

**HSE and the Environment Agency**  
**Generic Design Assessment (GDA)**

**Stakeholder Engagement Plan**

**October 2010**

## Introduction

This Plan sets out our approach to engaging with stakeholders, including members of the public, for the Generic Design Assessment (GDA) process. The Plan has been developed by the joint Environment Agency and HSE GDA Stakeholder Engagement Working Group. The Terms of Reference for that group are included at Annex B.

The Environment Agency and the HSE are working together to assess new nuclear power station designs, with a shared responsibility to make sure that any new nuclear power stations built in the UK meet high standards of safety, security, environmental protection and waste management. It is important for us to build public confidence and trust in our ability to fulfil this responsibility and engaging with stakeholders, and sharing information with them, helps us achieve that.

We are therefore committed to being as open and transparent as possible and encouraging the nuclear industry to do the same. We are encouraging those with an interest in new nuclear power stations to get involved in our work by increasing awareness of our role and identifying the most effective and efficient ways to engage and communicate.

## Background

As part of the Government's Energy review in 2006<sup>1</sup>, the nuclear regulators set out proposals for the "pre-licensing" of nuclear power station designs. The process, which we called Generic Design Assessment (GDA), was designed to enable the nuclear regulators to assess the safety, security and environmental impacts of new reactor designs at a generic level, i.e. before receiving an application to build a particular nuclear power station design at a specific location.

The key benefit of GDA is that it allows us to assess the safety, security and environmental implications of the new designs separately from site-specific approvals. In particular:

- It allows us to get involved with reactor designers at the earliest stage, where we have most influence;
- It is a step-wise process with the assessments getting increasingly detailed. This allows us to identify issues early in the process and reduce the financial and regulatory risks for potential operators;
- It separates design issues from specific siting issues, improving the overall efficiency of the regulatory process; and
- It is open and transparent. People can view detailed design information on the web and comment on it. We also give regular feedback on how our assessments are progressing and publish reports at the end of key stages, as well as quarterly update reports.

The HSE GDA process is based on an assessment in four steps. At the end of each step we publish a suite of technical reports to provide an update on the detailed technical assessment work undertaken by our nuclear assessors. These highlight the technical issues that have been raised to-date, and are summarised in public reports published on each of the designs. Unlike the Environment Agency, the HSE is not undertaking a formal consultation, but is instead inviting comments on the reports it published at the end of Step 3. Relevant information will be used to inform the HSE's Step 4 reports, which will be published in June 2011.

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<sup>1</sup> [www.decc.gov.uk/en/content/cms/publications/energy\\_review\\_06/energy\\_rev\\_06.aspx](http://www.decc.gov.uk/en/content/cms/publications/energy_review_06/energy_rev_06.aspx)

The Environment Agency's GDA process consists of a preliminary and detailed assessment followed by a consultation. Any comments received as part of the Public Involvement Process, but after the closing date for the consultation, will be considered by the Environment Agency as part of the site authorisation process.

## Principles

The following principles drive our approach to public and stakeholder engagement:

- Our shared commitment to openness, transparency, accountability, and proportionality; and
- As far as possible, stakeholders feel we have listened to their views, and have considered them in reaching our decisions.

## Aims

Our aims are to:

- Ensure our stakeholders understand our role in nuclear regulation and specifically new-build – what we do and what we don't do;
- Ensure we understand stakeholder views to allow our decisions to be informed by them;
- Ensure we are engaging relevant stakeholders at appropriate points in the decision making process;
- Ensure stakeholders understand how they can help inform our decisions; and
- Strengthen trust and confidence in us as regulators.

## Public Involvement Process

To help us achieve the aims of our public involvement process we have identified four separate objectives:

- Ensure people have opportunities to input to GDA;
- Actively engage with stakeholders;
- Publish relevant and timely information; and
- Review and revise our Plan.

An action plan relating to our objectives can be found at Annex A.

## Objective A: Ensuring people have opportunities to be involved in GDA

The public involvement process designed for GDA was launched in September 2007 and has been further refined and developed over time. Seeking comments from our stakeholders and using relevant information to inform our assessment process plays a key role in helping us achieve our aims.

