

The state of security in the civil nuclear industry and the effectiveness of security regulation April 2009 to March 2011

A report to the Minister of State for Energy,
Department of Energy and Climate Change
by the Director of Civil Nuclear Security

Office for Nuclear Regulation

Note by the Office for Nuclear Regulation:

The Office for Nuclear Regulation (ONR) was formed on 1 April 2011 and it is responsible for the regulation of security, safety and safeguards within the United Kingdom's nuclear industry. The Office for Civil Nuclear Security (OCNS) is now part of ONR and use of the term OCNS has been discontinued. This report though, predates the formation of ONR and therefore refers to OCNS.

Contents

| | Paragraph |
|---|-----------|
| Introduction | 1–6 |
| The UK’s legal and regulatory infrastructure | 7–10 |
| The state of security in the civil nuclear industry | |
| Protective security | 11 |
| <i>Assessing the threat to the civil nuclear industry</i> | 12 |
| <i>The Nuclear Industries Malicious Capabilities (Planning) Assumptions (NIMCA)</i> | 13 |
| Site security | |
| <i>Site security plans</i> | 14–15 |
| <i>The Technical Requirements Document</i> | 16–18 |
| <i>Temporary security plans</i> | 19–20 |
| <i>Inspectors</i> | 21 |
| <i>Inspections</i> | 22 |
| <i>Reports made under regulation 10</i> | 23–24 |
| <i>Counterterrorist exercises</i> | 25–27 |
| <i>Senior Managers (Nuclear) Security Briefing</i> | 28–29 |
| <i>Security Regulators Liaison Group</i> | 30 |
| <i>Vital area reviews</i> | 31–32 |
| <i>Vulnerability assessments</i> | 33–34 |
| <i>Civil Nuclear Constabulary</i> | 35–36 |
| <i>Decommissioning and security</i> | 37 |
| <i>International Physical Protection Advisory Service (IPPAS) Mission to Sellafield</i> | 38–39 |
| Transport security | |
| <i>Overview</i> | 40 |
| <i>Movements of civil nuclear material 2009/10</i> | 41–42 |
| <i>Movements of civil nuclear material 2010/11</i> | 43–45 |
| <i>Approved carriers</i> | 46–47 |
| <i>Reports made under regulation 18</i> | 49 |
| <i>The movement of Category I MOX fuel from France to Japan</i> | 50–51 |
| <i>Vitrified residue returns</i> | 52–54 |
| <i>Inspections</i> | 55–56 |
| <i>Import licensing</i> | 57–58 |
| Information security | |
| <i>Overview</i> | 59–60 |
| <i>The Information Security Branch</i> | 61–62 |
| <i>Inspections</i> | 63–65 |
| <i>Accreditation</i> | 66–68 |
| <i>Computer-based systems important to safety</i> | 69–70 |
| <i>Policy</i> | 71–73 |
| <i>Reports made under regulation 22</i> | 74–76 |
| Personnel security (vetting) | |
| <i>Overview</i> | 77–80 |
| <i>Security clearances 2009/10</i> | 81–84 |
| <i>Denials and appeals 2009/10</i> | 85 |
| <i>Security clearances 2010/11</i> | 86–88 |
| <i>Denials and appeals 2010/11</i> | 89–90 |
| <i>Cabinet Office Vetting Transformation Programme</i> | 91–92 |
| <i>Awareness and aftercare</i> | 93–98 |
| <i>Personnel security inspections</i> | 99–101 |

| | |
|--|---------|
| Generic Design Assessment and support to New Build | 102–104 |
| The effectiveness of security regulation | 105 |
| International commitments and activities | |
| <i>The International Atomic Energy Agency</i> | 106–108 |
| <i>The European Nuclear Security Regulators Association</i> | 109–110 |
| <i>The World Institute of Nuclear Security</i> | 111 |
| <i>Bilateral exchanges</i> | 112 |
| <i>International collaboration on uranium enrichment technology</i> | 113–114 |
| Support to Government | |
| <i>Nuclear Security Summit, Washington DC, April 2010</i> | 115 |
| <i>Department of Energy and Climate Change</i> | 116–117 |
| <i>Foreign and Commonwealth Office</i> | 118 |
| Administration | |
| <i>The Office for Nuclear Regulation</i> | 119–120 |
| <i>OCNS offices at Harwell</i> | 121–122 |
| <i>OCNS staffing</i> | 123–124 |
| <i>OCNS budget and cost recovery 2009/10</i> | 125–126 |
| <i>OCNS budget and cost recovery 2010/11</i> | 127–128 |
| Statement of assurance | 129 |
| Change of appointment | 130–131 |
| Annexes | |
| A OCNS organisation as at 31 March 2011 | |
| B Percentage of charges by operator recovered in financial year 2009/10 and financial year 2010/11 | |
| References | |
| Abbreviations | |

