



Office for
Nuclear Regulation

Corporate Plan 2020/21





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Nuclear Regulation

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to the Energy Act 2013

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Foreword



We are pleased to publish our first annual plan in line with our Strategy 2020-2025, introducing our new mission, vision, values and strategic themes.

Our work is vital to maintain a safe and sound UK infrastructure. It affects everyone: workers at civil and defence nuclear sites, transport carriers and hospitals, the nuclear supply chain, interested communities and the public at home and abroad. Fundamentally, we are here to protect society by securing safe nuclear operations, and will continue to do so in response to COVID-19 (coronavirus).

When we started to develop this plan last year, no one could have predicted the significance of COVID-19. ONR's role remains critical during this pandemic and while what we do remains constant, how we operate is already changing.

This plan outlines our priorities for this year, building on solid operational delivery and moving towards our five-year vision through clear strategic priorities. It takes account of the projected impact of COVID-19 and public health guidelines on our regulation and our internal operations. Our response will be careful and cautious, adjusting as the situation develops, over several phases.

Our plan for 2020/21 reflects a pared back approach to organisational development and change projects, ensuring that our staff have the capacity and support to focus on delivering regulation first and foremost.

Our approach will include seeking assurance that, throughout the different response phases to this pandemic and beyond, dutyholders can operate safely and securely, in line with the UK's high standards. We will also continue to engage with the nuclear sector and other regulators at home and abroad to learn, share best practice and retain resilience.

Despite constraints, our fundamental operational principles remain unchanged. Our enabling approach continues to focus on delivering the right safety and security outcomes.

We want also to demonstrate increasing levels of proportionality and consistency in our regulation and cost impact of decisions. As you'd expect, our focus on conventional health and safety matters will continue to take account of public health guidance. And we intend to continue with our outcome-focused security principles across the nuclear fleet, to assume new nuclear safeguards and nuclear material accountancy duties during this year, and to advise government on nuclear safety and security matters.

Internally, we will have a heavy focus on business continuity, recovery planning and the wellbeing of our people. We are expecting, in line with government advice, for our people to continue working at home for some time, other than for regulatory site visits and by exception in our offices. We will seek to learn from this experience to help us work more efficiently in the future. And we remain committed to delivering our two most important and beneficial strategic change projects – separation of our IT systems from the Health and Safety Executive (HSE) and a new regulatory platform, WIReD (Well Informed Regulatory Decisions).

More than ever, we value our people who work so hard to make ONR effective. We thank them for their commitment to ONR and public safety, and personal resilience, pragmatism and unrelenting professionalism during these testing times.

Our success also depends on continued support and commitment from our many stakeholders. We are also grateful to them and look forward to working in new, changing ways.



Mark McAllister
Chair



Adrienne Kelbie
Chief Executive

Top Five Priorities 2020/21

Strategic Theme 1: *Influencing proportionate improvements*

- 1** Maintain delivery of our core regulatory functions, holding dutyholders to account on behalf of the public. This will include targeted regulatory oversight of progress at 'Enhanced Attention' sites and assurance on safety and security in light of the COVID-19 pandemic.
 - 2** Deliver an effective UK State System of Accountancy for, and Control of, Nuclear Material (SSAC) and implementation of Security Assessment Principles (SyAPs) across all dutyholders.
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Strategic Theme 2: *Inspiring stakeholder confidence*

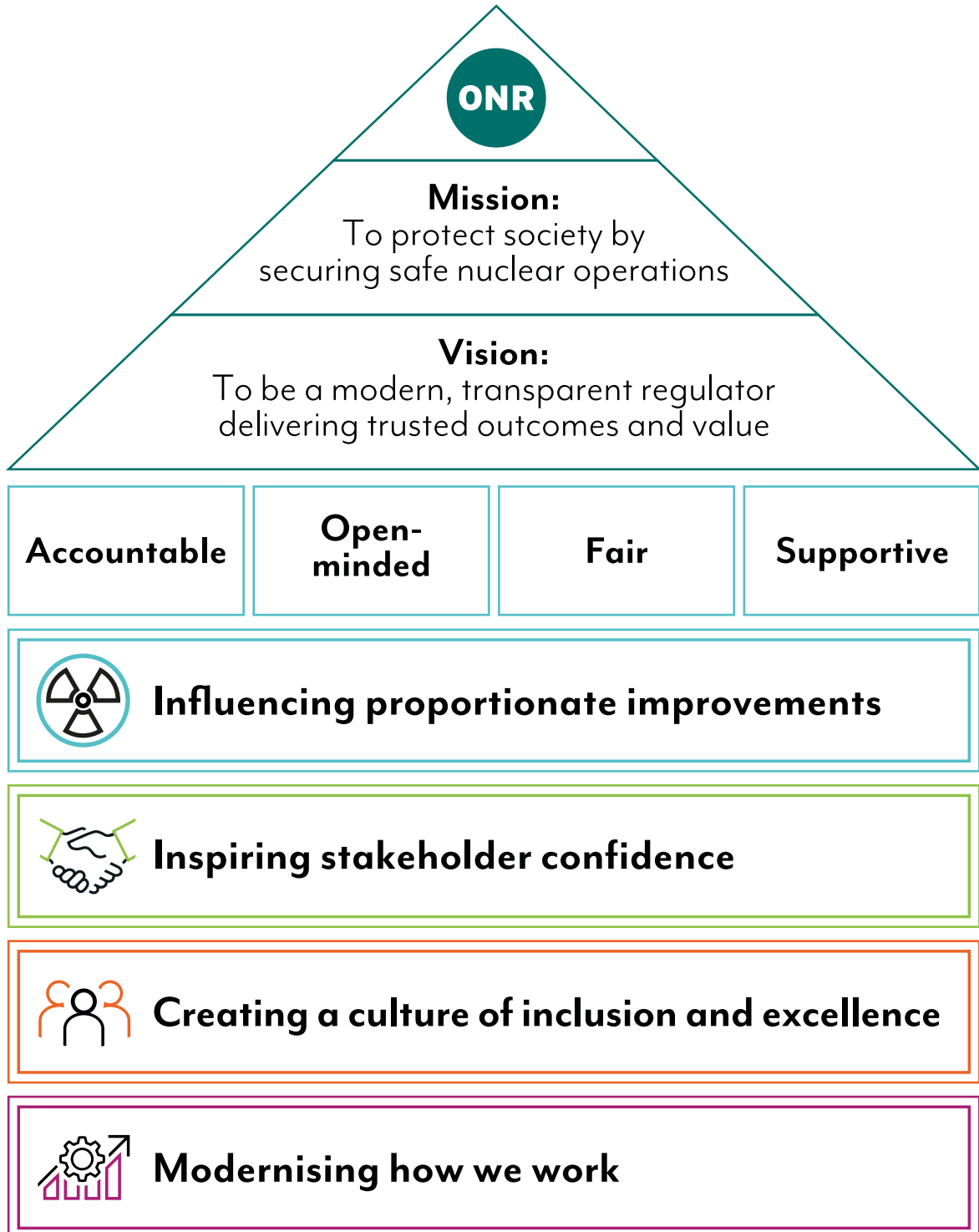
- 3** Enhance transparency through our stakeholder engagement, in line with the aspirations of our Strategy 2020-2025, to enable effective two-way communications, particularly as we respond to COVID-19.
-

Strategic Theme 3: *Creating a culture of inclusion and excellence*

- 4** Promote the sustained health and wellbeing of our staff through effective and inclusive leadership and management, as we respond to the COVID-19 pandemic.
-

Strategic Theme 4: *Modernising how we work*

- 5** Deliver our two strategic change projects – separating our IT infrastructure from the Health and Safety Executive (HSE) and commencing a pilot of our Well Informed Regulatory Decisions (WIReD) project.
-

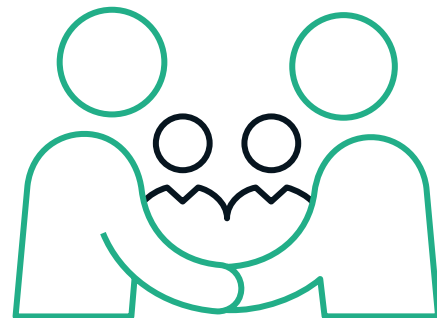


2 What has influenced us?



- 2.1 The global environment has changed significantly this year. The COVID-19 pandemic has influenced both how we are working and our appetite for non-essential work.
- 2.2 The national and global effects of the pandemic will continue beyond this year. In this plan, we've looked across our four strategic themes to identify the most critical activities to protect society through our regulation, continue to be transparent with our stakeholders, support our staff and to progress essential and urgent organisational development that will have the most impact on our effectiveness.
- 2.3 While adapting to new working arrangements, in line with government advice, we are working hard to ensure continued effective safety and security regulation and the health and wellbeing of our people.
- 2.4 Across the nuclear landscape specifically, other uncertainties and challenges remain that affect the demand upon, and focus of, our regulation. To balance that uncertainty in our operating environment, we have agreed regulatory planning assumptions with government. These underpin the direction and focus of our work and are at Appendix B.

“While adapting to new working arrangements, in line with government advice, we are working hard to ensure continued effective safety and security regulation and the health and wellbeing of our people.”



