

RWM

Health, Safety, Security, Environment and Quality Strategy 2020–2025

September 2020

Summary

We are Radioactive Waste Management (RWM), part of the NDA Group, working on behalf of the public to deliver geological disposal and provide radioactive waste management solutions. We support industry to store higher activity radioactive waste in a passively safe form, pending the availability of a geological disposal facility. Geological disposal will then provide a permanent and safe, secure and sustainable solution for its long-term management. We need to bring this about in a way that protects both people and the environment. To do this, over the next five years we will focus on: achieving sustained excellence in health, safety, security and environmental performance; supporting safe, secure and sustainable radioactive waste management and disposal; and developing the capability to undertake site characterisation and disposal system development safely, securely and sustainably.

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1. Introduction

- 1.1** Radioactive Waste Management Limited (RWM) issued its first Health, Safety, Security, Environment and Quality Strategy in 2015 following Company formation in 2014.
- 1.2** In 2019 RWM updated its overarching Corporate Strategy reflecting the start of a new phase in our programme to implement geological disposal for higher activity radioactive waste; this being the launch of the process to find a suitable site for, and community willing to host, a geological disposal facility (GDF).
- 1.3** This document sets out our updated Health, Safety, Security, Environment and Quality Strategy in support of our new Corporate Strategy.

RWM vision

A safer future by managing radioactive waste effectively, to protect people and the environment.

RWM mission

Deliver a geological disposal facility and provide radioactive waste management solutions.

- 1.4** Health, safety, security and protection of the environment are of overriding priority to achieve our vision and mission. To reflect this, we have four values which describe the kind of organisation we both strive, and need, to be. Our primary value is Safe.

RWM values

Safe

We are committed to achieving the highest standards of safety, security and environmental protection.

Professional

We are experts in our field, acting with integrity and efficiency to deliver the best solutions.

Engaging

We are open and communicate in a straightforward way that enhances understanding and encourages engagement.

Learning

We continuously learn, share knowledge and build strong mutually beneficial relationships.

¹Radioactive Waste Management, Corporate Strategy 2019.

2. Why we have updated this strategy

- 2.1** We need an up-to-date Health, Safety, Security, Environment and Quality (HSSEQ) Strategy that reflects the launch of the GDF siting process. The hazards, impacts and risks that we will have to effectively manage and the associated regulatory regimes are evolving, and our operating context has also changed.
- 2.2** RWM provides advice on the management of higher activity waste and nuclear materials which facilitates their conversion into passively safe forms as soon as practicable, while aiming to avoid the need for further conditioning or repackaging prior to geological disposal at some time in the future. Geological disposal is a permanent and safe, secure and sustainable solution for the long-term management of higher activity radioactive waste. It removes the burden on future generations to actively manage that waste. Our work also helps ensure there will be a disposal solution for wastes and spent nuclear fuel arising from any new nuclear power stations.
- 2.3** We have to deliver these overall outcomes in the right way. We will therefore continue to undertake our work taking full account of the health, safety, security and environmental implications for today, and for the future phases of our programme.
- 2.4** It is vital that communities and other stakeholders have confidence in our ability to meet the highest standards of health, safety, security and environmental protection and to meet their legitimate expectations of us. This means we must have strong, visible leadership and a mature health, safety, security, environment and quality culture where management systems are promoted, getting things right first time is valued and assurance welcomed.
- 2.5** As our engagement with stakeholders and communities increases, our staff may be travelling more, working in a more agile manner and personal safety and security and the security and resilience of information and communications systems will be an important consideration. It is essential we have a continued focus on effectively managing health (including mental health) and welfare, as well as more conventional safety aspects.
- 2.6** Our research, development and demonstration activities will be growing in scale, as will our supply chain, and our safety, security, environmental protection and quality arrangements need to evolve to match this.

