



Office for
Nuclear Regulation

Corporate Plan 2024/25





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to the Energy Act 2013

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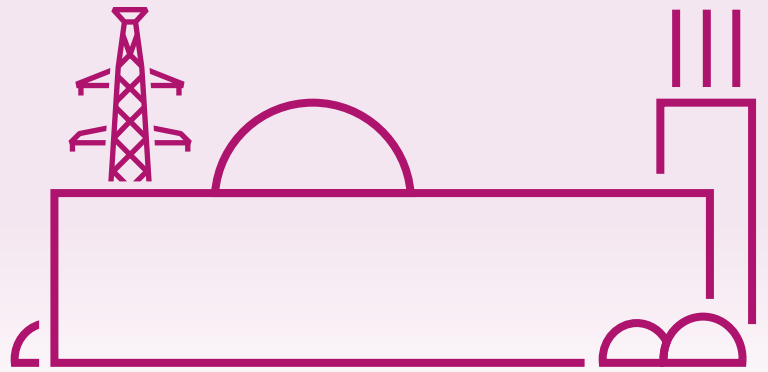
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As we enter the fifth and final year of our Strategy 2020-25, we have made considerable progress against our commitments to be a modern, transparent regulator, delivering trusted outcomes and value. This plan continues to build on our ambition, while focusing on delivering our mission to protect society by securing safe nuclear operations.

The nuclear landscape we regulate is changing at an increasing rate – from the government’s ambition for civil new nuclear and the potential mix of technologies, to the major investment planned for the defence nuclear enterprise, and growing innovation across the industry. In support of our core regulatory work to deliver efficient and effective regulation, our three priority areas of focus for this year will be:

1. People – capacity and capability
2. Our organisation, and
3. Our ways of working

We will continue to fulfil our role by influencing improvements and holding the industry to account where there have been shortfalls against the high standards of safety, security and safeguards that we expect. This includes focusing on sites that are

in enhanced or significantly enhanced regulatory attention.

With growing demand and pace in the sector, together with a rise in construction and demolition work, there is the potential for increased risks associated with these activities. As such, nuclear site health and safety will remain as a key cross-cutting theme, a priority focus for ONR and the industry for 2024/25. The emerging theme of cyber security is also a key priority and we will be seeking industry-wide improvements in these two areas during the year ahead.

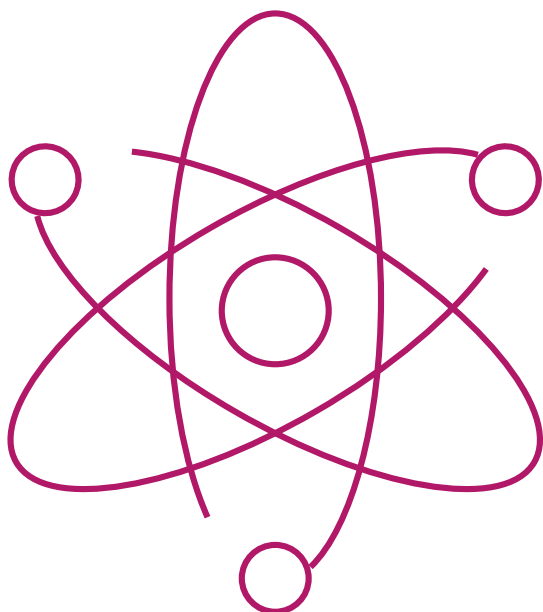
The safety and security of the UK’s operating reactor fleet will remain key, ensuring that we are satisfied with the standards of safety and security of reactors that are seeking extended periods of operational life. In addition, we will apply appropriate levels of attention to regulating nuclear licensed sites that are part of the Nuclear Decommissioning Authority (NDA) estate and their progress with remediation, alongside our important regulatory work associated with the Defence Nuclear Enterprise.

We will also continue to apply specialist resources to the effective regulation of the transport of radioactive materials, and to ensuring that the

UK meets its international safeguards reporting obligations.

As the nuclear sector prepares to support a growing new nuclear portfolio, we remain committed to contributing to ensuring a joined-up, industry-wide approach to building and sustaining a resilient workforce for the future, delivering future programmes safely, securely and effectively.

During 2024/25 we will make a step change in collaboration with international regulatory colleagues, which will include leveraging technical assessments undertaken by other regulatory bodies. We anticipate this providing efficiencies and acceleration



of assessments of new reactor designs, while ensuring that high standards of safety, security and safeguards are maintained. Part of our plan to better enable civil new nuclear includes the launch of our new framework for early regulatory engagement, enabling technology vendors and development companies to seek advice ahead of entering our formal processes.

In an increasingly dynamic environment with uncertain demands, we will use our stakeholder relationships and influence to ensure we maintain the capability, capacity, and flexibility required. We will work closely with the Department for Energy Security and Net Zero (DESNZ) to ensure that our early engagement and advice reflects government priorities.

Our Annual Review of Regulation identified several key areas for us to improve, which we will seek to address through a more integrated, risk informed and intelligence-led inspection regime, as well as progressing our revised charging strategy. As maintaining trust and confidence in our regulation remains ever more important, we will continue delivering on our commitments set out in our Openness and Transparency Policy.

We are pleased that our Organisational Review project will complete this year. We will be implementing the recommendations arising from the review. The project will build on our strengths to deliver an organisational structure, operating model, and pay and reward system fit for the next decade that enables us to be a more effective, inclusive and resilient organisation, better able to respond to future demands.

Informed by the Alliance Manchester Business School's (AMBS) independent assessment of our organisational culture, we will continue our journey to further embed a supportive, fair and inclusive culture where people feel empowered to deliver at pace.

We are experiencing a period of change in our leadership, and are making plans to ensure these changes are handled smoothly and with minimal impact on the organisation. The strength in depth and resilience in our leadership and our teams will continue to ensure we maintain our focus and effectiveness.

Work continues on the development of our next strategy that will set our direction for 2025-30. We will seek input from our staff, those we regulate, non-government organisations, government bodies and others.

We would like to thank all of our stakeholders and particularly our staff, who are vital to delivering the commitments in this plan, covering the final year of our existing strategy. 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.