Introduction

1 The United Kingdom attaches a very high priority to the physical protection of nuclear material and nuclear facilities. Within the UK's civil nuclear industry, security is regulated by an independent regulator, the Office for Civil Nuclear Security (OCNS), whose Director is accountable to Ministers. Operators of civil licensed nuclear sites are legally and financially responsible for security at their sites and they must demonstrate that the security measures which are maintained at their sites are appropriate to protect the nuclear inventories held there. OCNS approves the level of security at all civil licensed nuclear sites, conducts a programme of routine and no-notice inspections to ensure compliance and has the power to compel the operators to make improvements if necessary.

2 OCNS conducts its regulatory activities under the Nuclear Industries Security Regulations 2003,¹ a robust, modern, regulatory code which recognises the UK's obligations under the Convention on the Physical Protection of Nuclear Material (CPPNM) and takes account of the recommendations made by the International Atomic Energy Agency (IAEA) in its publication *The Physical Protection of Nuclear Material and Nuclear Facilities* (INFCIRC/225/Rev4).² In keeping with these obligations and guidelines, OCNS is the UK's 'designated competent authority' and complies with the recommendation that it should be independent, have the legal authority to regulate security in the industry, have access to the UK's intelligence services and maintain close links with the United Kingdom Safeguards Office.

3 The Director of Civil Nuclear Security (DCNS) is required to make a report to the Minister of State for Energy at the Department of Energy and Climate Change (DECC) on the 'state of security in the civil nuclear industry and the effectiveness of security regulation'. This report covers the period from April 2009 to March 2011.

4 The profile of security in the civil nuclear industry has continued to grow throughout this reporting period. A number of developments have prompted this, including general global interest in the security of nuclear materials which led to the Nuclear Security Summit in Washington DC in April 2010. The period has also seen increasing momentum behind the Nuclear Decommissioning Authority's (NDA's) programme to deal with the UK's nuclear legacy which has raised the prospect of realigning security provision as progress with decommissioning occurs. There has also been the continuing need to address lessons which emerge from mandatory, annual counterterrorist exercises and also to consider the extension of OCNS's *vires* to regulate security at construction sites for any New Build nuclear power plants. These developments characterised events both before and after the General Election of May 2010 and I have welcomed the commitment from DECC in providing the policy guidance to respond to them.

5 Throughout this period, OCNS has also contributed to the process which led to the formation of the Office for Nuclear Regulation (ONR) and which brought together the regulatory authorities responsible for security, safety and safeguards on 1 April 2011. This consolidation will be further developed in October 2011 when the Radioactive Materials Transport Team from the Department for Transport is expected to join ONR.

6 As vacancies occur, OCNS has continued to recruit staff to the Health and Safety Executive's (HSE's) Nuclear Directorate's offices in Bootle. About half of OCNS's staff remain at the Harwell Offices but these offices are expected to close in March 2012 as part of the rationalisation of the Government estate which has occurred since May 2010.

¹ Documents referred to in the text are listed under 'References'.

² Revision 5 adopted by IAEA in March 2011.

The UK's legal and regulatory infrastructure

7 The UK complies with internationally accepted best practice (as endorsed in the extant version of the IAEA's nuclear security guidance document *The Physical Protection of Nuclear Material and Nuclear Facilities* INFCIRC/225/Rev4) in putting in place security measures and procedures which are designed to prevent the theft or sabotage of nuclear material or the sabotage of nuclear facilities. A key component of these internationally agreed security guidelines has been the development of categorisation tables of nuclear materials which reflect the likelihood of a technically competent group with a malicious agenda using nuclear materials stolen from a civil licensed nuclear site to manufacture an improvised nuclear explosive device. This has prompted the development of two key principles underpinning the security of nuclear material: that of the 'graded approach', whereby the higher the category of nuclear material, the greater the level of security, and 'defence in depth'. The latter refers to the multiple, interlocking layers of security measures which are in place at every civil licensed nuclear site. These are designed to detect and to delay potential attackers, thereby allowing permanently-based security staff, which include at many sites an armed response capability, to mount a response.