- 2.7** We need to prepare for the major step changes that will occur as GDF programme moves into site characterisation and GDF development, and ultimately underground investigation and construction. We will develop the capability to obtain and comply with the required regulatory and land use planning permissions and consents. To address this, we expect to continue to grow as an organisation and to develop our supply chain. We will therefore have to maintain and develop the required safety, security, environmental and quality culture, while bringing in staff and organisations with diverse culture and experience.
- 2.8** We need to ensure value for money and proportionately respond to the requirements on us. So, while we are committed to achieving the highest standards of safety, security and environmental protection, we will avoid undue conservatism and complexity and be innovative where it adds value.
- 2.9** It will be a prerequisite that we embed sustainability into our ways of working and specifically play our part in the reduction of greenhouse gas emissions.
- 2.10** Knowledge management and information security will become ever more important. The continually evolving information / cyber security threat will need active management and we will fully transition to a risk-based approach to nuclear security regulation.
- 2.11** We are part of the NDA Group and one of a group of businesses, unified by the NDA mission, working together to be more effective and efficient and achieve the best overall outcomes. We will actively contribute to the development and implementation of Group functional strategies covering Group-level priorities and opportunities in areas such as safety, security and sustainability. We will equally ensure a clear focus on the obligations placed on us as a duty holder.
- 2.12** Finally, we have responded to progress and learning since the issue of the first Strategy, including from regulatory advice and scrutiny on our work which we will continue to seek.

3. Holistic approach to health, safety, security and environmental protection

- 3.1** A GDF will be regulated under nuclear safety legislation. This provides a licensing regime for sites to be used for higher hazard nuclear installations. Nuclear safety covers the control of the risk of exposure to radiation from both routine operational activities and from potential accidents.
- 3.2** Our work on the development of a GDF and provision of waste management advice will be undertaken taking full consideration of its implications for nuclear safety, both now and in the future. We will also manage the broad range of more 'conventional' hazards, impacts and risks relevant to our work. The aim will be to ensure that both nuclear and conventional safety risks are reduced so far as is reasonably practicable, alongside the effective management of security and environmental protection.
- 3.3** We also recognise that disposal is the final stage in the management of higher activity waste and that we should facilitate optimisation of safety, security and environmental protection across the whole lifecycle of radioactive waste management.
- 3.4** This Strategy applies to every leader and employee at RWM. We will also encourage our supply chain to embrace and follow the values set out in this Strategy in the work that they undertake on behalf of RWM. The HSSEQ Directorate will continue to provide leadership, advice, and assurance to the organisation as a whole.

4. Goals and areas of focus

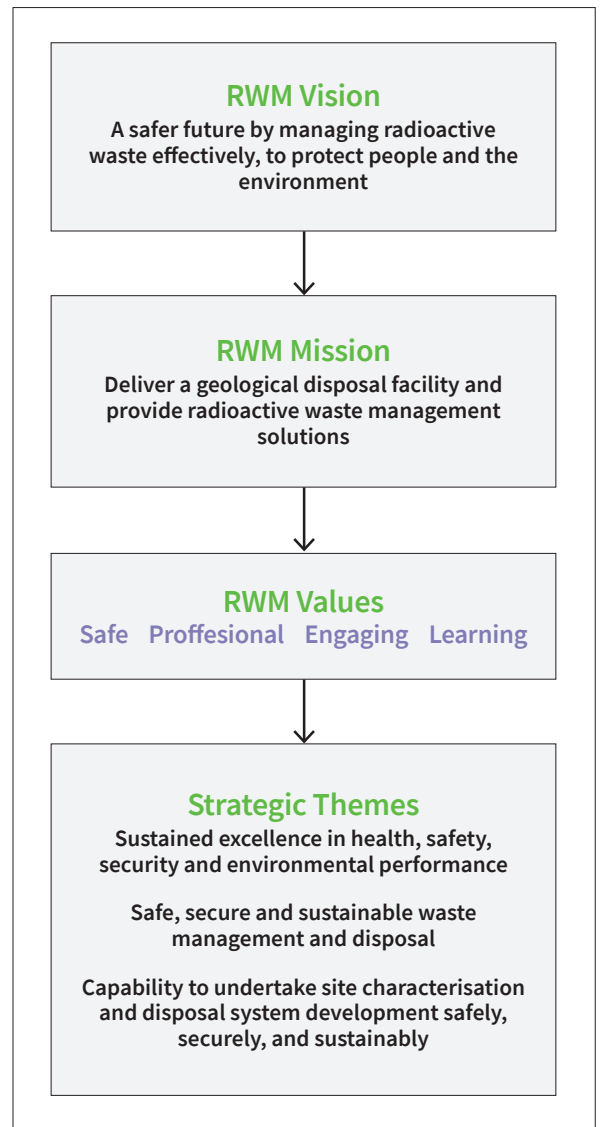
Our goals

- No harm to the health of our staff, supply chain, public and communities or others affected by our work
- No accidents
- No loss, theft or sabotage of our assets, including information
- To contribute to achieving a better and more sustainable future for all
- No regulation breaches
- To operate effectively, efficiently and resiliently, and consistently deliver on our commitments to customers and stakeholders
- To demonstrate and evidence in all our activities, our overriding commitment to safety, security and protection of the environment

4.1 Reflecting on the changes to our operating context, the needs of our developing programme and the successes and learning since the first issue of our Strategy, we have identified three main areas for development and improvement.