Dame Judith Hackitt
ONR Interim Chair

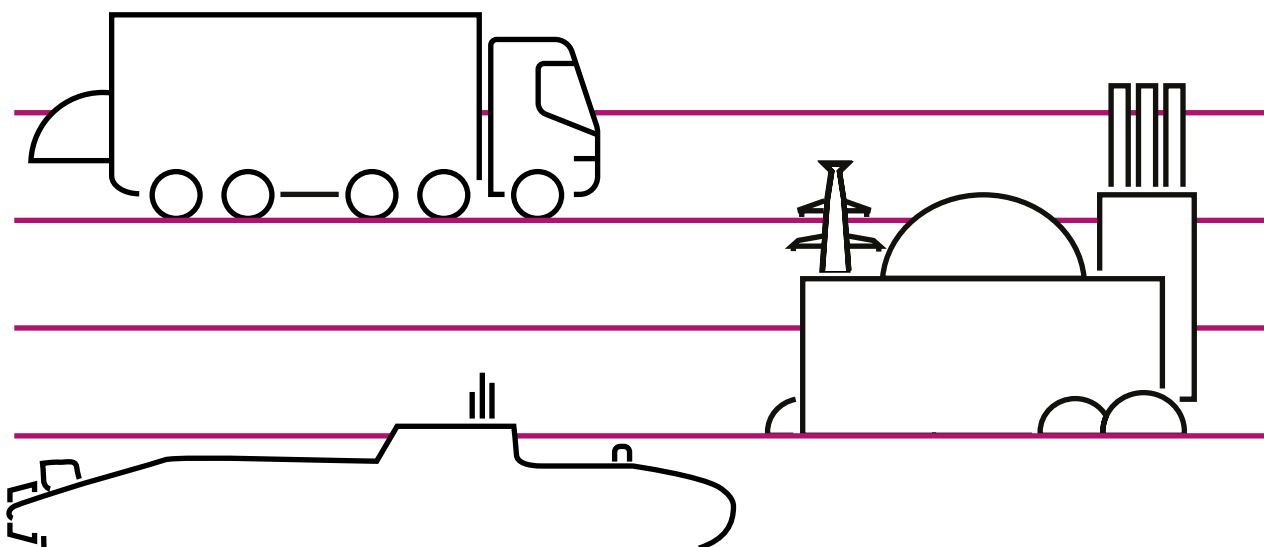


Mark Foy
Chief Executive,
Chief Nuclear Inspector

Risks

This Corporate Plan is informed by the strategic risks below. These risks have been identified as having the potential to have a significant impact. They are being proactively managed and mitigated through associated activities and actions. You can find our current risk appetite statement on our website - www.onr.org.uk/about-us/our-role/risk-management

1. **Having insufficient organisational capability and capacity**
2. **Failing to deliver efficient regulation in one or more of ONR's purposes**
3. **Failing to deliver strategic objectives to manage and respond effectively to incidents**
4. **Vulnerabilities in our health, safety and well-being (HSW) systems and approach**
5. **There is a risk that ONR security controls, in the physical, personal and cyber domains, are not sufficient to protect it from a deliberate or accidental compromise leading to damage to buildings, people or information systems.**
6. **Ineffective financial strategy – funding and charging**
7. **Failing to support key national civil and defence infrastructure projects**
8. **Failure to maintain the capability and resilience of Safeguards Information Management and Reporting System (SIMRS)¹ to ensure ongoing reporting to IAEA.**
9. **Inability of the organisation to respond effectively to the impact of significant internal change.**





ONR Office for Nuclear Regulation

Introduction to our 2024/25 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, maintaining the UK's 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 [about us](#), our [organisational structure](#), and [our regulation](#) on our website: onr.org.uk

This Corporate Plan is the fifth and final 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 2024/25 Corporate Plan is £114.1m compared to our 2023/24 final outturn expenditure of £105m; the £9m variance is mainly driven by increased work scope including our work on Generic Design Assessments (GDA), and staff related costs, including full year impact of recruitment and modelled pay inflation. 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 three priorities for 2024/25

Robust, effective and enabling regulation remain at the core of what we do and we will continue to drive demonstrable improvements at sites that are in significantly enhanced or enhanced regulatory attention, and influence long-term improvements for the CNI report themes.

To enable us to be fit for the future and most effectively support our regulation we have identified the following three priorities for this, the final year of our current strategy.

Priority 1 – People – capability and capacity

Invest to build our capability for the future and reward our talent; addressing the findings of the AMBS culture survey; succession planning for the future; and engaging with industry to build 'skills for nuclear', the capacity and capability required to deliver future UK nuclear ambitions safely and securely.