Key elements of the public involvement process include:

- Encouraging the Requesting Parties (the companies who have asked us to assess their nuclear power station designs) to publish information on the designs, including the information sent to us as part of our assessment process, on their own 'UK GDA' web pages;
- Inviting comments on those designs and requiring the Requesting Parties to respond to those comments;
- Asking the Requesting Parties to publicise this process;
- Inviting comments on HSE Step 3 reports; and
- Inviting comments as part of the Environment Agency's consultation.

The Requesting Parties have made a commitment to respond to all relevant comments. Where the comments relate to our assessment work, the issues raised are dealt with by our assessors. We use the public involvement process reports that we produce at the end of each Step of the GDA process to summarise the comments received.

To complete its assessment of the reactor design safety cases by June 2011, the HSE will need to receive any comments on either the designs or its Step 3 reports in sufficient time to reflect them in its Step 4 assessment reports. Therefore, the HSE will not be able to consider any comments relating to its assessment received after 31 December 2010. However, in the event that, in June 2011, the HSE issues an Interim GDA Design Acceptance Confirmation or the Environment Agency an Interim GDA Statement of Design Acceptability, the public involvement process will remain in place until the associated Resolution Plans have been completed.

**Action A1: Ensure Requesting Parties publish timely submissions.**

**Action A2: Ensure people have an opportunity to comment on the HSE Step 3 reports.**

**Action A3: Provide people with an opportunity to comment on the Environment Agency's GDA findings.**

## **Objective B: Actively engaging with stakeholders**

We want opportunities to engage with people 'face-to-face' in order to explain our role, listen to people's views, and to consider them. However, while we consider direct engagement an effective way to communicate with people, we also recognise that it is not always the most efficient way of reaching large numbers of people, or certain stakeholders, e.g. local communities. In the current climate of minimising public sector expenditure, we need to make difficult decisions about what we can and cannot commit to. While we will continue to speak at events, particularly key national events and community events such as Site Stakeholder Group meetings, we are likely to see some reduction in our direct engagement activity over the medium term. However, we will always consider invitations to speak at events and will try to make sure that GDA materials are available at events that we cannot attend in person.

In general, we focus our efforts on the following key stakeholders:

- The general public (including local interest and action groups), particularly those living near existing nuclear power stations, or potential new nuclear power stations;
- Local Authorities and other representative bodies near sites for potential new build;
- Non-Government Organisations (NGOs);
- Academics;

- The nuclear industry (including potential operators);
- Other international nuclear regulators; and
- Internal Stakeholders (colleagues).

As the sites for possible new nuclear power stations become clearer, and we increase our engagement with local communities, we need to consider more effective and efficient ways of informing those communities of our work. Separate detailed communications plans covering activity across both our generic assessment work and site specific work therefore are starting to be developed. This will include existing engagement activities such as attendance at Site Stakeholder Groups/Local Community Liaison Councils and other community events, any consultation events organised by the Environment Agency as part of its site permitting process, as well as an increasing use of regional media. As these new site communities will have an interest in our wider work to regulate the new sites, not just the environmental impacts, this work should be taken forward jointly by the Environment Agency and ND.

To ensure that we take a joined-up approach, the Department for Energy & Climate Change (DECC) established a 'New Build Engagement Group', which brings together DECC, the HSE, the Environment Agency and the Nuclear Decommissioning Authority. We are currently assessing the effectiveness of that group to determine whether it represents the most effective and efficient way forward. In the meantime, we have established monthly meetings with DECC officials to ensure we continue to work effectively and efficiently.

As the NGOs are generally membership organisations with a specific interest in the nuclear industry, either for or against, we have taken proactive steps to inform the NGOs of our work, organising seminars on a periodic basis. DECC have established a series of meetings with the NGOs, which both ND and the Environment Agency support and attend.

As the potential operators of new nuclear power stations have a particular interest in the outcome of GDA, they are an important stakeholder. So far, we have held two events for potential operators and we will continue to engage directly with them, for example in discussing the emerging results of our assessment, and the likely arrangements for the end of GDA.

