



Office for  
Nuclear Regulation

# Corporate Plan 2022/23





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Nuclear Regulation

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Presented to Parliament pursuant to  
Paragraphs 23 and 25(3) of Schedule 7  
to the Energy Act 2013

**June 2022**



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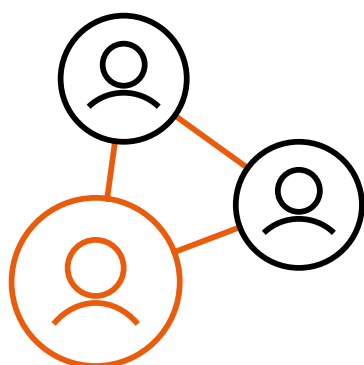
# 1 Foreword



We are pleased to publish our annual corporate plan for 2022/23 to deliver our mission to protect society by securing safe nuclear operations, in line with our [Strategy 2020-25](#).

We have all experienced the most extraordinary two years, as the COVID-19 pandemic has continued to impact society. Thanks to the professionalism and commitment of our staff, we have been able to maintain our resilience and continue in our unwavering commitment to achieve our mission, including working with government and international partners in response to the situation in Ukraine. We have also taken some proactive steps to be a more modern, transparent regulator delivering trusted outcomes and value. That has included learning from our response to the pandemic by retaining the benefits of how we have adapted to inform our future ways of working.

We are benefiting from our new senior leadership structure, implemented in June 2021. Having a combined Chief Executive and Chief Nuclear Inspector is enhancing our internal collaboration and cross-team working. As ONR develops into a more mature organisation, the new structure has strengthened our technical leadership with additional regulatory capacity through our Executive Director of Regulation, and a Chief Information Officer working with our Deputy Chief Executive to enable our modernisation activities. This year, we want our regulatory functions and corporate services to work even more closely, helping to ensure stability and consistency in delivering our Strategy 2020-25 and beyond.



Our top five ambitions for 2022-23 reach across the whole organisation and will inform how we deliver all four of our strategic themes. Only by working together across our regulatory functions and corporate services, can we deliver in the most effective, consistent and innovative ways to influence proportionate improvements to protect worker and public safety, and be ready to respond to the government's recently announced ambitions for new nuclear as part of its Energy Security Strategy.

Ensuring high standards of safety, security and civil nuclear material accountability across licensees and dutyholders remains at the core of our work through our regulatory interventions. We will continue to influence improvements on those sites and with dutyholders that are in enhanced and significantly-enhanced attention. In addition, management of ageing facilities, conventional health and safety performance, and effective leadership for safety and security are priorities for our regulation this year, ensuring we see the traction and collaboration needed across the industry to deliver improvements.

Within ONR, we will have a sharper focus on simplifying processes and reducing bureaucracy over the next 12 months, so we can operate more efficiently. We are streamlining our regulatory processes through our Well-Informed Regulatory Decisions (WIReD) project, improving our charging arrangements, and using IT to automate out-dated manual systems. In line with our [Approach to regulating innovation](#), we will establish an innovation hub as a gateway for industry, provide proactive advice and clear guidance, and enhance inspector training on how to consider innovative and novel solutions.

This corporate plan is an example of putting our simplification ambitions into practice. We have shortened this year's document, making our more routine information available on our website, ensuring this plan is firmly focused on how we will perform our regulatory functions and what we will achieve to deliver our strategy. We will look for further efficiencies across our publications in 2023, streamlining where appropriate, as we seek to make our information more accessible to our stakeholders and the public.

We will build on our **Statement of intent for an environmental policy** by enhancing our environmental and sustainability governance as a public corporation, recognising our commitment to reduce our environmental and carbon impact in line with broader government objectives.

Staff and stakeholder feedback, as always, helps us adjust and refine our priorities where needed. We look forward to the findings and recommendations from the joint Department for Business, Energy and Industrial Strategy (BEIS) and the Department for Work and Pensions (DWP) statutory Post Implementation Review (PIR) of ONR, undertaken in accordance with the Energy Act 2013 (TEA13) being published. We will begin to address those this year.

Following consultation, we will finalise our first 'Openness and Transparency Framework', laying out the policies, principles and actions we will take to grow our public communication credentials, including how and when we will engage and consult in the future. From better explaining our work in plain English, to modernising our communications and improving accessibility, we want to be exemplary and world-leading in our efforts to build, retain and enhance public trust.

None of our intentions become reality without our highly experienced staff, all of whom are dedicated to public safety. We have come a long way since vesting as a public corporation in 2014 to create a culture that is more inclusive and collaborative, and that enables us to be an effective and efficient regulator. This year, we aim to consolidate the progress we have made, so it benefits everyone in ONR and we have no exceptions when it comes to living our organisational values. That means our stakeholders can be assured they are working with a regulator that is open-minded, fair, supportive and accountable too.



**Mark McAllister**  
Chair



**Mark Foy**  
Chief Executive and  
Chief Nuclear Inspector

# How we will deliver: our top five ambitions for 2022/23

**1**

Influence timely and enduring improvements across the nuclear industry.

**2**

Promote innovation through our regulation and our organisation, sustainability in our operations, and collaboration across our regulatory functions and corporate services.

**3**

Increase openness and transparency across our work.