8 Ministerial responsibility for the security of the civil nuclear industry rests with the Secretary of State for Energy and Climate Change. Since the terrorist attacks in the USA on 9/11, the legislation and regulations governing security in the civil nuclear industry have been overhauled. The major developments in the last ten years have included the Anti-terrorism, Crime and Security Act 2001 (the 2001 Act) which enabled the Secretary of State to make the Nuclear Industries Security Regulations 2003 (the Regulations). The Regulations place significant obligations on the operators of civil licensed nuclear sites with regard to physical security measures; the security of sensitive nuclear information; the vetting of permanent staff and contractors; and the movement of nuclear material by road and rail within the UK and globally in UK-flagged vessels. The 2001 Act also extended the jurisdiction of the United Kingdom Atomic Energy Authority Constabulary (UKAEAC), the forerunner of today's Civil Nuclear Constabulary (CNC), to include the UK's nuclear power stations and anywhere within 5 km of them. The primary role of CNC is the protection of civil licensed nuclear sites and the safeguarding of nuclear material. In practice, this means the provision of an armed response capability at sites designated by the security regulator and also for designated moves of nuclear material. The designation of such civil licensed sites or such moves is determined, respectively, by the category of nuclear material stored at the site or being moved. The 2001 Act also made it an offence intentionally, or recklessly, to disclose information which prejudices the security of any nuclear site.

9 The second major piece of legislation was the Energy Act 2004 which enabled the formation of CNC by separating the UKAEAC from the United Kingdom Atomic Energy Authority and establishing the Civil Nuclear Police Authority as a non-departmental public body with the function of securing the maintenance of CNC. The Secretary of State has extensive powers under the Energy Act 2004 to ensure that CNC provides an efficient and effective policing service in order to comply with security plans at civil licensed nuclear sites and during moves of nuclear material.

10 As well as the Nuclear Industries Security Regulations 2003, the Uranium Enrichment Technology (Prohibition of Disclosure) Regulations 2004 were introduced to prevent the disclosure of proliferation-sensitive technology, particularly with regard to the UK's collaboration on uranium enrichment with The Netherlands, Germany, France and the USA.

The state of security in the civil nuclear industry

Protective security

11 Protective security at civil licensed nuclear sites covers the four distinct, yet inter-related areas of site security, transport security, information security and personnel security (vetting). These specialist areas are each addressed in the Regulations and OCNS's regulatory activities concentrate on ensuring that appropriate standards of security are met and subsequently maintained.

Assessing the threat to the civil nuclear industry

12 The most important factor influencing the level at which security measures are set is the likely threat to the civil nuclear industry. Assessing the threat is a continuous process which involves significant input from the national intelligence agencies. As the competent authority for security in the civil nuclear industry, OCNS has access to these agencies, and in particular to the Joint Terrorism Analysis Centre (JTAC) where OCNS is permanently represented and DCNS is a member of the JTAC Oversight Board. These links allow OCNS to remain informed about any intelligence-related developments which might affect security in the civil nuclear industry and to direct any changes in security preparedness as appropriate in response to new or emerging threats.

The Nuclear Industries Malicious Capabilities (Planning) Assumptions (NIMCA)

13 In a process involving a formal annual review, JTAC examines all current intelligence relating to the UK's nuclear industry and its conclusions are used by DCNS to set down planning assumptions with regard to the type of threat the civil nuclear industry should be protected against. These are recorded in a protectively marked OCNS document, known as the 'Nuclear Industries Malicious Capabilities (Planning) Assumptions' or 'NIMCA', which provides the basis for the design, implementation and management of security measures and systems by the regulated civil nuclear companies. It is important that these planning assumptions are not confused with the UK's Threat Levels System whereby changes in the national threat level are notified as appropriate, and security postures are adjusted if necessary. NIMCA sets the bar for the provision of security resources by the operators which are expected to be sufficient to sustain an effective and proportionate security posture on a daily basis, and also allow for a surge in security activity if a national change in threat demands it.

Site security

Site security plans

14 The Regulations place an obligation on operators of civil licensed nuclear sites holding Category I to IV nuclear material or other radioactive material, or those who use or store Category I to III nuclear material at other premises to have a site security plan (SSP). SSPs must detail the standards, procedures and arrangements for ensuring security at civil licensed nuclear sites and must be approved by OCNS. Furthermore, if a civil licensed nuclear site has a tenant who uses, or stores nuclear or other radioactive material (including radioactive sources), then the tenant is also required to have a SSP which must be approved by OCNS.

