



Guidance note

Radioactive Substance Regulation

Guidance on the Production and Use of An Integrated Management Prospectus

1. Purpose of the Document

1.1 To provide guidance on how an integrated Management Prospectus may be used by prospective operators of nuclear licensed sites to address the requirements of HSE and the Environment Agency.

2. Background

2.1 Both the HSE and Environment Agency require organisations to demonstrate that they are capable of holding and maintaining a Nuclear Site Licence and Environmental Permits. The HSE specify how this should first be demonstrated through production of a Safety Management Prospectus as part of an application for a site licence **1**. The Environment Agency does not specify how information should be provided but sets out 'what' information it requires under RSA93 (in Annex 1 of the Process and Information Document **2**).

2.2 Continued demonstration of organisational capability is regulated by the HSE under the HSWA and related regulations and the Licence Conditions, in particular LC 14 (safety documentation) and LC 36 (Management of Change); and by the Environment Agency under Schedule 1, Condition 6 of the RSA Authorisation.

2.3 HSE sets out in detail its expectations on the function and content of a Safety Management Prospectus in Technical Assessment Guide T/AST/072; and in other guidance, for example on Management of Change (T/AST/048), the Organisational Nuclear Baseline (T/AST/065) and on Licensee Use of Contractors and Intelligent Customer Capability (T/AST/049).

2.4 The Environment Agency sets out its guidance on expectations and considerations for the regulation of Management Arrangements in its Guidance to Regulators on Environmental Management Arrangements including those elements which would be addressed in an integrated Management Prospectus.

2.5 OCNS, now part of the HSE, regulates using the Nuclear Industries Security Regulations 2003 as amended in 2006. These regulations require clear management responsibilities and accountabilities to be set down in the Site Security Plan specific to each installation. The licensee must establish and maintain an effective security organisation to deliver the requirements of the Site Security Plan.

2.6 Experience has shown that nuclear site operators have used various ways to demonstrate compliance with these requirements. In some cases organisations have opted to provide a Safety Management Prospectus for the HSE together with separate documentation for the Environment Agency. More recently a number of operators have chosen to provide a single integrated Management Prospectus addressing both the issues of interest to the HSE and also the Environment Agency.

2.7 We believe that such an integrated approach offers clear advantages; often providing a more efficient and effective vehicle for the demonstration of compliance to regulators and the business itself across the fields of health, safety, environment, security and safeguards in respect of its nuclear activities.

For this reason this guidance describes how:

- * the HSE and Environment Agency regulatory expectations for management arrangements are aligned;
- * a single integrated Management Prospectus might address each of the HSE and Environment Agency common regulatory expectations;
- * the HSE and Environment Agency work together in assessing management arrangements.

2.8 We hope this guidance will help ensure that we continue to deliver a coordinated and consistent approach to our regulation of Management Arrangements wherever possible, whilst still retaining flexibility for organisations to do what is right for their business.

3. Joint Expectations

3.1 The HSE and Environment Agency expect licensable and permissible organisations to have in place robust management arrangements to ensure the proper management of the hazards and risks associated with the nature of the work undertaken within the nuclear sector. Both regulatory organisations expect the following elements to form the common basis of an Organisation's Management Arrangements:

1. Activities
2. Organisational Structure
3. Governance
4. Capability
5. Learning Organisation
6. Managing organisational change

3.2 Annex 1 shows where each of these elements is addressed in key HSE and Environment Agency guidance. The individual guidance documents describe each regulator's perspective (i.e. nuclear safety and environmental protection respectively) in assessing and interpreting the adequacy of arrangements.

4. Integrated Management Prospectus

4.1 The HSE and Environment Agency recognise that an integrated Management Prospectus is a strategic document that can be used to underpin the initial demonstration of a licensable and permissible organisation.

4.2 Such a document should tell the 'story' of what the organisation does; the associated hazards and the ways the organisation manages risk. This should remain visible and understood by the licensed or permitted organisation and its Board throughout the life of the licensed site. The elements addressed in the integrated management prospectus should therefore be maintained to describe, and assure the adequacy of, the current arrangements for managing health, safety, security and environmental matters. They should be used as part of the strategic management of the business rather than merely providing a summary of safety or environmental management systems.

