Opinion: BIT assessment

Origin: Domestic

RPC reference number: RPC-3699(1)-DECC-ONR

Date of implementation: June 2016



New guidance – Special Arrangement Approvals Office of Nuclear Regulation

RPC rating: validated

Description of proposal

ONR has produced new internal guidance for use by ONR inspectors and the applicants due to a change in regulatory approach to Special Arrangements.

Special Arrangements are consignments of radioactive material where it is necessary to employ safety measures such as additional operational controls, to compensate for the fact that the packaging of the consignment does not fully meet the appropriate international standards. This may happen, for example, in decommissioning arrangements where there are complex waste streams, or where radioactive materials are discovered unexpectedly. The arrangements must provide a level of safety and security which is at least equivalent to that provided by fully compliant packaging.

The original regulatory approach was to resist the use of Special Arrangements unless absolutely necessary, and there had been a tendency to assume that such arrangements were less safe. The new policy is to accept appropriate Special Arrangements where they align with the risk-based approach which is followed by ONR.

Impacts of proposal

ONR estimates based on its existing data that duty-holders in around 25 different organisations may need to apply for Special Arrangements over the next ten years, and that the total number of such applications will be 75 over the same period. The regulator assumes that three people in each organisation will need to familiarise themselves with the guidance at the time of each application. It notes that there are no other additional costs, as the requirements and process associated with Special Arrangements have not changed.

Quality of submission

The regulator has presented a clear and proportionate description of the costs and benefits of the new guidance. The RPC is able to validate the EANCB.

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Departmental assessment

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

Michael Gibbons CBE, Chairman

Date of issue: 13/4/2017

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