those indicators. Consideration will be given to increasing the number of performance indicators in a future revision of this document to reflect the full list of safety culture warning flags, in accordance with Issue 3 of the TIG on ‘Safety Culture Guide for Inspectors’ [5] (currently under development). [↑](#footnote-ref-3)
3. This should include analysis of reports that were reported internally but not to ONR on the INF1 system. [↑](#footnote-ref-4)