

Corporate Plan 2023/24





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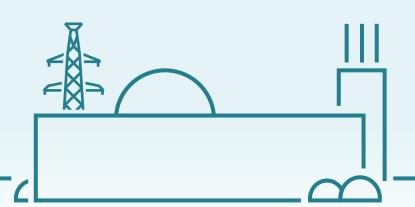
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Foreword



As we enter the final stages of our Strategy 2020-25, we are making considerable progress against the commitments we made to achieve our vision to be a modern, transparent regulator, delivering trusted outcomes and value. We are beginning to see the benefits of our change projects, but there are still residual improvements to be made. The activities documented in this plan – the fourth of the current strategy period – take us one step closer to achieving our ambitions, while always delivering on our mission to protect society by securing safe nuclear operations.

Alongside our core regulatory work, our top regulatory priority for this year is to drive demonstrable improvements at sites that are in significantly enhanced or enhanced attention, and influence long-term improvements for the CNI annual report themes. (PI) Our first internal Annual Review of Regulation confirmed that we need continued focus on several key themes, including proportionality, consistency, the transparency of our costs and accuracy of our forecasts to industry. These themes will, to a large extent, be addressed through a more integrated, risk informed and intelligence-led inspection regime, as well as our new charging strategy.

The nuclear landscape we regulate is changing at an increasing rate – from the significant ambition for civil new nuclear and the potential mix of technologies this is likely to involve, to the major investment planned for the defence nuclear enterprise, the growing adoption of innovation by the industry, and the need to consider the potential impact of the ongoing conflict in Ukraine. Together with the British Energy Security Strategy, the launch of Great British Nuclear (GBN) is expected to accelerate investment and provide opportunities across the nuclear supply chain, including Small Modular Reactor (SMR) competitions. Alongside this, public awareness and scrutiny of the sector is increasing, and maintaining trust and confidence in our regulation remains ever more important; our Corporate Plan includes activities that will ensure this.

Within ONR, we will streamline how we work across all our functions to become more efficient and create increased capacity to respond to future demands.

P2 We will also work to improve resilience of regulatory capability, through pre-emptive recruitment, increased efficiency and productivity. The timely launch of our Well-Informed Regulatory Decisions (WIReD) platform, which we intend to embed in-year,

will play a big part in knowledge management and succession planning, both key factors to drive progress in this area.

ONR needs to remain agile and resilient, while strengthening our relationships with key stakeholders to inform, influence, and jointly shape the way forward. Our expertise and visibility across the entire nuclear lifecycle and sector positions us well to do that, able to help inform and support the government in delivering on these ambitions, while retaining independence in our regulatory decisions. As the sector prepares to support a growing new nuclear portfolio, capability across it continues to present a particular challenge. We will therefore work to influence a joined-up, industry-wide approach to building and sustaining a resilient workforce for the future, to deliver future programmes safely, securely and effectively. (P3)

This year will be pivotal for laying the foundations that will prepare our organisation for the future. It is vital to ensure ONR is ready and in the best possible shape to respond to the operating environment and anticipated external factors. Staff



and stakeholder feedback, the recent Post Implementation Review of ONR, and benchmarking against other regulators domestically and internationally, has given us insight and direction in helping us to build a picture of what kind of organisation we want to be – and need to be – in the future. This year we will begin to implement the recommendations arising from the Organisational Review project completed last year. This work will sustain the long-term effectiveness of our structure and operations, while assuring fairness in our pay and grading, to ensure our staff feel valued and recognised at work. (P4)

Underpinning our programme of work is our ambition to further embed a supportive, fair and inclusive culture where people are empowered to deliver at pace to honour our commitments. (P5) We have placed

a lot of focus on culture over the last few years, culminating in an important piece of research carried out by Alliance Manchester Business School during 2022/23 that highlighted our culture is broadly in alignment with our mission, as well confirming the adjustments we need to make, particularly in how we manage internal change, to get where we want to be.

Towards the end of the year, we will turn our attention to the development of our next strategy that will take us to 2030. Until then, we would like to thank our stakeholders and particularly our staff, who are vital to delivering the commitments outlined in this plan.

It is their enduring expertise, professionalism and dedication to public safety and security, which continue to enable us to deliver our ambitions on behalf of the public we serve.





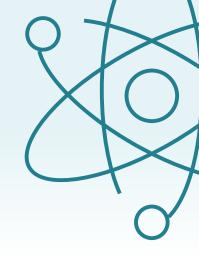
Risks

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

- Delivering efficient and effective regulation
- 2. Organisational capability and capacity
- 3. Incident management
- 4. Financial strategy funding and charging
- 5. Effective systems to protect the health, safety and wellbeing of our staff
- 6. Effective organisational security controls and associated infrastructure
- 7. Responding to environmental, social and governance (ESG) requirements



Introduction to our 2023/24 Corporate Plan



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, through the operation of the UK State System of Accountancy for and Control of Nuclear Materials (SSAC).