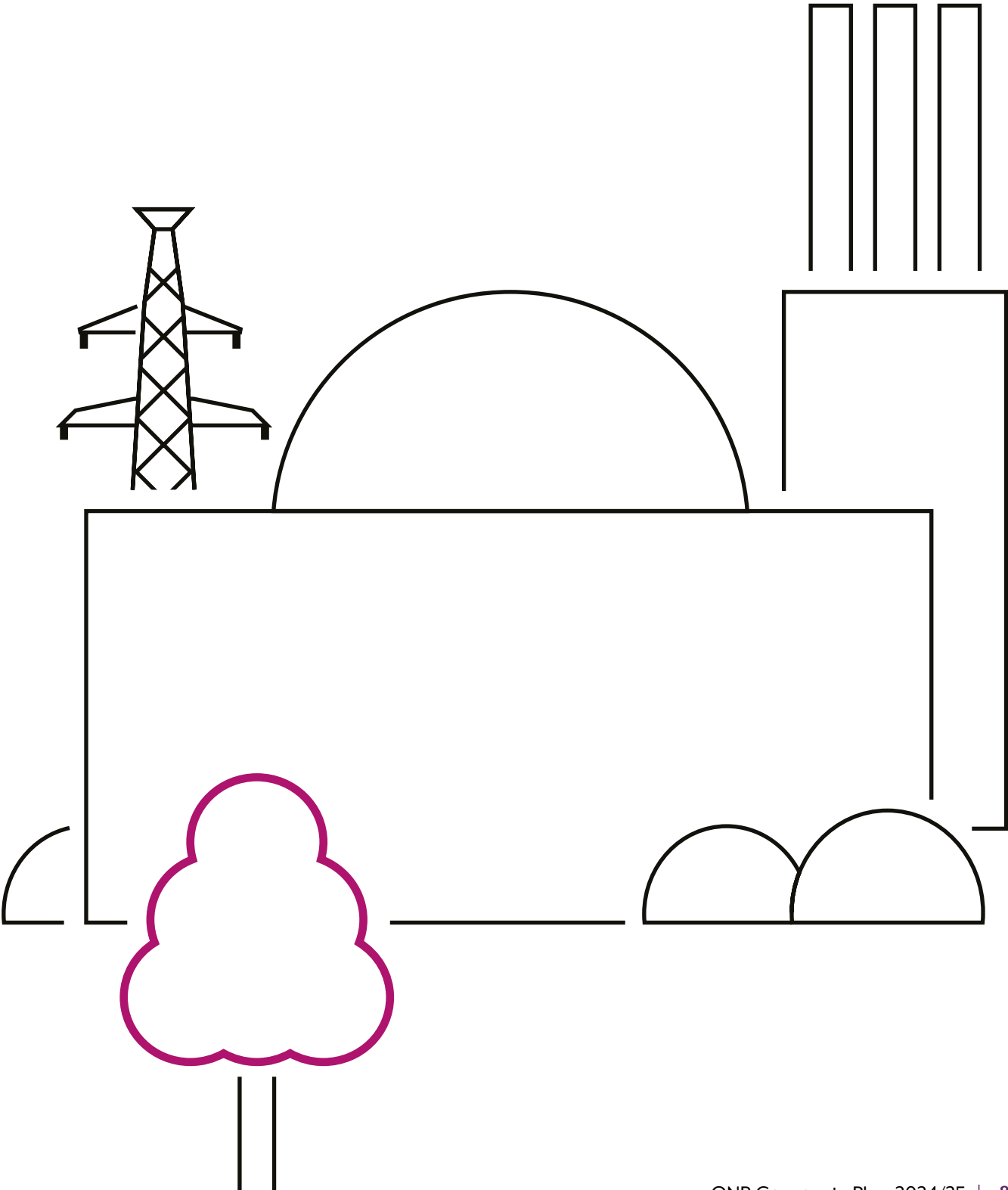
Priority 2 – Our organisation

Implement an integrated organisational structure responsive to future demands and rationalise our estate and infrastructure, optimising our use of space to promote effective collaboration and complement our hybrid working arrangements.

Priority 3 – Our ways of working

Deliver efficiencies and strive for continuous improvement, streamlining our regulatory approaches and how we work across our functions, adopting innovative solutions and being less risk averse in our decisions while maintaining high standards of regulatory oversight.

Our Strategic Themes





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 safely and securely.

Ongoing feedback from our stakeholders, most recently as part of our second Annual Review of Regulation exercise, tells us that it is increasingly important to ensure we are ready, fit for the future and in the best possible shape to respond to the operating environment and anticipated external factors.

In terms of proportionality and consistency, we will continue efforts to develop and embed a more integrated, risk-informed and intelligence-led inspection regime across our purposes.

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. Specific focus will be on ensuring that improvements are made at those sites that are in enhanced and significantly enhanced attention for safety or security performance reasons 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 and Special Nuclear Materials facilities, and on monitoring improvements in cyber security, physical security, and associated leadership and management, following enforcement activity in 2023.

- We will build on the achievements of last year, determining the adequacy of Sellafield Ltd's safety justifications to inform a number of permissioning decisions necessary to enable hazard and risk reduction activities at Sellafield such as those above. We will also give attention to improvements in Analytical Services, which provides key functions to the site that support high hazard risk reduction and which will move into significantly enhanced attention.
- We will co-ordinate our workstreams associated with Advanced Gas-Cooled Reactor (AGR) transition to defueling and decommissioning to ensure we are proportionate and consistent in our regulatory approach.

- We will work with government and the International Atomic Energy Agency (IAEA) to establish a proportionate approach to IAEA safeguards for plutonium management at Sellafield; and continue to hold Sellafield to account on its leadership and management improvements associated with cyber security, with a view to confirming that Sellafield Ltd has approved security standards, procedures and arrangements in place, following ONR enforcement activity in 2022/2023.
- Devonport Royal Dockyard Ltd (DRDL) – we will monitor and assess DRDL’s progress against the Level 1 Regulatory Issue evidenced by development and implementation of credible plans for completion of the required safety improvements to docking facilities. This will also provide evidence of DRDL’s robust decision making and confirm progress towards its move to routine regulatory attention.
- Atomic Weapons Establishment (AWE) – we will monitor and assess progress against the Level 2 Regulatory Issue requiring AWE to enhance its capacity and capability, examine levels of autonomous decision making and seek evidence of more consistent and effective internal assurance and internal challenge capability. This will be evidence of AWE Aldermaston making clear progress towards routine attention.
- EDF Energy Nuclear Generation (NGL) (Corporate) – we will continue to influence timely implementation of EDF’s comprehensive cyber transformation programme, which includes enhancements to technical controls supported by robust governance arrangements to ensure improvements are enduring. A return to a routine level of regulatory attention will be possible when sufficient delivery of this programme has been achieved.
- Nuclear Restoration Services Ltd (NRS) (formerly Magnox) Berkeley – we will influence development of a satisfactory vulnerability assessment leading to approval of the site’s first Security Assessment Principles (SyAPs) aligned security plan. Additionally, we will continue with the investigation into the civilian guard force management on the site.
- Springfields Fuels Ltd – we will work to ensure the dutyholder delivers timely improvements in cyber leadership and governance and its independent assurance function. We will also continue to influence Springfields Fuels Ltd to address the absence in suitably qualified and experienced persons (SQEP) in key security positions, and ensure the site security plan reflects the revised Physical Protection System Outcome.

More broadly, the key regulatory themes of nuclear site health and safety and cyber security emerging from the [CNI annual report on Great Britain’s nuclear industry](#) will be a priority for our regulation across the nuclear estate.

In support of the theme for nuclear site health and safety, our new regulatory strategy for nuclear site health and safety seeks to ensure that dutyholders work individually and collectively to take action to drive improvements that protect the health and safety of workers across the nuclear sector. We will adopt regular, sustained and strategic level engagement on nuclear site health and safety with nuclear sector leaders stakeholder groups, including the supply chain. For example, for Hinkley Point C we will continue to 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 also increasing significantly.

Through collaboration in multi-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, influencing 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.

Our themed inspection on climate change runs through to 2025 to provide assurance on the continued adequacy of industry's arrangements to ensure appropriate levels of safety in the face of climate change impacts, taking account of the latest scientific advice.

In 2024/25 we will conduct site-based regulatory inspections at selected sites on a targeted, proportionate basis. This will help us to evaluate the effectiveness of nuclear site licensees' arrangements to monitor and review climate change information to determine if additional measures are needed to ensure that their sites and activities remain protected in the future. Once the site-based regulatory inspections are completed, the CNI themed inspection summary report will be published, detailing the conclusions and findings.

Having an internationally respected regulatory regime is a key strength for the UK, and we have been preparing for the expansion of new nuclear for some time. Following the launch in January 2024 of the government's Civil Nuclear: Roadmap to 2050, and its consultations on alternative routes to market and siting, we will deliver our commitments including: embedding improvements on GDA and licensing, launching our offer for vendors seeking early engagement. We will seek to realise efficiencies in how we do things, maximising the value of overseas regulatory work through our multilateral collaboration with international regulatory bodies.