3 About ONR



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- 3.1 We are the UK's independent nuclear regulator, with the legal authority to regulate nuclear safety, security and conventional health and safety at 36 licensed nuclear sites in Great Britain (GB). This includes the existing fleet of operating reactors, fuel cycle facilities, waste management and decommissioning sites, as well as licensed defence sites, together with the regulation of the design and construction of new nuclear facilities.
 - 3.2 We also regulate the transport of nuclear and radioactive materials by road, rail and inland waterways. Our nuclear security regulation covers approval of security arrangements within the civil nuclear industry and provides regulatory oversight for the security of transportation of civil nuclear materials.
 - 3.3 We will operate the UK State System of Accountancy for and Control of Nuclear Materials (SSAC) and a domestic safeguards regime from 1 January 2021, at the end of the transition period laid out in the Withdrawal Agreement.
 - 3.4 We are governed by a ten-strong unitary Board, comprising a Chair, five independent Non-Executive Directors and four Executive Directors from a range of backgrounds. The Board is responsible for our strategy, provides strategic leadership and monitors resources and performance, and supports the work of over 600 staff based in Bootle, Cheltenham and London. The Board also ensures that effective arrangements are in place within our organisation to provide assurance on governance, risk management and internal control.
 - 3.5 Our Chief Executive, Adrienne Kelbie, leads the organisation and is accountable for ensuring all funds are spent in accordance with Parliament's intentions, and in line with HM Treasury's 'Managing Public Money' and other relevant governing guidance and instructions.
 - 3.6 Our Board has responsibility for regulatory strategy; and has delegated all specific regulatory decisions to our Chief Nuclear Inspector (CNI), Mark Foy. He is accountable for ensuring that our regulatory activities are targeted effectively, discharged properly and that our regulatory decisions are proportionate and consistent. He provides assurance to our Board that regulatory decisions are being made appropriately within the legal requirements of the Energy Act 2013 and other relevant legislation.
 - 3.7 Though we already disclose significant amounts of information on our regulatory activities on our website, we want to be even more open and transparent. We will continue to engender public trust and respect by sharing information about our activities and dealing with questions, enquiries and concerns by providing explanations of our decisions. We also routinely engage with site stakeholder groups and local liaison committees at all sites, non-government organisations (NGOs), the public, media and local, regional and national politicians.
 - 3.8 You can find out what we do, how and where we regulate, and how we work with stakeholders on our website.
-
- “We are the UK’s independent nuclear regulator, with the legal authority to regulate nuclear safety, security and conventional health and safety at 36 licensed nuclear sites in Great Britain (GB).”**

ONR Board



Mark McAllister
Chair



Oona Muirhead CBE
Non-Executive
to 30 September 2020



Dr Janet Wilson
Non-Executive



Bronwyn Hill CBE
Non-Executive
to 31 May 2020



Tracey Matthews
Non-Executive
from 1 June 2020



Sir Simon Lister
Non-Executive



Sarika Patel
Non-Executive



Adrienne Kelbie
Chief Executive



Mark Foy
Chief Nuclear Inspector



Sarah High
Finance Director



Dave Caton
HR Director

Senior Leadership Team



Mark Foy
Chief Nuclear Inspector



Katie Day
Policy and Communications Director



Mike Finnerty
New Reactors Director
Deputy Chief Nuclear Inspector



Dave Caton
HR Director



Adrienne Kelbie
Chief Executive



Donald Urquhart
Operating Facilities Director
Deputy Chief Nuclear Inspector



Sarah High
Finance Director



Dr Mina Golshan
Sellafield, Decommissioning, Fuel and Waste Director
Deputy Chief Nuclear Inspector



Dr Anthony Hart
Technical Director
Deputy Chief Nuclear Inspector



Paul Fyfe
Security and Safeguards Director
Deputy Chief Nuclear Inspector

4 Our strategic themes and key activities



Strategic Theme 1:

Influencing proportionate improvements



“Our top priority is the delivery of our core statutory purposes, holding dutyholders to account on behalf of the public.”

- 4.1 Our top priority is the delivery of our core statutory purposes, holding dutyholders to account on behalf of the public. During the COVID-19 pandemic that means continuing to seek assurances that site licencees and other dutyholders are adequately resourced to safely and securely carry out their activities, particularly around staffing levels and contingency arrangements. As the external situation evolves, we will ensure our regulation remains effective to respond to the different impacts for our dutyholders.
- 4.2 We will support national efforts during the pandemic by ensuring that public health measures are being observed at licensed nuclear sites. We expect the UK’s nuclear industry to continue to make responsible decisions as it responds to the challenges of the pandemic, reducing risks as appropriate, in line with public health guidance. We will continue to work closely with industry to get the necessary assurances on the adequacy of the measures implemented. If appropriate, we will consider the need for enforcement action, in line with our Enforcement Policy Statement.
- 4.3 Alongside our response to the pandemic, our core regulatory focus remains to deliver proportionate, targeted and balanced decisions that take a long-term view of the safety and security challenges of the UK nuclear industry and support growth. Our Security Assessment Principles (SyAPs) apply the same regulatory approach as our Safety Assessment Principles (SAPs), and we expect to have all new site security plans approved this year.

4.4 Our CNI's first **Annual Report** on Great Britain's nuclear industry identified three overarching themes that merited increased industry attention over the coming years, and to which we will provide focus in 2020/21:

i Sustainable programmes for management of ageing facilities:

There are significant challenges associated with regulating ageing facilities and infrastructure approaching the end of operational life. We intend to undertake the second CNI "themed" inspection, which will concentrate on non-power generating plant facilities across Sellafield and defence sites.

ii Conventional Health and Safety (CHS) performance:

Certain sectors of the industry have experienced a reduction in performance in this area. During this year, we will fully integrate ONR's CHS function into our wider operational delivery function to improve our regulation and maximise efficiency.

iii Realising the benefits of SyAPs to deliver a holistic approach to security.

The implementation of SyAPs will enable us to apply an outcome-based approach to nuclear security regulation. We will also work closely with the Department for Business, Energy and Industrial Strategy (BEIS) to review Nuclear Industry Security Regulations 2003, in order to embed outcome-focused regulation.

4.5 As ever, we will continue to focus on areas that pose the greatest risk, in particular those sites receiving enhanced and significantly enhanced regulatory attention, with Sellafield continuing to be one of our top regulatory priorities.

Our regulatory attention during 2020/21

4.6 The scope of our regulatory activities is informed by a number of factors, including the regulatory attention levels assigned to the sites. The attention level assigned for each site is based on its performance over

the past year and our understanding of the challenges faced, reflecting hazards and risks. It also reflects an overall judgement across nuclear safety, CHS, security and transport purposes. This is reported in our CNI's annual report.

4.7 Last year, we implemented a new framework for assigning regulatory attention levels at sites and on dutyholders. This year, we will refine the framework to align with approaches used by other UK and international regulators.

Table 1: 2020/21 Regulatory attention levels for licensed sites and other dutyholders

Regulatory attention	Licensed site
Significantly enhanced	Sellafield – First Generation Magnox Storage Pond, Magnox Swarf Storage Silo; Pile Fuel Cladding Silo and Special Nuclear Materials Facilities
	Sellafield – Overall Site Security (Sellafield Ltd)
Enhanced	Atomic Weapons Establishment, Aldermaston & Burghfield (AWE plc)
	Sellafield – Remainder of estate (Sellafield Ltd)
	Devonport Royal Dockyard Limited
	Hunterston B (EDF Energy Nuclear Generation Ltd)
Routine	Dungeness B (EDF Energy Nuclear Generation Ltd)
	Dounreay Site Restoration Limited (Moved from Enhanced in March 2020)
	All other licensed sites

Table 2: 2020/21 Regulatory attention levels for security dutyholders

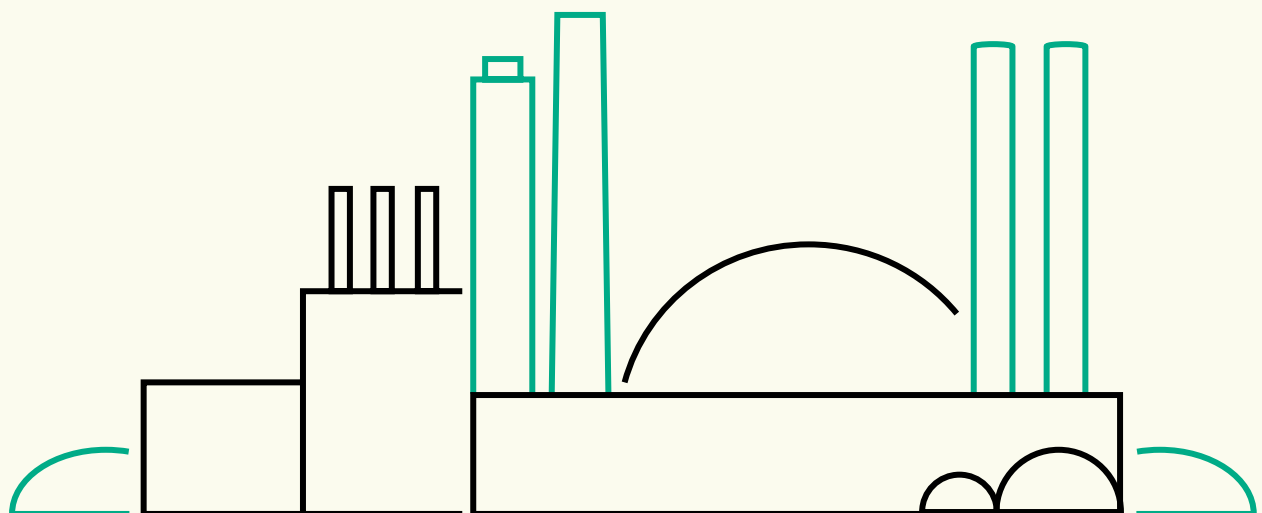
Regulatory attention	Security Dutyholder
Significantly enhanced	Sellafield site (overall)
Enhanced	Dounreay Site Restoration Limited (including Transport)
	Magnox (Corporate)
	Harwell – Research Sites Restoration Limited
Routine (All moved from enhanced)	National Nuclear Laboratory (Windscale)
	Direct Rail Services Ltd
	Geodis UK Ltd
	Canberra (Tenant on Harwell site)
	TN International Orano
	EDF Energy Nuclear Generation Ltd (Corporate)

Strategic Theme 1 priorities for 2020/21

***Priority 1:** Maintain delivery of our core regulatory functions, holding dutyholders to account on behalf of the public. This will include targeted regulatory oversight of progress at ‘Enhanced Attention’ sites and assurance on safety and security in light of the COVID-19 pandemic.*

New Reactors

- 4.8 At the Hinkley Point C construction site, we will continue to regulate key project milestones through our programme of interventions.
- 4.9 We will engage with stakeholders about the proposed new nuclear reactor at Sizewell C, using alternative methods while COVID-19 restrictions remain in place. Over the next year, we expect to receive NNB Genco’s application for a nuclear site licence for Sizewell C, the first formal stage of our regulatory assessment of the proposed project.