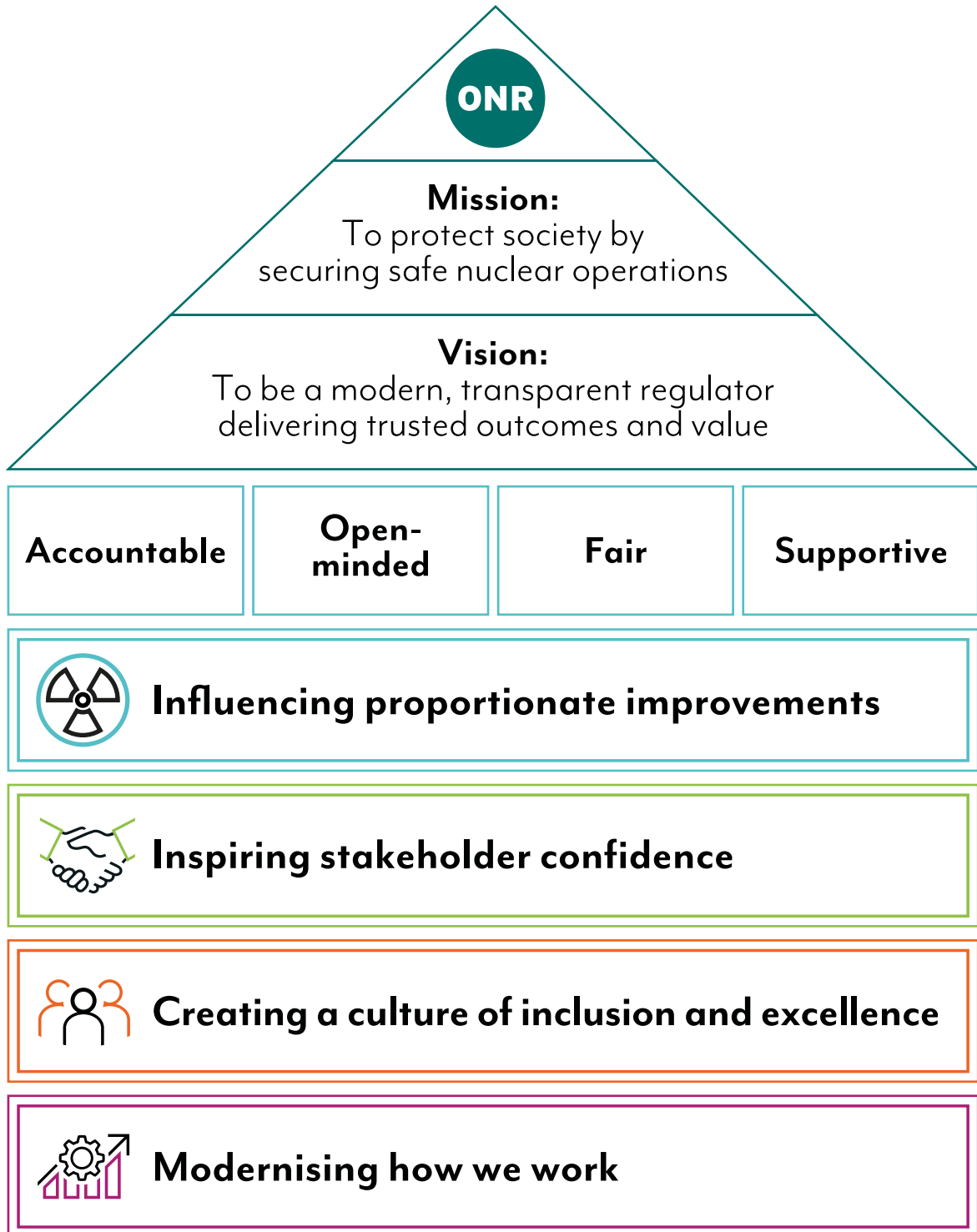
**4**

Live all our values all the time, advocating equality, diversity and inclusion.

**5**

Drive simplification and efficiency in our systems, practices and processes.







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# 2 What has influenced our plan



The factors that have informed and influenced this year's corporate plan are varied. Developments across industry and government policy necessitate an increasing demand for our regulatory expertise, while we navigate a changing nuclear landscape, adjust to 'living with COVID-19' and work with government and international stakeholders to respond to the situation in Ukraine. The UK Government has enhanced its commitment to civil nuclear power in response to energy security challenges, setting clear targets for new nuclear. Alongside our current regulatory portfolio, we are planning our response to the additional regulation that will be necessary over the medium and longer term.

Looking ahead to the next 12 months, our operating environment is diverse: undertaking the first Generic Design Assessment (GDA) of a Small Modular Reactor (SMR); regulating the end of generation for the Advanced Gas Cooled Reactors (AGR), including their move into defuelling, as well as the regulation of defence infrastructure projects; enabling safe major hazard and risk reduction at Sellafield; and continuing to improve the security regulatory framework, ensuring the industry can respond to ever evolving external threats.

This corporate plan explains the priority actions we will take to enable the high standards of nuclear safety, security and safeguards to be maintained in the UK through our regulation, by informing government policies and assuring the public with more transparent communications. We have agreed a set of regulatory planning assumptions with government to balance the external demands beyond our control that underpin the direction and focus of this plan and our work. These are set out in the appendix.

We know we must be ready to respond to government policy for new nuclear, 'net zero' and greater security of energy supply. We will do this by robust, independent regulation of licensees and dutyholders, and through our ongoing dialogue with government on regulatory needs and resources. We will also support the government's better regulation objectives by enabling innovation, exploring opportunities to be innovative ourselves and continuing to focus on the proportionality and consistency of our regulation.

We have taken learning from our pandemic response over the last two years to shape this corporate plan, so we retain the good practice we have adopted. This includes using technology to blend remote working with office working, as well as on the sites we regulate, to help us work smarter and more efficiently.

We know that an inclusive culture is vital to ensuring we can deliver our organisational ambitions, protect our staff's personal wellbeing, and embed new ways of working, which is why we have placed it at the forefront of our approach. We will work hard so our values – Accountable, Open-Minded, Fair and Supportive – are entrenched in our relationships and behaviours with each other, and with our stakeholders.

In developing this plan, we have also been guided by our strategic risks to determine the activities and projects we will prioritise this year. This includes modernising our IT and regulatory systems, further maturing our cyber resilience and corporate security, and improving our financial and charging strategies.



# 3 About ONR



We are the UK's independent nuclear regulator, with the legal authority to regulate nuclear safety, civil nuclear security and safeguards, and conventional health and safety at the 35 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 other licensed and, in part, authorised defence sites, together with the regulation of the design and construction of new nuclear facilities. We also regulate the transport of civil nuclear and radioactive materials by road, rail and inland waterways.

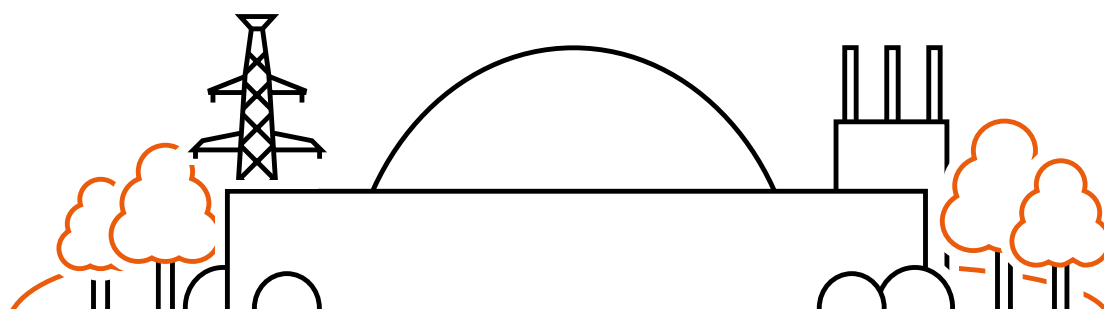
Our nuclear security regulation covers approval of security arrangements within the civil nuclear industry and provides regulatory oversight for the security of transportation of civil nuclear materials and the management of effective arrangements for sensitive nuclear information. Our safeguards regulation serves to ensure that civil nuclear material remains accounted for and controlled to ensure the UK maintains its safeguards obligations as set out under international treaties and agreements.

We are governed by a ten-strong unitary board, comprising a Chair, five independent Non-Executive Directors from a range of backgrounds, and four Executive Directors. The Board is responsible for our strategy, provides strategic leadership and monitors resources and performance. It also ensures that effective arrangements are in place within our organisation to provide assurance on governance, risk management and internal control. You can find out more about [our Board, its sub-committees and how we are governed](#) on our website.

