RSR guidance for leadership and management at nuclear sites

February 2026

Version 1

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We improve the quality of our water, land and air by tackling pollution. We work with businesses to help them comply with environmental regulations. A healthy and diverse environment enhances people's lives and contributes to economic growth.

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1. Introduction

The principal aim of the environment agencies in England (the Environment Agency) and Wales (Natural Resources Wales) is to protect or enhance the environment. Radioactive substances activities on nuclear sites represent some of the highest environmental hazards that we regulate.

The management condition in your permit and your written management system are fundamental to how you effectively:

- protect people and the environment
- manage environmental risks
- optimise disposals of radioactive waste to be as low as reasonably achievable

You should ensure that your management system is combined with effective leadership. Together, they should:

- set high standards of environmental performance
- ensure that Best Available Techniques (BAT) are applied
- engage members of staff in achieving high standards through establishing an effective environmental culture
- ensure that equipment provided to perform an environmental protection function is maintained so that it can continue to perform its function
- reduce the occurrence of environmental incidents
- ensure that lessons are learned from environmental incidents
- ensure adequate record keeping
- support effective compliance with environmental permits

Scope of guidance

This document gives guidance to operators who hold radioactive substances permits at nuclear sites in England and Wales. It sets out our expectations for leadership and management, organised around four topics: leadership, capability, management system implementation and learning. We expect to see these expectations demonstrated through our compliance assessment work.

This guidance is applicable throughout the lifetime of facilities including design, construction, commissioning, operation and decommissioning. This guidance should be read in conjunction with Management systems for EPR permits which sets out the requirements for all Environmental Permitting Regulations (EPR) permits. A management system should always be proportionate to the risks to the public and environment associated with the activities that the operator (or future operator) is carrying out. Section 6 explains how this guidance applies to the different lifecycle stages of nuclear sites and references other relevant processes and guidance.

Our expectations are based upon internationally accepted good practice from the International Atomic Energy Agency (IAEA) and other sources. For other relevant guidance, with additional details and examples of good practice, see the IAEA General Safety Requirements Part 2, Leadership and Management of Safety and associated Safety Guides:

- GS-G-16 Leadership, Management and Culture for Safety in Radioactive Waste Management
- GS-G-3.1 Application of the management system for facilities and activities
- GS-G-3.5 The management system for nuclear installations

2. Leadership

> Operators should establish and sustain effective leadership and management for the environment, including radioactive waste. This is to ensure that the public and the environment are properly protected from the harmful effects of ionising radiation.

Directors, managers and leaders at all levels should focus the organisation on achieving and sustaining high standards of protection of the public and environment against the dangers arising from exposure to ionising radiation.

This leadership should start at the highest level of management and be evident throughout the management chain. Leaders should take strict environmental compliance as the minimum organisation standard and should seek innovation and continuous improvement.

As an operator or future operator, you must have sufficient governance of the permitted activities consistent with our legal operator and competence requirements. Responsibility for environmental protection always falls to the organisation or person responsible for the activities that could give rise to adverse effects. You should make other organisations or people who contribute to or might affect an organisation's environmental protection performance aware of their responsibilities.

Governance

Governance is about establishing the framework of authority and accountability within the organisation. This involves the definition of roles, structures, groups and committees within an organisation. Effective governance ensures proper control of the organisation and the decisions it makes and enables permit compliance and wider environmental protection.

You should ensure that senior management is clearly accountable for environmental matters. We expect directors, managers and leaders to provide governance of all activities that can impact on environmental protection and performance. The governance arrangements should also ensure proper engagement of interested parties.

You should ensure that:

- there is clear responsibility for environmental performance throughout the organisation
- there are clear policies addressing environmental protection including radioactive waste management that are understood by everyone in the organisation
- there are clear environmental objectives that are communicated to everyone who may impact on environmental performance
- there is a reporting system to make senior managers aware of challenges to environmental performance, including environmental incidents and poor environmental performance, so that appropriate mitigation and actions can be taken

We expect there to be committees and other working groups that meet to consider environmental risks, radioactive waste management, non-conformances and performance. There should be:

- a clear description of their role and remit
- key committees for environmental management identified in written processes
- a logical flow of information and appropriate means of escalating issues to senior management and directors
- clarity from terms of reference that these groups or committees have the appropriate makeup
- a forum where the most significant environmental issues are discussed, advice taken and decisions made

Policies, goals, strategies and plans

You should manage all activities that can impact on environmental performance in a risk based and proportionate way. You should have policies, goals, strategies and plans to manage and improve environmental performance. Directors, managers and leaders should ensure that these are delivered throughout the organisation.