You can find out more <u>about us</u>, our <u>governance arrangements</u>, and <u>our regulation</u> on our website: onr.org.uk

This Corporate Plan is the fourth annual plan to support delivery of our Strategy 2020-25. Our key activities and commitments across our strategic themes are presented in this plan in alignment with our Organisational Effectiveness Indicator (OEI) framework.

The OEI framework measures our performance against our strategic themes, and progress against our Strategy 2020-25 and annual plans, providing a broad evidence base to assure our Board, government, and the public of the efficiency and effectiveness of our regulation.

Our budget to deliver this 2023/24 Corporate Plan is £102.1m compared to our 2022/23 final outturn expenditure of £93.3m. The budget reflects the regulatory assumptions agreed by our Board and government, set out in the appendix, as well as the resources necessary to deliver this year's commitments in line with our strategic intent.

Our top five priorities for 2023/24 are:

Drive demonstrable improvements at sites that are in significantly enhanced or enhanced attention and influence long-term improvements for the CNI report themes.

Streamline how we work across all our functions to become more efficient and create increased capacity to respond to future demands.

Influence a joined-up industry-wide approach to building and sustaining a resilient and capable workforce for the future, with the capacity to deliver future programmes safely, securely and effectively.

Begin to implement the recommendations arising from our Organisational Review project to ensure ONR is fit for the future, improving the effectiveness of our organisational structure and assuring fairness in our pay and grading.

Further embed a supportive, fair and inclusive culture where people are empowered to deliver at pace to honour our commitments.

What has influenced us?

In setting our plan, we have considered how our operating environment affects our work. Factors include:



Drive for simplification, efficiency and Growing public transparency around External awareness our costs of nuclear **Aukus** (Australia, **UK and United** States defence Nuclear and security Harmonization and partnership) Sector wide Standardization resourcing Initiative (NHSI) capacity Stakeholder and skills feedback International **Atomic Energy British Energy** Agency (IAEA) Security Strategy standards and nuclear Defence new build infrastructure agenda work Radiation Innovation Emergency MOD* Preparedness and programme **Public Information** - naval nuclear Regulations 2019 propulsion (NNPP), (REPPIR) strategic Safe and secure weapons long term storage The challenges of spent fuel facing the Greening industry government commitments **Great British Nuclear**



Strategic Theme 1

Influencing regulatory improvements

Our core focus remains on ensuring that current and future nuclear licensed sites and other dutyholders in Great Britain conduct their operations safely and securely in accordance with the law, and that they can account for and control relevant nuclear material.

Ongoing feedback from our stakeholders, most recently as part of our first Annual Review of Regulation exercise, tells us that the consistency and proportionality of our regulation are still areas we can enhance. As a result, in the year ahead, we will make further progress in developing a more integrated, risk-informed and intelligence-led inspection regime across our purposes. (P2)

We will continue to assess licensee safety cases and security plans to make proportionate, targeted, and balanced decisions that recognise the risks and challenges faced, with specific focus on ensuring that improvements are made at those sites which are in enhanced and significantly enhanced attention for safety or security performance reasons (P1) including:

• Sellafield Ltd – we will continue to focus on influencing timely hazard and risk reduction activities at legacy facilities such as the Magnox Swarf Storage Silo, Pile Fuel Cladding Silo, First Generation

- Magnox Storage Pond (FGMSP) and Special Nuclear Materials Facilities, and on monitoring improvements in cyber security leadership and management, following enforcement activity in 2022/2023.
- Devonport Royal Dockyard Ltd (DRDL) – our primary focus will be on determining the adequacy of safety justifications for planned submarine dockings, and on securing DRDL focus on risk informed, credible, outcome focused planning and delivery, to give confidence on sustainable safety improvements.
- Atomic Weapons Establishment (AWE) Aldermaston – our focus will be on the operator's delivery of infrastructure improvements in support of the continued safe operation of facilities to maintain the UK's defence capability, and on how organisational improvements are implemented across the site to improve the planning and delivery of safety documentation.

 EDF Energy Nuclear Generation (NGL) (Corporate) – we will work to influence enhancements to EDF NGL's cyber security. Initially, our focus will be on the dutyholder's development of a comprehensive, fully resourced cyber security improvement plan and robust governance arrangements to drive implementation, enabling a return to a routine level of regulatory attention when sufficient progress has been made.