Our Chief Executive and Chief Nuclear Inspector (CE/CNI), Mark Foy, leads our organisation and is accountable for ensuring that all ONR funds are spent in accordance with HM Treasury's [Managing Public Money](#), and other relevant governing guidance and instructions. He is also accountable for ensuring that our regulatory activities are targeted effectively and discharged properly, and that regulatory decisions are proportionate, consistent and are made within the legal requirements of the Energy Act 2013 and other appropriate legislation.

The [Senior Leadership Team \(SLT\)](#) is responsible for leading ONR to deliver our mission, vision and strategic outcomes. It supports the Board to carry out legislative, policy, operational and administrative functions and requirements, in line with individual director accountabilities and collective responsibilities for strategic leadership.

You can find out more about [our regulation](#) and how we work [with our stakeholders](#) on our website.



# 4 Our strategic themes and key activities



## Strategic Theme 1: Influencing proportionate improvements



We will continue to influence licensees and dutyholders, supporting innovation where appropriate, to deliver sustainable and efficient outcomes, and proportionate improvements.”

### Our strategic regulatory priorities

We will continue to ensure that current and future GB nuclear-licensed sites and other dutyholders conduct their operations safely and securely in accordance with the law, and that they can account for and control relevant nuclear material. That means ensuring that the nuclear industry controls its hazards and risks effectively, has a culture of continuous improvement and maintains appropriately high standards. We will also continue to influence licensees and dutyholders, supporting innovation where appropriate, to deliver sustainable and efficient outcomes, and proportionate improvements.

Learning from the COVID-19 pandemic response has been integral to our work over the last two years. This year, we will develop ONR's regulatory standards for nuclear industry preparedness for pandemics, and other potential societal disruptions, and benchmark industry's preparedness. We will work collaboratively with BEIS and continue to engage with international partners to share knowledge and good practice.

We will begin development of a Nuclear Integrated Management Maturity Model (NIM3). This will provide a framework that enables our inspectors to examine the maturity of attributes by which dutyholders deliver their safety and security responsibilities. NIM3 will be a long-term enabler to help us to better target our attention in ways that are proportionate and secure sustainable improvements.

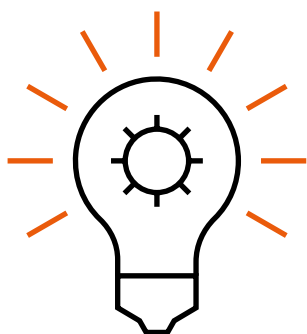




In line with the ambitions in our [Stakeholder Engagement Strategy 2020-25](#), we will also invest more time with dutyholders to explore the consistency and proportionality of our regulation. This will enable us to recognise opportunities to improve where needed. We intend to create a more integrated inspection regime to reduce regulatory burden and improve how we share intelligence and information across our purposes. This will help us target and prioritise risk-based regulatory interventions more consistently and proportionately. We will take steps towards a single plan for the regulation of each of our dutyholders and update regulatory and technical standards guidance to embed more consistent and proportionate regulation across our purposes.

Our [Approach to regulating innovation](#) explained how we wanted to promulgate our enabling approach to facilitate innovation in the industry and through the supply chain, where we are satisfied that it is safe and appropriate to do so. We have many examples of how we have already responded to innovative ideas and technologies, and we will publicise those over the next year.

We will set out our plans for regulating innovative technologies and solutions, including using expert panels, offering advice, and providing a testing ground for new business models and innovative ideas through an 'innovation hub', which will provide a 'safe space' to explore and foster new ideas without prejudice and ahead of any formal regulatory engagement. It will be underpinned by appropriate training of our inspectors.



More widely, our Chief Nuclear Inspector's annual report has become a useful reference point for industry and our wider stakeholder community to understand the nuclear industry's performance, the regulatory priorities we have identified for industry, as well as the specific issues that warrant the most regulatory attention.

We will deliver an integrated regulatory response to each of the priority themes set out below with cross-industry ownership, to ensure we see progress on each.

1. **Continued attention on the management of ageing facilities:** we will publish the outcome from the CNI themed inspection soon, which will provide an industry-wide review of the management of ageing facilities. We will continue to engage with senior industry leaders to secure their ongoing commitment to progress improvements relating to the adequacy of their arrangements for the management of ageing facilities, and implementation of those arrangements, collaborating as necessary.
2. **Focus on conventional health and safety (CHS) performance:** We have begun to benchmark the conventional health and safety performance of the nuclear sector against other high hazard sectors, and this work will continue to inform our regulatory focus and approach. We will also undertake a nuclear industry-wide electrical safety intervention, and continue to seek wider improvements in health and safety performance across the industry.
3. **A new focus on leadership for safety and security culture:** We want to enhance our focus on the quality and effectiveness of licensees' safety and security culture, and how their leadership influences this. We expect this to lead to an approach across the industry that is more consistent with our expectations for the leadership of safety and security.

## Our regulatory attention levels for 2022/23

Our regulatory attention levels are assigned for each site based on its performance over the previous year, alongside our understanding of the specific challenges faced, wider strategic factors, licensee performance and the level, novelty, and complexity of hazard and risk.

We will continue to deliver proportionate, targeted and balanced decisions that recognise the risks and challenges faced, giving specific focus on those sites in enhanced attention.

From April 2022, Dungeness B and Burghfield returned to routine regulatory attention for safety. In June 2021, EDF announced that Dungeness B would not return to service, and would enter de-fueling. Coupled with significant progress over the last 18 months, including addressing corrosion issues, it is

now appropriate for it to return to routine attention. Similarly, sustained performance and delivery of improvements, including safety case submissions, has enabled us to agree that the Atomic Weapons Establishment (AWE) site at Burghfield can also return to routine attention.

Our security attention level has changed for Magnox Ltd Corporate, also moving from enhanced to routine, following improvements in security outputs. EDF Energy (Corporate) is now in enhanced attention for security, in light of compliance and organisational challenges that need additional regulatory oversight. The Magnox Limited site at Berkeley is also subject to increased attention, moving to enhanced to reflect the increased work required to access revisions in the site's security plans resulting from hazard and waste reduction work.

**Table 1 – Regulatory attention levels for 2022/23**

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, and overall site security (Sellafield Ltd)
Enhanced	Atomic Weapons Establishment, Aldermaston
	Devonport Royal Dockyard Ltd, Devonport
	Sellafield – Remainder of estate (Sellafield Ltd)
	EDF Energy Corporate – Security considerations only
	Magnox Limited – Berkeley – Security considerations only
	Magnox Limited – Harwell – Security considerations only

## Our regulatory activities

### New Reactors

We have refreshed our strategy to regulate the safe construction of Hinkley Point C (HPC), in recognition of the change in complexity and pace as the project moves into the installation phase. Our main focus will be on oversight of the ongoing civil works as it reaches a peak over the next two years, the increasing level of system and equipment installation, quality of components (recognising that most will be manufactured and delivered by the end of 2023), and developments for future activities (commissioning and operations).

We are also looking forward to the end of the project, anticipating challenges and developing innovative regulatory approaches to ensure that our regulation remains enabling, fit for purpose and well-targeted.

We expect to decide whether to grant a nuclear site licence to NNB GenCo for Sizewell C (SZC) this year.