Examples of good practice include the following:

- there is an environmental management policy statement endorsed by senior management
- the organisation has environmental and sustainability goals, with supporting processes to enable them to be delivered and monitored
- technical directors have a good understanding of environmental aspects of the business
- policies, goals, strategies and plans are periodically reviewed against the environmental objectives, and actions are taken where necessary to address any deviations

Effective decision making

We expect operators to take account of environmental protection when making all business decisions. Environmental protection should be optimised to provide the highest level that can reasonably be achieved.

Optimisation decisions balance both:

- the health detriment to people associated with the radiation exposure
- the other benefits and detriments of the option being considered, such as safety, economic and social impacts

This applies to all decision making in relation to permitted activities and is important when demonstrating the application of BAT as required by permit conditions.

You should:

- ensure environmental protection and radioactive waste management is given a level of attention proportionate to the risk and is evident in decision making
- ensure an integrated approach is taken, with all relevant matters considered and priorities properly assigned when there is a conflict between environmental protection and any other goals of the organisation – for example relating to health, safety, security, quality, economic and commercial matters
- ensure that relevant information is sought, such as radioactive waste characteristics, information on costs, any alternative engineering solutions and the views of relevant interested parties
- evaluate the quality of data and opinions and questioning assumptions
- explore scenarios of expected and unexpected behaviours (the ‘what if’ scenarios)
- consider short and long-term implications
- allow for error, uncertainty and the unexpected, and demonstrate a prudent approach
- invite challenge and review of decisions made at all levels of the organisation
- remain in control of decisions made that affect the permitted site (see legal operator and competence requirements)
- keep adequate records of decisions made including any environmental justifications, for example BAT demonstration

Managers should clearly explain the basis for environmental related decisions. For example, information on their understanding of what is important to the safety of the radioactive waste management facilities and activities, and on any other relevant factors. This should be supported by appropriate data and evidence.

Examples of good practice relating to environmental decision making include the following:

- environmental and sustainability impacts should be considered when procuring equipment, for example consideration of energy use and carbon emissions
- when making design choices or modifications, there should be a system in place to rank the relative environmental merits of the options
- where design safety review committees are in place, these should include a member with responsibility for considering the environmental impact of design changes, for example a Radioactive Waste Advisor (RWA)
- decisions with environmental consequences should be supported by people who are suitably qualified and experienced
- maintenance, inspection and testing plans should consider the environmental risk
- work programmes should identify environmental decisions that need to be made and ensure that there is sufficient time to allow the optimal environmental option to be implemented

Interested parties

Interested parties are employees and external groups who have an interest in environmental protection. You should reinforce the value of environmental protection in interactions with staff, contractors, suppliers, stakeholders and the public.

During decision making, we expect there to be appropriate means of communicating environmental information and consideration of the concerns and expectations of interested parties.

Examples of interaction with interested parties might include:

- engaging employees through an environment group
- publicly sharing information on environmental performance
- attending relevant public events and engaging the public – especially where changes to operations are planned

Culture

We expect operators to establish a culture where environmental protection and sustainability are valued and prioritised. Your leadership and management system should foster and sustain a strong environmental culture, where there is a common understanding of what this means. The culture should be one where employees accept personal accountability for environmental protection.

Having a questioning attitude allows negative behaviours to be challenged and can drive improvements. These questions may relate to technical, human or organisational factors.

To establish a culture that protects the public and the environment, all leaders and managers should:

- take responsibility for ensuring that environmental protection is promoted
- establish behavioural expectations and a common understanding of environmental risk across the organisation
- ensure that any staff, contractors and suppliers that can impact on environmental performance are aware of the environmental policies and expectations
- visibly demonstrate commitment to environmental protection through their activities
- challenge behaviour that threatens the environment
- endorse behaviour that protects or enhances the environment
- engage staff at all levels to secure collective responsibility, personal accountability, shared values and improvement of environmental protection
- encourage reporting and learning from events, defects or actions that may impact on the environment

We expect the senior managers to take responsibility for delivery of the environmental policy and show commitment to do so. They should be open to challenge and spend time considering ways to improve environmental performance.

3. Capability

> Operators must have an organisation with sufficient competent people to ensure permit compliance. You must maintain records to demonstrate how you fulfil this requirement.