We will provide timely advice and support to the DESNZ on civil new nuclear, subject to funding being made available. We will work closely with the Environment Agency and Natural Resource Wales (NRW) as fellow regulators of civil new nuclear and Advanced Nuclear Technologies.

We will continue with a two-step GDA for GE Hitachi's Nuclear Energy BWRX300 reactor; with Rolls-Royce SMR

Ltd (LWR SMR) expected to enter Step 3 in 2024; Holtec International's SMR-300 is expected to enter and complete Step 2 in-year.

Following the successful launch of our Innovation Hub in 2022, we completed the pilot sandboxing exercise in the regulation of Artificial Intelligence (AI), a ground-breaking project developed by ONR and the Environment Agency made possible by a grant from the government's Regulators' Pioneer Fund (RPF). The sandbox is the first applied to nuclear regulation anywhere in the world, providing regulators and industry stakeholders with a safe space to consider how AI technologies could be regulated.

Over the next twelve months, the Innovation Hub will deliver additional sandboxing exercises in other areas, along with additional innovation enabling tools including expert panels and innovation cafés. These will provide a safe environment for industry to explore innovative technologies and proposals, without prejudice, prior to formal regulatory assessment. In addition to liaison with other national and international regulatory bodies, the innovation hub will also consider improved, novel ways to assist ONR in delivering proportionate regulation to the nuclear industry.

Regarding operating facilities, in addition to a range of safety case assessments in support of new and upgraded facilities, lifetime extensions and end of generation, we will continue to influence the delivery of sustained improvements, aligned with the findings published in the [CNI themed inspection report on ageing facilities](#).

We will also engage with and influence EDF to ensure safe risk-informed decision making with respect to the ongoing safety of the graphite cores and facility investment in support of extending the operating life of its reactors.

Other key areas of focus for this year include our continued work towards the consolidation of irradiated fuel from Dounreay at Sellafield Ltd, the decommissioning of NRS power stations, the transfer of the Ministry of Defence (MoD) Vulcan site to the Nuclear Decommissioning Authority (NDA), and the relicensing of AGR sites from EDF to Nuclear Restoration Services following fuel-free verification.

We will work closely with NDA's Nuclear Waste Services in their engagement with potential volunteer communities to host a future Geological Disposal Facility, supporting NDA events to provide assurance on our role on ensuring high standards of safety and security of a disposal facility. In addition, we will produce guidance to meet government policy objectives relating to the regulation of the end states of nuclear sites.

Our thematic priorities for cyber security are aligned to cross-sector commitments under the [2022 Civil Nuclear Cyber Security Strategy](#) and the CNI's cross-cutting priority on cyber security. We will deliver key regulatory objectives including increased scrutiny of leadership, governance and culture delivered through a thematic programme of interventions across dutyholders. Delivery of the cyber benchmarking exercise against the Cyber Assessment

Framework will enhance regulatory intelligence and enable sector-wide trend analysis.

Following the independent review of our SyAPs we will implement the findings and recommendations, and undertake appropriate stakeholder consultation and engagement on proposed changes.

We will establish the standards, procedures and arrangements for the categorisation and classification of cyber security systems. We will also work with government to influence potential changes to our cyber security vires in 2025, in parallel with the Nuclear Industry Security Regulations review.

Our Safeguards Information Management and Reporting System (SIMRS) is a strategic element of the UK State System of Accounting for and Control of Nuclear Material (SSAC) and a critical tool for nuclear material accountancy and declaration to the IAEA. A programme of continuous development and improvement is being implemented and, during 2024/25, we will make improvements relating to accessibility and further enhancements that ensure longer term sustainability and resilience of the system. This will ensure that we continue to meet all our obligations against domestic targets and international reporting requirements.

With demand for Human Factors (HF) capability within the nuclear sector expected to remain high, in 2024/25 we will work collaboratively with stakeholders in the sector on the development of an HF 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 two-to-three 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 unannounced roadside stops of vehicles transporting Class 7 dangerous goods (radioactive materials). Working in collaboration with the Police and the Driver and Vehicle Standards Agency this allows us to observe vehicles in a different, and potentially more testing dynamic. These will continue throughout 2024.

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

We will:	Key deliverables/milestones:
<p>Continue our work to facilitate timely return of dutyholders to a routine level of regulatory attention</p>	<p>Ensure improvements are made at sites that are in enhanced and significantly enhanced attention</p> <p>Complete assessments for DRDL and AWE Aldermaston to measure their improvement in safety performance and readiness to move to routine regulatory attention</p> <p>Complete assessment of Sellafield's readiness to return towards a routine level of regulatory attention for physical security</p>
<p>Support government's strategic ambitions for new nuclear</p>	<p>Progress step 3 of Rolls Royce Ltd. SMR GDA</p> <p>Commence step 2 of Holtec International SMR300 and GE Hitachi's Nuclear Energy BWRX300 GDA</p> <p>Deliver ONR activities against commitments made in the Civil Nuclear: Roadmap to 2050</p> <p>Provide advice and support to DESNZ on implementation of the Civil Nuclear Roadmap and consultations on siting and 'alternative routes to market'</p> <p>Undertake regulatory early engagement with prospective market entrants to the UK in accordance with our new arrangements</p> <p>Continue our support to phase B of the government's AMR demonstrator programme</p>
<p>Continue our work to influence timely hazard and risk reduction at Sellafield Ltd</p>	<p>Support the reinvigorated G6 approach that supports major hazard and risk reduction on the Sellafield site</p> <p>Assess and determine the adequacy of Sellafield's safety justifications, and challenge our approach to permissioning, to enable effective and efficient delivery of hazard and risk reduction activities</p>

We will:	Key deliverables/milestones:
<p>Enable ageing AGR cores to operate and shutdown in a demonstrably safe and secure state</p>	<p>Complete assessment of safety cases that underpin the safety of lifetime extensions for AGR reactors</p> <p>Engage with, and influence, EDF to ensure safe, risk informed decisions are made with regard to safety functional requirements of the graphite cores. This will provide confidence that AGRs can be operated safely through to end of life</p>
<p>Enable the safe and innovative delivery of critical nuclear defence projects</p>	<p>Complete regulatory engagements, assessments and permissions associated with key defence infrastructure projects, including the modern assembly/disassembly facility at AWE Burghfield, improvements in dock capabilities at Devonport and delivery of D58 at BAE systems</p>
<p>Deliver an integrated regulatory response to the priority themes in the CNI Annual Report to drive industry-wide ownership and progress</p>	<p>Deliver themed inspection around industry's consideration of climate change in safety cases</p> <p>Implement the new cross-industry site health and safety strategy to drive sustained focus across the industry</p> <p>Complete regular and sustained, engagement on nuclear site health and safety with nuclear sector leaders and stakeholder groups to ensure they deliver performance improvements</p>