- 4.10 We began Step 4 of the UK HPR1000 Generic Design Assessment (GDA) in February 2020. This provides confidence that the proposed generic reactor design is capable of being constructed, operated and decommissioned to the standards of safety, security and environmental protection required. Through Step 4, we will conduct an in-depth assessment of the evidence provided by the Requesting Party (in this case, General Nuclear Systems Ltd) to support and form the basis of its safety and security cases.
- 4.11 At Bradwell, we will focus our efforts on ensuring that Bradwell B GenCo obtains a clear understanding of our regulatory expectations for licensing nuclear power plants. These include organisational development expectations in order to become a capable licensee in the future.
- 4.12 Our regular engagement with stakeholders around the prospective site, including with local campaign groups and local authorities, remains integral to our work. While we may need to deploy different communication methods during the pandemic, we are committed to continue proactive engagement.

- 4.13 The government has committed additional funding for a further two years to develop our regulatory capability in advanced nuclear technologies. We will build on work already undertaken to revise our safety assessment principles and technical inspection and assessment guidance to cover advanced modular reactors (AMRs) and small modular reactors (SMRs). We will engage with the small number of potential vendors, to enable understanding of our expectations, in anticipation of a government request to support and form the basis of its safety and security cases.

Operating Facilities

- 4.14 We will continue to give enhanced regulatory attention to Dungeness B in light of a range of ageing management issues, and to Hunterston B, given the ageing graphite reactor cores. We will make decisions on any restart – or otherwise – of the two reactors at Hunterston B, as well as on the future operation at Hinkley Point B, based on the adequacy of safety cases provided by the licensee. We will also increase our focus on preparations that will in future enable effective and safe transition of the ageing Advanced Gas-cooled Reactor (AGR) fleet from operational state to defuelling.

4.15 We will provide regulatory oversight of proposals from EDF to transform its corporate support function, to recognise the changing operating environment, including the approach to end of life of AGR reactors.

4.16 At the licensed defence sites, we will continue to give enhanced regulatory attention to Devonport Royal Dockyard and the AWE Aldermaston and Burghfield sites, but will consider the potential of returning Devonport Royal Naval Dockyard to routine regulatory attention. We will focus on the wide range of safety case submissions expected this year, including the MENSA facility at Burghfield, and Astute docking capability and submarine defueling at Devonport.

Sellafield

4.17 Accelerating hazard and risk reduction at Sellafield remains a significant regulatory focus, in particular enabling early retrievals from the legacy silos. To achieve this, we will continue our regulatory assessment of the design and safety case for the Box Encapsulation Plant, which will receive some of the retrieved waste.

4.18 Following successful completion of the Dounreay Exotics Consolidation Programme, the focus is now on safe, long-term storage of special nuclear material at the Sellafield site. Therefore this year, we'll maintain enhanced regulatory attention on related activities and facilities.

4.19 We will also provide regulatory oversight of Sellafield Limited's plan for organisational change following cessation of Magnox reprocessing.

4.20 We will seek assurance on the robustness of Sellafield's security structures and processes, particularly in relation to the remaining elements of the Sellafield Security Enhancement Programme. We will also monitor Sellafield's progress against the expectations laid out in its site security plan.

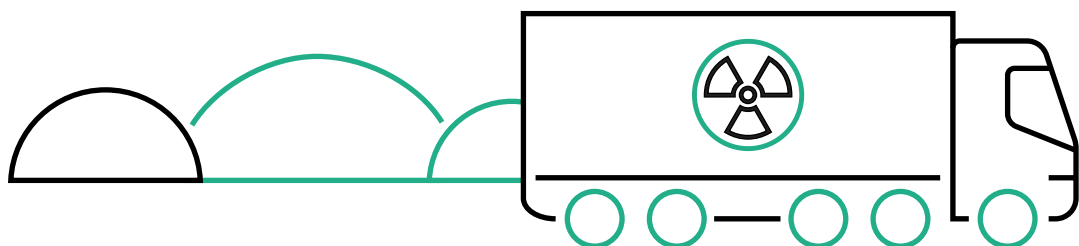
Decommissioning, Fuel and Waste (DFW)

4.21 We will focus on proportionate regulation of hazard and risk reduction activities across Nuclear Decommissioning Authority (NDA) – owned decommissioning sites.

4.22 In preparation for a future geological disposal facility, we expect to complete our work revising the definition of bulk quantities to provide a clear interpretation in the context of storage and disposal, which will inform the licensing framework. We also expect to consult with stakeholders on the revised definition.

Technical Division

4.23 In May 2020, the implementation period for the Radiation Emergency Preparedness and Public Information Regulations (REPPPIR) 2019 drew to a close. Our Emergency Preparedness and Response function will inspect local authority arrangements for off-site nuclear emergencies. We will do similar for the amended Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (CDG) 2009, learning lessons as the regulations are applied.



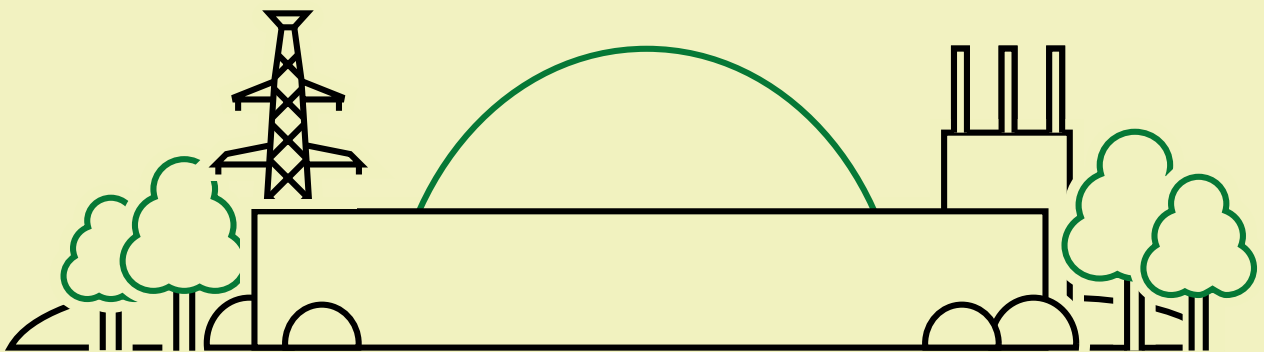
- 4.24 We will update our management systems to consider the cost impact of our regulatory decisions more explicitly. This will align with government expectations for reporting against the Growth Duty, as set out in the White Paper on the Regulation of the Fourth Industrial Revolution. This will form part of our ongoing work to review the overall structure and management arrangements for our regulatory assessment and inspection guides, to improve their accessibility and alignment with the duties to which they pertain. Our guidance, as it is amended and updated, is available on our website.
- 4.25 We will implement our research strategy, which outlines our research objectives, approach to delivery, and seeks better ways of measuring the effectiveness of the research we commission. The focus this year is on supporting our inspectors to exercise regulatory judgement effectively and confidently, and will benchmark our research through the CNI's Independent Advisory Panel.
- 4.26 After reviewing our regulation of 'direct shine radiation' doses to the public (the ionizing radiation emitted by a nuclear facility indirectly through reflection and scattering), we will provide greater focus on inspecting licensee arrangements, working with the industry to develop good practice guidance, and bring arrangements around Scottish sites in line with those adopted in England and Wales.
- 4.27 Our aim this year is to approve all major dutyholders to have SyAPs-aligned security plans. This will allow us to assess the benefits the new regime brings for dutyholders and the public. It will also enable us to transition outcome-focused security regulation fully into our routine regulatory business. This is a key step towards enhancing operational co-ordination, collaboration and integration across our purposes, allowing us to pilot an integrated compliance inspection for the first time by end of 2020/21.
- 4.28 The UK SSAC project phase concludes on 31 December 2020 and we anticipate transition to our Civil Nuclear Security and Safeguards Division, from September 2020. We expect to assume our safeguards and nuclear material accountancy duties from 1 January 2021, after the transition period laid out in the Withdrawal Agreement.

“Our aim this year is to approve all major dutyholders to have SyAPs-aligned security plans. This will allow us to assess the benefits the new regime brings for dutyholders and the public.”

Priority 2: *Deliver an effective UK State System of Accountancy for, and Control of, Nuclear Material (SSAC) and implementation of Security Assessment Principles (SyAPs) across all dutyholders.*

Our mission

is to protect society
by securing safe
nuclear operations



Strategic Theme 2:

Inspiring stakeholder confidence



“We engage with – and learn from – a diverse range of individuals and groups”

- 4.29 Inspiring stakeholder confidence and our public service ethos underpin how we work. We engage with – and learn from – a diverse range of individuals and groups, and aim to be an exemplar of openness and transparency.
- 4.30 We already welcome diverse perspectives, including interested communities and academics, work collaboratively and constructively with government to inform policy, and strive to make our information even more accessible. This year we will develop the structures to begin to deliver on the aspiration set out in our Strategy 2020-2025 to be an exemplar of transparency, while continuing our established programme of proactive engagement and publication of information.
- 4.31 We will explain how we are responding to COVID-19, from our regulatory activities to supporting our staff, in line with public health guidelines.

