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| ONR Project Assessment Report  Nuclear Safety Committee Terms of Reference – Request for approval of RRSL Nuclear Safety Committee Terms of Reference and Arrangements for Urgent Safety Proposals under Licence Condition 13(3) & 13(12) |



ONR Project Assessment Report

**Project Name**: Nuclear Safety Committee Terms of Reference

**Report Title**: Request for approval of RRSL Nuclear Safety Committee Terms of Reference and Arrangements for Urgent Safety Proposals under Licence Condition 13(3) & 13(12)

**Dutyholder/Applicant**: RRSL

**Authored by**: C D Thomas, Nuclear Safety Inspector, ONR

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Table 1: Circulation (latest issue)

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| Organisation | Recipient | Date Report Sent |
| ONR | D Hasted, Director of Regulation, OFD  B Archer, Superintending Inspector – Nuclear Safety, OFD | 19/07/24 |
| Environment Agency | S Wallace, Site Inspector | 19/07/24 |
| Dutyholder/applicant | R Daniels, Regulatory Interface Lead, SSLA (RRSL.safety@rolls-royce.com) to distribute as appropriate within RRSL | 19/07/24 |

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# Executive Summary

**Request for approval of RRSL Nuclear Safety Committee Terms of Reference and arrangements for Urgent Safety Proposals under Licence Condition 13(3) & 13(12)**

**Permission Requested**

Rolls-Royce Submarines Limited has submitted for approval the Terms of Reference and Arrangements for Urgent Safety Proposals for its GB Nuclear licenced sites’ Nuclear Safety Committee. Section 1 contains the Terms of Reference, and Section 2 contains arrangements for obtaining consideration of, or advice on, urgent safety proposals. Consequently any approval from ONR will be given under Licence Conditions 13(3) for Section 1 and 13(12) for Section 2.

**Background**

Licence Condition 13 ‘Nuclear Safety Committee’ requires that the licensee establishes a Nuclear Safety Committee and to submit to ONR for approval its terms of reference. Furthermore the licensee shall ensure that once approved no alteration or amendments are made to the terms of reference unless ONR has approved them [LC13(3) refers]. Licence Condition 13 also requires the licensee to produce appropriate Nuclear Safety Committee arrangements for obtaining consideration of, or advice on, Urgent Safety Proposals arrangements and any and all revisions are approved by The Office for Nuclear Regulation (ONR) [LC13(12) refers].

Rolls-Royce Submarines Limited has a single Terms of Reference and Arrangements for Urgent Safety Proposals document, approved by ONR in November 2015, for the licensed sites of Neptune Reactor, Raynesway (Site Licence 13C) and Nuclear Fuel Production Plant, Raynesway (Site Licence 49).

The main amendments to the Terms of Reference and Arrangements for Urgent Safety Proposals relating to this latest request are: (a) simplification of the Terms of Reference, and (b) general updates, including the removal of role of Licensee’s Agent.

**Assessment and inspection work carried out by ONR in consideration of this request**

ONR has reviewed the changes to the Terms of Reference and confirmed that they meet the requirements of the Licence Condition 13. Furthermore, the amendments are in line with ONR expectations as summarised in ONR’s Nuclear Safety Technical Inspection Guide NS-INSP-GD-013. Arrangements for Urgent Safety Proposals remain unchanged from previously approved.

**Matters arising from ONR's work**

There are no regulatory issues or concerns arising from this assessment.

**Conclusions**

The Project Assessment Report presents the findings of the assessment of the proposed changes to the Terms of Reference and Arrangements for Urgent Safety Proposals for the Nuclear Safety Committee submitted by Rolls-Royce Submarines Limited for approval. The findings are that the changes represent enhancements to the existing arrangements.

In conclusion, I judge that the amended Terms of Reference and Arrangements for Urgent Safety Proposals satisfactorily address the requirements of LC 13.