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

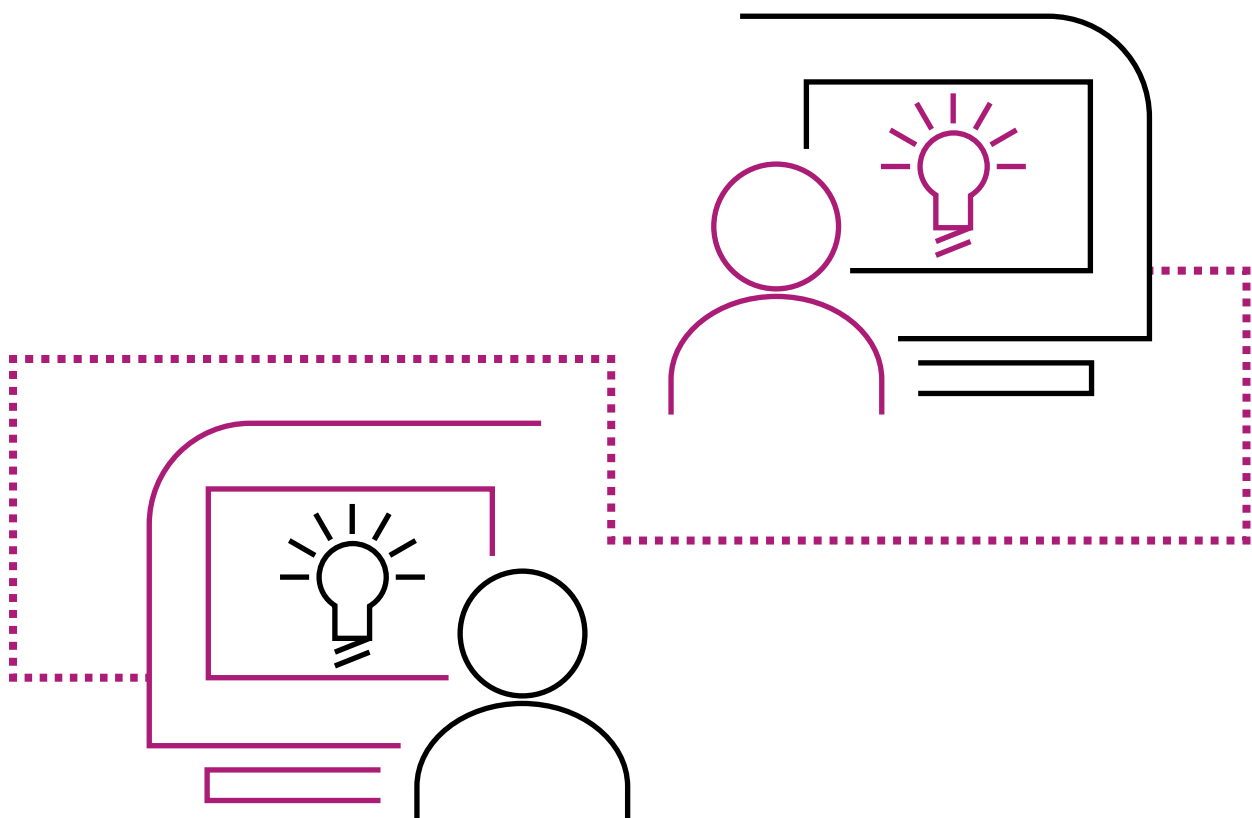
We will:	Key deliverables/milestones:
Continue our work to improve collaboration, co-operation, proportionality, and consistency across our purposes	Issue the guidance supporting the government policy objective for Proportionate Regulatory Controls Close out our Organisational Review project by embedding an integrated and sustainable organisational structure, operating model, and pay and reward system that enables us to be a more effective, inclusive and resilient organisation

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	Embed a mature regulatory intelligence process to provide strategic insight to inform intervention planning to maintain high standards of safety, security and safeguards
Progress a planned efficiency review of our regulatory delivery, making appropriate improvements	Complete a Regulatory Assurance review that provides an insight into the targeting, prioritisation and efficiency of our regulation

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:
<p>Embrace innovation, new approaches and technologies in how and what we regulate, and share best practice</p>	<p>Implement revised strategy for innovation</p> <p>Generate a safe space for industry and its supply chain to explore innovative technologies and proposals, without prejudice, prior to formal regulatory assessment</p> <p>Our approach to innovation is fully embedded in our training and management system, influencing a more open approach to innovation in both how and what we regulate</p> <p>Strengthen our communications with industry and its supply chain to enable improved engagement on innovation</p>





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.

With a significant increase in the UK government's ambition for new nuclear, there is increased interest in key policies such as siting, geological disposal, proportionate regulatory controls and funding models for new nuclear, and in regulatory processes. We will continue to provide advice related to government nuclear policy, when requested, at the earliest possible stage, as these activities progress.

We value highly stakeholder feedback from multiple sources to inform and improve our effectiveness and impact. We will review and respond to the findings of our latest stakeholder survey, identifying the necessary actions to address the feedback in-year and beyond.

We will maintain our leadership of, and engagement with the UK Health and Safety Regulators Network which provides an effective forum to share learning and enable a common voice with UK health, safety and environmental regulators, leading to more effective, efficient and consistent regulation for the benefit of society, industry and government.

Internationally, we will maintain our roles within the IAEA, the Nuclear Energy Agency (NEA), and other key international organisations. We will continue to share knowledge with and learn from other international nuclear regulators on areas of common interest, and play a key role in developing and influencing relevant good practice and international standards, including in public communications and engagement. Having supported the publication of the NEA's 'Characteristics of a trusted nuclear regulator' guidance in 2023, and explored how we can self-assess to benchmark against it, this year we will use the guidance to identify and work on areas for improvement.

We will continue to enhance our dialogue with interested stakeholders, including non-government organisations (NGOs), on regulatory processes and practices, including topics of specific interest. In 2023 we started the development of a new website to enhance the accessibility of our information to the public and user experience. Having launched the new

website earlier this year, our focus will be on maximising the benefits of its new functionality.