Strategic Theme 2 priorities for 2020/21

Priority 3: *Enhance transparency through our stakeholder engagement, in line with the aspirations of our Strategy 2020-2025, to enable effective two-way communications, particularly as we respond to COVID-19.*

- 4.32 To support our Strategy 2020-2025, we are developing a five-year stakeholder engagement strategy setting out our ambitions for excellence in our communications and engagement. This will set the tone for work beyond this year to better define our domestic stakeholder programme, including how we will inform the government’s climate change and net zero policies, and how we’ll collaborate and learn from those we engage with, such as other regulators, to improve our effectiveness.



4.33 Taking into account the limitations of physical engagement due to COVID-19, we will refresh our Strategic Framework for International Engagement, which sets how we will advance nuclear safety standards and practice through our influence and advice, and learn from others to improve our own work, in particular following EU Exit. A key international commitment will be delivery of the UK Report for the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management.

4.34 We will continue our constructive work with NGO groups, including our regular forums with local and national interest groups, although we expect to deploy different communication methods while restrictions continue. We will ensure we explain our role in the regulation of external hazards more clearly to provide stakeholder confidence in our work in relation to climate change.

- 4.35 We will develop a strategic and consistent approach to widen and diversify the stakeholders we engage with, focussing this year on academia and professional bodies. Our intention is to further strengthen and broaden our relationship with academic institutions to inform capability, research and decisions in the future.
- 4.36 We are committed to leading the way in how we make information widely accessible, and explaining our decisions to the public. That means writing in plain English, and optimising digital channels to enhance visibility of what we do and why we do it. This year, we will set out our approach to be an exemplar of openness and transparency, aligning with the expectations in the Regulators' Code and the Nuclear Energy Agency's (NEA) Characteristics of an Effective Nuclear Regulator, and utilising feedback from interested parties.
- 4.37 Our approach to greater transparency will include exploring the opportunities for increased public consultation on key regulatory decisions. Drawing on international good practice, and learning from other domestic regulators, we will formulate early proposals on how this will be implemented. We already consult on many aspects of our work, so the focus will be on an approach for significant regulatory decisions.
- 4.38 We expect the International Atomic Energy Agency (IAEA) report on the Integrated Regulatory Review Service (IRRS) on the UK mission (that took place in 2019) to be published shortly. We have already developed an action plan to address the findings from the mission. Some of the findings will take several years to address, where solutions require time to develop, or where they relate to multiple regulators. We will provide the government with technical advice for its co-ordinated response to the IAEA findings.
- 4.39 In Autumn 2020, we will publish our second CNI report, and expect to engage with industry to discuss the key themes and findings. The report will present more clarity on the trajectory of sites and dutyholders receiving enhanced levels of regulatory attention.
- 4.40 We will continue to engage with the industry Safety Directors' Forum and its associated committees on industry-wide matters, such as security, regulatory innovation, the economic impact of regulatory decisions, and developing good practice guidance on local site stakeholder groups and committees. We intend to outline our approach to innovation, to provide clarity on how we support and enable innovation, while maintaining high standards of safety and security.
- 4.41 Our Strategy 2020-2025 states our ambition to amend our charging model to increase the predictability of charges and income for dutyholders. During the year, we intend to seek industry and government feedback to inform options for our future charging model. It will take some time to develop proposals, and if required, formulate a new charging methodology. In the interim, we will consider short-term improvements within our current fees regulations.
- 4.42 Independent advice and feedback on current and potential issues that may be of regulatory significance is important to us, and the work of the CNI's Independent Advisory Panel will continue to provide independent advice to our CNI on topics of nuclear and regulatory interest. The Panel is comprised of academics, nuclear experts, other regulators and members of our NGO Forum.

Our vision

is to be a modern,
transparent regulator
delivering trusted
outcomes and value



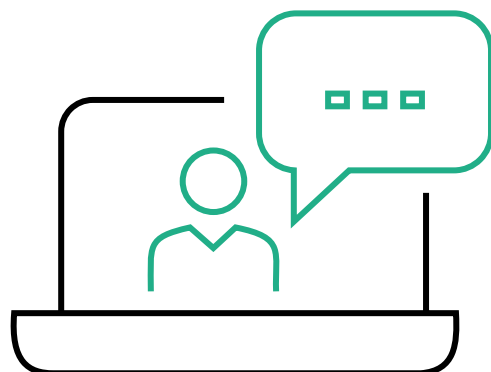
Strategic Theme 3:

Creating a culture of inclusion and excellence



“Our people are our greatest asset. Their wellbeing and physical and mental health is at the centre of our response to COVID-19 and we will continue to do all we can to support them.”

- 4.43 Our people are our greatest asset. Their wellbeing and physical and mental health is at the centre of our response to COVID-19 and we will continue to do all we can to support them. This includes additional wellbeing provisions, re-prioritisation of non-essential/non-urgent work, offering alternative ways of working and broader consideration of the impact of the pandemic on our people over time.
- 4.44 This year, working within the restrictions imposed upon us by the pandemic, we will progress the most essential people-related programmes and will continue our work to develop our staff to create a more inclusive, integrated and efficient workplace, in line with the ambitions of our Strategy 2020-2025.
- 4.45 We will continue to develop our leadership and management capability and begin work with our staff to embed our new organisational values that will establish our new cultural norms.
- 4.46 We will also work towards putting in place the right measures to retain our highly-motivated people and fully embrace diversity across the whole organisation, to meet our increasingly varied regulatory demand and develop a greater sense of personal and corporate responsibility.
- 4.47 We'll measure staff perceptions of our effectiveness in our next staff survey.

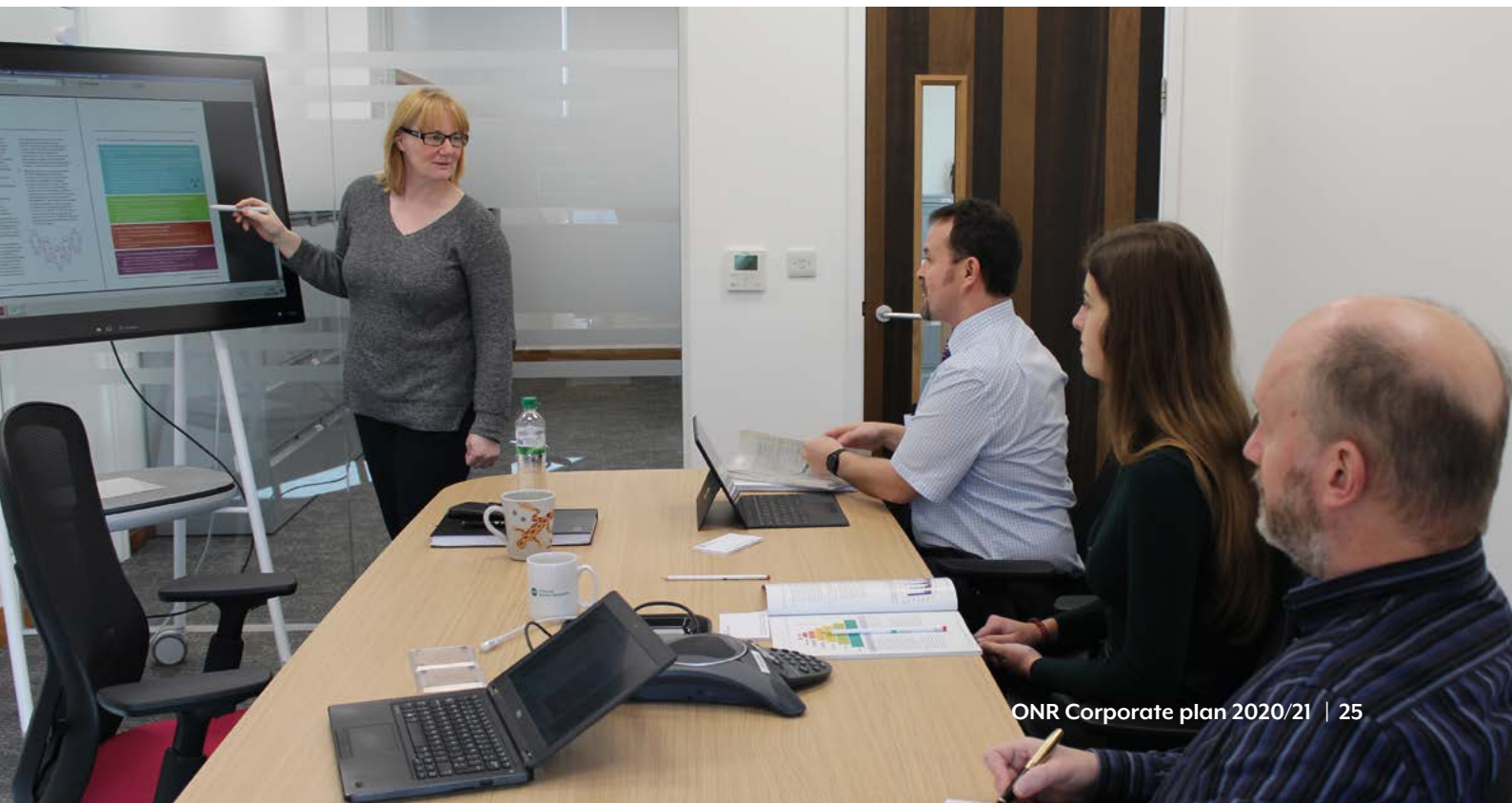


Strategic Theme 3 priorities for 2020/21

Priority 4: *Promote the sustained health and wellbeing of our staff through effective and inclusive leadership and management, as we respond to the COVID-19 pandemic.*

- 4.48 Our staff have responded remarkably to changes in ways of working as a result of the COVID-19 pandemic. Our leaders and managers have supported their teams through these challenging times and put staff wellbeing first. We will continue to invest in their development, so they have the best possible learning and tools to lead our organisation and manage staff successfully through this pandemic and beyond.
- 4.49 Our ONR Academy will remain a critical enabler of this. Much of our Academy content is already online, and we'll change the delivery method of more programmes this year to enable remote learning. We will focus on improving productivity and performance, role modelling behaviours, developing and empowering multi-disciplinary teams and leading our people effectively through change. We'll overlay this development with new succession planning and talent management processes.