We are engaging closely with BEIS and relevant regulators to ensure that our independent regulation is unhindered by the Regulated Asset Base (RAB) model that the government intends to use to provide finance for the SZC project.

In 2021/22, BEIS received an application from Rolls-Royce SMR Limited to commence a GDA for its SMR design and we have subsequently been asked to commence a GDA of this technology. Using the modernised GDA process, we commenced step 1 of the GDA in April 2022, and we expect to complete step 2 around September 2024. The reactor design uses well-understood pressurised water technology, with some innovative features.

Our work on Advanced Nuclear Technologies (ANTs) will be focused on international engagement to look at potential assessment and standards harmonisation, with the aim of reducing regulatory burden and increasing efficiency across regimes. We will also continue our engagement with reactor vendor organisations that are considering UK-based developments and providing advice to BEIS on regulatory challenges.

Earlier this year, government published its advanced modular reactor research development and demonstration programme, following the previous year's announcement that the preferred technology was high temperature gas. We will continue to support this work and prepare for potential design assessment in the coming years.

### Operating Facilities

The regulation of the management of ageing facilities is a key focus for us across Great Britain's civil reactor fleet, as it nears the end of generation. This year, we will continue to prioritise corrosion management, graphite ageing, boiler integrity and general ageing of infrastructure at these sites. The focus on management of ageing facilities also applies at the defence sites we regulate, in particular the AWE at Aldermaston and Devonport Royal Dockyard.

As a result of the end of generation at Dungeness B and Hunterston B in 2021/22, and the planned end at Hinkley Point B during 2022, we expect significant changes to EDF NGL's operating model. We will oversee and permission, if appropriate, these changes to ensure sufficient resources remain in place to deliver the high safety and security performance we expect.

Furthermore, as EDF continues with these and wider preparations for end of generation, we will ensure that there are adequate arrangements for safe defueling and transition into decommissioning, in line with the government's plans for the Advanced Gas-Cooled Reactor Operating Programme (AGROP).

At defence sites, our focus remains on regulating the necessary infrastructure and facility improvements required. We will continue to regulate strategic defence projects including decommissioning, as well as refurbishment, replacement and development of new infrastructure and facilities. We are also engaging with government to understand regulatory requirements for its future plans.

We will continue to focus our efforts on the culture and leadership improvements necessary at AWE's Aldermaston site and at Devonport Royal Dockyard Ltd (DRDL). DRDL already has a clear and agreed plan to deliver improvements in accountability for safety, maintenance of safety-related equipment, openness and transparency, safety culture, and sustained improvements in the conduct of work.

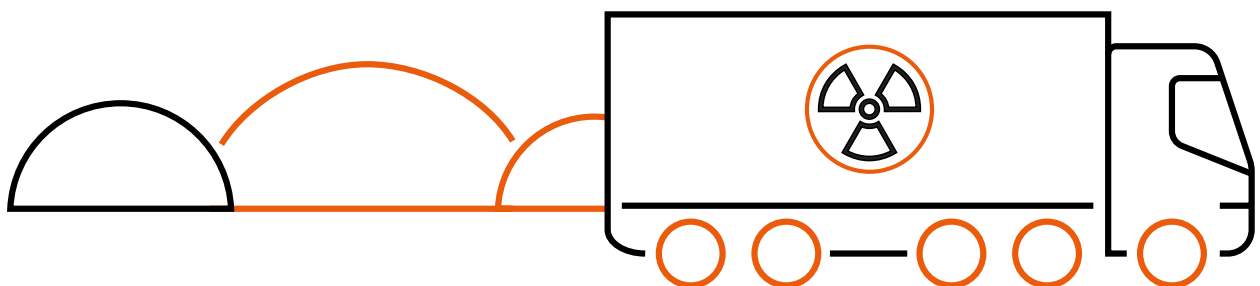
At Aldermaston, AWE has put in measures to ensure delivery of safety improvements at the site receive the right levels of attention, and we will continue to track progress with them.

### **Sellafield, Decommissioning, Fuel and Waste**

Our regulatory strategy at Sellafield has enabled good progress to be made in high hazard and risk reduction, and our proportionate regulatory oversight and permissioning activities will continue to ensure safe delivery of those activities.

Our focus remains on enabling the safe commencement and sustained safe delivery of the early waste retrieval programmes for the Magnox Swarf Storage Silo and Pile Fuel Cladding Silo, and on continued safe management of plutonium at the site. We will also ensure that the Nuclear Decommissioning Authority's (NDA) AGROP, which supports Sellafield Ltd to receive and manage the spent AGR fuel from EDF, progresses safely.

We will continue to regulate the conventional health and safety and fire safety performance at Sellafield, in particular the management of risks associated with chemicals, asbestos, electrical safety and legionella.



Elsewhere on decommissioning sites, we will prepare for the decommissioning of the Steam Generating Heavy Water Reactor at Winfrith, and on site re-licencing and de-licensing activities across the NDA estate.

We will provide advice and engage with government at national, regional and local level, and with the NDA's newly formed **Nuclear Waste Services**, to ensure that any decisions made about the site selection of a future geological disposal facility and its design are informed by safety and security standards, and that our regulatory expectations are clear.

### **Civil Nuclear Security and Safeguards**

We remain firmly focused on delivering an integrated and holistic approach to security, maintaining our regulatory focus on the areas of greatest risk, and ensuring that dutyholders deliver their improvement schedules and approved security plans. We will develop our risk-based approach to cyber security further, to increase resilience capabilities at sites where there is an interface between information technology and operational technology. We also plan to commission and complete an independent five-year review of our Security Assessment Principles (SyAPs), consulting with our stakeholders to get feedback.

We expect to complete our assessment of dutyholder security plans aligned to our SyAPs by March 2023. We will also use our security and safeguards expertise to inform the GDA of the Rolls Royce SMR and EDF's AGR defueling and decommissioning.

Having completed our first full, successful year of regulatory activities as the statutory regulator for safeguards, we are keen to benchmark our performance and will conduct an international technical peer review of our safeguards function this year. The peer review will assist in the further development of our framework to make consistent regulatory judgements on the adequacy of safeguards arrangements.

We shall continue to engage closely with the Cabinet Office and UK Vetting Service on the development and implementation of the revised Vetting Modernisation Programme, given our role on personnel security and vetting for the nuclear industry. We want to ensure that the revised clearance levels remain appropriate.

Working with government, the National Cyber Security Centre (NCSC) and industry, we are progressing the sector's cyber security strategy. Already much of our regulatory activity is aligned to the strategy, and over the next year we will continue to focus on risk management and culture, additional scrutiny of leadership and governance in regulatory assessments, and encouraging dutyholders to undertake self-assessments aligned to the NCSC's Cyber Assessment Framework. This will allow for comparisons across other critical sectors, helping information sharing where appropriate, to enable learning and improvement.

## Technical Division

Our Technical Division works across all our regulatory purposes. It helps ensure we maintain the quality and develop our competence as a capable regulator, including appropriate regulatory standards and processes, as well as leading on some cross-cutting regulatory activities such as emergency planning and response and transportation.