15 There are currently 31 civil licensed nuclear sites, each with a SSP, and there are 12 tenants on sites who are required to maintain an SSP. SSPs are protectively marked according to their content. It is important that the level of security at a site is both proportionate and effective, and the SSPs therefore take into account the most recent

assessment of an adversary's malicious capabilities described in NIMCA, and the category of the civil licensed nuclear site for which the SSP is being designed. Clearly, the existence of a significant inventory of nuclear material held at a Category I civil licensed nuclear site such as Sellafield attracts a level of security which would neither be necessary nor justified at a Category IV site. Making this correlation between hazard and security is known as the 'graded approach' to security which in turn is complemented by 'defence in depth', whereby multiple layers of security are designed to delay and detect an adversary and thereby give sufficient time for the on-site security force to respond. Following approval by OCNS, SSPs are adopted and thereafter, they become the basis against which the operators are judged to be compliant. Once approved, SSPs remain subject to constant review, scrutiny and amendment as necessary by the operator concerned and by OCNS through regulatory activity. Each year, SSPs are formally reviewed by site security staff and approved by OCNS.

The Technical Requirements Document

16 The Technical Requirements Document (TRD) is a protectively marked policy document, produced by OCNS, whose purpose is to help the operators meet the requirements of the Regulations. The TRD sets out model security standards, objectives and requirements which operators can incorporate into their SSPs as appropriate. OCNS recognises that given the variety of design between the UK's nuclear plants and local geographical conditions, it is not possible to make one set of security measures fit all nuclear sites and plants and the guidance is therefore written to give sufficient flexibility to accommodate these local variations. A key part of OCNS's role is to ensure that SSPs capture these variations and present a robust, yet effective and proportionate, security regime at all sites according to the hazard they each present.

17 During this reporting period, OCNS has produced additional guidance for the potential operators of any New Build nuclear power plants which might be constructed. This is protectively marked and it establishes the approach to New Build security whereby security is built in at the design stage. The policy also reflects the improvements to the general security of nuclear facilities which have been introduced since the 9/11 terrorist attacks in the USA in 2001.

18 OCNS is currently reviewing the TRD as a whole and shortly expects to replace it with a revised guidance document which will be known as *National Objectives, Requirements and Model Standards for the Protective Security of Civil Licensed Nuclear Sites, other Nuclear Premises and Nuclear Material in Transit* or 'NORMS'. Following the appropriate consultation with operators and other stakeholders, NORMS is expected to replace the TRD in late 2011.

Temporary security plans

19 OCNS recognises that SSPs are living documents and that they are subject to change, particularly for example, if building works are to be carried out which will affect the integrity of the security arrangements described in the SSP. When such circumstances occur, the operator must obtain OCNS's prior approval for a temporary security plan (TSP), whose purpose is to detail compensating security arrangements whilst the building works are in process. Operators and the regulator maintain a close liaison to ensure that the SSPs remain fit for purpose.

20 OCNS approved 162 TSPs between 1 April 2009 and 31 March 2010, and 112 TSPs between 1 April 2010 and 31 March 2011.

Inspectors

21 During the period covered by this report, OCNS has concentrated on the development and training of those nuclear security inspectors who have recently joined the organisation. All nuclear security inspectors in the Approvals and Compliance Unit (ACU), which is responsible for the regulation of site, information and transport security, are now fully trained and warranted. The ACU is split between the main offices of the Nuclear Directorate of HSE (now the Office for Nuclear Regulation) at Redgrave Court, Bootle, and OCNS's original offices at Harwell. Inspectors have site responsibilities based on site location and the complexity of each site's activities. The aim is to create a portfolio of inspection responsibilities for each nuclear security inspector which creates a reasonable and sustainable burden of travel for the inspector between sites and which, as far as possible, shares the workload fairly. Unsurprisingly therefore, security inspectors based at Harwell tend to work the civil licensed nuclear sites in the south of the UK and the Bootle-based inspectors concentrate on sites to the north.

Inspections

22 Over a set period of time and depending on the complexity of the site, OCNS nuclear security inspectors will formally inspect every component of a site security plan both to ensure compliance and, in conjunction with site security staff, to assess the continuing effectiveness of the security measures in place against the malicious capabilities outlined in NIMCA. These inspections and assessments are an essential component to the annual review of all SSPs and provide a clear focus for regulatory activity and interventions. During the period April 2009 to March 2010, OCNS nuclear security inspectors carried out 161 routine site inspections and a further 24 no-notice inspections to ensure compliance against the Regulations. Between April 2010 and March 2011, 207 routine site inspections and no-notice inspections were conducted.