- 4.50 We will enhance the leadership and management skills of our teams, supporting organisational development in the context of our new organisational values.
- 4.51 We intend to shape our internal communications and wider engagement around our new values, ensuring our staff understand how we will reinforce the behaviours needed to create a culture of both inclusion and excellence. The values will be aligned across all our policies and processes, including our performance management system. This will be reflected in a new holistic approach to manage performance and development, aligned to our values.
- 4.52 We want to improve awareness of our total "Employee Value" Proposition and will develop a new pay and recognition system to achieve greater accountability and support improved performance and efficiency, with new underpinning longer-term pay deal arrangements from 2021 onwards.



Accountable

We act with integrity and honour our commitments. We are accountable for our actions, behaviours and impact on others. We own our mistakes and learn from them. We ask for and offer help when needed.



Open-minded

We proactively seek new and innovative ways of working to help each other and ONR excel. We are open to ideas and feedback from our colleagues and stakeholders and take all opportunities to improve ourselves, our teams and our organisation.



Fair

We are inclusive and respect people for who they are. We welcome and value diverse perspectives, in and outside of ONR, and share our views openly and constructively. We make decisions fairly, based on the best, broadest available information. We recognise good performance and behaviour and address exceptions.



Supportive

We show that we care for each other and our stakeholders, making a positive difference to others' wellbeing and performance. We listen, trust each other and work together to harness our collective skills, knowledge and experience to make better decisions.



Strategic Theme 4:

Modernising how we work



“We intend to build on the good progress already made towards becoming a more efficient organisation, by starting to realise the benefits of recent and current investment in leaner, more streamlined and efficient processes.”

- 4.53 Despite pandemic restrictions, we intend to build on the good progress already made towards becoming a more efficient organisation, by starting to realise the benefits of recent and current investment in leaner, more streamlined and efficient processes. That means a keen focus now on the enablers that will drive our modernisation agenda over the next five years.
- 4.54 Consequently our priority in 2020/21 is on ensuring our systems remain effective and resilient for our staff to work effectively during COVID-19 restrictions; separating our IT infrastructure from the Health and Safety Executive’s system; and completing the groundwork to pilot our WIReD project. It is only by having those fundamental systems in place we can begin delivering efficiency benefits for our staff and stakeholders.
- 4.55 Modernising how we work in relation to our data management systems will continue, alongside our strategic enabler projects. We hold a substantial amount of information but better systems and tools will help us to optimise data analysis, insight and intelligence. As part of our IT modernisation in the longer term, we will use technology to deliver significant change in our use of management information to provide value, insight and intelligence and support our decision-making.
- 4.56 In the more immediate term, we will continue to deliver our improved Integrated Management System to manage our policies, processes and procedures. This will provide benefits for the organisation, particularly around delivering arrangements for measurement, assessment and continuous improvement.

- 4.57 Effective alignment of our project management support, processes, tools and templates is also essential to our modernisation. We will review our programme management effectiveness to understand how we can do better. This will enable us to improve the management of change, and inherent interdependencies between projects and programmes of work, to improve resource deployment and project sequencing.
- 4.58 We'll also refine our approach to measuring and presenting organisational impact and effectiveness through our Organisational Effectiveness Indicator (OEI) framework. This is key to providing assurance of the effectiveness of our regulatory strategies, and of our performance against stakeholder confidence factors, our people strategy and our modernisation programme.

- 4.59 Having the structures and systems in place to help us better balance demands on our workforce is important. This will enable us to be more joined-up across our regulatory purposes into the future. A new workforce planning tool will provide insight on the demand forecast, current workforce, supply forecast, gap analysis, scenarios planning and deployment options to support this work.
- 4.60 Since the onset of the pandemic, we've been using our incident management arrangements, and capturing learning to enhance our Integrated Incident Management Framework, business continuity plans and our ongoing response. We intend to review operational experience to inform longer term new ways of working.



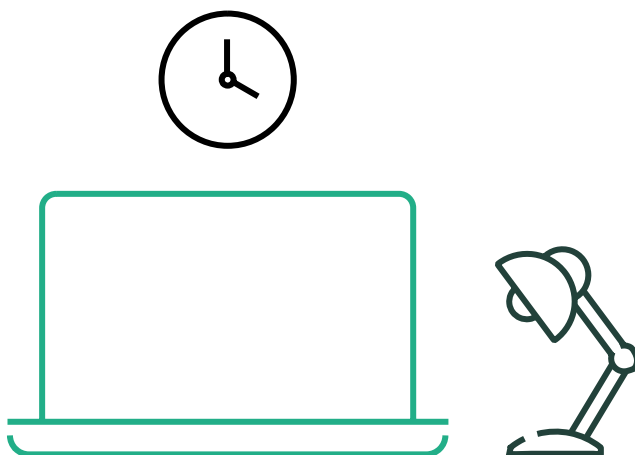
Strategic Theme 4 priorities for 2020/21

Priority 5: *Deliver our two strategic change projects - separating our IT infrastructure from the Health and Safety Executive and commencing a pilot of our Well Informed Regulatory Decisions (WIReD) project.*

- 4.61 In terms of our work this year, we intend to deliver our IT Separation project: separating our IT systems and data from the HSE IT network and establishing our own infrastructure and services. This will deliver multiple benefits including providing a robust, independent network infrastructure, delivering enhanced resilience and information management.
- 4.62 This is a key component of our IT strategy and modernisation programme. Delivery of IT Separation, will enable us to deliver new tools to improve our efficiency and effectiveness. This includes our WIReD project, which will improve regulatory processes, as well as other services such as online, real-time project and portfolio information, to help us monitor and report change activity more effectively.

- 4.63 Phase 2 of our WIReD project is expected to recommence in summer 2020, following a review to better optimise commercial arrangements and ensure that the project continues to represent value for money. This second phase will include completing the development of the software solution for the new system, and associated user acceptance testing. This will be followed by a pilot in early 2021. This pilot is an essential precursor to successful roll-out across ONR. We'll continue to engage our industry stakeholders as the project evolves, with particular focus on how they will access and interact with ONR using the new dutyholder portal.

“In terms of our work this year, we intend to deliver our IT Separation project: separating our IT systems and data from the HSE IT network and establishing our own infrastructure and services.”



- 5.1 Performance against this plan will be regularly reported to our Board, to the Department for Work and Pensions (DWP), our sponsorship body, and to BEIS via our Quarterly Assurance Reviews, and to the public on an annual basis through our Annual Report and Accounts with a focus on:
- how effectively we influenced proportionate improvements through dutyholders across all our purposes;
 - how we delivered the principles of the UK Regulators' Code;
 - whether we have operated efficiently and delivered value for money;
 - whether we met our key performance indicators; and
 - how we have performed against our plan.

Our corporate milestones

- 5.2 Our corporate milestones are outlined at Appendix A.

Our Organisational Effectiveness Indicators

- 5.3 Our Organisational Effective Indicators (OEI), implemented last year, provide the foundations for a modern, fit-for-purpose framework supplanting our output-focussed and efficiency-based key performance indicators. The OEIs are based upon the NEA's ten characteristics of an effective nuclear regulator and are aligned against our four strategic themes.

- 5.4 They provide a broad evidence base in order for us to assure our Board, government and the public of the efficiency and effectiveness of our regulation and wider organisational impact. Each of the ten characteristics are supported by performance indicators, the consolidation of which indicates the extent our performance outcomes have been achieved.
- 5.5 Many of our international peers have shown a keen interest in our work on the framework. We'll continue to share our learning with others and develop the framework.

“Our Organisational Effective Indicators (OEI), implemented last year, provide the foundations for a modern, fit-for-purpose framework.”



OEI Framework – characteristics of an effective regulator



Strategic Theme 1: *Influencing proportionate improvements*

- 1 We regulate in a timely and efficient manner.
- 2 We make consistent, balanced and proportionate regulatory decisions.
- 3 We focus our attention on the safety and security performance of sites receiving enhanced levels of regulatory attention.



Strategic Theme 2: *Inspiring stakeholder confidence*

- 4 We are open and transparent in our regulation and decisions.
- 5 Stakeholders and dutyholders are confident in our regulation of the industry.