More broadly, the key regulatory themes emerging from the 2022 Chief Nuclear Inspector's annual report - management of ageing facilities, conventional health and safety (CH&S) performance, and leadership and culture for safety and security – will be a priority for our regulation across the nuclear estate. (P1)

Through collaboration in muti-agency forums and cross-industry engagement we will emphasise the importance of risk profiling and prioritisation for driving improvements in dutyholders' control of hazards and risks to nuclear site health and safety, driving integration into wider management arrangements. We will place particular focus on safety leadership, culture and learning, and how they are cascaded in the management of contractors to drive improvements in safety performance across the sector.

We continue to undertake targeted assessments of leadership and culture for safety and security, prioritising sites in enhanced attention, or undergoing major lifecycle change. For example, Leadership and Management for Safety attributes are in enhanced attention at Devonport Royal Dockyard Ltd (DRDL). These are key enablers, fundamental to delivering improved safety performance outcomes, while DRDL also delivers a very challenging programme to support submarine operations. Our planned interventions will focus on governance, assurance and accountability at all levels of leadership, to help enable the delivery of credible, risk-informed, integrated plans. Our Cyber Security inspectors are also delivering thematic interventions across industry in support of the UK civil nuclear cyber security strategy.

These interventions focus on leadership and governance of cyber and information risk, and the associated security culture.

In addition, we will develop and deliver a themed inspection on climate change to provide assurance on the continued adequacy of industry's arrangements to maintain safety in the face of climate change impacts, taking account of the latest scientific advice.

To support the government's strategic ambitions in respect of new nuclear, our work on the Generic Design Assessment (GDA) of the Rolls Royce SMR will continue. We have also agreed with the Department for Energy Security and Net Zero (the Department for Energy) that we will commence GDAs of further reactor technologies in this next year; the specific technologies and timescales remain to be determined. subject to decisions made under the department's GDA entry process. We continue to provide support and advice to the Department for Energy, and subject to funding being made available, this will include taking forward recommendations from the

British Energy Security Strategy relating to the streamlining and acceleration of regulatory processes and guidance for design assessment and licensing.

Following the successful launch of our innovation hub in 2022/23, this year we will focus on delivering our regulatory sandbox for innovation, in addition to other industry offerings. These products aim to provide a safe space for industry to explore innovative technologies and proposals, without prejudice, prior to formal regulatory assessment.

In support of the CNI annual report themes, at Hinkley Point C (HPC), one of our principal areas of focus will be on nuclear site health and safety. In addition, we will focus on the quality of the permanent plant, manufacture, delivery, and installation of components as the site sees a peak in civil engineering work, with equipment installation significantly increasing. We are aware of the failed fuel issues at the Taishan plants and have been liaising with international regulators on the root causes, and with Nuclear New Build Generation Company (NNB) on the implications for the HPC and Sizewell C developments. We are confident that the issues will be addressed prior to fuel load at HPC.

With regards to operating facilities, in addition to a range of safety case assessments in support of new and upgraded facilities, and as well as end of generation, we will continue with our oversight of ageing management, aligning with the findings of last year's CNI themed inspection. As the regulator, we have a part to play in influencing the delivery of

sustained improvements, hence we will continue to deploy resources and focus regulatory attention in this area during 2023/24. We will work with the French regulator, Autorité de Sûreté Nucléaire (ASN) to gain the most up-to-date understanding of the stress corrosion cracking issues across the French Pressurised Water Reactor fleet and any implications for Sizewell B (SZB). Any signs of stress corrosion cracking at SZB will need to be monitored throughout the life of the station and, although the French designs are different, the information provided by ASN is valuable as it may also provide an indication of potential future issues.

We will also work to influence enhancements to EDF's cyber security, in particular the development of a comprehensive, fully resourced cyber security improvement plan and robust governance arrangements to drive implementation. In relation to defence, at AWE and Devonport sites, we continue to apply significant regulatory effort to ensure that operators deliver the necessary infrastructure improvements. This is essential to ensure licensees can continue to operate these facilities safely, and to deliver the programmes of work needed to maintain the UK's nuclear deterrent capability.

At Sellafield Ltd, we will continue to assess cases in support of high hazard and risk reduction across the site. particularly at legacy facilities that are assigned a significantly enhanced regulatory attention level, as well as new build facilities that are key enablers to waste retrievals from those legacy facilities.

Key areas of focus for this year at decommissioning, fuel and waste sites include continued work towards the consolidation of irradiated fuel from Dounreay at Sellafield Ltd, the continued decommissioning of Magnox power stations, the transfer of the Ministry of Defence (MOD) Vulcan site to the Nuclear Decommissioning Authority (NDA), and the relicensing of advanced gas cooled reactor sites from NDA to Magnox following fuel-free verification. We will also continue to work closely with the Department for Energy and NDA's Nuclear Waste Services in their engagement with potential volunteer communities to host a future Geological Disposal Facility (GDF). Our role will be to inform government decisions made in respect of site selection, in terms of application advice, support and scrutiny. In addition, we will continue with our work to produce guidance to meet government policy objectives relating to the regulation of the end states of nuclear sites.