Your permit requires you to manage the activities on your site using sufficient competent people to achieve compliance with the conditions of the permit.

Senior management must determine the resources and competencies necessary to carry out the activities of the organisation with due regard to environmental protection and should provide them. This will involve ensuring that there are adequate competent people organised in such a way that allows them to meet your permit requirements.

Organisational approach

Your organisational structure must reflect your organisation's current activities, whilst also planning for future activities. For this to be effective, you should:

- have an organisational structure and management system that secures co-ordination of all those directly and indirectly involved in your organisation's activities that might affect the environment – there should be clear lines of responsibility and control
- consider the factors that affect the reliable performance of organisations when designing organisational structures, job roles and responsibilities, processes and procedures that might affect environmental protection
- plan for and establish a structure that reflects the full range of activities you intend to perform, over the lifetime of the facility and in emergencies
- periodically review the organisational structure to ensure that it continues to meet the business needs regarding environmental protection – this is particularly important where there is a change in activity or when starting a new phase of work (for example moving from operations to decommissioning)
- show how key environmental responsibilities are allocated to different roles for current and foreseeable activities – this is particularly relevant when the organisation is undergoing structural changes
- clarify how the structure supports your organisation's compliance with environmental permits and delivery of integrated waste management, especially within complex or multi-site organisations
- demonstrate that you understand the interfaces with organisations that have the potential to impact on your environmental performance – for example, relying on a parent company or supply chain to provide specialist technical advice
- have effective processes for assessing, monitoring and maintaining sufficient resources (people) and competence

Roles and responsibilities

We expect operators to identify those roles that are essential for the delivery of permit compliance in the management system. This will include a wide range of roles including senior leaders, supervisors, team leaders and operators.

You should ensure that there are clear definitions of roles, responsibilities, accountabilities, authorities and performance standards for environmental protection. For specific environmental roles we expect there to be a method of determining and assessing the appropriate competency levels (for example using a competence framework). Behavioural competencies (for example leadership) are expected alongside technical ones for some roles.

You should also ensure that:

- training required to gain and sustain the relevant levels of competence is organised and recorded – there should be evidence of the assessed competence of each staff member (training records)
- all activities with the potential to affect the environment are covered in roles and responsibilities
- individuals at every level are trained in environmental compliance needs, even if this is a basic level of awareness – staff with specific environmental responsibilities can demonstrate a greater understanding of the requirements of environmental protection and permits (information on the requirements for RWAs is given later in this section)
- where required, individual environmental responsibilities are part of job descriptions, competence frameworks, training plans and awareness programmes
- all individuals who have responsibilities for environmental protection have sufficient personal authority, including access to resources, to deliver those responsibilities effectively
- there is effective supervision and oversight of all activities and individuals that might affect the environment
- specialists can spend time maintaining their expertise, training and development

It is important that you manage the resilience of your capability, so that the required skills are always available. This should include succession planning, especially for niche or specialist and intelligent customer roles. Consideration should also be given to the use of appropriate deputies to cover staff absence.

There should be arrangements to cope with loss of resource (both internal and supply chain). There should also be a recognised point at which you need to suspend relevant activities if the capability (people or competence, or both) gets too low.

Knowledge management

Knowledge management is an integral part of an organisation's capability. It is also an essential element of an effective management system. You should manage knowledge and information of the organisation as an asset. This is especially important on nuclear sites given the long operational and decommissioning timescales that can span many generations of workers.

Operators should have processes for knowledge management such that sufficient relevant information and knowledge is available to those who make decisions that might affect environmental protection. This may include information concerning past experiences, performance or legacy issues. These processes should include how information is captured, stored, transferred and used.

It is important that the knowledge management needs of new projects are considered from the outset.

Supply chain and external contractors

You may use contract resources to complement your in-house capability, but you must remain responsible as the operator as defined in your permit. Other competencies that should remain in-house include leadership, those for fostering a strong environmental culture, and expertise to understand technical, human and organisational aspects to ensure the environment is protected.

We expect you to assess your in-house capability requirements so that you always remain a capable operator in your own right. You should retain sufficient skills so that you can be an 'intelligent customer' or 'informed customer'. Where you use contractors, you should ensure that those undertaking intelligent customer roles are suitably qualified and experienced to understand the environmental significance of products and services provided by others.