Strategic Theme 3: *Creating a culture of inclusion and excellence*

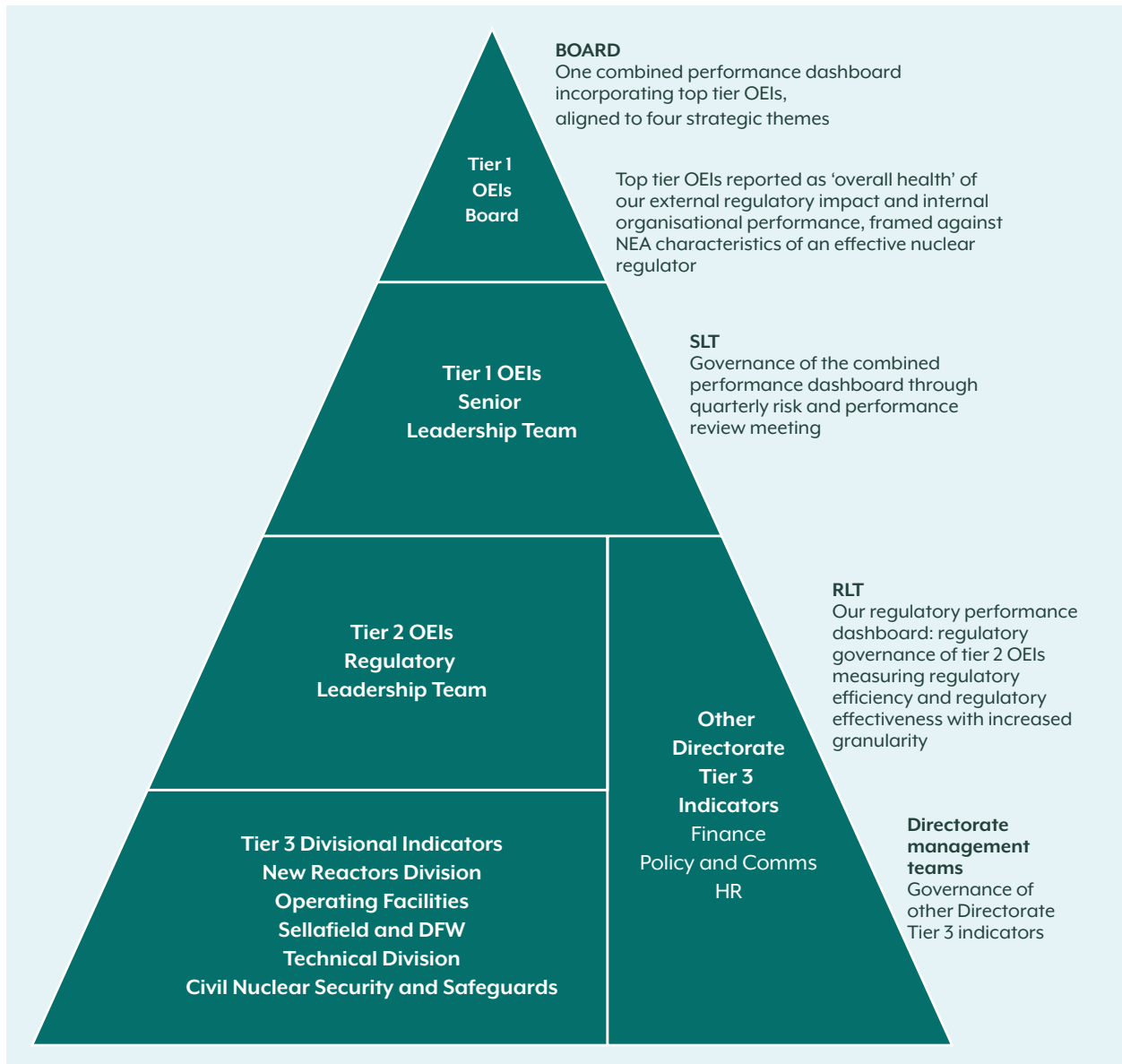
- 6 We have the necessary regulatory and wider technical competence to exercise our statutory functions.
- 7 We get the best out of and for our people.



Strategic Theme 4: *Modernising how we work*

- 8 We have the necessary business continuity and emergency response capability.
- 9 We strive for continuous improvement and a strong learning culture.
- 10 We have and maintain a strong organisational capability (people and systems) to equip ONR for the future.

5.6 Our tiered framework of OEs provides us with indicators set against each characteristic corresponding to their respective levels of oversight, accountability and governance.



6 Our resources



People

- 6.1 We are proud of our staff and their expertise, and the flexibility they've demonstrated as they adapt to changing circumstances. We've worked hard over the last five years to strengthen our capacity and capability.
- 6.2 We are not complacent though: Our Academy will continue to implement leaner approaches to learning, how we induct and develop our new and existing staff, improve our knowledge management, and introduce more online services.
- 6.3 We are already proactive in addressing mental health as part of our wider wellbeing approach, which has been integral to our support to staff since COVID-19 pandemic onset. We will implement our mental health strategy and action plan to complement our staff welfare activity to create a healthy and inclusive culture. We will continue to support managers and staff to understand and deal with stress, supporting work on resilience and using external tools to help us measure progress and implement best practice.
- 6.4 We have had a number of successes in increasing awareness and understanding of the importance of diversity and inclusion (D&I) as part of a healthy culture and effective decision making. Our contribution on D&I has been recognised through external accreditation from the National Equality Standard. This includes achieving Disability Confident Leader (Level 3), recognised externally as a commitment to disability inclusion.

- 6.5 We will undertake further work to embed and embrace D&I fully across ONR, focusing on those areas our staff and external accreditation processes have highlighted. These include securing more senior leader sponsorship to help our D&I group progress, and defining the employee value proposition referenced under Strategic Theme Three.

“We are proud of our staff and their expertise, and the flexibility they've demonstrated as they adapt to changing circumstances.”



Our commercial arrangements

- 6.6 We will ensure that our commercial arrangements continue to drive and add value from our existing contracts, and continue to engage with our suppliers to ensure they deliver to time, quality, scope and cost criteria within the contracts.
- 6.7 Our established Technical Support Framework (TSF) provides a modernised framework for procuring technical support. Where skilled resource is not available from within ONR, or where the recruitment of permanent staff would not deliver best value, we rely on Technical Support Contracts (TSCs). We'll continue to maximise and review the use of TSCs to secure value and to deliver efficiencies in our procurement.
- 6.8 Work in our New Reactors Division accounts for the majority of TSC-related spend. During this year, we expect a net increase in TSC demand, 80% of which will be associated with increasing levels of assessment during Step 4 of the Generic Design Assessment of the UK HPR1000 new reactor design.
- 6.9 We will begin to scope how delivery of our current outsourced services in HR, Finance and Procurement can work better for us after contracts expire in October 2023.

Funding

- 6.10 We are funded primarily by charges to the nuclear industry through cost recovery from dutyholders and charges to government for specific commissioned activities, together with grant funding from our sponsoring body, DWP, which is around 2% of our budget. The latter covers activities that we are not permitted to recover. For specific government commissioned activities, we intend to put in place a charging protocol for providing our expertise and advice, and we plan to begin our work to update our charging model (detailed in Strategic Theme two). We do expect the government to announce its plans for the future funding model for the domestic nuclear safeguards regime.

Budget 2020/21

- 6.11 The budget required to deliver our plan in 2020/21 is £91.9m. This is £0.4m (less than 0.5%) lower than our 2019/20 final outturn of £92.3m. The budget reflects regulatory assumptions agreed by our Board and government at Appendix B, as well as the resources necessary to deliver the commitments in this plan together with achievement of our corporate priorities and strategic intent as set out in our Strategy 2020-2025.





7 Strategic risks



7.1 We manage risk through clear lines of executive accountability and regular review and challenge by our Risk Improvement Group and Senior Leadership Team, subject to scrutiny by our Audit and Risk Assurance Committee (ARAC) and our Board. Our current strategic risks relate to:

- delivering efficient and effective regulation;
- information management practices and protective security systems to ensure we have established adequate and appropriate levels of security and control;
- cyber security and infrastructure and the need to establish our own independent network infrastructure;
- enhancing our organisational capability;
- change and/or uncertainty in policies relating to the context within which we operate, ensuring we are flexible, adaptable and capable to respond to changing environments and priorities;
- commercial oversight and delivery;
- ability to manage a portfolio of change;
- incident management;
- financial strategy – funding and charging; and
- responding to the COVID-19 pandemic.

7.2 We expect to revise our Risk Management Framework after the introduction of our automated risk management system during 2020/21, to reflect the impact of digital ways of working on the risk management process. This will also provide the opportunity to incorporate process improvements, including greater clarity around escalation and de-escalation processes.

“We manage risk through clear lines of executive accountability and regular review and challenge by our Risk Improvement Group and Senior Leadership Team, subject to scrutiny by our Audit and Risk Assurance Committee (ARAC) and our Board.”

2020/21 Risk appetite statement

7.3 Our appetite for particular risk areas depends on factors such as the likelihood of the risk occurring and the potential impact of the risk (before and after controls) on our strategic objectives. We also consider the interdependencies in our risk appetite across our functional areas; so we are cognisant of how risk impacts elsewhere within the organisation and consider the cumulative impact that may manifest as a result.

7.4 The following statements provide the context for making well considered decisions in particular areas and our Board expects decisions to be taken in line with the appetite it has determined. Where appropriate, we have assigned a classification in line with the HM Treasury risk appetite definitions listed below.

Classification	Description
Averse	Avoidance of risk and uncertainty in achievement of key deliverables or initiatives is paramount. Activities undertaken will only be those considered to carry virtually no inherent risk.
Minimalist	Predilection to undertake activities considered to be very safe in the achievement of key deliverables or initiatives. Activities will only be taken where they have a low degree of inherent risk. The associated potential for reward/pursuit of opportunity is not a key driver in selecting activities.
Cautious	Willing to accept/tolerate a degree of risk in selecting which activities to undertake to achieve key deliverables or initiatives, where we have identified scope to achieve significant reward and/or realise an opportunity. Activities undertaken may carry a high degree of inherent risk that is deemed controllable to a large extent.
Open	Undertakes activities by seeking to achieve a balance between a high likelihood of successful delivery and a high degree of reward and value for money. Activities themselves may potentially carry, or contribute to, a high degree of residual risk.
Hungry	Eager to be innovative and choose activities that focus on maximising opportunities (additional benefits and goals) and offering potentially very high reward, even if these activities carry a very high residual risk.

Regulatory

- 7.5 Our regulatory framework is mainly non-prescriptive and puts the responsibility on dutyholders to demonstrate that the level of risk has been reduced.
- 7.6 Our inspectors use guidance from a range of sources, including SAPs and our guidance on Risk Informed Decision making to ensure that risks are reduced as low as reasonably practicable (ALARP).
- 7.7 In interpreting the legal framework, we recognise that there is an element of risk in undertaking every activity (for example, we may accept an increase in short-term risk to enable accelerated risk reduction in the longer term), but we ensure that dutyholders can demonstrate these risks are adequately controlled, taking account of relevant factors and circumstances.