The 2022 Civil Nuclear Cyber Security Strategy was formally published last year. Developed jointly between government, the civil nuclear industry and ONR, it sets out how the sector aims to manage and mitigate evolving cyber risks over the next five years. We have commenced a significant amount of regulatory activity in support of its key objectives, such as increased scrutiny of leadership and governance for cyber security in regulatory assessments. In addition, we are refining our Cyber Assessment Framework (CAF) aligned benchmarking assessments, to

enhance regulatory intelligence, enable greater cross-sector analysis and improved trend identification, as well as improved information sharing across common platforms, namely our WIReD dutyholder portal.

We will continue to support the government-wide Vetting Modernisation Programme which will deliver significant change to the current vetting process across the sector. We will work alongside the Department for Energy, Cabinet Office and United Kingdom Security Vetting (UKSV) in our role as the responsible authority for the sector to ensure this essential area of risk is managed on behalf of our sponsoring government department.

With demand for Human Factors (HF) capability within the nuclear sector expected to remain high, in 23/34 we will be working collaboratively with stakeholders in the sector to develop a Human Factors Learning Pathway for Nuclear – an innovative approach to developing HF competence. We anticipate that the nuclear pathway will be accessible to dutyholders and other stakeholders and will provide flexible routes to develop and enhance HF competence through site work, online study, and tailored coaching and mentoring. This work is key to addressing the chronic shortage of HF capability nationally and ensuring that the human contribution to risk is effectively managed. The programme and early modules will be developed in the coming year, with the full pathway being developed over a 3-4-year period.

For transport, we have detailed plans for compliance inspections across the nuclear and non-nuclear sectors and for permissioning activities relating to package approvals. This includes new inspection initiatives, such as undertaking roadside stops of vehicles transporting Class 7 dangerous

goods and radioactive materials, in collaboration with the Police and the Driver and Vehicle Standards Agency (DVSA), as well as sampling dangerous goods safety advisors and radiological protection advisors, both of which play a significant role in ensuring the safety of transport.

Organisational Effectiveness Indicator 1: Our regulatory activity drives demonstrable improvements and compliance across our purposes

We will:	Key deliverables/milestones:
Continue our work to facilitate timely return of dutyholders to a routine level of regulatory attention P1	Complete assessment of Sellafield Ltd's readiness to return towards a routine level of regulatory attention for physical security
Support government's strategic ambitions for new nuclear	Commence Step 1 on two GDAs (subject to Ministerial request)
Continue our work to influence timely hazard and risk reduction at Sellafield Ltd	Assess and determine the adequacy of Sellafield Ltd's safety justifications to inform a number of permissioning decisions necessary to enable hazard and risk reduction activities
Enable ageing AGR cores to operate and shutdown in a demonstrably safe and secure state	Assess and determine acceptability of safety justifications relating to the lifetime extension of reactors at Hartlepool and Heysham 1, and review their security plans
Enable the safe and innovative delivery of critical nuclear defence projects	Assess and determine adequacy of safety justifications for planned submarine dockings at Devonport
Deliver an integrated regulatory response to the priority themes in the CNI Annual Report, to drive industry-wide ownership and progress	Deliver themed inspection around industry's consideration of climate change in safety cases

Organisational Effectiveness Indicator 2: Our regulatory decisions are proportionate, balanced and unbiased

We will:	Key deliverables/milestones:
Continue our work to improve collaboration, co-operation, proportionality, and consistency across our purposes P2	Produce guidance supporting the government policy objective for Proportionate Regulatory Controls Commence work on integration as part of Organisational Review project

Organisational Effectiveness Indicator 3: We have a continuous self-improvement and learning culture

We will:	Key deliverables/milestones:
Use knowledge, operational experience and trends from past interventions and other sources to inform more strategic and intelligence-informed risk-based interventions	Share our knowledge to inform design and implementation of policies that maintains high standards of safety, security and safeguards
Progress a planned efficiency review of our regulatory delivery, making appropriate improvements P2	Conduct a review of our regulatory processes for design assessment and licensing to identify opportunities for streamlining/accelerating deployment of new nuclear technologies

Organisational Effectiveness Indicator 4: Innovators are confident to test and deploy technology in a UK regulatory framework that embraces innovation

We will:	Key deliverables/milestones:
Embrace innovation, new approaches and technologies in how and what we regulate, and share best practice	Deliver and implement regulatory sandbox for innovation



Strategic Theme 2

Inspiring stakeholder confidence

It is key to public confidence that we engage with diverse stakeholders with a wide range of views, learn from others, work openly and transparently, and communicate in accessible ways.