4.3 To address the regulatory expectations of both the HSE and the Environment Agency, an integrated Management Prospectus should address each of the elements described in para 3.1. To do this an integrated Management Prospectus should describe:

a) the type of activities carried out. This might include a summary of the key activities taking place; the associated hazards; and reference to the safety, security and environmental management arrangements that are in place to control the hazards. One of our guiding principles in better regulation is that the degree of regulation and scrutiny applied to any organisation or activity should be proportionate to the level of hazard and risk that the work presents. If the work involves discrete stages then we need to understand what each major phase involves as well as understanding how full lifecycle requirements are being addressed.

b) how the organisational structure meets the nuclear safety, security and environmental management needs of the business. The structure should reflect current and foreseeable activities and should show how key responsibilities are allocated. We would expect new organisations to plan for and establish a structure based on principles that reflect the full range of activities they intend to perform. Similarly, established organisations should have in place appropriate arrangements for the management of change – both changes in the organisation and in the nature of the work.

c) the organisation's approach to the governance of nuclear safety, security and environmental protection. It should show how, with the appropriate individual and collective attitudes and behaviours, safety and environmental protection is directed and controlled.

d) how the right structure, resources and competences exist to deliver the nuclear safety, security and environmental protection needs. This should include arrangements to help assess and put in place the structure, resources and competences necessary to ensure an organisation continues to be a capable and responsible operator. Organisations that hold Nuclear Site Licences prepare and implement a Nuclear Baseline for nuclear safety. Where possible we would encourage such operators to include environmental capability needs within an integrated Nuclear and Environmental Baseline. Alternatively organisations may choose to demonstrate this in some other manner e.g. through one document or in a number of documents with a plan to show how they fit together.

e) how a 'learning organisation' culture is fostered. Organisations should show how they build learning processes into all their interactions both within and outside the company so that it absorbs and responds to lessons from their own and others experience.

f) the organisation's approach to managing change. This should provide a link to the licensee's arrangements for compliance with LC36 and for the maintenance of the nuclear baseline. It should also describe arrangements to assess the significance of proposed changes in relation to the RSA93 Authorisation. The system should assure the organisation that it is still capable of meeting the requirements of management systems, structures and resources so that they remain in compliance.

5. Working Together

5.1 We recognise that at existing nuclear sites and in considering new developments the HSE and Environment Agency need to continue to work closely together. One example of our working together is our Joint Programme Office, that provides a 'one stop shop' for the Generic Design Assessment of new nuclear power station designs.

5.2 We are committed to working together through our joint Memorandum of Understanding, and will continue to reflect this in a variety of ways:

- development of joint guidance, such as this document, where possible
- sharing information on developments within the industry to ensure we remain aware of one another's positions and can avoid cutting across these where ever possible

- encouraging operators to seek early and joint engagement with both regulatory organisations wherever possible
- working together to plan reviews of integrated documentation and ensuring a co-ordinated response to these; and,
- carrying out joint inspections of areas of common interest.

References:

1. HSE Technical Assessment Guide – Function and Content of a Safety Management Prospectus (T/AST/072) (insert hyperlink once published)
2. Environment Agency Guidance to Regulators – Environmental Management Arrangements (insert hyperlink once published)

Annex 1 Joint Expectations

Comment Element	Link to HSE T/AST/072	Link to Environment Agency Guidance
Activities	Element 1	Section 2
Organisational Structure	Element 2	Section 3
Governance	Element 3	Section 4 and Section 5
Capability	Element 4	Section 6
Learning Organisation	Element 5	Section 7
Managing Organisation Change	Element 6	Section 8

*1 The Licensing of Nuclear Installations 2007.
 1 Process and Information Document for: Applications for New Authorisations; Applications for Variations of Existing Authorisations; Environment Agency Review of Existing Authorisations issued under the Radioactive Substances Act 1993 to Nuclear Sites in England and Wales, 2005*