You should monitor the use of contract staff with environmental responsibilities to check that they are meeting the required standards. This may include ensuring they are suitably trained in environmental protection, and this reflects current legislation and guidance. It is important to identify contract staff in the organisational structure and for them to be included in any capability assessment. This is so that any reliance upon them is visible and properly managed. It is best practice to have a procurement strategy in place that defines your overall approach to use of the supply chain.

Radioactive Waste Advisors (RWAs)

> Operators must manage and operate activities in consultation with a suitable RWA who can provide advice on complying with the permit.

Your permit requires you to consult a suitable RWA on matters relating to compliance with your permit. The method and size of RWA provision should be proportional to the complexity of your activities. Some larger operators may choose to adopt a corporate RWA approach, where the duties are shared amongst more than one individual. Further details are in RSR permits for nuclear licensed sites: how to comply.

Whatever method is used, it should be clear how to get advice and who to go to for specific technical guidance. The role of technical experts in decision making and approvals should be specified.

4. Management system implementation

> Operators must have a written management system, sufficient to achieve compliance with permit conditions and protect the environment. You must maintain records to demonstrate your compliance.

An effective management system is essential to control environmental risks on nuclear sites. The requirement for such a management system is a condition in all our permits.

Senior management should take responsibility for establishing, applying and continuously improving the management system. The management system should be aligned with the environmental goals of the organisation and bring together all the necessary elements for protection of the environment.

We expect the following elements to be included in a documented system:

- environmental policies, plans, strategies, goals and standards
- specific arrangements for meeting permit and other regulatory requirements (for example, identification of environmental protection functions, identification of environmental equipment and its maintenance, methods for calculating discharges), and relevant codes and standards – there should be a clear link between permit requirements and the management arrangement for complying with them (for example a compliance matrix or ‘mandatory standards’)
- organisational structures, roles, responsibilities, accountabilities, levels of authority and interfaces with external organisations and interested parties
- arrangements to manage changes that could affect environmental protection (for example changes to the configuration of a plant, or resources)
- planned and systematic actions necessary to provide confidence that requirements have been met, commonly referred to as assurance
- arrangements for independent review before decisions that affect the environment are made
- arrangements for documenting and retaining records to demonstrate compliance with your permit
- arrangements for independent verification or review of the above elements – this may include being independently certificated to recognised standards, for example Eco-Management and Audit Scheme (EMAS), ISO 14001, ISO 45001 and ISO 9001

Using an accredited certified management system is not a guarantee that you will meet all your permit conditions. You are still responsible for implementing your system effectively and making sure you comply with each permit condition. However, the independent checks carried out for an accredited certified scheme or standard should result in greater confidence in your management system, and your management of compliance.

The way in which a management system is designed and implemented can determine its overall effectiveness. We expect the management system to be integrated, follow a graded approach and be properly controlled.

Integrated

An integrated management system has the benefit of allowing all business risks to be managed in a common way. The environmental management system should be appropriately integrated with other elements, including safety, health, economic and quality requirements. It should have a clearly defined structure.

The management system should cover both radiological and non-radiological risks associated with the radioactive substances activity permit. You should ensure that the management system also encompasses the requirements of any other environmental permits. Other environmental risks not explicitly covered by permits should also be considered, such as biodiversity or sustainability.

Graded approach

You should adopt a graded approach when applying your management system. As the environmental risk (or benefit) or complexity of an activity increases, we expect to see a corresponding increase in the effort (resources, time, money) devoted to managing it. In practice, we would expect more control of processes, equipment and resources for the activities that pose the greatest risks. For example, this may include the level of detail in work instructions, frequency of testing and monitoring, calibration of equipment, audits and assurance activities, and record keeping.

Your management system should contain a clear description of the type of activity being carried out (for example, manufacturing, construction, reactor operations, or decommissioning) and the nature of the environmental risks. There should be systems in place to understand and categorise environmental risks associated with certain activities or pieces of equipment (for example hazard assessment or environment case process). This will determine the proportionate development and application of the management system.

The application of a graded approach should not be used as a justification for not applying all the necessary management system elements and quality management controls. It should also not be used as justification for not meeting regulatory requirements or relevant codes and standards.

Maintaining the management system

You should have written procedures for the implementation, maintenance and review of the management system. This should include a process for identifying, implementing and reviewing new and existing environmental legislation.

Your management system should be updated if policies, plans, strategies or goals are changed, or if the activities you carry out on the site change. We expect you to periodically review the documented processes.