The UK government's ambition for new nuclear has increased significantly, signalled through the British Energy Security Strategy (BESS), Powering Up Britain, Great British Nuclear, the recommendations from the Skidmore Review, and commitment to Sizewell C. As a result, there has been increased interest in the generic design assessment process (GDA), as well as key policies, such as siting, geological disposal, proportionate regulatory controls and the regulated asset base (RAB) funding model for new nuclear.

We will continue to provide advice related to government nuclear policy, when requested, at the earliest possible stage, as these activities progress. The Post-EU Exit requirements to streamline legislation, specifically the Retained European Union Law (REUL) bill, is likely to require significant resource this year, so we will remain flexible to address emerging requirements.

Over the last few years, we have increasingly used stakeholder feedback from multiple sources to inform and

improve our effectiveness and impact, the benefits of which are now beginning to realise. We will review and respond to the findings of our stakeholder survey and identify the necessary actions to address the feedback inyear and beyond.

Internationally, we will maintain our roles within the Nuclear Energy Agency (NEA) and International Atomic Energy Agency (IAEA), to continue to learn from other nuclear regulators globally and play a key role in influencing relevant good practice and international standards, including in public communications and engagement.

Having been involved in the work to develop the NEA's 'characteristics of a trusted nuclear regulator' guidance, this year we will consider how we can self-assess to benchmark against it and identify areas to build on.

In March 2023, we published our 'Policy for openness and transparency with interested stakeholders and the public', setting out our commitments on public disclosure

and position on public consultation. Supporting work for this year includes reviewing our publication scheme, creating a new ONR website to enhance the accessibility of our information to the public and user experience, and enhancing our dialogue with interested stakeholders, including nongovernment organisations (NGOs), on regulatory processes and practices such as the potential impacts of climate change on nuclear safety.

The findings of the Post Implementation Review (PIR) of ONR, which concluded last year, confirmed that we are effective across our regulatory

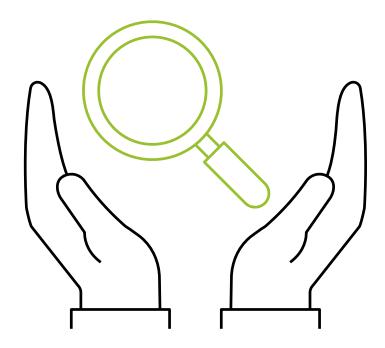
purposes, meeting all our legal obligations and operating effectively as an arm's length body. The report contained 14 recommendations to enhance and build upon existing practices and processes, reinforcina our ongoing focus on charging, risk management, enabling innovation and driving greater proportionality, consistency and efficiency in our regulation. We have made good progress, already clearing the majority of our recommendations and will continue to address the remaining recommendations with a view to completing them in-year.

Organisational Effectiveness Indicator 5: We engage with UK and international stakeholders to improve the effectiveness of our regulation and to inform UK policy demonstrable improvements and compliance across our purposes

We will:	Key deliverables/milestones:
Strengthen relationships with stakeholders through effective engagement and feedback	Host industry conference 2023 Hold NGO Forums Launch stakeholder survey 2024 Commence engagement with licensees for the CNI Themed Inspection on climate change
Inform nuclear policy with UK government from the earliest stages	Work closely with the Department for Energy Security and Net Zero (DESNZ) and the MOD as they develop nuclear policy in the civil and defence sectors
Continue to work with international regulators on areas of common interest to accelerate regulatory decision making and influence standards	Explore self-assessment against the NEA 'Characteristics of a trusted regulator' Prepare for the IAEA's Integrated Regulatory Review Service (IRRS) follow-up mission to the UK Prepare for the International Physical Protection Advisory Service (IPPAS) follow-up mission to the UK Meet all our international Safeguards obligations

Organisational Effectiveness Indicator 6: We are transparent and accessible to our stakeholders and the public

We will:	Key deliverables/milestones:
Deliver engaging and accessible publications	Publish Corporate Plan 2023/24 Publish Annual Report and Accounts 2022/23 Publish Chief Nuclear Inspector's Annual Report 2023
Support effective openness and transparency about our growing portfolio of regulatory activities	Review publication scheme
Enhance the accessibility of our information to the public and user experience	Launch new website





Strategic Theme 3

Creating a culture of inclusion and excellence

We will continue to invest in our staff - building capability, resilience, and promoting wellbeing in our great teams, underpinned by our inherent focus on inclusion and excellence.

