



Sellafield Ltd
Sellafield Ltd Manual

SLM 3.06.01

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Sellafield Ltd Assurance Manual

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1 Introduction

The Assurance process as defined in the Topic 3.06 suite of documents, details the co-ordinated structure of arrangements for the monitoring, assessment, review and improvement of processes internal to Sellafield Ltd and to demonstrate compliance with the Sellafield Ltd Management System (SLMS) as defined in SLM4.05.01. The process helps to ensure that Sellafield Ltd maintains their 3rd Party Certification to ISO 9001 and ISO 14001 and provides part of the arrangements in place to comply with Nuclear Site Licence Condition 17. However, these are not the only Assurance activities being conducted within Sellafield Ltd, for example, (but not limited to) Manager in the field, local reviews/surveillances etc, in process assurance are also locally used, but are not covered as part of the Assurance Framework.

The arrangements as a whole are designed to provide oversight of the assurance framework which will measure effectiveness of business performance and evaluate compliance with our obligations; that implements effective measures of performance, demonstrating achievement of customer and stakeholder requirements. In addition, assessing whether risks associated with, but not limited to, nuclear, radiological and conventional safety, the environment, quality, security and business reputation are being managed and that the business complies with legislation, ISO 9001 & ISO 14001 Standards, Nuclear Site Licence Conditions etc. The assurance activities applied to each process must be proportionate to the hazards and risks associated with that process. These arrangements are not intended to replace line management controls as defined elsewhere within the management system.

The Sellafield Limited EHS&Q Assurance Framework Gatekeeper Forum will provide an oversight of the ATLAS Assurance Framework and will advise the Head of Quality, as appropriate, of any issues it believes are significant enough to warrant escalation to the Safety, Security, Safeguards and Assurance Committee (SSAC) for consideration of further escalation to the SL Executive.

This manual describes the structure and high level process for the Sellafield Ltd Assurance Framework and applies to all areas of the business, it is consistent with and aligns to SLM 2.15.01 Sellafield Quality Manual.

The Head of OU/Decommissioning Programme Delivery/Project Managers/Heads of Engineering will, in co-ordination with Process Owners, put in place the arrangements to define and justify the Tier 1 arrangements for their areas, in accordance with SLP 3.06.01 How do I define Tier 1 and Tier 2 Assurance Arrangements for a Process?

Process Owners will put in place the arrangements to define and justify Tier 2 arrangements required by the framework in accordance with SLP 3.06.01 How do I define Tier 1 and Tier 2 Assurance Arrangements for a Process?

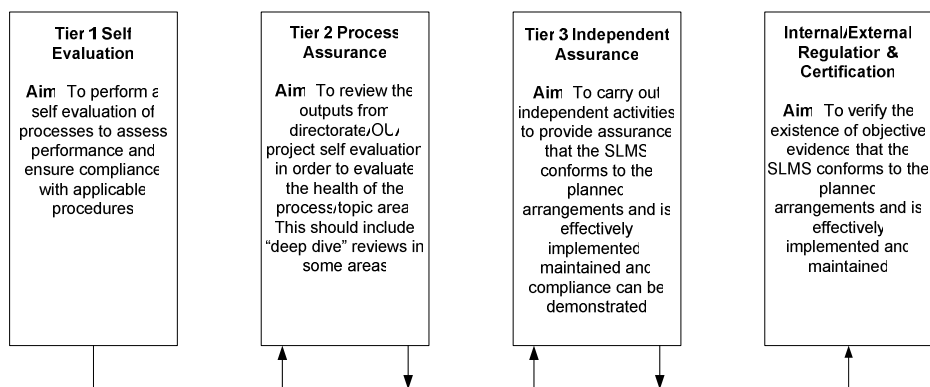
Output from Assurance activities should be fed into the OU/Directorate and where applicable, relevant capability committees and management meetings as required, and be considered as part of the management review (SLP 3.10.01 How do I conduct management reviews) to ensure any trends, themes and learning are identified and actioned.

Independent Assurance Audits are performed using a graded approach proportionate to risk and hazard and are fed back to the Chief EHS&Q Officer and Executive through the Safety, Security & Assurance Committee process. Significant issues are fed back immediately via the Head of Assurance. These activities are scheduled on the "Tier 3" section of the annual Independent Assurance Programme.