**Recommendation**

This Project Assessment Report recommends that approval is given under LC13(3) to the amended Section 1 of EDNS9701659113, Terms of Reference for the Rolls-Royce Submarines Limited Nuclear Safety Committee (Version 4.0, January 2024). In addition, approval is given under LC13(12) for the Arrangements for Urgent Safety Proposals in Section 2 of EDNS9701659113 for the Rolls-Royce Submarines Limited Nuclear Safety Committee (Version 4.0, January 2024) for the Rolls-Royce Submarines Limited Nuclear Safety Committee. This Project Assessment Report also recommends that Licence Instruments 506, 507 for the Neptune Reactor, Raynesway (Site Licence 13C), and 510 and 511 for the Nuclear Fuel Production Plant, Raynesway (Site Licence 49) be signed by the Director of Regulation, under the authority delegated from the ONR Chief Nuclear Inspector.

Table 2: List of abbreviations

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| Term/Acronym | Description |
| LC | Licence Condition |
| NSC | Nuclear Safety Committee |
| ONR | Office for Nuclear Regulation |
| PAR | Project Assessment Report |
| RRMPOL | Rolls-Royce Marine Power Operations Limited |
| RRSL | Rolls-Royce Submarines Limited |
| ToR | Terms of Reference |
| TIG | Nuclear Safety Technical Inspection Guide |
| USP | Urgent Safety Proposals |

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# Permission requested

1. In its letter RRSL/GEN/908v2/Y [1], Rolls-Royce Submarines Limited (RRSL) has submitted for approval the Terms of Reference and Arrangements for Urgent Safety Proposals for its licenced nuclear sites’ Nuclear Safety Committee (NSC) [2]. Section 1 contains the Terms of Reference, and Section 2 contains arrangements for obtaining consideration of, or advice on, urgent safety proposals. Consequently any approval from ONR will be given under Licence Conditions 13(3) for Section 1 and 13(12) for Section 2.

# Background

1. Licence Condition (LC) 13 ‘Nuclear Safety Committee’ [3] requires that the licensee establishes a NSC and to submit to The Office for Nuclear Regulation (ONR) for approval its Terms of Reference (ToR) and Arrangements for Urgent Safety Proposals (USP). Furthermore the licensee shall ensure that once approved no alteration or amendments are made to the terms of reference unless ONR has approved them [LC13(3) refers]. The Licence Condition also gives the option of the licensee producing appropriate NSC arrangements for obtaining consideration of, or advice on, urgent safety proposals arrangements and any and all revisions are approved by ONR [LC13(12) refers].
2. RRSL has a single document for ToR and Arrangements for USP for both its licensed sites at Raynesway, i.e. the Neptune Reactor, Raynesway (Site Licence 13C) and Nuclear Fuel Production Plant, Raynesway (Site Licence 49). The current version of the ToR and Arrangements for USP [4] was approved by ONR in November 2015 in the following Licence Instruments; (LI) 503 [5] under LC13(3) and 504 [6] under LC13(11) for the Neptune Reactor, Raynesway; and LI 506 [7] under LC13(3) and 507 [8] under LC13(11) for the Nuclear Fuel Production Plant, Raynesway.
3. The main amendments to the ToR and Arrangements for USP relating to this latest request are: (a) simplification of the ToR, and (b) general updates, including the removal of role of Licensee’s Agent.

# Assessment and inspection work carried out by ONR in consideration of this request

1. I have reviewed the revised ToR and Arrangements for USP and confirmed that they meet the requirements of the Licence Condition. These are: (a) simplification of the Terms of Reference, in particular, sections 1.5-1.8 of the currently approved ToR [4] have been removed and are now within RRSL Internal NSC Management Arrangements as confirmed in Paper NSC/1328, Section 7 [9], and (b) general updates, including the removal of the role of Licensee’s Agent. The main amendments, as summarised above, are in line with paragraph 5.2 of the Nuclear Safety Technical Inspection Guide (TIG) [10].
2. There are no changes to Section 2, Arrangements for USP [2] from the previously approved Arrangements for USP [4] but Section 2 will be approved due to a change of document version number.
3. I have also confirmed that all the changes to the ToR have been subject to the licensee’s due process, having been considered by the NSC [9].