We will continue our work to strengthen and modernise our capability, readiness, and resilience of our emergency preparedness and response function this year. We will regulate industry and local authorities to ensure appropriate standards and capabilities exist in their emergency arrangements. We will work with government to maintain a robust national nuclear emergency response framework and capability. We will also engage with key industry and stakeholder groups to drive continual improvements for emergency response too.

As Great Britain's Competent Authority for the transport of civil radioactive materials, we will continue to regulate dutyholders to ensure safe and secure operations in line with nationally and internationally agreed safety and security standards.

We will establish a new Organisational Learning Function (OLF), alongside our **specialist inspectors and professions**. This will combine regulatory intelligence, knowledge management, and research and provide a link to our innovation hub and the ONR Academy. We expect this to strengthen the use and sharing of intelligence, drawing on our WIReD platform to target our regulatory priorities more precisely.



## Strategic Theme 2: Inspiring stakeholder confidence



We want to encourage more diverse perspectives, beyond those we normally engage with, to inform our regulation and give us different insight into our work.”

As we embark on the third year of our [Stakeholder Engagement Strategy 2020-25](#), our focus on greater transparency grows, alongside expanding our reach into new and different groups and communities, to create better understanding of, and engagement in, our work. We want to encourage more diverse perspectives, beyond those we normally engage with, to inform our regulation and give us different insight into our work. Feedback is critical to our success and our most recent annual stakeholder survey, conducted in February 2022, said we remain highly regarded as a professional, trusted and independent regulator.

Our well-established programme of activities, including participation in Site Stakeholder Groups (SSGs) and Local Liaison Committees (LLCs), sharing information through our website and social media channels, engagement through our expert panels and our Chief Nuclear Inspector’s annual report, will continue. We will share information about how we work with academic organisations and professional bodies, to inform our regulatory decisions, research and capability. You can find more information [on our website](#).

We will host our joint ONR/Non-Governmental Organisation (NGO) Forum during the year, alongside continuing to answer questions and enquiries from the public and our stakeholders to explain our regulatory activities and how we work. We want to enhance our two-way engagement, using opportunities to take interested parties through our regulatory decision-making process. We will use webinars and topic-specific meetings to do this, starting with how we regulate for external hazards (such as climate change and seismic issues).

Having spoken to a range of stakeholders domestically and internationally to shape our framework for openness and transparency, we expect to consult on a draft framework in 2022 and publish thereafter. It will set out our commitments on public disclosure, including ambitions, plans and associated activities, prioritising what we need to deliver to support improvements and embed these within our organisation.

It will also confirm our policy for public consultation: when, why and how we will inform, engage and/or consult, so our stakeholders can be clear what to expect from us, in line with [International Atomic Energy Agency \(IAEA\) guidance for engaging with interested parties](#) and the public, and the recommendation on ONR from the 2019 Integrated Regulatory Review Service (IRRS) mission to the UK. In parallel, we intend to refresh our guidance for inspectors attending SSGs and LLCs, and begin work to introduce an ONR Academy training course on effective stakeholder engagement. We will also enhance the training of plain English report writing for our staff.

Effective working with government, including devolved administrations, remains integral to our stakeholder engagement. We will continue advising on a range of matters, including policies for a new nuclear RAB, proportionate regulatory controls and geological disposal facilities. Our intent is to share our knowledge and expertise to inform design and implementation of policies in a way that protects workers and the public, and maintains the high standards of safety, security and safeguards expected in the UK. We will also continue to work with BEIS on security regulations to ensure alignment with the Convention on the Physical Protection of Nuclear Material and SyAPs.

The environmental and sustainability agenda becomes more important every year, and we were pleased to publish ONR's [Statement of intent for an environmental policy](#) last year. This year, we will use our existing networks and extend our reach to new stakeholders to learn from them as we develop our environmental policy.

We will carry on seeking opportunities to expand our stakeholder engagement, and to increase and widen the diversity of those we communicate with. The different insights gained from this approach will help shape and develop our work on efficiency and cost-effectiveness of our regulation.

We continue to deliver against our [Strategic Framework for International Engagement](#) focusing on refining our internal planning and reporting arrangements to better share our impact and outcomes with our Board and stakeholders. We will deliver the UK's report to the [Joint Convention on the Safety of Spent Fuel Management & on the Safety of Radioactive Waste Management](#). We will also begin preparations for the next cycle of the Convention on Nuclear Safety and continue to address the other recommendations from the IRRS mission to the UK, ahead of the follow up mission which is due in early 2024. We are also planning for the next International Physical Protection Advisory Service (IPPAS) mission, covering nuclear security regulation to the UK.





Our leadership role in the Organisation for Economic Co-operation and Development's Nuclear Energy Agency (OECD – NEA) work to provide guidance on the 'characteristics of a trusted nuclear regulator' continues, and we will work with international bodies and partners to deliver it.

We will also continue to provide the primary interface on behalf of the UK with the IAEA, the Western European Nuclear Regulators Association (WENRA), the European Nuclear Safety Regulators' group (ENSREG), the European Nuclear Security Regulators' Association (ENSRA) and OECD – NEA regarding the production and adoption of standards and guidance that represent internationally agreed good practice. Our work includes leading or advising on the UK preparations for engagement at IAEA standards committees, convention commitments, the participation in IRRS and IPPAS missions to other countries, and other international regulatory engagement and peer review activities, such as the ENSREG Topical Peer Review.

In addition, we will continue to develop our relationship with the IAEA Safeguards department and nuclear co-operation agreement partners to ensure we are delivering our international safeguards obligations. We are supporting IAEA in the production of new international safeguards guidance and providing advice and guidance to developing nuclear states in the establishment and maturing of their safeguards systems. We will also be part of the UK delegation at the IAEA Safeguards Symposium this year.



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



Using the learning from our pandemic response, we will continue to develop our managers and leaders to support our people and make our new ways of working a reality.”

As we navigate the recovery from the COVID-19 pandemic, maintaining the health and wellbeing of our staff remains paramount, keeping them safe and protecting our organisational resilience to regulate effectively. The prolonged nature of the situation has affected all parts of society, but has also been a catalyst for change, with staff feedback helping to shape new ways of working and our push for simplification and efficiency in how we work. Using the learning from our pandemic response, we will continue to develop our managers and leaders to support our people and make our new ways of working a reality.

In practice, that means placing a far greater focus on health and wellbeing in our management and workplace systems, as well as through our organisational culture, by enabling our leaders and managers to operate effectively in a hybrid working environment and maximise the potential of our staff through continuous improvement and professional development.

We will introduce a simplified performance management system, focused on having the right conversations at the right time that better balance work objectives and professional development with wellbeing. This will align with a new talent management pilot, and encourage ‘light touch’ feedback regularly, to help us live the values and work more collaborate and inclusively.

In parallel, we will launch a new staff recognition scheme, giving managers more flexibility in how we reward and celebrate success in delivering ONR’s mission and vision. We will also expand our leadership development programme to strengthen our succession planning, in line with the talent management pilot for future leadership roles, to meet the likely demand upon us over the coming years.