One of the main challenges facing the nuclear sector is the shortage of skills for nuclear. We continue to engage closely with government to gain certainty of future demands across the whole lifecycle of nuclear, including GDA and licensing for new nuclear. We will engage with senior leaders in industry to work together to build the skills and capability base required to deliver the future UK ambition safely and successfully. This includes building on our existing networks (including Women in Nuclear, Nuclear Sector Skills Board and National Skills Academy Nuclear), as well as Great British Nuclear (GBN), to influence and engage in initiatives that seek to improve industry-wide outcomes in skills, capability, diversity, and inclusion. (P3) Within ONR, we continue to take steps to grow our pipeline, develop our people, effectively manage knowledge transfer (particularly using our WIReD platform), attrition rates and, in line with the industry, our ageing demographic, while remaining responsive to the market and

building flexibility in our recruitment plans. As part of this, we will roll out an organisation-wide succession planning and talent management approach, including a new pre-director development programme to future-proof our leadership. (P3)

With our simplified performance management process now embedded, we will launch our Academy Strategy to further strengthen the resilience and capability of our workforce. As part of this, we intend to create a safe space for our inspectors to practice, develop and master regulatory craft, building confidence and underpinning knowledge, as well as reinforcing proportionality and consistency principles. We will develop and launch a more diverse and structured development programme for our regulatory specialists, combining legal elements with other core skills. This will be supplemented with appropriate mentoring, on the job coaching, and experiential learning. At the same time, we will develop Corporate

services staff to provide high quality enabling services to our front-line regulation. To support hybrid working, the Academy will continue to offer a blended approach to learning and development, focussing on support for new starters, optimising opportunities for face-to-face engagement and tacit learning. (P5)

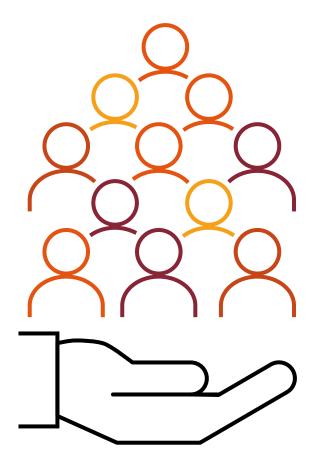
In our Strategy 2020-25, we committed to an Organisational Review, to ensure our structure is effective and efficient, supports our mission and is fit for the future. Last year, we completed the research phase for the Organisational Structure and Pay and Grading workstreams; this year, we will design, develop, engage on, and start to implement the recommendations, with design principles aligned with our values. This is a project of significant scale and impact, so our focus will be on leading our people through this major change effectively. (P4)

In parallel, we will roll out further 'new ways of working' commitments, such as improvements to our recruitment and promotion approach, and reinforce our hybrid working position. While offering more flexibility to work remotely, we will continue to encourage staff to balance this against business need, by attending the office regularly to enable collaboration, creativity, and knowledge sharing - and help sustain our cultural identity in the longer-term. (P5)

Having successfully achieved National **Equality Standard accreditation** for the second time, as part of our Diversity and Inclusion (D&I) Strategy, we will continue to address the assessment recommendations for

further improvement. We will also ensure our D&I plans are aligned with the emerging findings of the culture research undertaken by Alliance Manchester Business School (AMBS) last year, to focus and optimise our approach in this area. (P5)

Through our Achieving Culture Excellence (ACE) programme, we will be taking further steps to engage with, and empower staff to contribute to a more inclusive, healthier, and safer workplace. The data from the Health and Safety Executive (HSE) safety climate survey we undertook last year will enable us to establish a benchmark for our own safety culture. We will analyse the data and deliver on key actions, responding and acting on staff feedback, and will use further pulse surveys to monitor the effectiveness of the ACE programme.



Organisational Effectiveness Indicator 7: We have technical competence at our core

We will:	Key deliverables/milestones:
Influence a joined-up, industry wide approach to building and sustaining a resilient and capable workforce for the future	Oversee the establishment of an industry wide forum that will seek to address the skills shortage Influence the forum to agree a clear set of actions to deliver the capacity and capability to meet projected industry needs
Strengthen workforce flexibility, resilience and capability	Launch Academy strategy Roll out succession planning and talent management approach Launch structured development programme for regulatory specialists

Organisational Effectiveness Indicator 8: We exhibit strong leadership and an inclusive culture that embraces change

We will:	Key deliverables/milestones:
Engage with our staff to shape and begin to implement the recommendations of the Organisational Review project P4	Develop and be ready to implement a revised organisational structure Produce delivery plan for response to Pay and Grading activity Develop and start to implement the agreed principles and costed investment for the Pay and Grading review Undertake comprehensive equality impact assessment of proposed changes across organisational review implementation
Continue to shape a culture of inclusion and excellence	Publish our response to AMBS's research findings on culture Launch our 'Being a Good Ally' toolkit to staff Analyse the data from the safety climate survey and prioritise actions for delivery through the ACE programme



Strategic Theme 4

Modernising the way we work

We will build on our strengths by realising the benefits of past and current investment and becoming more efficient.

To do so, our focus this year is on simplifying and identifying efficiencies in our ways of working, and on making better use of technology.