2. The Assurance Framework

2.1 Purpose & Scope

The Sellafield Ltd Assurance Framework is the structure by which Management System assurance arrangements within the organisation are assured. The three tiers of the framework are described below. These arrangements as a whole are designed to provide the “defence in depth” within the management system commensurate with the level of hazard and risk within the business.



2.2 Self Evaluation (Tier 1)

This Tier provides a detailed review of compliance with and the effectiveness of the implementation of the process arrangements within the SLMS and is subject to an oversight evaluation at Tier 2.

The Process Owner will provide checklists to enable health of the process to be accurately assessed by the Directorate /OU as part of the self evaluation process.

The Heads of OU/Decommissioning Programmes/Project Managers/Heads of Engineering are accountable for the identification and resourcing of the annual Tier 1 programme for their areas, in consultation with Process Owners and Divisional Heads of Quality, as defined in SLP 3.06.01 How Do I define assurance arrangements for a Process. Each Division/Directorate is responsible for allocating competent personnel to perform self evaluations, ensuring they are completed to time and to the appropriate quality and ensuring that the sample taken is sufficient and commensurate with the significance of the hazard or risk.

The Divisional Heads of Quality are responsible for coordinating the Tier 1 Programme and for ensuring that the Heads of OU/Decommissioning Programmes/Project Managers/Heads of Engineering have applied appropriate risk analysis to their area/project and is addressing the correct elements of the process requirements, this must be done in consultation with the Process Owners and not in isolation.

The activities in this tier of the framework are performed within the Directorates by Directorate employees with some independence from the activity being reviewed (as defined in BS EN ISO19011), where possible or practicable. This enables the Division/Directorate to assess its compliance with and performance against the aspects of a process agreed between the Heads of OU/Decommissioning Programmes/Project Managers/Heads of Engineering and the Process Owner.

The outcome of the self evaluation is colour coded against the criteria set out in Figure 1, to enable a consistent comparison of the findings to be made across the organisation. All self evaluation activities will be recorded in the ATLAS Assurance module. In addition, any significant findings should be immediately escalated via the appropriate route (line management, Process Owner, Head of Quality etc).

2.3 Process Assurance Review (Tier 2)

This Tier is designed to ensure process management system arrangements are fully compliant with legislative requirements, SL obligations and to ensure that, where self evaluation arrangements have been conducted, they are working effectively, fit for purpose, and that the outputs are an accurate assessment of the health of the process/topic area. Tier 2 activities are scheduled and undertaken by the Process Owner (or nominated representative)

Process Owners are required to define the Tier 2 assurance activities commensurate with the risks associated with their process. The totality of the arrangements defined must ensure that the Process Owner can determine the current level of performance of their process/topic area and the current level of compliance with the documented procedures for the process/topic area (including policies, charters and manuals).

The activities must also confirm that the documented procedures meet the requirements of legislation, standards, customer contracts and Nuclear Site Licence Conditions. T2 is the opportunity for competent independent assessment of the effectiveness and efficiency of the implementation of the processes and should be used to calibrate the T1 activities.

The PO should conduct whatever activities he feels necessary to discharge his accountabilities. This will vary across processes and within processes as some process elements will be more significant than others.

Process Owners should review self evaluation, Internal Regulator, ONR/EA, LRQA, WANO outputs and conduct a "deep dive" in a sample of Directorates to ascertain the accuracy and adequacy of self evaluation outputs or equivalent monitoring arrangements (e.g. performance indicators). These "deep dives" must proportionately cover the significant hazards and risks in terms of both scope and periodicity. The outcome of process assurance is colour coded against the criteria set out in Figure 1, to enable a consistent comparison of the findings to be made across the organisation. (See SLP 3.06.02).

All Process Assurance Reviews (Tier 2) will be recorded in the ATLAS Assurance module. Output from these activities should be fed into the OU/Directorate and where applicable capability committees and management meetings as required, and be considered as part of the management review to ensure any trends, themes and learning are identified and actioned. The Process Owner is responsible for ensuring that Tier 2 Process Reviews are completed and that any actions raised from these activities are closed to time and to the required quality.

The Process Owner may call upon Heads of OU/Decommissioning Programmes/Project Managers/Heads of Engineering to assist in carrying out a Tier 2 Process Assurance Review.