Enhancing our succession planning complements our continued focus on developing our capability and resilience across all disciplines and teams, to create a culture where everyone can excel. Our in-house training function, the ONR Academy, is growing and adapting its prospectus to deliver in a hybrid environment as we learn from the COVID-19 disruption and seek more efficient delivery approaches to train and develop our staff.

To help achieve our ambitions for greater collaboration across our regulatory functions and be more unified across our corporate support services, we will increase our efforts to ensure our culture values and includes everyone. We will ensure expectations of our leaders are clear and to live all our values all the time and embed the values through our directorates and divisions.

Our staff-led diversity and inclusion group has provided advice, support and advocacy for many years. We will explore how to strengthen its profile and influence through our Senior Leadership Team and Board, to give it more authority and traction to enhance the impact and create the culture we want for all.

We will roll out our successful 'reverse mentoring' scheme, piloted with directors last year, with our wider senior management community. The purpose is to encourage staff from under-represented groups, to offer perspectives and insights to senior leaders and managers, broadening horizons and enabling clearer thinking about how behaviours can impact staff, and what is needed to make a positive difference. The pilot attracted overwhelmingly positive feedback from mentees and mentors on how it enabled different perspectives to inform approaches to operational tasks and strategic thinking, with unanimous support for rolling it out across ONR.

We will seek to re-validate our accreditation as a Disability Confident Leader (Level 3). This is to reaffirm our commitment to supporting, retaining and developing staff with disabilities or specific needs by recording and reporting on disability, making reasonable adjustments

where needed, and better supporting mental health and wellbeing in our workplace.

We will also continue our programme of awareness events to increase understanding and build capability of managers and teams, including providing advice and toolkits for practical support.

Accessibility is a priority, from enabling our systems, services and information so they can be accessed by whoever needs it, to ensuring our recruitment and retention policies allow us to have a diverse talent pool giving ONR the necessary capability now and in the future. We will improve the accessibility of our publications, HR processes, digital services and offices, where needed, to ensure we are fully compliant with accessibility requirements, and can identify and embed good practice into our future ways of working.

ONR was established as a public corporation eight years ago, and our operating environment has evolved during that time. In line with our commitment in our [Strategy 2020-25](#), this year we will review our capacity and capability. This is necessary to ensure we have the right resources and skills mix and can continue to attract and retain the talent we need to address future regulatory and organisational demands for delivering our mission and vision. So we will undertake research and benchmark with other bodies and organisations to understand how we may need to change and improve.

Proactively seeking learning and responding to feedback is integral to shape how we work now and deliver in the future. As well as our annual stakeholder survey, we undertake regular surveys with our staff – ranging from insight on health, safety and wellbeing, to short 'pulse' checks – to capture sentiment while we have navigated COVID-19. This year we will undertake a full staff survey to get detailed feedback on staff engagement and views on how our people are feeling, our organisation, working environment and practices, and how well we are living the ONR values day to day.

## 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

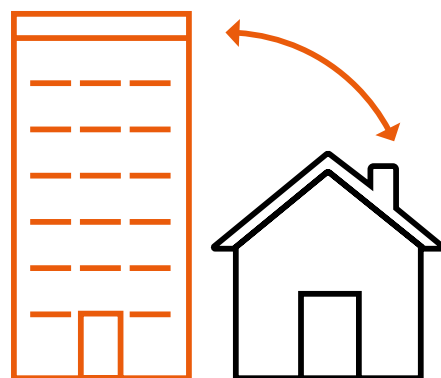


We will continue to harness staff and stakeholder feedback to help us be more efficient, consistent, and streamlined in how we work by using innovative technologies and simplifying the processes that may create unnecessary burden and bureaucracy.”

Our staff are integral to achieving our mission and vision and we all have a responsibility to ensure our contribution is efficient and effective. We will continue to harness staff and stakeholder feedback to help us be more efficient, consistent, and streamlined in how we work by using innovative technologies and simplifying the processes that may create unnecessary burden and bureaucracy over the next year.

We have been developing our WIReD platform over the last two years, working with staff and stakeholders to shape the design and functionality. We will work towards full implementation of the new platform this year, improving the accessibility, effectiveness and consistency of end-to-end regulatory processes and increasing our regulatory insight capability. This modernisation project is another important step to become more efficient, by digitising and automating manually-intensive activities to allow us to manage knowledge better and navigate more easily through our regulatory processes.

Building on the good practice and lessons learned from the COVID-19 pandemic response, we have gained an understanding of how our business continuity arrangements can be developed and enhanced. We will develop our organisational resilience through our formal Integrated Incident Management Framework to manage incidents safely and effectively, and will test its effectiveness with our staff and stakeholders.



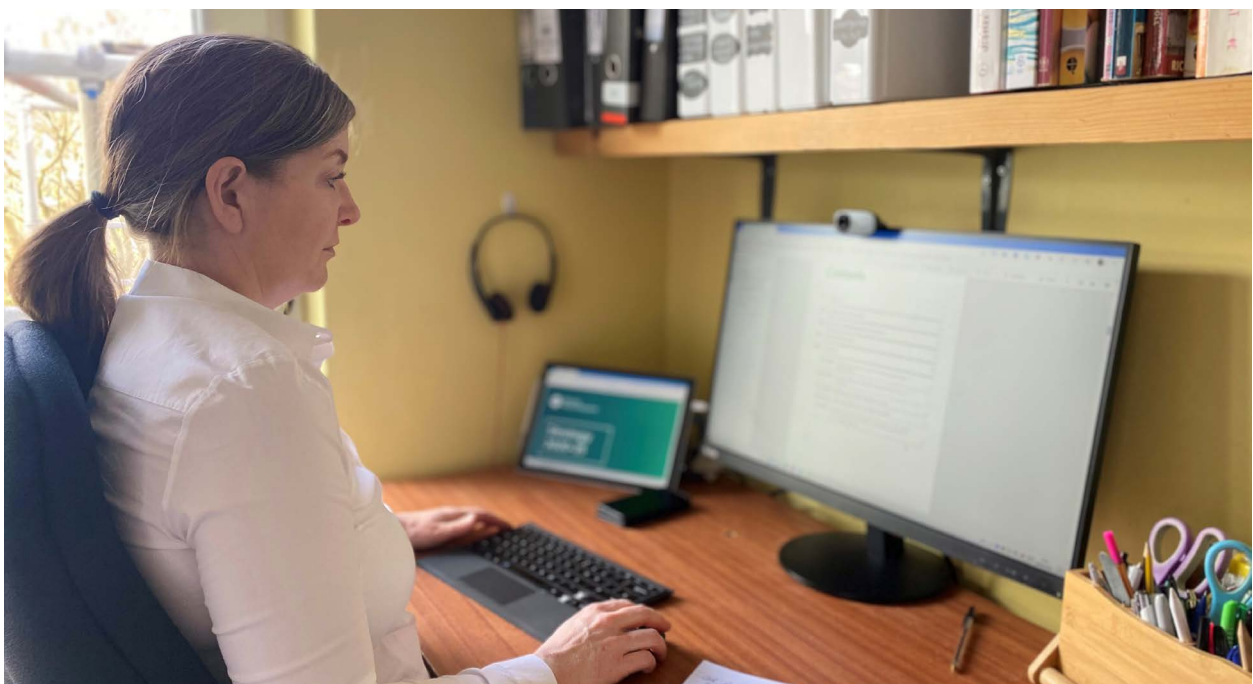
We are embedding hybrid working as part of our flexible working arrangements, informed by research we conducted with staff and stakeholders at the beginning of the pandemic. Hybrid working is intended to balance the benefits from greater choice about where staff work with organisational need and bringing our teams together in an office environment to enable collaboration, connection and capability development.

