

## Changes to Civil Nuclear Security Regulations

### Department for Business, Energy and Industrial Strategy

RPC rating: **validated**

#### Description of proposal

The proposed regulation will clarify roles and responsibilities around nuclear security, aligning the overall regulatory regime more effectively with new outcomes-based security guidance, known as the Security Assessment Principles (SyAPs), which will shortly be published by the Office for Nuclear Regulation (ONR). In particular, it will:

- ensure that a responsible person in relation to the premises is appointed, and has a duty to ensure that there is an approved security plan in place for their premises;
- extend the contingency requirements for nuclear site security plans and transport security plans to include clearer references to cyber threats, in line with the increased focus on such threats in the SyAPs;
- modify the ONR's responsibilities regarding the personnel security regime so that the ONR assesses ongoing arrangements for personnel security as well as vetting, and some vetting can be undertaken directly by the operator rather than by the ONR; and
- remove reference to outdated classification guidance for Sensitive Nuclear Information.

#### Impacts of proposal

The Department estimates, based on consultation evidence that:

- the modifications to the personnel security regime and the requirement to appoint a specific responsible person will have negligible ongoing impacts, as both are clarifications of existing regulation and guidance with which the industry already complies;
- the removal of references to outdated classification guidance will have negligible impacts, as the sector currently complies with HMG's broader classification guidance and will continue to do so; and

- the requirement to consider cyber threats in site security plans will create some one-off costs as site operators will need to update their site and transport security plans, but ongoing costs will be negligible.

It also estimates that there will be one-off costs to businesses in the civil nuclear sector as a result of the need for security officers to familiarise themselves with the new regulations and make minor changes to procedural documents. It estimates that these costs, and those associated with the requirement to consider cyber threats, will total less than £0.1 million altogether, based on the consultation and some plausible assumptions about staff time and costs. We are content that, even if the consultation respondents underestimated the likelihood of costs applying to them, this measure would score as zero-cost for purposes of the BIT.

Finally, it describes some non-monetised benefits which arise from complying with international obligations and assuring the reputation of the UK's civil nuclear industry.

## Quality of submission

As first submitted, the RPC did not consider the submission to be fit for purpose for two reasons:

- the Department did not describe the change or set out the impacts of the policy clearly; and
- the Department presented evidence from consultation which appeared not to support its assessment that the measure was zero-cost.

The Department has now described the policy and its impacts very clearly, and has provided a thorough and coherent description of the consultation it undertook with respect to these regulations. It has also set out the views of respondents systematically and shown how these support its estimates of cost and benefit.

The RPC confirms that the assessment is now fit for purpose and validates the business impact target score of zero.

## Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net cost to business (EANCB)	£0.01 million (final estimate)

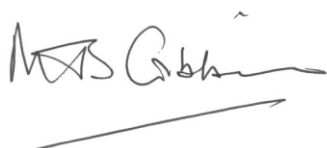
Opinion: EANDCB validation  
Origin: domestic  
RPC reference number: RPC-3536(1)-MOJ  
Date of implementation:

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Business net present value	£0.1 million
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**RPC assessment**

Classification	Qualifying regulatory provision (IN)
EANCB – RPC validated <sup>1</sup>	Zero
Business Impact Target (BIT) Score <sup>1</sup>	Zero
Small and micro business assessment	Not required (fast track low-cost regulation)



**Michael Gibbons CBE**, Chairman

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<sup>1</sup> For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000.