**Action B1: Develop communications plans for effective and efficient local community engagement for sites listed in the Nuclear National Policy Statement.**

**Action B2: Continue to participate in the New Nuclear Engagement Group meetings and look for more opportunities to work with stakeholders in a co-ordinated way.**

**Action B3: Continue to hold or participate in events for key stakeholders.**

**Action B4: Use national and local events to raise awareness of our roles and our work to assess new nuclear power stations.**

**Action B5: Subject to resource constraints, develop and maintain exhibition stands and materials.**

### **Internal Stakeholders**

Internal communications is just as important as external communications and we must ensure that our colleagues are kept informed of GDA progress.

**Action B6: To use internal communication channels to keep colleagues updated on GDA.**

### **Media activity and existing communication tools (web and e-bulletin)**

In addition to organising and attending events, it is important that we use the media to help explain our role to stakeholders, particularly members of the public, who can be harder for us to reach. In order to ensure that what we are doing is accurately reflected in the media, we have developed a separate communications plan. This includes organising press briefing at key stages, and placing articles in the national, regional and specialist press.

It is also important that we use existing communications tools effectively to alert stakeholders to our progress, including issuing Press Notices and e-bulletins, and updating the New Build website News Page.

In addition, both the HSE and Environment Agency are working to identify good practice and new ways of communicating with stakeholders.

**Action B7: Work with colleagues across ND and the Environment Agency, and Press Office to develop a specific media handling plan.**

**Action B8: Ensure that we use existing communications channels effectively to promote GDA.**

**Action B9: Work to identify good practice and new ways of communicating with stakeholders.**

### **Objective C: Publishing relevant and timely information**

Providing relevant and timely information is the cornerstone of our approach to openness and transparency as it helps people understand our role and offers regular updates on our progress.

In September 2007, we launched a joint Environment Agency/HSE new nuclear build website. Over the years this has been refined and developed to include more information on our assessment process.

As well as general information about the GDA process, we also use the website to publish:

- Guidance on the process we are using to assess designs.
- Technical reports we produce at the end of each step of GDA.
- Regulatory Issues we raise with the nuclear power station designers as part of our assessment process.
- Details of the technical contactors we are using to support the work of our assessors.
- Quarterly update reports on the GDA process.
- Information about our stakeholder engagement activity.
- Broader information, for example on site licensing and authorisations processes.
- Links to Requesting Parties' websites.

To ensure that the website remains easy to navigate as more information is added, it is maintained and reviewed annually. We reviewed and re-designed the GDA website in February 2009, and we reviewed it again in Q1 2010.

**Action C1: Continue publishing GDA guidance and update reports.**

**Action C2: Review the GDA website in Q1 2010.**

## **Objective D - Evaluation**

We will need to review this Plan on a regular basis to ensure that the actions identified are delivering against objectives A-C. In addition, as we move through different phases of the new nuclear build process, we will need to ensure that the Plan, and in particular its objectives, remain relevant.

Early indications from the Nuclear Energy Agency's work on openness and transparency practices across nuclear regulators are that all nuclear regulators find it difficult, if not impossible, to measure transparency. While there are indicators that can be used to provide quantitative data, e.g. the numbers of documents published, numbers of comments received, numbers of events attended, etc, qualitative analysis, e.g. are technical documents written in a way that non-specialists can easily understand, is more difficult. For GDA, we are gathering and assessing quantitative data on an ongoing basis, we have conducted market research and conduct internal and external audits of our stakeholder engagement activity. However, this is an area that we will continue to look for examples of good practice.

### **Market Research**

On the recommendation of the independent Process Review Board (PRB), the Environment Agency commissioned research to help gauge public understanding, perceptions and confidence in the nuclear regulators' roles in the nuclear new-build process.

Initial research was conducted in June 2009, which indicated low levels of awareness and interest in nuclear power generally, and also of the HSE's and Environment Agency's role as nuclear regulators. The findings are being used by HSE and the Environment Agency to inform their communications plans, and have helped inform this joint Plan.