# Matters arising from ONR’s work

1. There are no regulatory issues or concerns arising from the assessment. With the ToR and Arrangements for USP, the ONR inspectors judged that compliance with LC13 was adequate overall and that the ToR and Arrangements for USP contain the key provisions of LC13, and many of the expectations set out in the TIG [10].
2. In 2019, in RRSL letter 49/CDM756/Y [11], Revision 3 of the Terms of Reference was submitted to ONR with a request for approval to amend the ToR for its licenced nuclear sites’ Nuclear Safety Committee. The change reflected the change of the company name only from Rolls-Royce Marine Power Operations Limited (RRMPOL) to Rolls-Royce Submarines Limited (RRSL); the licensee’s company number remained the same. ONR responded in writing [12].

# Conclusions

1. This Project Assessment Report (PAR) presents the findings of ONR’s assessment of the proposed changes to ToR for the NSC, and for urgent safety proposals considered by the NSC. Based on the work carried out, I am satisfied that the Terms of Reference remain adequate to satisfy the requirements of LC 13.

# Recommendations

1. This PAR recommends that approval is given under LC13(3) and 13(12) for the amended Rolls-Royce Submarines Limited Terms of Reference and Arrangements for Urgent Safety Proposals [2], and that Licence Instruments 506 [13], 507 [14] for the Neptune Reactor, Raynesway (Site Licence 13C), and 510 [15] and 511 [16] for the Nuclear Fuel Production Plant, Raynesway (Site Licence 49) be signed by the Director of Regulation, under the authority delegated from the Chief Nuclear Inspector.

References

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| [1] | RRSL, RRSL/GEN/908v2/Y - LC13 Nuclear Safety Committee, Request for Approval of RRSL NSC ToR and Arrangements for USP. |
| [2] | RRSL, EDNS9701659113 Terms of Reference for the RRSL Nuclear Safety Committee. Version 4.0, January 2024. |
| [3] | ONR, “Licence Condition Handbook,” February 2017. |
| [4] | RRSL, EDNS9701659113 Terms of Reference for the RRMPOL Nuclear Safety Committee. Version 2.0, November 2015. |
| [5] | ONR, “Licence Instrument 503 (13C) - Approval of Alteration or Amendment to the Terms of Reference of a Nuclear Safety Committee (CM9 2015/422034)”. |
| [6] | ONR, “Licence Instrument 504 (13C) - Approval of Nuclear Safety Committee's Arrangements for Obtaining Consideration, or Advice on Urgent Safety Proposals (CM9 2015/422144)”. |
| [7] | ONR, Licence Instrument 506 (49) - Approval of Alteration or Amendment to the Terms of Reference of a Nuclear Safety Committee (CM9 2015/422024). |
| [8] | ONR, “Licence Instrument 507 (49) - Approval of Nuclear Safety Committee's Arrangements for Obtaining Consideration, or Advice on Urgent Safety Proposals (CM9 2015/422026)”. |
| [9] | RRSL, “NSC/1328 Nuclear Safety Committee (NSC) Meeting 2023/12. Minutes of the meeting held at Rolls-Royce Submarines Limited on 13 December 2023 (CM9 2023/66072)”. |
| [10] | ONR, Nuclear Safety Technical Inspection Guide (TIG) NS-INSP-GD-013 Revision 6. |
| [11] | RRSL, “49/CDM/756/Y - Request for Approval to amend the Terms of Reference for the Nuclear Safety Committee (CM9 2019 184360),” 2019. |
| [12] | RRSL, “RRMPOL 71054N - Approval to amend the Terms of Reference for the Nuclear Safety Committee under Licence Condition (CM9 2019 227828)”. |
| [13] | ONR, “Licence Instrument 506 (13C) - Approval of Alteration or Amendment to the Terms of Reference of a Nuclear Safety Committee”. |
| [14] | ONR, Licence Instrument 507 (13C) - Approval of Alteration or Amendment to Nuclear Safety Committee's Arrangements for Obtaining Consideration, or Advice on Urgent Safety Proposals. |
| [15] | ONR, Licence Instrument 510 (49) - Approval of Alteration or Amendment to the Terms of Reference of a Nuclear Safety Committee. |
| [16] | ONR, Licence Instrument 511 (49) - Approval of Alteration or Amendment to Nuclear Safety Committee's Arrangements for Obtaining Consideration, or Advice on Urgent Safety Proposals. |