Management system documents should be appropriately controlled, to ensure the correct versions are used and changes between versions are clearly marked.

Communication and engagement

A management system will only be effectively implemented where staff and other interested parties understand its purpose and are engaged with its development.

You should have arrangements to communicate important information relating to the management system including:

- environmental policy and expectations
- learning from experience (see section 5)
- how to share urgent action required to secure environmental protection
- how to provide feedback on the management system

Management of change

You should have effective processes for assessing all management system changes, planned and unplanned, that may impact on any aspect of environmental protection. This includes any changes to:

- organisational structure and resources, especially the provision of RWAs, and use of the supply chain
- environmental policy, goals, strategies, plans or priorities
- procedures or techniques, especially those used for preventing and minimising radioactive waste, or selecting optimal disposal routes or those which may alter the disposability of any wastes
- plant design or configuration

For more examples of these types of changes, see RSR permits for nuclear licensed sites: how to comply.

We expect you to have systems in place to assess changes and categorise them in a way that takes into account the actual or potential environmental impact. This is so that those

with the highest impact attract the most attention. The impact may be in relation to permit limits or notification levels, generation of waste, or your ability to comply with permit conditions or meet your wider environmental goals.

The consequence of change should be considered:

- in advance of making the change
- alongside other considerations (for example safety, security, commercial)
- in a cumulative way, such that the impacts of several small changes are not dealt with in isolation

You should have a documented process for notifying the Environment Agency of changes to the management system or resources which might have, or might reasonably be seen to have, a significant impact on how you comply with the conditions of the permit. The notification should clearly describe the change and include any necessary justifications. It is helpful to discuss any proposed changes with the Environment Agency as early as possible.

Records management

You must have a suitable system to keep documented records in line with permit requirements.

Records should be:

- sufficiently detailed to inform future decision-making activities
- maintained in a form that is easily retrievable in the future
- retained for periods specified in your permit or Compilation of Environment Agency Requirements (CEAR)

For more detail on the Environment Agency's requirements for record keeping, see the generic developed principles RSMDP14 – record keeping.

5. Learning

> Operators should learn from their own and others' experience to continually improve their ability to protect the environment.

A learning organisation can successfully create, acquire and transfer knowledge. It avoids complacency, welcomes challenge and looks for better ways of working. This can have a dramatic effect on your organisation's ability to comply with your permit and drive environmental improvements.

You should have processes to facilitate learning, and these should be captured in the management system. We consider it good practice that:

- the effectiveness of management system is monitored to identify areas for improvement – this may involve using the 'plan-do-check-act' approach.
- performance indicators are used and are leading rather than lagging where possible, since these can highlight and address risks before they are realised – you should understand how the indicators will be used and acted upon, taking into account their limitations
- all processes are regularly evaluated for their environmental effectiveness
- causes of non-conformances of processes and causes of events that could give rise to environmental impacts are evaluated and any consequences managed and mitigated
- corrective actions are determined and taken in a timely manner – the status and effectiveness of corrective actions should be monitored and reported to management at an appropriate level in the organisation
- independent oversight and self-assessments of the management system are regularly conducted (that is, audits, inspections and assurance activities)
- the organisations and individuals should be given sufficient authority to carry out their responsibilities and have direct access to senior management
- learning should be taken from any independent certification of recognised management system standards (for example EMAS, ISO 14001, ISO 45001, ISO 9001)
- the management system includes arrangements for the evaluation and timely use of lessons learned (internal or external), technical advances, research and development, and lessons from identifying good practices – there should be an established way of capturing and communicating learning across the organisation, for example, through operational experience briefs, meetings and committees

Learning should be taken from a wide range of sources including:

- observations, near misses, deviation and non-conformance reports from staff at all levels
- monitoring, review and audit activities relating to strategies, plans, goals, standards, processes, plant and systems, testing and validation procedures, environmental

monitoring, inspections and investigations, incidents and events, and self- and external assessments
- reviews by external organisations (for example regulators, independent certification companies and the World Association of Nuclear Operators - WANO)
- performance benchmarking with other nuclear operators and relevant organisations, including the supply chain, and through industry groups (for example Environment Agencies Requirement Working Group – EARWG and Nuclear Industry Liaison Group – NILG)

You should have a systematic process for monitoring and reviewing new regulations, codes, standards or guidance and best practice, and where necessary, implementing changes to the management system. This is especially important for changes to legal obligations relating to radioactive substances and environmental protection.