In addition, we are reviewing the results of surveys being undertaken by other organisations, e.g. potential developers and academics, to gain intelligence about how best to design future engagement.

**Action D1: Undertake a detailed review of the market research results and refine existing stakeholder engagement and communications strategies.**

### **Seeking Feedback from engagement activity**

To ensure that activities we organise are successful, we regularly request feedback from participants. We use this information to improve the standard and relevance of our activities.

**Action D2: Continue seeking feedback on activities, including the Environment Agency's GDA consultation event and its online consultation, and use the findings to shape future activities and improve stakeholder engagement.**

### **Identify and adopt appropriate good practice identified in NEA Guidance on Openness and Transparency**

Currently, the Organisation for Economic Co-operation and Development's (OECD) Nuclear Energy Agency Working Group on Public Communications and the European Nuclear Safety Regulators Group (ENSREG) Working Group on Improving Transparency is undertaking some

research on the openness and transparency of nuclear regulators internationally. The outcome of this research will be used to provide information on openness and transparency, which will help us assess the extent to which we are adhering to international good practice.

**Action D3: Assess the openness and transparency of the GDA process against NEA good practice on openness and transparency.**

### **Internal and external reviews**

As part of the GDA governance arrangements, the HSE put in place an Independent Process Review Board (PRB). Their reviews of the GDA process include assessing the effectiveness of the Public Involvement Process. So far, the HSE has commissioned three reviews by the PRB and their reports are available on our website.

In addition to this, we carry out internal audits after each Step of the GDA processes, including on stakeholder engagement.

The Environment Agency's GDA consultation will be independently evaluated and a report published.

**Action D4: Subject the public involvement process to a Process Review Board appraisal in early 2010 and internal audits at key stages.**

**Action D5: Publish GDA consultation evaluation report by the end of 2011.**

### **Ongoing monitoring and reporting**

For the duration of the public involvement process, we will continue to monitor the comments made to the RPs and the responses provided. We will also continue to consider the comments we receive directly in taking forward our assessment. The HSE will summarise the comments received during Step 4, along with any responses, in its report on the public involvement process for Step 4. The Environment Agency will publish all consultation responses received, by the end of 2010. Its final conclusions, having carefully considered all the comments received, will be published in a decision document in June 2011.

We will monitor website usage as well as the number of subscribers for the e-Bulletin. As this is an ongoing project, evaluation will be undertaken on a monthly basis.

**Action D6: Assess on a monthly basis, the numbers of comments received on the design information and HSE Step 3 assessment reports, as well as website usage, e-bulletin subscriptions, numbers of events attended and documents published.**

## Annex A – GDA Stakeholder Engagement Action Plan

The table below details communications to be delivered by HSE & EA. It is recognised that both organisations have different brands, guidelines and standards for their corporate products. Joint materials will be produced according to the ‘lead’ organisations respective standards.

Action	Activity	Timing	Lead	Target	Status
<b>A. ENSURING PEOPLE HAVE OPPORTUNITIES TO BE INVOLVED IN GDA</b>					
A1: Ensure RPs publish timely submissions.	- Agree publication timeline with RPs. - Ensure RPs publish to schedule.	Jan 2010 To be agreed.	AS AS/MW	RPs	Complete.
A2: Ensure people have an opportunity to comment on the HSE Step 3 reports.	- Develop a process to invite and consider comments.	Nov 2009	MW	All	Complete.
A3: Provide people with an opportunity to comment on the Environment Agency’s GDA findings.	- Develop a consultation process and invite comments. - Use stakeholder input in our decision making.	28 June to 18 October ‘10.	IS/AL/CR	All	National and area comms and engagement plans in place and being implemented.
<b>B. ACTIVELY ENGAGING WITH STAKEHOLDERS</b>					
B1: Develop communications plans for effective and efficient local community engagement for sites listed in the Nuclear National Policy Statement.	Develop and review communications and engagement plans.	Feb 2010	AL/MW/CR/AS	All	Plans need to developed in line with wider ND strategy (not yet agreed). EA local community engagement plans underway.
B2: Continue to participate in the New Nuclear Engagement Group meetings and look for more opportunities to work with stakeholders in a co-ordinated way.	- Input to OND proposal for developing new approach to new build engagement.	Ongoing.	MW, AL	Govt, Regs	Discussing with DECC.
B3: Continue to hold events for key stakeholders.	- Consider NGO event. - Local community engagement. - EA GDA consultation event (with HSE input).	Feb/Mar ‘10 May/June July ‘10	MW/AL AL/AS AL	NGOs All All	See Action B2 Considering options 16 July.

