

Revised guidance for Application for UK competent Authority Approval

Office of Nuclear Regulation

RPC rating: validated

Description of proposal

The revised guidance is used by duty-holders and provides advice on how to make an application for a radioactive material package design that requires Competent Authority Approval. The document updates the 2001 Applicant's Guide, to reflect changes in the regulations, the transfer of radioactive material transport responsibilities from DfT to ONR, and general and specific policy changes to align more with the wider ONR approach.

The regulator argues that "the new guide is written to try and promote a better quality and 'right first time' safety case, so it is hoped that it will have a positive effect on safety cases and reduce the burden of rewrites".

The significant changes include the removal of technical details, which will now be documented in bespoke Transport Technical Assessment Guides (TAGs). An additional paragraph is also added to explain ONR's new policy on dealing with applications where the applicant appears to have dropped the case rather than respond to reasonable questions from ONR. ONR will now formally close such legacy applications rather than pursue them.

The new guide is published and available for duty-holders to read on the ONR website.

Impacts of proposal

The guidance will affect organisations who apply to ONR for the approval of their package designs and/or shipments. Based on previous numbers of applications, ONR estimates that 20 organisations in the UK from the combined nuclear and non-nuclear sectors will be affected.

The regulator estimates a one-off familiarisation cost of £11,000, using standard estimates for reading speeds and industry salary rates. It notes that the length of the new guidance document is only 12 pages.

In subsequent years, ONR anticipates that 50% of the 20 duty-holders who are affected may wish to re-read the guidance, resulting in an annual cost of £5,400.

The guidance document replaces an out-of-date and much longer previous document (46 pages). The regulator therefore estimates savings of £3,400 per year, because duty-holders will no longer have to re-read this document. It notes that it has assumed each duty holder would only have to re-read the earlier guidance once, as they are already fairly familiar with the document.

Overall, the regulator estimates an increased cost of £7,400 in year 1, and costs of £2,000 in subsequent years. As the net impact to business is estimated at less than £50,000 per annum, the BIT score is rounded to zero.

Quality of submission

The regulator has presented a clear and proportionate description of the costs and benefits of the new guidance.

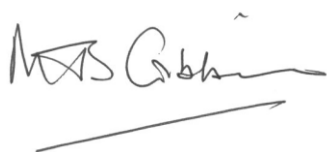
The RPC is able to validate the BIT assessment.

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

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