2.4 Independent Assurance Audits (Tier 3)

This is a formal audit process, conducted in accordance with ISO 9001/ISO 14001 and is required to provide assurance that the SLMS complies with relevant standards (ISO9001 and ISO14001), legislation, contracts and Nuclear Site Licence Conditions and determines the level of compliance in the field, by undertaking plant visits to test the arrangements. These audits also look at the adequacy of the arrangements put in place and make suggestions for improvement and identify good practice. Independent Assurance Audits, whilst testing the SLMS arrangements for a process will also address the local arrangements which support the operational activities being conducted.

Independent Assurance Audits are performed using a graded approach proportionate to risk and hazard and are fed back to the Chief EHS&Q Officer and Executive through the Safety, Security & Assurance Committee process. Significant issues are fed back immediately via the Head of Assurance. These activities are scheduled on the "Tier 3" section of the annual Independent Assurance Programme.

The Site Independent Audit Team also undertake audits which may be requested by Senior Management, covering activities over and above the scheduled Independent Assurance Audit programme, such audits are scheduled on the 'Additional' section of the programme.

Independent surveillances – these are performed by the Independent Audit teams and can be based on a theme or a specific topic, they are less structured than a formal audit and can be used to follow up areas of concern identified during previous audits or follow up progress against improvement programmes. These surveillances are scheduled on the “Additional” section of the annual Independent Assurance Programme.

2.5 Other Independent Audit Activities

Internal audits – performed by the Corporate Internal Audit Team, these are formal audits performed to an agreed programme. The work programmes of Corporate Internal Audit and EHS&Q Assurance are co-ordinated to prevent overlap and to enable joint audits to be performed where required.

External assurance activities – these include third party certification assessments, customer and regulator audits and inspections.

Internal Regulation – a robust Nuclear Independent Oversight function that contributes to the effective delivery of the Nuclear Site Licence Conditions, Environmental Permits, nuclear security regulation and the meeting of the Health & Safety at Work Act.

Interactions and Interrelationships - Outputs from all assurance activities undertaken through the SL Assurance Framework, should be assessed to determine whether other elements of the SLMS Topic Areas are affected and to ascertain what actions need to be undertaken to ensure gaps throughout the interrelated topic are adequately addressed

Figure 1 Colour Rating used in the Assurance Framework Activities

	Assessment of Process, Assurance Arrangements and Implementation
Purple	1 – Exemplar Meets and exceeds requirements. Practical solutions exist to address problems encountered elsewhere (shared learning)
Blue	2 – Good Standard Generally exceeds requirements. Alert to and actively pursuing potential improvements. Suggestions from Auditors/Evaluators/Assessors considered on merits
Green	3 - Adequate Arrangements meet requirements, some opportunities for improvement identified, but being addressed only slowly. Auditors/Evaluators/Assessors only able to identify a few minor points for improvement.
Yellow	4 – Below Standard Fundamental requirements met, but some specific procedural weaknesses identified or examples found that demonstrate a failure to follow procedures. Failure to recognise that problems exist.
Orange	5 – Significantly below standard Procedures or practices flawed to such an extent that one or more important requirements are missed or not delivered. Failure to recognise that problems may exist. Willingness to adopt a strategy to bring about the required level of improvement
Red	6 – Unacceptable Seriously deficient arrangements or failed application, such that fundamental objectives are not achieved or safety is prejudiced. Failure to recognise the need for improvement or a very defensive response adopted.

2.2 Organisation

Key responsibilities within the assurance framework are summarised as follows (detailed responsibilities are contained within the procedures beneath this manual):

Chief EHS&Q Officer

- Responsible for oversight of the assurance framework as Process Sponsor.
- Accountable to the Board for EHS&Q Assurance.

Process Owners

- Determining the risks associated with their process
- Defining Tier 2 assurance arrangements for their process and performing Tier 2 process assurance reviews (including Nuclear Site Licence Condition assurance where applicable).

Head of OU/Decommissioning Head of Programme Delivery/Project Managers/Heads of Engineering

- Identification & scheduling of Tier 1 Self Evaluation Activities
- Identification of competent personnel to perform self evaluations
- Performing Tier 1 Self Evaluations as scheduled.
- Addressing findings from all assurance reviews in a timely manner.
- Participating in Tier 2 and Tier 3 “deep dives” as necessary.
- Reviewing output from Directorate assurance activities to identify trends, themes and learning.