Learning also involves continually developing the capability of your organisation (as described in section 3). This may be the formal training of staff, giving sufficient time to obtain relevant qualifications, membership of professional institutes and chartership, or accreditation as an RWA.

6. Application of this guidance to different lifecycle stages

Our expectations for leadership and management apply to all lifecycle stages of a nuclear site, from the early stages of the development of new nuclear facilities through to the final closure of a site. These expectations are independent of the type (or types) of radioactive substances activities being carried out or the technology being used. We expect the maturity of leadership and management arrangements to develop as projects progress from concept, through design and into operation.

Before you obtain a permit

As a prospective operator, before you obtain an environmental permit you must be able to satisfy the legal operator and competence requirements of EPR. This includes demonstrating that you have the technical competence to carry out your activity. For example, you know how to operate the necessary equipment, comply with the law and government policies, and minimise risk and impact of your activities on the environment.

Future operators should have a high-level project plan that they can share with the regulator. This should be supported by resource plans that underpin how the environmental aspects of the project will be delivered. The organisational structure and development of each future operator will vary. You should clearly demonstrate your approach to organisational development.

In addition to permits, you may be applying for planning permission for development through the Local Authority (LA) under the Town and Country Planning Act (TCPA), or through the Planning Inspectorate in the case of Nationally Significant Infrastructure Projects. The Environment Agency is a statutory consultee for planning application consultations.

As part of a permit application you need to provide a description of your management arrangements, including organisational capability, leadership and governance. Your management arrangements should cover the control of design, especially if you are adopting a Generic Design Assessment (GDA) design or a subsequent reference configuration. In nuclear new build this is usually achieved through an Integrated Management Prospectus.

It is common for future operators to procure services from the supply chain at an early stage. For example, for design, inspection or assurance work. Our expectations for use of the supply chain and contractors are in section 2.

Preparing to comply with a new permit

For permit compliance arrangements that are not needed now, we expect future operators to have plans to develop them. These plans should be written into a formal action plan. This plan should be resourced, scheduled and set meaningful, measurable development milestones to indicate progress against it. The detail of these plans should be proportionate to the stage of development. Usually, this action plan will form part of the permit application.

Construction

During the construction of a nuclear facility, management arrangements are needed to ensure the quality of the buildings and equipment meet standards. It is good practice to create and maintain a comprehensive equipment register that may include information such as storage requirements, equipment location and status, and whether equipment will eventually provide an environmental protection function. You should arrange for appropriate inspection and maintenance of this equipment prior to its installation.

Commissioning

Prior to commissioning, the operator must be able to demonstrate that all operational management arrangements are in place to comply with all permit requirements. This includes operational instructions, specifications and rules that adequately describe how each system or component must be operated, managed and maintained. These should identify environmental protection equipment specifically. You should have systems in place for tracking and managing any design changes and commissioning activities, for example, pre-operational checks and system functional tests.

During commissioning you must ensure that sufficient records relating to the management of radioactive substances and waste systems are made. This is to facilitate the subsequent management of these substances and systems, and to demonstrate whether compliance with requirements and standards has been met. This is required by the permit condition to demonstrate compliance with appropriate criteria for the acceptance into service of adequate systems, equipment and procedures.

Operations and decommissioning

During the operation of your site, the focus of leadership and management is expected to reflect the scale and range activities taking place, following a graded approach. Management systems should adapt as sites transition from operations, to decommissioning and clean up, and eventual closure. This should include the written processes and the capability of the organisation. For example, when existing organisations

are combined or restructured, the transfer of responsibilities to other organisations and use of the supply chain.

The transition from operations to decommissioning will bring significant change to your business. Your management system should control the environmental risks of this change as well as address all the ongoing goals of operating your organisation, including decommissioning goals and the associated radioactive waste arisings. You are required by your permit to notify your environmental regulator of significant, relevant changes to your management system, resources, Waste Management Plan (WMP) or Site Wide Environmental Safety Case (SWESC). It is beneficial to discuss any proposed changes with the Environment Agency as early as possible. There is specific RSR guidance for nuclear sites undergoing decommissioning that covers management arrangements.

In many cases, consent to decommission a nuclear power station or reactor must be obtained from the Office for Nuclear Regulation (ONR) under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations (EIADR). The Environment Agency is a statutory consultee to ONR under the EIADR regime. We would therefore expect any mitigation under EIADR to be meet and align with the information in the WMP and SWESC.