

Office for Nuclear Regulation

An agency of HSE

Dr P Burt
Nuclear Information Service
Ibex House
85 Southampton Street
Reading
RG1 2QU

David Senior
Programme Director
Defence Facilities

Tel: +44 (0)151 951 4860
Email: david.senior@hse.gsi.gov.uk

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Dear Peter

AWE: Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR)

Thank you for your letter of 17th July, in which you seek further information in relation to the our emergency planning zones around the AWE Aldermaston and Burghfield sites to that provided in letter of 11 May 2012. I would also thank you for forwarding the Large & Associates report that has informed some of the issues you raise and which we have reviewed and recognised in preparing our response.

As previously stated, REPPIR sets out the requirements for the assessment of the potential impact on the public of a reasonably foreseeable event, and for the corresponding setting of emergency planning zones. The previous and current determination of these Detailed Emergency Planning Zones (DEPZ) has and continues to be carried out in accordance with these regulations. AWE's assessment and ONR's review of its outcome has led to the setting of the current 3km and 1.5km DEPZs for the Aldermaston and Burghfield sites respectively. ONR is satisfied that the current assessments and associated zones fully meet the requirements of the UK legislation covering nuclear emergency planning arrangements; furthermore we are content that these would ensure the safety of the public in the event of such an emergency. However, as you have highlighted in your letter, the arrangements are subject to a continuous review process and the technical basis and impact on the emergency preparedness arrangements and plans of the outcome of the current review will be published in the near future, both by ourselves and by AWE.

The emergency preparedness arrangements for each nuclear licenced site in the UK are defined on an individual case by case basis reflecting the specific radiation hazards. ONR therefore believes it could be misleading to make direct comparisons with the planning zones around the

Pantex plant, as its determination depends on both variations in site hazard and risk, as well as the requirements of US law and US nuclear emergency planning arrangements.

The perceived inconsistency you raise between the degree of public protection offered in the event of an accident on site and that of an accident involving a nuclear weapon in transit is due to the fact that for UK transport emergency planning, the reasonably foreseeable emergencies will differ in character from those on a manufacturing or assembly facility within the nuclear licensed site. Key factors include the added protection afforded by the containment within the nuclear facilities and the emergency response capability that is immediately available on the site. However, should you have any further queries in this regard, or require further information on the public protection described in Local Authority and Emergency Services Information (LAESI), we suggest that you may wish to approach MoD, since the transport of nuclear weapons is outside ONR's legal vires.

REPPiR requires that emergency plans should address reasonably foreseeable radiation emergencies, with the degree of planning being proportionate; therefore, for events with lower frequency and potentially higher consequence than those identified as reasonably foreseeable the UK applies the concept of extendibility. This approach was endorsed in the findings of the Sizewell B and Hinkley Point C Public Inquiries.

The current guidance on extendibility is issued by DECC in their Nuclear Emergency Planning Liaison Group (NEPLG) consolidated guidance Chapter 9

http://www.decc.gov.uk/assets/decc/what%20we%20do/uk%20energy%20supply/energy%20mix/nuclear/issues/emergency_plan/neplg/guidance/file18821.pdf

This guidance recommends that provision is made for extension of the emergency preparedness arrangements using general contingency planning rather than making detailed plans. For example, decisions to extend countermeasures beyond the detailed planning zone would be taken by the strategic commander at the time, consistent with the guidance and informed by all relevant local and wider factors.

ONR has not been involved in any formal testing of the AWE specific extendibility arrangements; however, we are confident that the off-site plans interface well with wider civil contingency planning.

ONR continues to work with MoD, NEPLG, Cabinet Office and Local Authorities to develop further the confidence in these arrangements across the UK including the development of an integrated programme of testing and exercising. NEPLG consolidated guidance is kept under continual review and any changes as a result of either lessons learned from the Fukushima event or testing of emergency plans will be reflected in updated guidance from DECC on their website. With reference to the timing of AWE's HIRE assessments, AWE informed ONR (then NII) of the outcome of its 2008 review on 14th July that year, and subsequently published their Reports of Assessment on their website.

http://www.awe.co.uk/Contents/Files/AWE_Aid_REPPiR_Redacted_Dec2010.pdf

The most recent operator's review of the Hazard Identification and Risk Evaluation and the subsequent submission of the Report of Assessment was carried out to the timescales required by the regulations, the documentation being submitted on 1st July 2011. We expect to be informed of the outcome of the next review at the same time in 2014. You should note that there is no specified timescale for the regulatory process that may follow the submission.

As you are aware, ONR is increasingly working to be more open and transparent in what it does and how regulatory decisions are made. Following the completion of the HIRE assessment cycle, the reports giving the basis of the decisions will be published on our own and AWE websites.

ONR targets its resources and prioritises its regulatory interventions on the basis of risk and other factors. ONR therefore concluded that a full assessment and determination for the last two cycles would be disproportionate, on the basis that AWE identified that there was no material change required to the DEPZ as a result of their assessment. In light of our current regulatory priorities and bearing in mind that last year's Report of Assessment gave no indication that the current planning zones and arrangements are inadequate, our review of the determination of the DEPZ for the Aldermaston site has been treated as non-urgent. However we currently expect to have completed this process within the next few months.

I thank you for your interest in this area of nuclear regulation and trust that this letter addresses your concerns.

Yours sincerely

A handwritten signature in black ink that reads "David Senior". The signature is written in a cursive style with a small flourish at the end.

David Senior

**HM Deputy Chief Inspector
Programme Director – Defence Facilities
Office for Nuclear Regulation**