

Guidance on Risk-Informed Decision Making; Guidance and Advice Note on The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 – radiation and contamination monitoring, and determination of transport index; Revised Guidance on Management of Regulatory Issues

Office for Nuclear Regulation (ONR)

RPC rating: validated

This Opinion covers three changes to guidance; for each, a brief description of the change, its impacts (as set out in the IA) and the quality of the submission is given in the table below. All three have an Equivalent Annual Net Direct Cost to Business (EANDCB) which rounds to zero.

Measure	Description	Impact	Quality of submission
Guidance on Risk Informed Decision Making May 2017	ONR has produced new guidance, which sets out clearly in one place the regulator’s risk-based framework and criteria for making regulatory decisions. There is no change to the actual requirements imposed on site operators or duty-holders, and no new content; the change merely consolidates and clarifies existing	ONR argues that because there is no change to the requirements or to the content of the guidance, the only costs to business will be familiarisation costs, which it estimates at £18,000. It argues that there will be no additional costs associated with regular re-	The submission is clear and concise, and uses appropriately evidenced assumptions in its calculation of familiarisation costs. It could have been improved by giving a sense of scale for the efficiency gains described, though given the small number of businesses

	guidance.	reading of the guidance, as businesses will already undertake this activity. It expects that there will be some benefits to business as a result of improved understanding of ONR's approach to risk and consequent efficiency savings around compliance.	affected and the expertise of operators and duty-holders, the RPC accepts that they are likely to be small.
Guidance and Advice Note on The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 – radiation and contamination monitoring, and determination of transport index Advice note Nov 2016; guidance to be	ONR has produced guidance (which is aimed mainly at its own inspectors) and an Advice Note (which is aimed at site operators, duty-holders and transporters and which summarises the guidance) on the requirement for inspection and radiation monitoring of equipment used in transporting radioactive materials.	This guidance will affect around 37 duty-holders at nuclear sites, and a further 2000 smaller duty-holders. ONR argues that the guidance sets out existing requirements more clearly and will not change the activities of inspectors or duty-holders. Thus, the only costs associated with the change are familiarisation costs. It estimates total one-off familiarisation costs of £37,000 and total ongoing costs as a result of rereading of guidance	The assessment is largely clear and concise, and the assumptions are generally appropriately supported, though the assumptions as to take-up of the guidance by smaller operators are not well-justified. Under any reasonable assumption, however, the EANDCB is not affected. In future assessments, ONR may wish to consider making use of a table of cost calculations rather than a

Opinion: BIT assessment
 Origin: Domestic
 RPC reference number: 3800, 3801, 3802
 Date of implementation: see table

published April 2017		ahead of inspection of £1,700.	narrative, to improve clarity and concision.
Revised Guidance on Management of Regulatory Issues April 2017	ONR's Regulatory Issues Database (RID) records safety and security issues identified by ONR inspections and their associated follow-up actions. It is used by the regulator to ensure that follow-up actions are appropriately pursued. ONR has revised its guidance to inspectors on the use of the RID and the appropriate management of regulatory issues and follow-up actions.	This guidance will affect around 37 duty-holders at nuclear sites, and a further 2000 smaller duty-holders. ONR argues that the revised guidance will not materially alter the behaviour of inspectors or of duty-holders. Thus, the only costs associated with the change are familiarisation costs. It estimates total one-off familiarisation costs of £6,000.	The assessment is clear and concise, and the assumptions are generally appropriately supported, though the assumptions as to take-up of the guidance by smaller operators are not well-justified. Under any reasonable assumption, however, the EANDCB is not affected.

Departmental assessment

Classification	Qualifying regulatory provision
Equivalent annual net cost to business (EANCB)	£0.0 million

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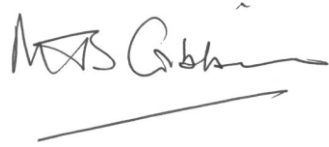
Business net present value	£0.0 million
Societal net present value	£0.0 million

RPC assessment

Classification	Qualifying regulatory provision
EANCB – RPC validated ¹	£0.0 million
Business Impact Target (BIT) Score ¹	£0.0 million
Small and micro business assessment	Not required

¹ For reporting purposes, the RPC validates EANDCB and BIT score figures to the nearest £100,000.

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Michael Gibbons CBE, Chairman