In March 2023, we published our ‘Policy for openness and transparency with interested stakeholders and the public’. This was recognised by the IRRS follow up mission to the UK in January 2024 as an exemplar policy which was noted as a ‘good performance’. This year we will continue to implement our commitments set out in this policy and measure our performance against it, including its effectiveness and impact in maintaining and building public trust and confidence in ONR.

The findings of the Post Implementation Review (PIR) of ONR, which reported in 2022, concluded that we are effectively

delivering our regulatory purposes, and endorsed our effectiveness as a regulator to support current and future regulatory demands, including the government ambition for new nuclear. We have implemented a range of recommendations to enhance our existing practices, reinforcing our ongoing focus on charging, risk management, enabling innovation and driving greater proportionality, consistency and efficiency in our regulation. We have provided assurance to government on progress and evidence of delivery that all actions remain on track for the final ministerial report in July 2024.

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.

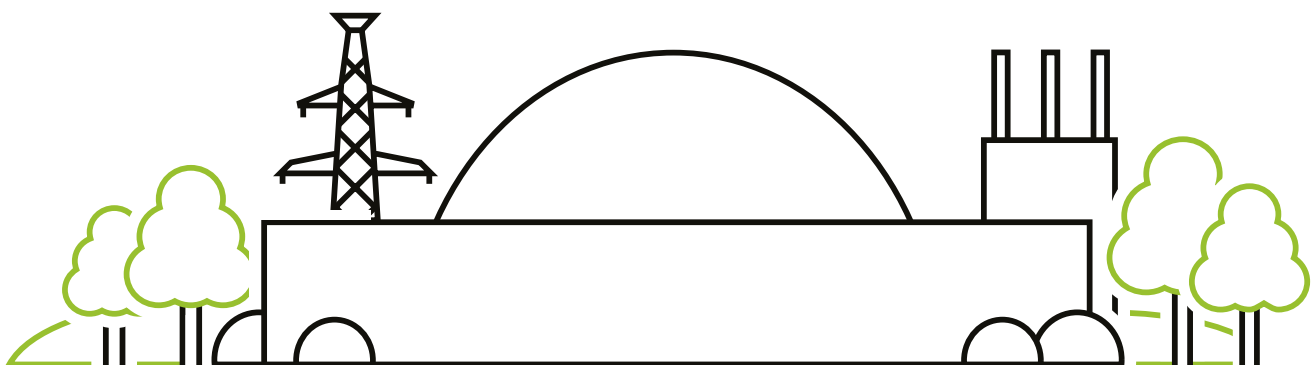
We will:	Key deliverables/milestones:
Strengthen relationships with stakeholders through effective engagement and feedback	Host annual stakeholder conference 2024 Hold NGO Forums and workshops Review and respond to findings of our 2024 stakeholder survey Complete engagement and discovery phase with licensees and other stakeholders as part of the CNI themed inspection on climate change Publish the CNI themed inspection summary report, detailing the conclusions and findings
Inform nuclear policy with UK government from the earliest stages	Provide timely advice and support related to government nuclear policy at the earliest possible stage

We will:	Key deliverables/milestones:
<p>Continue to work with international regulators on areas of common interest and to influence standards</p>	<p>Demonstrate through case studies how we influence national and international practice and learn from our stakeholders to improve our impact and reduce regulatory burden</p> <p>Use the self-assessment to benchmark ONR against the NEA 'Characteristics of a trusted regulator' as a tool to identify areas to build on</p> <p>Meet all our international Safeguards obligations</p> <p>Maximise the value of overseas regulatory work through multilateral collaboration with international regulatory bodies to enable the sharing of regulatory assessments and facilitating greater efficiency</p>

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

We will:	Key deliverables/milestones:
<p>Deliver engaging and accessible publications</p>	<p>Publish corporate publications that meet accessibility guidelines:</p> <ul style="list-style-type: none"> Corporate Plan 24/25 Annual Report and Accounts 23/24 Chief Nuclear Inspector's Annual Report 2024 Climate Change Themed Inspection Report

We will:	Key deliverables/milestones:
<p>Support effective openness and transparency about our growing portfolio of regulatory activities</p>	<p>Publish clear, accessible information and engage openly and constructively</p> <p>Review delivery of our commitments against standards for public consultation and engagement as set out in our Policy on Openness and Transparency</p> <p>Complete a review of our publication scheme</p> <p>Provide assurance and evidence delivery against the PIR recommendations to government for the final ministerial report in July 2024</p>
<p>Enhance the accessibility of our information to the public and user experience</p>	<p>Maximise functionality of the new website to enhance accessibility of our information to the public and user experience</p> <p>Complete a review of the delivery against our commitment to enhance dialogue with interested stakeholders, including non-government organisations (NGOs), on regulatory processes and practices including potential impacts of climate change on nuclear safety</p>





Strategic Theme 3

Creating a culture of inclusion and excellence

We will place increased focus on investing in our staff – building capability, resilience, and promoting wellbeing in our great teams, underpinned by our inherent focus on inclusion and excellence.

The industry is entering a period of change with the government policy on energy security and net zero creating a demand for new civil nuclear in the UK. This is in addition to the major investment already established by the MoD for its nuclear propulsion and strategic weapons programmes.

As the industry prepares to support a growing nuclear portfolio, the shortage of, and competition for, people with the skills required to support its ambitions will present a particular challenge. We are supporting and contributing to ensuring an industry-wide approach to building and sustaining a resilient, capable workforce for the future. Ensuring this joined up approach is successful is a priority to ensure the successful, safe and secure delivery of the UK's ambition.

We will also continue to engage closely with government to gain certainty of future demands across the whole lifecycle of nuclear. We will engage with senior leaders in industry to work together to build the skills and capability base required to deliver the UK ambition safely and successfully. This includes

building on our existing networks (including Women in Nuclear, Nuclear Skills Development Board and National Skills Academy for 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.

Within ONR, we continue to grow and diversify our talent pipeline, and develop and build the capability of our people to work effectively, efficiently, and consistently. We are improving our workforce planning and recruitment so that we can remain responsive to demands whilst addressing the industry wide challenges of the need to increase diversity, an aging demographic and an increasingly competitive skills market.

Our effective planning and implementation of our 'always on' recruitment campaign will ensure that, despite the anticipated levels of retirements and staff turnover, we will maintain resilience in staff capability and capacity, including the niche skills, to deliver our mission. We will develop and maintain agility in our approach to recruitment including: streamlining

job roles; an effective and candidate-friendly application process; and inclusive advertising to continue to increase our diversity. In attracting and bringing in the best candidates in a challenging market, we will also make best use of the 'Destination Nuclear' initiative.