Like most organisations, we are learning to adapt and will keep our changes under close review, as we move towards embedding our new ways of working. In parallel, we will be considering our future office needs ahead of planned contract reviews of our office leases. We want to ensure our office spaces are adaptable and flexible to support greater face-to-face collaboration.

Moving to new ways of working also means modernising how we work by making better use of the technology available to us. We will continue to build our internal IT capability, focusing on developing and maturing our IT service, working closely with our primary supplier to optimise provision and value for money, and refreshing our internal IT strategy.

IT will enable us to automate processes, so we can be more productive and efficient. This includes our programme and project management tools and organisational performance data gathering and analysis. We will upgrade IT applications for our records management to improve user experience and begin work on a new ONR website, creating a modern, accessible portal to aid effective stakeholder engagement by 2024.

Building on the analysis of our charging arrangements and associated legal framework last year, and working with our staff and stakeholders, we will review our processes and systems for charging. We want to be able to provide greater insight, assurance and transparency in our forecasting and charging for our licensees and dutyholders.



# 5 Our budget, performance, and strategic risks



### **Our budget, audit, and assurance**

We are funded primarily by charges to the nuclear industry, through cost recovery from dutyholders and charges to government for specific commissioned activities. In addition, we receive grant funding from DWP, which is around 2.5% of our budget and covers activities that we are not permitted to recover, such as fire safety, aspects of transport regulation and some specific activities in relation to our safeguards function.

The budget required to deliver this 2022/23 corporate plan is £97.3m. This compares to our 2021/22 final outturn expenditure of £86.2m. The budget reflects regulatory assumptions agreed by our Board and government in the appendix, as well as the resources necessary to deliver the commitments in this plan together, in line with strategic intent as set out in our [Strategy 2020-25](#).

We continue to apply our [Integrated Audit and Assurance Framework](#) to manage our audit and assurance activity, which blends internal and external assurance sources, to help us identify and strengthen areas for improvement across our organisation and our work.

### **Our performance**

We report our performance against this corporate plan and progress against our [Strategy 2020-25](#) to our Board, to BEIS, and to DWP (our sponsoring department) throughout the year.

Annually, we also report on our performance and accountabilities to Parliament and the public through our Annual Report and Accounts. Our CNI annual report provides additional information about our regulation and the performance of the GB nuclear industry.

Through these reporting arrangements, we will disclose:

- a how effectively we influenced proportionate improvements through dutyholders across all our regulatory purposes;
- b how we delivered the principles of the UK Regulators' Code;
- c the extent to which we have operated efficiently and delivered value for money;
- d whether we met our organisational effectiveness indicators;
- e how we have performed against our plan; and
- f the progress we have made in delivering the outcomes in our [Strategy 2020-25](#).

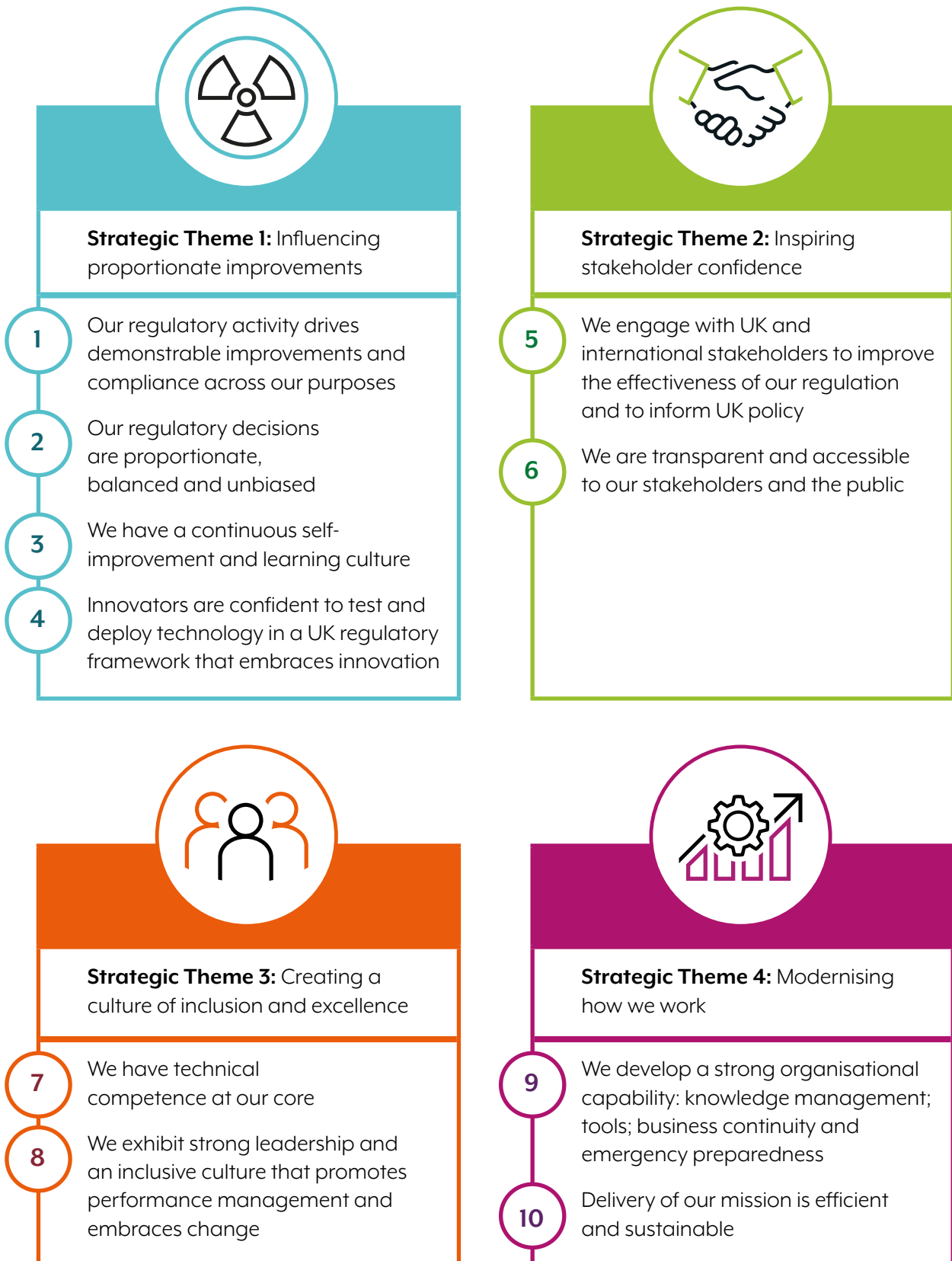
Throughout everything we do, it is important for us to measure our performance, and if necessary adjust our intentions and priorities so we can continue to achieve our strategic ambitions. We are now in the third year of using our [Organisational Effectiveness Indicator \(OEI\) framework](#), which measures our performance against the strategic themes.