Reports made under regulation 10

23 Operators are obliged under regulation 10 of the Regulations to report within 24 hours a broad range of events and occurrences which may be of interest from a security point of view. There is a comprehensive list of reportable events in the Regulations themselves but for ease of reference, they include *inter alia* such matters as unauthorised incursions on to a civil licensed nuclear site, any incident involving an explosive device or a firearm, malicious damage, theft of nuclear material or sensitive nuclear material and failure to comply with the Site Security Plan. There is also a requirement for operators to report 'any matter or event which might affect the security of the premises or the material, equipment or information mentioned in regulation'. This latter requirement is a 'catch all' and operators have developed the wholly welcome practice of using the regulation 10 procedures to report a variety of events which may have limited bearing on security. I welcome the fact that they do so.

24 As a result though, most reports made under regulation 10 have little or no impact on security. No reports were made under regulation 10 in either of the periods 2009/10 or 2010/11 which in themselves constituted a serious breach in security but all reports were investigated where necessary by OCNS inspectors and the appropriate action taken. On a number of occasions throughout both these periods, CNC was unable to meet its agreed minimum staffing levels at some of the sites to which it is deployed due mainly to sickness of staff. There are contingency plans to be followed when this occurs and following implementation, OCNS inspectors carry out checks to ensure the plans were correctly followed.

Counterterrorist exercises

25 Every civil licensed nuclear site is required to hold an annual counterterrorist exercise at which OCNS inspectors must be present and which must test all the elements responsible for security at the site. This is an important component of a site's security regime and

considerable care is taken to ensure that scenarios are credible and demanding, and that the greatest possible proportion of the workforce on each site can benefit from them. These exercises are designed to test command and control arrangements, to probe the interfaces between the various agencies which contribute to security at civil licensed nuclear sites and to encourage increasing interaction between security and safety. The lessons identified during the exercises are documented and subsequently reflected as appropriate in revised counterterrorist contingency planning.

26 Exercise scenarios are approved by OCNS to ensure consistency between sites. Over the last two years, these have reflected the malicious capabilities outlined in NIMCA and have introduced more demanding scenarios, including an element of 'force-on-force' exercise play. Exercises have taken place both during, and out of, normal working hours and during daylight and at night. Many good practices have been observed and changes made as part of the drive towards continuous improvement in security at civil nuclear sites.

27 There were 27 exercises during the 2009/10 reporting period, and 26 exercises during 2010/11. I want to acknowledge the commitment of the sites in mounting these exercises on their busy, operational plants. Exercises are costly and disruptive but they are evidence that the industry at all levels continues to take security seriously.

Senior Managers (Nuclear) Security Briefing

28 During the two years covered by this report, I have continued with the Senior Managers (Nuclear) Security Briefings which occur biannually in May and November at the Health and Safety Laboratory (HSL) at Buxton. The aim of the briefings is to raise security awareness amongst managers in the civil nuclear industry. The briefings comprise a series of lectures and practical demonstrations on HSL's range and test facilities which are designed to illustrate the malicious capabilities outlined in NIMCA. I consider these briefings to be an essential component in maintaining management awareness of security issues. Each briefing has been over-subscribed, and feedback from the briefings is invariably positive. OCNS is supported in these briefings by specialists from the Centre for the Protection of National Infrastructure (CPNI) whose expertise is crucial to their success. I am grateful to the Head of CPNI who has been able to continue to provide this support, particularly over the last 12 months when there have been fewer resources available.

29 The undoubted value of these briefings and the clear demand for them prompted OCNS to arrange 'roadshow' versions of the briefing for senior managers at the Sellafield civil licensed nuclear site in April 2009 and March 2010. These two briefings were attended by 70 middle and senior managers, including members of the Sellafield Ltd Executive. Again, the CPNI outreach team provided invaluable support to OCNS staff.

