Regulatory Policy Committee

Updated guidance on the assessment of the commissioning of security systems and infrastructure

Office for Nuclear Regulation

RPC rating: validated

Description of proposal

ONR has produced a Technical Assessment Guide (TAG) for use by ONR inspectors in assessing the adequacy and execution of commissioning arrangements that relate to the performance of equipment, the personnel who operate it and the associated procedures that support its operation.

Impacts of proposal

The monetised direct impact relates to one-off familiarisation with the guidance. ONR estimates that the guidance will be relevant to:

- 31 civil nuclear sites holding a site licence and their tenants;
- 20 approved carriers of nuclear material; and
- Approximately 300 duty holders holding or controlling Sensitive Nuclear information.

ONR has applied web analytics to previous placements of new guidance on ONR's website to estimate that around 2% (7) of the potentially affected entities will read the document during the first year after publication. In addition, ONR anticipates from past experience that a single representative from each of the 31 nuclear licensed sites will voluntarily read the guidance for background information at the time of its publication. This means that 38 people in total will read the guidance for familiarisation purposes.

The guide is 6 pages long, and ONR estimates that it can be read and digested in 25 minutes, allowing for three full reads of the document. This is based on Regulator Appraisal Subgroup (RAS) Group Guidance, which assumes that an average reading speed is 200 words per minute and stipulates that three full readings are required for understanding.

The cost to industry in the first year is therefore calculated to be:

- 1 representative x 0.42 hours x 31 licensed sites x hourly rate (£47.86) , plus
- 7 interested parties (based on web analytics) x 0.42 hours x hourly rate (£47.86).

This yields a total one-off cost of £760.

ONR acknowledges that it is likely that a number of employees of entities subject to this type of assessment may wish to read the TAG for background information as part of the process of preparing for the assessment. However, the behaviour of the regulator and the regulated entities will not be changed, as guidance (of a near-identical length) is already available to those undergoing assessment and will be replaced by the TAG for purposes of preparation. ONR therefore does not expect the new guidance to create any additional ongoing costs.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0 million. This will be a qualifying regulatory provision that will score under the Business Impact Target.

Quality of submission

ONR has provided a well-evidenced assessment of the likely impact of the new guidance. The RPC considers the submission to be a good example of the level of evidence and analysis required to validate the impact of a relatively straightforward measure.

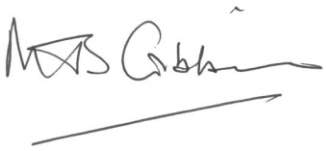
Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net cost to business (EANCB)	£0 million
Business net present value	£0 million
Societal net present value	£0 million

RPC assessment

Classification	Qualifying regulatory provision (IN)
EANCB – RPC validated[1]	£0 million
Business Impact Target (BIT) Score[1]	£0 million

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



Michael Gibbons CBE, Chairman