Divisional Head of Quality

- Production of annual self evaluation programmes for each Division/Directorate.
- Responsible for the maintenance of the Tier 1 Self Evaluation programme

Head of EHS&Q Quality

- Management of the master schedule containing the programme of assurance activities.
- Management of the ATLAS Assurance module.
- Provision of performance indicators to Directorates and Executive relating to review results, assurance programme delivery and completion of findings.
- Delivery of Tier 3 independent assurance programme to monitor the adequacy and effectiveness of the management system arrangements.

2.3 Key Principles

- These arrangements apply to all processes and topic areas within the scope of the SLMS.
- Tier 1 Self Evaluation will form the majority of the assurance activities carried out under the framework and are the responsibility of the Head of OU/Decommissioning Head of Programme Delivery/Project Managers/Heads of Engineering at a frequency of review for each process at Tier 1 determined by the Head of OU/Decommissioning Head of Programme Delivery/Project Managers/Heads of Engineering, in consultation with Process Owners and is determined based on the risk associated with the process
- Tier 2 Process Assurance reviews are the responsibility of the Process Owner and are scheduled at a frequency that best supports each Process owner.
- The Independent Assurance (Tier 3) of the framework is delivered by the EHS&Q Assurance Department.
- Assurance activities must address performance as well as compliance. All tiers of the Framework must review compliance with and performance of the processes in the field, during the relevant activities.
- All assurance reports and associated findings and actions will be managed on the ATLAS Assurance module. The accessibility of information at all levels is essential to the effectiveness of the framework and outputs from lower tiers must be considered by higher tiers.
- Reporting arrangements will be via the appropriate SL governance committees and meetings to ensure they receive adequate management attention and an escalation route for issues identified during assurance activities which have not been adequately addressed

2.4 Interfaces with other Processes

Due to its nature, the Assurance process has interfaces with several other processes and an impact on all topics defined within the SLMS. Key interfaces are as follows:

- Governance – the assurance process provides information inputs to the governance process to enable decisions to be made regarding allocation of resource and risk management. The governance process also provides a structure of governance committees which can be used to escalate issues identified during assurance activities to ensure they receive adequate management attention.
- Quality, Environmental, Radiological Protection, Conventional Safety, Nuclear Safety – the assurance activities performed provide an input to the management review process. Corrective and preventive actions relating to the SLMS are also generated by the assurance process.

3 Definitions/Abbreviations

3.1 Definitions

Assurance – a systematic approach to assess whether the organisation is doing what it says it does, to the appropriate standard and to assess whether the arrangements comply with required legislation, ISO Standards and customer requirements. In this context there must be an element of independence to the activity.

Self evaluation (Tier 1) – the schedule of assessment activities defined by the Heads of OU/Decommissioning Programme Managers/Project Managers/Heads of Engineering and conducted to a Process owner defined checklist within the Directorate, OU or Area.

Process Assurance Review (Tier 2) – a review of the outputs from directorate/OU/ project Self Evaluation (Tier 1) in order to evaluate the health of the process/topic area, this should include “deep dive” reviews in selected areas

Independent Assurance Audits (Tier 3)– independent assessments of arrangements against the SLMS to review of the adequacy, effectiveness and degree of conformance with the documented arrangements and compliance to ISO 9001/ISO 14001.

Deep dive – a review of self evaluation activities in a sample of OU’s to determine their adequacy and accuracy. This review must be done in the field and must not be a desktop exercise.

3.2 Abbreviations

EA	-	Environment Agency
EHS&Q	-	Environment, Health, Safety & Quality
ISO	-	International Organisation for Standardisation
LRQA	-	Lloyds Register Assurance
ONR	-	Office of the Nuclear Regulator
OU	-	Operating Unit
SL	-	Sellafield Ltd
SLMS	-	Sellafield Ltd Management System
SSAC	-	Safety, Security and Assurance Committee
WANO	-	World Association of Nuclear operators

4 References

SLP 3.06.01	How do I define Assurance Arrangements for a process?
SLP 3.06.02	How do I perform a Tier 2 Process Owner assurance review?
SLP 3.06.03	How do I perform a Tier 1 Self Evaluation?
SLM 4.05.01	Sellafield Ltd Management System Manual

5 Amendment Record

Issue 2 to Issue 3

Date of amendment	Section or paragraph amended	Details of amendment
March 2015	All Sections	Major re-write of the document to remove references to Internal Regulation, WANO, PEB activities and to reflect changes in the application of the Assurance Framework.