It also provides a broad evidence base for us to assure our Board, government, and the public of the efficiency and effectiveness of our regulation and progress against our [Strategy 2020-25](#) and our annual corporate plans. The ten OEIs are underpinned by sub-indicators, each with outputs and outcome-based measures, and other key performance indicators to tell us how well we are performing across our operations, which when aggregated show our progress.





Figure one – Our ten organisational effectiveness indicators



### **Our strategic risks**

Risk management is fundamental to how we work: it informs our planning; improves the way we prioritise and deliver and drives value in what we do. We manage risk through our directorates and divisions, with clear lines of executive accountability and regular review and challenge by our Risk Improvement Group and Senior Leadership Team. Scrutiny is provided by our Audit and Risk Assurance Committee (ARAC) and our Board.

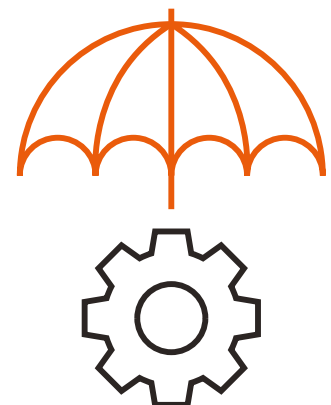
We review our risk appetite annually, which provides the framework for our decision making, as well as the context for risk identification, control and mitigation. Our appetite depends on factors such as the likelihood of the risk occurring and the potential impact of the risk (before and after controls) on our strategic objectives. We also consider the interdependencies in our risk appetite across our functions, taking account of the cumulative impact that may manifest as a result. You can find our [current risk appetite statement](#) on our website.

This year, we will embed our refreshed Risk Management Framework, including our updated risk appetite statement, within our governance arrangements as a fundamental tool for driving efficiencies in how we prioritise, manage and control organisational activity and aid our decision-making as a public corporation.

We will also benchmark our risk management approach against other government departments and public bodies, including other regulators, to gather and share good practice, as well as drawing from our own experience in operational regulatory decision making.

This corporate plan is informed by the following strategic risks that we are currently managing and mitigating against:

- delivering efficient regulation;
- responding to, and recovering from, the COVID-19 pandemic;
- change and/or uncertainty in policies and environment within which we operate, ensuring we are flexible, adaptable and able to respond;
- modernising of IT infrastructure and systems;
- effective systems to protect the health, safety and wellbeing of our staff;
- effective organisational security controls and associated infrastructure;
- organisational capability;
- commercial oversight and contract delivery;
- incident management;
- financial strategy – funding and charging; and
- responding to environmental and social governance requirements.



# Appendix – Regulatory Planning Assumptions 2022/23

1	There are no nuclear events within the UK or overseas which undermine or result in a significant change to ONR'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 only the EPRs at Hinkley Point C and Sizewell C) proceed at declared rates and no significant safety, security or safeguards concerns emerge.
4	The end-of-life plan for the existing Advanced Gas-Cooled Reactor (AGR) fleet will continue to be refined by EDF as the reactors approach end of life, and our resourcing plans allow for this.
5	No new life-limiting factors emerge in the UK's fleet of AGRs and the single PWR at Sizewell B that affect the resources that ONR deploys to this area.
6	The AGR Operating programme, to ensure the safe, secure and cost-effective de-fuelling of AGR power stations, progresses in line with the timescales and planning expectations of all delivery partners including EDF, NDA and its subsidiaries.
7	ONR operates a domestic nuclear safeguards regulatory regime that meets UK international obligations, maintains effective control and accountancy of civil nuclear material, and enables the deployment of new nuclear technologies and longer-term development of the UK nuclear fuel cycle.
8	New funding arrangements for safeguards implemented from April 2022 provide comprehensive, sustainable funding for all safeguards activities.
9	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.
10	The regulatory framework and division of responsibilities between ONR and the Defence Nuclear Safety Regulator (DNSR) for the regulation of the defence sector remains unchanged.
11	The AUKUS (Australia, UK and US) programme will not require significant regulatory input in the next 12 months.

<b>12</b>	The level of ONR's support to Phase 4 of the government's Advanced Nuclear Technologies (ANT) work programmes remain as scoped, with some work deferred at the request of industry to allow them to satisfactorily complete their BEIS-funded research work.
<b>13</b>	There is one SMR GDA assessment ongoing from April 2022.
<b>14</b>	There are no significant security or geopolitical events resulting in changes to national security policy or risk appetite that would require revalidation of, or enhancements to, civil nuclear security regulatory arrangements currently in place.
<b>15</b>	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.
<b>16</b>	The Magnox fuel reprocessing capability will continue to operate safely during 2022/23 to enable reprocessing of as much fuel as is practicable. All remaining fuel will be stored safely pending the future decision on disposal.
<b>17</b>	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.
<b>18</b>	Progress with the hazard and risk reduction programmes at Sellafield will continue, support and funding to deliver them will remain a government priority which includes enabling the NDA to secure the necessary investments to deliver these major projects.
<b>19</b>	Magnox and other decommissioning works continue in accordance with NDA declared programmes; including the revised approach to decommissioning the former Magnox power stations, with sites potentially being brought forward earlier than currently scheduled.
<b>20</b>	ONR's work to support UK policy development for long term disposition of Plutonium inventory will continue.
<b>21</b>	UK Government remains committed to a Geological Disposal Facility and the process for identifying a suitable location is currently underway.
<b>22</b>	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.
<b>23</b>	ONR's work to support the UK's international commitments (for example IAEA standards, conventions, missions and international event reporting) remains in line with our Strategic Framework for International Engagement.

<b>24</b>	The industry's response to the Nuclear Sector Deal (NSD) continues to evolve, but there will be no new significant requests of ONR beyond planned activities to provide regulatory input to workstreams on innovation, new build, decommissioning and sector skills, the NSD Programme Board and the Nuclear Industry Council.
<b>25</b>	ONR will provide ongoing technical and regulatory policy advice if the government's proposal for a Regulated Asset Base Model for nuclear is further developed and implemented, ensuring that safety and security remain paramount. Ways of working to ensure an effective interface with other regulators will be agreed.
<b>26</b>	ONR will work alongside government, as necessary, to implement the recommendations from the Post Implementation Review of Part 3 of the Energy Act 2013.
<b>27</b>	ONR will advise government in its policy development on planning and regulation for new nuclear.
<b>28</b>	The next five-year sector-wide Civil Nuclear Cyber Security Strategy will focus on areas already attracting significant regulatory oversight including risk management, resilience, culture and skills and we do not expect any new, significant demands upon ONR.

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