4.2 From now until 2025, we will focus on the following three strategic themes:

1. Sustained excellence in health, safety, security and environmental performance
2. Safe, secure and sustainable waste management and disposal
3. Capability to undertake site characterisation and disposal system development safely, securely and sustainably



5. Strategic themes

Sustained excellence in health, safety, security and environmental performance

5.1 We will:

- Continue to develop the leadership and culture in our organisation and supply chain, striving for sustained excellence in health, safety, security and environmental performance as part of our broader organisational transformation
- Continue to develop the capability of the HSSEQ Directorate to ensure it provides the appropriate leadership, support and assurance for the organisation.
- Continue to develop our organisational arrangements, obtaining independent certification of our management system where appropriate, with a particular focus on:
 - the health, welfare and personal safety and security of our employees
 - construction design and management safety
 - sustainability, and
 - information security and resilience
- Establish an integrated assurance framework that provides effective and efficient assurance of key health, safety, security, environmental and quality risks and controls, as well as other key risks and controls.

Safe, secure and sustainable waste management and disposal

5.2 We will:

- Continually improve our waste management advice, processes and underpinning disposal system safety case (including addressing regulatory feedback), to facilitate effective and efficient delivery and overall optimisation of the safety, security and sustainability of waste packaging and disposal
- Provide up to date packaging specifications, covering all higher activity waste and nuclear materials, which effectively support the development of industry priorities and packaging plans and make transparent the safety, security and environmental basis of disposal requirements
- Ensure our endorsement of waste packages remains current, with supporting package records, to facilitate their future disposal without the need for further conditioning or repackaging and the accompanying safety and environmental implications these activities would entail.

Capability to undertake site characterisation and disposal system development safely, securely and sustainably

5.3 We will:

- Apply and continue to develop our site evaluation framework and its underpinning to ensure the requirements for future permissioning are appropriately addressed
- Develop and agree the strategy, with underpinning technical and organisational development plans, to obtain and operate under the permissions required for site characterisation
- Establish the capability to develop the required site-specific GDF safety, security and environmental cases based upon site characterisation data.

This Strategy will be supported by detailed plans.

6. By 2025

6.1 We will:

- Have demonstrated year-on-year achievement of the highest standards of health, safety, security and environmental performance
- Be operating to mature and benchmarked arrangements for the management of health, safety, security, information security and resilience, environmental protection, sustainability and quality – and be ready for the next challenges
- Be facilitating the overall optimisation of the safety, security and sustainability of waste management and disposal
- Have approved records arrangements for all waste packages in storage
- Have identified sites for which we have confidence the necessary permissions for characterisation and GDF development can be secured, subject to confirmation of geological conditions
- Be ready to apply for, and operate under, the permissions required for site characterisation.

7. Governance

7.1 Among other responsibilities, the RWM Board and its members have both collective and individual responsibility for health and safety. The Board ensures RWM complies with statutory requirements and meets appropriate health, safety, security, environmental protection and quality standards. The measures taken to do this, and support fulfilment of this Strategy, include establishment of:

- Board Regulatory Committee to advise the Board with respect to ensuring RWM meets its responsibilities and regulatory expectations
- External specialist advice
- Nuclear Safety and Environment Committee to provide authoritative advice on nuclear and radiological safety and environmental protection matters
- Health and Safety Committee to, among other matters, discuss health and safety matters with employee representatives
- Health, Safety, Security, Environment and Quality Directorate to, among other matters, provide advice and assurance on health, safety, security, environment, quality and other regulatory requirements and performance
- RWM as a prospective permit and licence holder, subject to pre-application advice and scrutiny by regulators
- NDA holding RWM to account for delivery and overseeing and assuring management of Group strategic risks.



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