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Action	Activity	Timing	Lead	Target	Status
B4: Use national and local events to raise awareness of our roles and our work to assess new nuclear power stations.	<ul style="list-style-type: none"> <li>- Write to SSG &amp; LCLC Chairs.</li> <li>- Fringe events at NDA Nat. Stakeholder meetings.</li> <li>- EDF Hinkley Point Community Forum.</li> <li>- Attend meetings of local interest and action groups as appropriate.</li> <li>- Consider other events.</li> </ul>	<p>Jan 2010</p> <p>2 monthly</p> <p>Ongoing</p> <p>Ongoing</p>	<p>AL</p> <p>AL</p> <p>AL</p> <p>AL</p> <p>All</p>	<p>Locals</p> <p>Locals</p> <p>Locals</p> <p>Locals</p> <p>All</p>	<p>EA last wrote to SSG Chairs in Aug/Sept '10.</p> <p>Attended: Springfields SSG, EDF Hinkley Point Community Forum, Nuclear Special Interests Group, DECC NGO event, World Nuclear University Summer Institute, Nuclear New Build Conference, Seaham Town Council Planning &amp; Environmental Committee, EDF public exhibitions, Hartlepool LCLC, Nuclear Issues Group, Heysham LCLC, Somerset Nuclear Energy Group.</p>
B5: Develop and maintain exhibition stands and materials	<ul style="list-style-type: none"> <li>- revise GDA leaflet.</li> <li>- prepare new joint pull-ups.</li> <li>- discuss preparing 'new build' materials.</li> </ul>	<p>Jan 2010</p> <p>Jan 2010</p> <p>April/May '10</p>	<p>AS/CR</p> <p>CR/AS</p> <p>MW/SB</p>	<p>All</p>	<p>Complete.</p> <p>Done.</p> <p>Being progressed.</p>
B6: Use internal communication channels to keep colleagues updated on GDA.	<ul style="list-style-type: none"> <li>- Use relevant HSE and EA communications mechanisms as appropriate</li> </ul>	<p>Ongoing</p>	<p>MW/LR/AS/CR</p>	<p>All</p>	<p>Now a common working practice.</p>

Action	Activity	Timing	Lead	Target	Status
B7: Work with colleagues across ND, the Environment Agency and Press Offices to develop a specific media handling plan.	- Need to discuss with press office and ND communications team.	Jan/Feb	MW/LR/AS/CR	All	Media plans developed for key announcements, but overarching ND Comms being reviewed in light of Public Sector expenditure cuts..
B8: Ensure that we use existing communications channels effectively to promote GDA.	- Identify appropriate trade journals to promote GDA, including supply chain and engineering. - Contact Local Authorities around HPC around the time of first site licence. - Discuss with key representative bodies (NIA, etc) placing GDA leaflets in reception areas. - Provide information for event delegate packs.	Ongoing	MW/AS/CR/SC/Press Offices	All	Communications channels now in place.
B9: Work to identify good practice and new ways of communicating with stakeholders	- Consider new website based initiatives such as pod-casts, and msm alerts.  - Consider findings of the Nuclear Energy Agency's work on transparency in international nuclear regulatory organisations.	End Sept. 2010.  End Oct 2010	MW/AS/CR/SC/Press Office  MW	All  All	Work relates to development of new HSE ND website. Final paper expected in Oct 2010
<b>C. PUBLISHING RELEVANT AND TIMELY INFORMATION</b>					
C1: Continue publishing GDA guidance and update reports.	- Publish Quarterly Reports. - Publish GDA guidance. - Publish GDA Step reports. - Publish EA consultation. - Publish EA decision document.	Quarterly As relevant Jun '11 June '10 June '11	DW/MW HSE/EA DW IS IS	All	Ongoing work. Ongoing work. Ongoing work. Complete. Planned.