We will focus on improved management and leadership capability through continuing to embed and enhance our succession planning and talent management processes with delivery of integrated and supporting development programmes, greater clarity on roles and accountabilities and piloting a new selection centre approach to support promotion and development for those seeking leadership roles.

We will embed and evaluate our newly-launched cohort approach to inspector development built around a structured programme with emphasis on coaching and mentoring as well as experiential learning. This will provide opportunity to ensure a more rounded development and supported learning experience to enable our developing cadre to better understand, practice and master regulatory craft, building confidence and underpinning knowledge, as well as reinforcing proportionality and consistency principles.

We will conduct an organisation-wide training needs analysis through our ONR Academy, that will inform development of blended learning for all staff and prioritise skills needed across all areas. This will underpin provision of high-quality delivery and services to

enable our front-line regulation in an increasingly digital world.

Another key priority for us is to address our cultural issues in particular taking forward actions to tackle issues identified in the AMBS Cultural Survey. This will include taking recommendations forward to support underpinning cultural changes that will develop a more diverse and inclusive organisation. We will also use our Staff Conference and our Leading ONR events to utilise our leaders and influencers to deliver the culture we want for our people.

We are recognised for our professionalism, capability, expertise and effectiveness as an independent regulator, but in the face of a fast-moving external environment and industry, we must ensure we remain agile, resilient and effective to protect the long-term delivery of our mission. As we enter our tenth year of operations as a public corporation, and following the PIR, the time is right to take stock and understand what we need to do to set us up for the future, which is the purpose of our Organisational Review project.

The project was set up to review and develop an organisational structure, operating model, and pay and reward system that will enable us to be more effective, resilient, and reflect our aspired culture and values. Through open competition, we commissioned PricewaterhouseCoopers (PwC) to undertake an independent objective review of pay and grading and organisational structure. There was extensive representation from

across the organisation in addition to engagement with specific, targeted groups.

Implementing the findings from the review during the year will provide for a unified regulatory operating structure that is inclusive of our regulatory purposes, promoting a holistic approach to planning, prioritisation and decision making, which will

enable a cohesive, consistent and effective approach to regulation for the long term. As part of this project, we will also build on the extensive work carried out in 2023/24, to finalise the implementation of improvements to our pay, reward and progression system - to ensure it remains fair, equitable, and fit for purpose.

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	Support and contribute to the joined-up industry wide approach to agree a clear set of actions to deliver the capacity and capability to meet projected industry needs
Strengthen workforce flexibility, resilience and capability	<p>Conduct an organisation-wide learning needs analysis to support the development of a new Academy Strategy from 2025 that will meet priority corporate learning needs and address strategic gaps</p> <p>Embed and enhance our succession planning and talent management processes and approach</p> <p>Deliver and evaluate our leadership programme for senior leaders</p> <p>Embed a structured development programme for regulatory specialists</p> <p>Evaluate our newly-launched cohort approach to inspector development across ONR, built around a structured programme</p>

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 implement the recommendations of the Organisational Review project	<p>Complete the implementation of our Organisational Review project outcomes to include the organisational structure aligned to people and functions; and the unified regulatory operating structure inclusive of our regulatory purposes</p> <p>Undertake an equality impact assessment of proposed changes across the organisational review implementation</p>
Continue to shape a culture of inclusion and excellence	<p>Deliver a ‘Staff Conference’ and two ‘Leading ONR’ events to align organisation and leadership on our cultural journey and to better prepare for future environment and challenges</p> <p>Implement future initiatives based on findings from AMBS research report to strengthen our organisational culture</p> <p>Continue to embed diversity and inclusion initiatives to ensure that every colleague feels valued and is treated in a fair and equal manner</p> <p>Complete the review of our safety management system and continue to embed our approach to support our organisation to effectively implement controls to mitigate the risks associated with our work activities</p>



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.

Last year we appointed a dedicated efficiency lead and commenced work with the aim of establishing an enduring organisational approach to identify, drive, deliver, measure and report on efficiencies. We now have an Efficiency Framework and supporting guidance, and associated reporting arrangements are embedded and will continue to evolve as our work matures. With a strong leadership commitment to foster a continuous improvement mindset, this year we will focus more on cultural elements to ensure the vision and goal for efficiency in ONR are understood and continue to deliver productivity improvements. We will provide the training, tools and resources to empower all staff to take responsibility for improving what we do and how we do it.

We will do this by delivering communications and engagement to support organisational approach to efficiencies, and establishing a network to share ideas and best practices; and refining our approach to recording and reporting efficiencies to show impact on performance.

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. 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.

Through ONR's Synergy Programme Board, we are working closely with the DWP Synergy Programme (comprising a cluster of members including DWP, Home Office and Ministry of Justice and Cabinet Office) to represent our interests and ensure post-SSCL (Shared Services Connected Ltd) contract plans are developed in line with Government Shared Service strategy. This will entail building a common operating model to replace the Single Operating System (SOP), Business Process Outsourcing and a commercial strategy, and as such will involve a significant amount of HR and Finance resource, working with DWP to support the SOP replacement solution.

Having developed our Digital Strategy, and re-tendered for our digital partner support in 2023, this year our focus will be on transition of the current services to the new strategic partners and bringing our helpdesk in house to improve responsiveness. We will continue to innovate and modernise to drive efficiency and improve our capability in using our data effectively across the organisation.

We will also work to improve resilience of regulatory capability for the year ahead, through efficiency and productivity. Following the successful handover of our Well Informed Regulatory Decisions (WIReD) project last year, we will now attend to the stabilisation and maintenance of the platform, and longer-term embedding of the current processes and delivery of the RIDDOR reporting access. Once we have confidence in the stability of the platform we will digitise the small number of residual low use processes that remain outstanding.

Launched in February 2023, the WIReD dutyholder portal is a critical source of intelligence and insight that we can act on. It is delivering productivity gains and more streamlined ways of working through simplified regulatory processes and access to real-time regulatory management information, with immediate cost benefits as a result of List N improvements. Our regulatory teams will continue working with dutyholders to support phased and proportionate implementation.

Our Charging Strategy provides assurance that our charging regime is fit for purpose and that we have a

proportionate and pragmatic solution for future years, with a clear focus on those areas requiring attention. We will explore alternative funding routes, in collaboration with government colleagues, to ensure we are funded appropriately to support our regulatory activity so we can respond effectively to the UK's changing nuclear landscape.