- 7.8 We are supportive and open to considering innovative technologies, however our risk appetite is largely cautious given the need for confidence that the safety and security benefits claimed can be achieved. For certain applications, given the importance of safety or security of the technology proposed, our risk appetite will remain minimalist.

Operational

- 7.9 From an operational perspective, we are open to considering new processes and ways of working to improve our efficiency and effectiveness, for example our WIRed project. However, our risk appetite in regard to development and implementation is cautious given the need to ensure there is adequate change control and confidence in business continuity throughout any transition. We continue to work closely with stakeholders in seeking feedback to inform and improve our operational effectiveness.

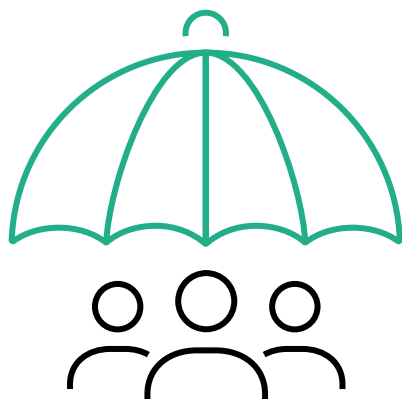


Reputational

- 7.10 The nuclear industry comes under close public scrutiny and our role as a regulator is equally open to challenge, which means protecting our reputation is important. It is one of our biggest assets and we will not tolerate unsolicited comments or behaviours that could be detrimental to our mission or adversely affect our reputation. To that end, we place significant corporate and regulatory effort on maintaining high levels of engagement with those we regulate, seeking regular feedback and providing assurance that we are effective, with a suitably qualified and experienced workforce, to make evidence-based regulatory decisions that will ensure the safety, security and safeguarding of the UK nuclear industry and the transport of nuclear materials and radioactive substances.
- 7.11 Our approach therefore to reputational risk is cautious given the significant attention we give activities across all our functions, to ensure we maintain (and improve where necessary) our positive reputation in the public domain.

People

- 7.12 Having a well-resourced, diverse, motivated and highly competent workforce is key to achieving our strategic vision. As a public body, we are accountable to the public and must demonstrate the highest standards of behaviour, integrity and values in how we discharge our duties.
- 7.13 To compete in an increasingly challenging and competitive global labour market for the scarce skills we need, we must ensure that we are open to how we recruit and develop our staff to access the skills and expertise that we need. This will include being willing to be innovative and challenging in how we create opportunities for development of leadership and management skills and how we build the resilience across ONR.
- 7.14 We will maintain a cautious approach to how we recognise and reward our staff, given the need to have due regard to **'Managing Public Money'** and related guidance on public sector pay policy, as well as the need to ensure appropriate costs of regulation.



Information governance and information/cyber security

- 7.15 Due to the ever present and inherent threat of loss of information, whether through unintentional or malicious internal and external factors, we have an averse appetite to risk in our information security and cyber security related activities.
- 7.16 In our information governance, we are keen to minimise disruption to our day to day business when introducing activities and controls that strengthen our compliance, and so therefore have a minimalist appetite for such risks.

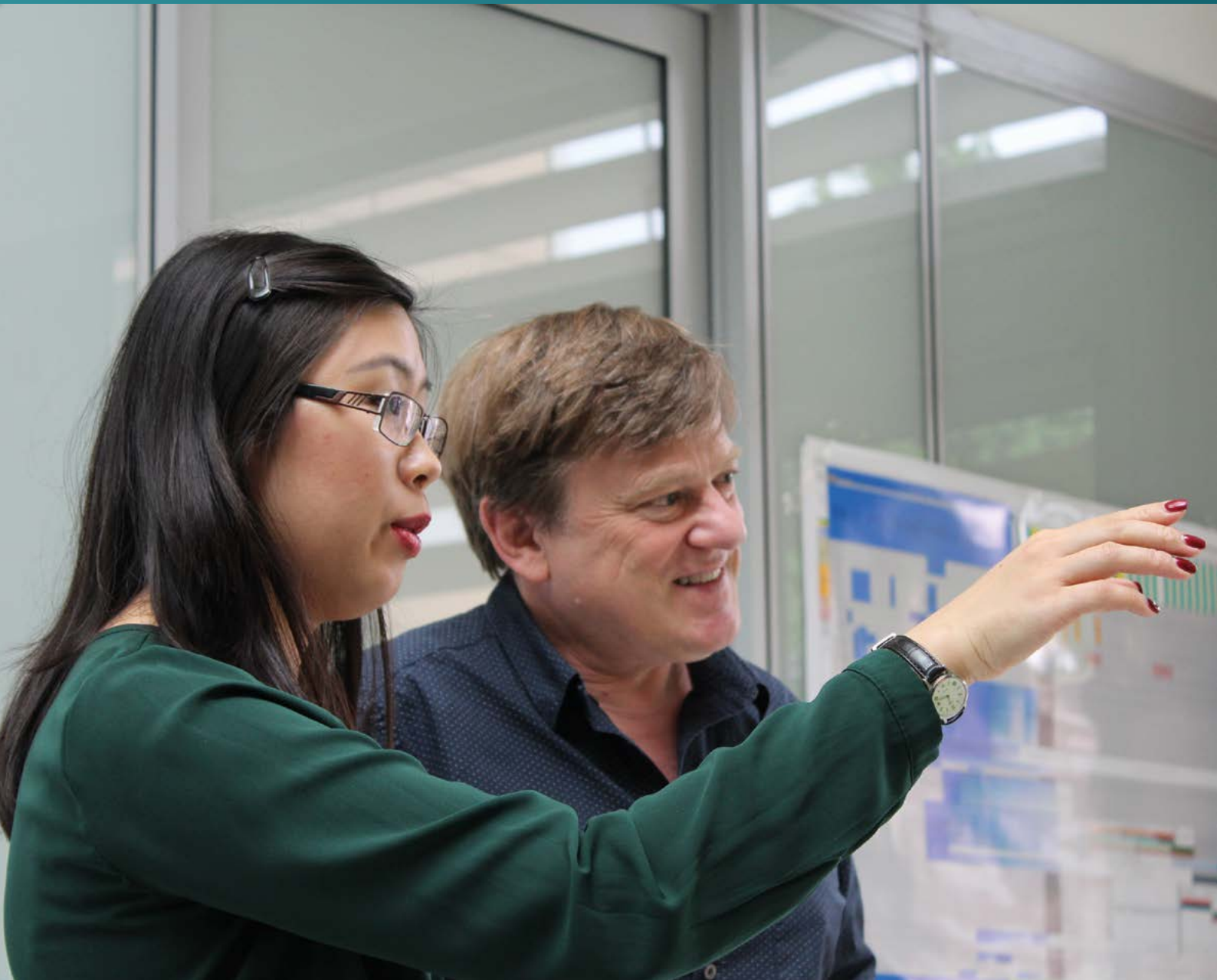
“As a public body, we are accountable to the public and must demonstrate the highest standards of behaviour, integrity and values in how we discharge our duties.”

Financial

- 7.17 We have established a robust budget-setting process that secures the funding required to support the efficient and effective delivery of our planned regulatory activity. All financial decisions will be taken to optimise value for money in the use of public funds, ensure appropriate compliance and eliminate the risk of loss to secure its long-term financial viability. Therefore, we have a minimalist appetite in respect of financial governance, management and control and will only consider exceeding these constraints if a financial response is required to mitigate risks associated with nuclear safety and security.
- 7.18 As a regulator, we aspire to be an exemplar in our compliance and legal standing. We are averse to the risks of internal fraud and fraudulent behaviour and will maintain appropriately robust controls and sanctions to maximise prevention, detection and deterrence of this type of behaviour.