Our aim is to minimise unnecessary burden and bureaucracy across the organisation, establish the appropriate levels of project governance, and strengthen our ability to respond to future demand. (P2) To support this, and ensure we plan and prioritise effectively while delivering change in the most efficient way, we will rely on well-established project management disciplines to enhance project oversight and governance for this year's major projects.

Having launched our Digital Strategy in 2022, this year our focus will be on implementation, driving service improvements and the right technology solutions to meet our corporate security requirements, and re-tendering for digital partners to support us through innovation and modernisation. A key part of this strategy is putting into practice our vision for how we use data. to assure our stakeholders and drive better, evidence-based, strategic, and operational decisions. This will see us digitising our operational performance

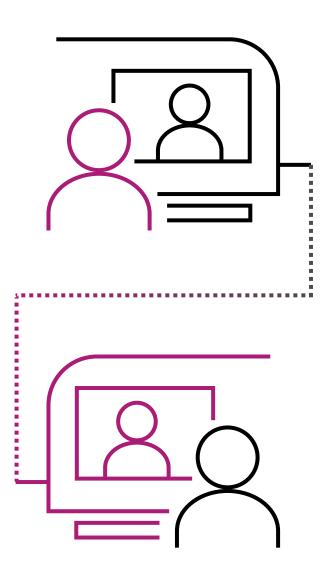
data to build capability and understanding within the organisation.

We will also work to improve resilience of regulatory capability for the year ahead, through pre-emptive recruitment, efficiency and productivity. Following the successful delivery of our WIReD project last year, we will now focus our attention on the transfer and maintenance of the platform, and longer-term embedding of the current processes, before the work to digitise the small number of residual low use processes is undertaken. Launched in February 2023, the WIReD dutyholder portal is a critical source of intelligence and insight that we can act on. It is also delivering productivity gains and more streamlined ways of working through simplified regulatory processes and access to real-time regulatory management information, with particular cost benefits as a result of List N improvements. Our regulatory teams will continue working with dutyholders to support phased and proportionate implementation. (P2)

This year, we will finalise our Charging Strategy, which will provide assurance that our charging regime is fit for purpose, that we have explored options for alternative charging approaches (aligned with a PIR Recommendation), and that we are clear on our areas of focus for the next few years. In addition, it will demonstrate that we can articulate a proportionate and pragmatic solution for future years, with a clear focus on those areas requiring attention. Our focus will therefore be on improving the quality of our delivery plans and the quality and accuracy of our time recording, which will result in more robust financial forecasts and will aid us in the way we can positively respond to new innovative workstreams. To support this, we will work to improve understanding of resource deployment and the impact of fluctuations in our direct and indirect activity on our cost recovery, forecasting and predictability to dutyholders. We will also mature our workforce planning to provide strategic insight into resource supply and demand against budget, capability, and capacity requirements.

Our incident management and business continuity arrangements continue to develop and integrate with those in our emergency preparedness and response function. As a result, we expect to become more resilient and have well-developed crossorganisational response arrangements in place, able to support a future Level 3 emergency exercise (designed to identify emergency preparedness and response best practices as well as areas for improvement).

The leases for all three of our office locations (Bootle, London, and Cheltenham) are due for review or renewal in 2024. We will continue negotiations with our landlords and Government Property Agency to retain and/or secure facilities that meet our future needs. Following the adoption of hybrid working, this will allow us to review our space requirements and shape our estates' footprint. We have established working groups for each location, with representation from different parts of the business, and we will engage with staff and trade unions throughout the process and ensure appropriate transition.



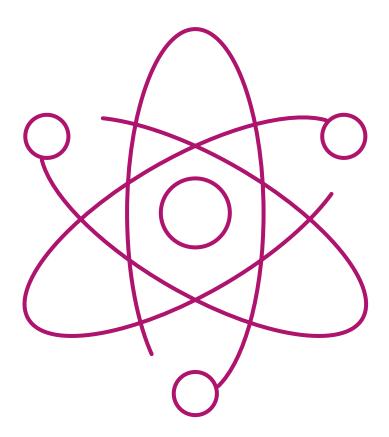
Organisational Effectiveness Indicator 9: We develop a strong organisational capability: knowledge management; tools; business continuity and emergency preparedness

We will:	Key deliverables/milestones:
Integrate our incident response arrangements in readiness for a future national level 3 emergency exercise	Put in place cross-organisational response arrangements
Continue to deliver improvements in digitisation and IT service management	Establish an Automation and Data Centre of Excellence Develop quality assured metrics across ONR's performance indicator hierarchy Re-tender for digital partner provision
	Technology refresh – laptop, mobile and Windows 11 operating system upgrade
Continue to embed processes and drive benefits of the WIReD platform	Deliver further enhancements to WIReD dutyholder portal through additional processes, including Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), Contact Reports and High Activity Sealed Sources (HASS)