Action	Activity	Timing	Lead	Target	Status
C2: Review the GDA website in Q1 2010.	<ul style="list-style-type: none"> <li>- Invite user feedback on content and structure.</li> <li>- Improve metadata.</li> <li>- Links from other websites.</li> <li>- Include a website feedback facility.</li> <li>- Add FAQs.</li> <li>- Ensure appropriate links to site licensing webpages.</li> </ul>	Qtr 1 2010	AS/MW	All	Complete
<b>D. EVALUATION</b>					
D1: Undertake a detailed review of the market research results and refine existing stakeholder engagement and communications strategies.	<ul style="list-style-type: none"> <li>- Assess results of initial market research and revise stakeholder engagement Plan and action plan.</li> <li>- Consider follow-up market research.</li> </ul>	<p>Nov 2009</p> <p>Mar 2010</p>	CR/MW	Regs	<p>Complete findings reflected in current Plan.</p> <p>Additional Market Research unlikely due to Public Sector expenditure cuts.</p>
D2: Continue seeking feedback on activities, including the Environment Agency's GDA consultation event and its online consultation, and use the findings to shape future activities and improve stakeholder engagement.	<ul style="list-style-type: none"> <li>- Provide feedback forms at events and analyse comments.</li> </ul>	Ongoing	SC	Regs	Ongoing work.
D3: Assess the openness and transparency of the GDA process against NEA guidance.	<ul style="list-style-type: none"> <li>- Undertake assessment of GDA public involvement process against NEA guidance.</li> </ul>	October 2010	MW/AL	Regs	Awaiting NEA Guidance, currently in draft. Expected to be finalised in October 2010.

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Action	Activity	Timing	Lead	Target	Status
D4: Subject the public involvement process to a Process Review Board appraisal in early 2010, and internal audits after key stages.	- Provide materials on public involvement process as appropriate.	Apr 2010	MW	Regs	Third PRB report published on 23 September. Internal Audit scheduled.
D5: Independent evaluation of EA GDA consultation.	- independent consultant appointed to review consultation.	Aug/Sept 2011	AL	All	Interim report to be produced in Dec 2010.
D6: Assess on a monthly basis, the numbers of comments received on the design information and HSE Step 3 assessment reports, as well as website usage e-bulletin subscriptions, numbers of documents published and events attended.	- Prepare metrics, including - Numbers of public comments. - e-bulletin subscriptions. - number of e-bulletins issued. - website hits. - documents published - number of events attended	Monthly	SC/MT	Regs	Indicators created and being maintained. Monthly meetings in place.

## **Annex B: GDA Stakeholder Engagement Group: Terms of Reference**

### **Purpose**

To work together to plan, co-ordinate and deliver in an open and transparent way, our stakeholder engagement and communications for GDA.

### **Aims**

- To raise stakeholder awareness of GDA and encourage their involvement
- To keep stakeholders well informed throughout the assessment and seek their views
- To strengthen and build trust and confidence in us as regulators

### **Objectives**

- To develop, implement, review and maintain a joint stakeholder engagement Plan and action plan
- To publish appropriate, accurate and timely information on GDA and our role as independent regulators
- To develop and share key messages and Q&A
- To develop, review and maintain the joint new build website and share/agree information for publication
- To develop and manage a public comments process for GDA and produce update reports at key stages
- To develop joint promotional materials
- To identify opportunities to communicate and engage directly with stakeholders
- To evaluate the efficiency and effectiveness of our stakeholder engagement
- To keep each-other informed of relevant strategic issues

### **Timing**

The group will meet on a monthly basis. Additional meetings/teleconferences to be arranged as and when required.