8 Governance

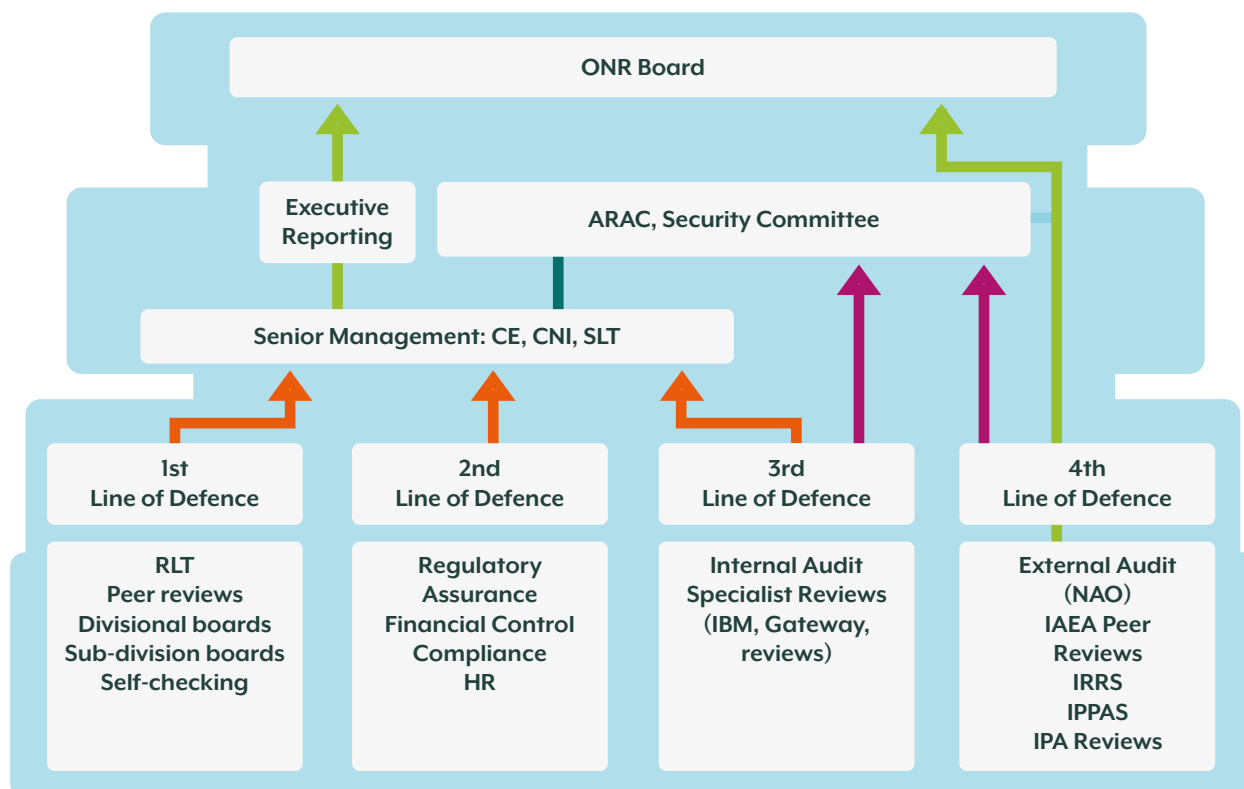


- 8.1 Our Board ensures effective arrangements in place for assurance, risk management and internal control. The Board composition is prescribed in the Energy Act 2013, and all Board members must act in the best interests of ONR and in accordance with the Seven Principles of Public Life. The **Framework Document** between ONR and DWP clarifies roles and responsibilities.
- 8.2 The Board receives robust and consistent assurance across all our purposes and activities. It is supported by three committees: the Audit and Risk Assurance Committee; Security Committee; and the Nominations and Remuneration Committee.

Integrated Audit and Assurance Framework

- 8.3 Our Integrated Audit and Assurance Framework provides a single integrated framework for managing our audit and assurance activity, introducing standard reporting and control disciplines aligned with the Treasury’s Three Lines of Defence model. It is summarised in Figure 1 and includes a fourth line of defence to demonstrate the additional assurance derived over and above the Treasury’s Assurance Frameworks model, from external sources, including the National Audit Office and international peer review.
- 8.4 Our Audit and Assurance function provides an assurance rating from our activities to our Board, its committees, as well as our Chief Executive, CNI and Senior Leadership Team. All assurance activities are deliberately independent of our operations to ensure that all ratings are objective and are reported as such.

Figure 1 – ONR Integrated Audit and Assurance Framework



9

Conclusion





- 9.1 By March 2021, we will have made good progress to delivering our operational responsibilities and our 2025 strategic intent.



To our licensees and dutyholders, we will:

- be open to innovation in both how and what we regulate;
- systematically seek and use inspection and intervention feedback to improve our impact;
- provide greater clarity about the costs of our regulatory decisions;
- seek more learning from UK and international organisations to improve the outcomes we influence and ensure no unnecessary regulatory burden;
- act as an enabling regulator consistently across industry;
- be more efficient and effective.

To our people, we will:

- display a culture that reflects our values;
- provide enhanced leadership and management capabilities;
- work consistently across disciplines;
- develop a model of feedback and response;
- achieve the benefits of change.

To the public, ministers and government, we will:

- continue to hold the nuclear industry to account, including taking robust enforcement action where appropriate;
- proactively publish clear, accessible information and engage openly and constructively;
- inform government on nuclear policy;
- enhance our use of academic research to inform our regulation.

10 Appendices





Appendix A – Corporate Milestone Plan 2020/21

	Quarter 1			Quarter 2		
	Apr 20	May 20	Jun 20	Jul 20	Aug 20	Sep 20
Influencing proportionate improvements					<ul style="list-style-type: none"> ONR Safeguards regulatory guidance submitted for internal approval 	
Inspiring stakeholder confidence		<ul style="list-style-type: none"> Lay and publish ONR 2025 Strategy 	<ul style="list-style-type: none"> Lay and publish ONR Corporate Plan 2020/21 Publish updated Scheme of Delegation Publish report on approach to regulation of innovation 	<ul style="list-style-type: none"> Lay and Publish ONR Annual Report and Accounts 2019/20 Publish Regulators Code Self Assessment 2019/20 	<ul style="list-style-type: none"> Submit 7th UK Joint Convention Report for BEIS 	<ul style="list-style-type: none"> Publish Stakeholder Engagement Strategy
Creating a culture of inclusion and excellence			<ul style="list-style-type: none"> Launch new Mental Health Strategy Launch Diversity and Inclusion plan 	<ul style="list-style-type: none"> Launch new ONR values 		
Modernising how we work						

Quarter 3			Quarter 4		
Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21
		<ul style="list-style-type: none"> Complete Assessment all required SyAPs-aligned security plans 	<ul style="list-style-type: none"> ONR formally taking on its Safeguards Regulatory function Make decision – permission Heysham 1 Reactor start up following statutory outage 		<ul style="list-style-type: none"> Make decision – permission for commencement of construction & installation of the additional plant to enable full retrieval at PFCS Make decision – readiness of DRDL to move to routine regulatory attention Make decision – permission for the start of bulk installation of MEH Systems at Hinkley Point C Undertake a review of NNB GenCoS Readiness to apply for a Nuclear site licence for SZC
<ul style="list-style-type: none"> Publish Chief Nuclear Inspector's Annual Report 2020 	<ul style="list-style-type: none"> Conduct Annual Stakeholder Survey 	<ul style="list-style-type: none"> Publish updated Strategic Framework for International Engagement 			<ul style="list-style-type: none"> Publish report on CNI themed inspection on ageing management of non-NPP sites Publish update to ONR guidance on regulatory attention levels Consult on draft openness and transparency framework.
	<ul style="list-style-type: none"> Commence pay negotiations 		<ul style="list-style-type: none"> Conduct staff survey Shaping ONR – Leadership event 		<ul style="list-style-type: none"> Implement new pay deal
<ul style="list-style-type: none"> Commence user acceptance testing of WIReD 		<ul style="list-style-type: none"> Complete IT Separation project Complete transition of the UK SSAC project into CNSS 			<ul style="list-style-type: none"> Commence WIReD stage 1 pilot

Appendix B - ONR Regulatory Planning Assumptions 2020/21

1	There are no nuclear events within the UK or overseas which undermine or result in a significant change to Regulatory Directorate's planned work programmes.
2	Government policy in support of UK civil nuclear power remains positive.
3	Programmes to construct and commission new power reactors (currently the EPR at Hinkley Point, a potential second at Sizewell, and HPR 1000 proposed at Bradwell) proceed at declared rates, and no significant safety or security concerns emerge.
4	The shutdown dates of the existing AGR fleet occur in accordance with EDF's declared plan.
5	No new life-limiting factors emerge in the UK's fleet of AGRs and the single Pressurised Water Reactor at Sizewell that affect the resources that ONR deploys to this area.
6	ONR will continue to build its regulatory capacity and capability to deliver a domestic safeguards regime equivalent in effectiveness and coverage of Euratom by December 2020, so it is ready to become the UK nuclear safeguards regulator at the end of the transition period as laid out in the Withdrawal Agreement.
7	With the exception of nuclear safeguards, there will be no significant impact on the UK regulatory framework following the transition period.
8	Government's policy, programme and contracting model for the current nuclear submarine fleet, 'laid up' submarines, the new build Dreadnought class and the associated strategic weapon capabilities remain unchanged for the next two years.
9	The regulatory framework and division of responsibilities between ONR and Defence Nuclear Safety Regulator (DNSR) for the regulation of the defence sector remains unchanged.
10	There is no change to the level of ONR support to the Government's SMR and ANT work programmes, beyond the phase two funding which will support further capability and up to two GDA assessments within the next 12 months.
11	There are no significant nuclear security breaches or changes in policy to national security requirements that would undermine the security arrangements currently in place.
12	There will be no change to the scope of ONR's vires to regulate security and we will continue to support the government on the Convention on the Physical Protection of Nuclear Material and its Amendment.
13	Following the cessation of reprocessing at THORP, its pond will be used for long-term interim storage of spent fuel from AGRs on site at Sellafield. The Magnox fuel reprocessing capability will continue to operate safely to NDA's declared timelines, ensuring that the agreed volume of Magnox spent fuel is reprocessed.

14	With the permanent shutdown of THORP and pending conclusion of Magnox reprocessing at Sellafield, the licensee's attention will be focused on major organisational change to bring enhanced focus on hazard remediation and decommissioning.
15	Accelerating the hazard and risk reduction programmes at Sellafield will continue and progress to address them will remain a Government priority which includes enabling the NDA to secure the necessary investments to deliver these major projects.
16	Materials consolidation between Dounreay and Sellafield will remain a high Government priority.
17	Work to develop a UK policy for plutonium stocks will continue to explore options.
18	Government remains committed to a Geological Disposal Facility and the process for siting will proceed as planned.
19	ONR can continue to be able to recruit or deploy (including through our Technical Support Contracts) niche skills, in areas such as cyber security and supply chain, to meet regulatory demand.
20	ONR's work to support the UK's international commitments (e.g., IAEA standards, conventions, missions and international event reporting) remains at current levels in line with our Strategic Framework for International Engagement.
21	New Radiation Emergency Preparedness and Public Information Regulations (REPPiR) came into force in May 2019, with full implementation required by May 2020. ONR will allow sufficient resources to regulate REPPiR and support dutyholders through this transition period and into a business as usual phase.
22	The industry's response to the Nuclear Sector Deal continues to evolve, but there will be no new significant requests of ONR, beyond planned activities to support innovation (as set out in ONR's forthcoming publication on innovation).
23	ONR will provide ongoing technical and regulatory policy advice as the government's proposal for a Regulated Asset Base Model for nuclear develops, ensuring that safety and security remain paramount, but there will be no change to our vires or regulatory programme in the next 12 months.
24	ONR will work alongside government to inform an effective Post Implementation Review of the Energy Act 2013, as required in law.