This year we will deliver education and training to the organisation to ensure a thorough understanding of our charging principles whilst continuing to improve the quality of our delivery plans and the quality and accuracy of our time recording. This will result in more robust financial forecasts, and will aid us in positively responding to new innovative workstreams. To support this, we will mature our regulatory planning horizon to inform longer-term multi-year forecasting for our stakeholders and increase certainty (reduce volatility) in our forecasts. We will embed effective workforce planning to enhance the quality of our forecasting and improve oversight of the deployment of our resources.

We will build on activities that have strengthened our emergency response arrangements and ability to manage incidents effectively, with a focus on developing a sustained capability to increase resilience during incidents. Working with stakeholders, we will practise and test these arrangements in accordance with established programmes in anticipation of a future national Level Three emergency exercise.

The leases for our Bootle, Cheltenham and London offices are all due for

review or renewal in 2024. With the adoption of hybrid working, and in conjunction with Government Property Agency (GPA), we have taken the opportunity to review and renew our leases in Bootle and Cheltenham and rationalise our space requirements. This will reduce our office footprint and cost base at these locations by circa 40% and produce an annualised saving of circa £2.2m. We are also required to vacate our London office (Windsor House) ahead of the lease expiry in September 2024. We have successfully concluded negotiations with GPA

and will be moving to a smaller, more cost-effective public sector location in central London.

Working groups for each location are established, as we begin the process of shaping and redesigning our offices to ensure they reflect modern ways of working and provide a vibrant and collaborative place to work. We are engaging with staff and trade unions, which is crucial to the successful delivery of each lease project and we will ensure all parties are fully sighted and aligned on delivery plans.

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

We will:	Key deliverables/milestones:
Continue to develop and practice incident response arrangements in readiness for a future national level 3 emergency exercise	Integrated cross-organisational arrangements that deliver an appropriate and sustainable ONR response to a nuclear emergency event
Continue to deliver improvements in digitisation, IT service management and data	Implement a new internal SIAM (Service Integration and Management) model to improve the service offering and embed new specialist partners into the model Improve data literacy across the organisation through a programme of targeted education
Focus attention on the stabilisation and maintenance of the WIReD platform and continue to embed processes and drive benefits of WIReD	Deliver further enhancements and new functional additions under WIReD Phase 3 initiative, including digitising the small number of residual low use processes that remain Complete a final benefits realisation review of WIReD
Develop mature business continuity capability	Roll out wider business continuity programme in accordance with the best practice outlined in the Business Continuity Institute’s newly revised guidelines

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	Achieve in year objectives within 2024/25 budget
<p>Drive improvements in our charging arrangements</p> <p>Improve quality of delivery plans and financial forecasts</p> <p>Improve the quality and accuracy of our time recording</p>	<p>Explore and agree alternative funding routes, in collaboration with government, to ensure we are funded appropriately to support our regulatory activity</p> <p>Drive forward efficient process for budget setting and forecasting, and progress production of robust multi-year budgets</p>
Mature our workforce planning approach	Strategic Workforce Planning tool demonstrably supports agile resource management for all activities, including effective and controlled deployment and redeployment of staff and informs budget forecasts and resource requirements over the next five years
Secure office facilities that meet our future requirements in light of hybrid working arrangements	<p>Renew leases in Bootle and Cheltenham and downsize our estates footprint by 35 – 40% in both offices</p> <p>Realise gross annualised savings of over £2.2m from 2023/24 cost levels</p> <p>Implement move to a new public sector location in central London ahead of lease expiry in September 2024</p>
Build on our Environmental Statement of Intent, develop, publish and implement an Environmental, Social and Governance (ESG) strategy	<p>Support the continued development and refinement to formalise our approach to managing ESG</p> <p>Develop and integrate environmental arrangements and impact into processes within the ONR management system, including international travel</p> <p>Demonstrable reduction in environmental impacts, in accordance with the commitments set out in our Environmental Statement of Intent</p>

Regulatory Assumptions

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

ONR 2024/25 Regulatory Assumptions	
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 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 and AGR Transition, continues safely and securely ensuring that domestic and international safeguards obligations are met. The de-fuelling of AGR power stations and transfer to Nuclear Restoration Services, progresses in line with the timescales and planning expectations of all delivery partners including EDF, NDA and its operating companies.
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 for the regulation of the defence sector remains unchanged.
8	The AUKUS (Australia, UK and US) Programme will require continued regulatory advice and may include advice to the relevant Australian regulatory body, where appropriate. ONR regulatory input 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 in the current phase will continue as scoped and conclude in March 2025.

ONR 2024/25 Regulatory Assumptions

10	<p>The Rolls Royce SMR GDA will enter step 3 in 2024, and the GE Hitachi and Holtec International GDAs will enter step 2 in 2024.</p> <p>DESNZ priorities will inform our strategic planning to provide regulatory capacity for GDAs.</p>
11	<p>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, current civil nuclear security regulatory arrangements.</p>
12	<p>There will be no change in 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.</p>
13	<p>Sellafield Ltd's post operational clean out decommissioning activities and long term spent fuel storage continue safely and securely, meeting domestic and international safeguards obligations and in accordance with their declared programme and timescales.</p>
14	<p>Delivery of hazard and risk reduction programmes at Sellafield will continue in accordance with their declared programme. 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.</p>
15	<p>Nuclear Restoration Services and other decommissioning works continue in accordance with NDA declared programmes and are appropriately funded, including accelerated development of relicensing plans across the decommissioning estate.</p>
16	<p>ONR's work to support UK policy development for long term disposition of Plutonium inventory will continue.</p>
17	<p>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.</p>
18	<p>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 and radiation protection to meet regulatory demand.</p>
19	<p>ONR's international engagements to fulfil legal, treaty and government international obligations and support our strategic priorities remain aligned with our Strategic Framework for International Engagement and are supported by appropriate funding mechanisms.</p>

ONR 2024/25 Regulatory Assumptions

20	Subject to funding being secured where necessary, in advance of work commencing, ONR will provide ongoing technical and regulatory policy advice including via the provision of secondees to support GBN, respond to the challenges raised by the British Energy Security Strategy and other matters relating to government ambitions for nuclear, such as the high-assay low enriched uranium (HALEU) programme, as required.
21	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.
22	There will be up to two requests for pre-licensing application early engagement.
23	There will be one request to engage on a further GW scale new nuclear development.
24	Demand for ONR's early engagement/advice on new nuclear matters is prioritised.
25	Long term funding mechanisms implemented to enable ONR to respond effectively to the UK's changing nuclear landscape and conduct appropriate regulatory activity in a timely manner.
26	Staff recruitment and attrition rates remain within current planning margins.
27	Work with DESNZ on further changes to the Nuclear Safeguards (EU Exit) Regulations 2019 following the PIR will ensure our regulation can continue unhindered.

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