Organisational Effectiveness Indicator 10: Delivery of our mission is efficient and sustainable

We will:	Key deliverables/milestones:
Deliver in-year efficiencies to meet additional demand associated with new national strategic programmes P2	Generate £4.3m in-year cost savings, to outturn in line with our approved budget
Drive improvements in our charging arrangements Improve quality of delivery plans and financial forecasts Improve the quality and accuracy of our time recording	Finalise Charging Strategy Develop multi-year high level budgets

Mature our workforce planning approach	Establish an effective workforce planning process that provides a single version of the truth and delivers value to operational deployment and informs the annual planning process
Secure office facilities that meet our future requirements in light of hybrid working arrangements	Make decision on options for future office footprint Refresh and/or sign new lease for all office locations
Building on our Environmental Statement of Intent, develop, publish and implement an Environmental, Social and Governance (ESG) strategy	Develop clear lines of responsibility and accountability for ESG Establish an ESG Working Group to monitor and report on performance



Regulatory assumptions

Our regulatory assumptions underpin the scope of our activity in terms of government policy and parameters for the work we do.

Ref	2023/24 Assumption
1	There are no nuclear events within the UK or overseas that undermine or result in a significant change to ONR's planned work programmes.
2	Programmes to construct and commission new GW power reactors (currently only the EPRs at Hinkley Point C and Sizewell C) proceed at declared rates and no significant regulatory concerns emerge.
3	The end-of-life plan, and consideration of potential for any life extensions, 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.
4	Resourcing plans allow for any new life-limiting factors that may 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.
5	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.
6	Government's policy, Defence Nuclear Infrastructure 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.
7	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.
8	The AUKUS (Australia, UK and US) Pact will require continued regulatory advice over the next 12 months. ONR regulatory input to the programme will be scoped and funded in sufficient time to allow adequate resourcing of the work.
9	The provision of ONR's support to the High Temperature Gas Reactor (HTGR) demonstrator programme, including building regulatory capability and engaging with vendors will continue as scoped. Phase five of the Advanced Nuclear Technologies (ANT) work programme will continue as scoped. ONR will undertake priority international engagement on ANTs in support of regulatory harmonisation.
10	The Rolls Royce SMR GDA will be ongoing and enter Step 2 in 2023 and ONR will have been asked to commence no more than two new GDAs.

Ref	2023/24 Assumption
11	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.
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	Sellafield Limited's post operational clean out decommissioning activities and long term spent fuel storage continue safely and securely and in accordance with their declared programme and timescales.
14	Progress with the hazard and risk reduction programmes at Sellafield will continue and 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.
15	Reviewed and updated Magnox and other decommissioning works continue in accordance with NDA declared programmes, including accelerated development of relicensing plans across the decommissioning estate.
16	ONR's work to support UK policy development for long term disposition of Plutonium inventory will continue.
17	UK Government remains committed to a Geological Disposal Facility; the process for identifying a suitable location continues and potential options for design assessments are advanced.
18	ONR can continue to maintain regulatory resources, and recruit or deploy (including through our Technical Support Contracts) niche skills in competitive market areas such as safeguards, cyber security, supply chain and new nuclear to meet regulatory demand.
19	ONR's international engagements to support UK international obligations and ONR's strategic priorities remain aligned-with our Strategic Framework for International Engagement and are supported by appropriate funding mechanisms.
20	ONR will provide ongoing technical and regulatory policy advice as government develops the Regulated Asset Base Model for nuclear, ensuring that safety and security remain paramount. Ways of working to ensure an effective interface with other regulators will be finalised.
21	ONR will work alongside government, as necessary, to implement the recommendations from the Post Implementation Review of Part 3 of the Energy Act 2013.

Ref	2023/24 Assumption
22	Subject to funding being secured where necessary, in advance of work commencing, ONR will provide ongoing technical and regulatory policy advice and undertake work to support Great British Nuclear, respond to the challenges raised by the British Energy Security Strategy and other policy, technical and regulatory matters relating to new nuclear developments as required.
23	ONR will work alongside government to ensure the 2022 Civil Nuclear Cyber Security Strategy continues to be delivered. ONR will focus on areas already attracting significant regulatory oversight including risk management, resilience, culture and skills.
24	There will be up to two requests for pre-licensing application engagement in year.
26	ONR will commit resource to working with DESNZ, DWP and HSE colleagues on the Retained EU Law (Revocation and Reform) Bill.
27	Long term, appropriate funding mechanisms will be agreed and implemented to enable ONR activity requested in relation to government policy (such as nuclear new build and related international engagement) to be funded without delay.
28	Staff recruitment and attrition rates fall within current planning margins.