Security Regulators' Liaison Group

30 In October 2009, OCNS hosted a meeting of the Security Regulators' Liaison Group (SRLG) at its Harwell offices. SRLG is a UK-based organisation which shares relevant good practice and experience among those involved in the regulation of radioactive sources. It was created in response to the High-activity Sealed Radioactive Sources and Orphan Sources Regulations 2005 (HASS) and the need to coordinate the security of sealed radioactive sources on civil, non-nuclear sites. The scope of SRLG extends to all UK-based regulatory authorities with a role in the security of radioactive substances. The meeting in October 2009 was attended by representatives from OCNS, the Nuclear Installations Inspectorate, HSE, CPNI, the National Counter Terrorism Security Office, the Department for Transport, the Environment Agency, the Scottish Environment Protection Agency and the Northern Ireland Environment Agency.

Vital area reviews

31 Many civil licensed nuclear sites contain 'vital area(s)' which are defined as '*An area containing nuclear material and/or other radioactive material (including radioactive sources), or equipment, systems, structures or devices, the sabotage or failure of which, alone or in combination, through malevolent acts as defined in the extant NIMCA document could directly or indirectly result in unacceptable radiological consequences thereby endangering public health and safety by exposure to radiation*'.

32 The effective protection of vital areas remains a major priority. The work associated with identifying vital areas, and devising options to mitigate the impact of sabotage or failure, involves site security staff (including CNC as appropriate), safety specialists from the Nuclear Installations Inspectorate and OCNS. Vital area reviews and subsequent mitigation action remain a key component in ensuring that the appropriate protective security measures are in place at all the UK's civil licensed nuclear sites.

Vulnerability assessments

33 In previous reports, I have discussed how OCNS contributed to a 2007/08 national review of protective security in the UK's hazardous industries which was coordinated by the Home Office's Office for Security and Counter Terrorism. This coincided with the introduction of NIMCA which comprised a revision of the security planning assumptions for the civil nuclear industry. As a matter of course, the revision prompted a series of vulnerability assessments to ensure that existing measures were sufficient to defeat the revision of malicious capabilities outlined in NIMCA.

34 The first phase of these vulnerability assessments, which examined the measures in place to detect and to delay an attacker and the ability of the on-site security force to respond, was completed in November 2008 and prompted a number of improvements in security provision. A second phase of assessments followed which concentrated on the measures in place to protect vital areas and operators were required to forward proposals for security improvements where they were considered to be necessary. I can confirm that all proposals have been received during the period covered by this report and where approved, they have been, or will be, included in approved SSP security improvement schedules.

Civil Nuclear Constabulary

35 CNC is a specialist police force which provides the dedicated armed response capability at designated civil licensed nuclear sites. It is funded by the operators of those sites to which it is deployed. The Civil Nuclear Police Authority (CNPA), a non-departmental public body, is responsible to the Secretary of State for Energy and Climate Change for the efficiency and effectiveness of the Constabulary. CNC has a greater proportion of authorised firearms officers (AFOs) than any other UK police force and as well as providing the armed response capability at designated sites, these officers are also deployed as armed escorts for designated moves of nuclear material including consignments sent by sea.

36 During the period covered by this report, CNC has increased the proportion of its officers who are AFOs and I have welcomed both this and the commitment to increased training, given that the skills CNC need as armed responders are challenging both to develop and to retain. A focused and demanding training regime will ensure that all officers achieve and retain the same high standards.

Decommissioning and security

37 NDA is making an ever more significant impact on reducing or removing the UK's nuclear legacy and in time, I expect this to deliver a security 'dividend'. From a regulatory point of view, security at a site is set at a level which is designed to prevent the theft or sabotage of the nuclear materials held on the site. Once the nuclear materials have either

been removed or 'conditioned' into a form which minimises the hazard they present, then security can be adjusted appropriately. As an example, when the remaining Magnox fuel at the Chapelcross nuclear power stations has been removed to Sellafield for reprocessing, then it is unlikely that the site will require an armed response capability and it could be redeployed elsewhere. There are a number of civil licensed nuclear sites where a reduction in security overheads will be possible and I have discussed the possible implications of this with senior representatives from the operators, NDA, CNC, CNPA and DECC.

International Physical Protection Advisory Service (IPPAS) Mission to Sellafield

38 At the Nuclear Security Summit in Washington DC in April 2010, the UK Government formally committed to inviting an International Physical Protection Advisory Service (IPPAS) mission, provided by IAEA, to the UK. IPPAS was created by the IAEA to assist states in strengthening their national nuclear security regime. An IPPAS mission allows a state to benefit from an independent, impartial peer review of its nuclear security regime and obtain advice on implementing international instruments (such as the Convention on the Physical Protection of Nuclear Material) and guidance published by IAEA on the physical protection of nuclear and other radioactive material and associated facilities. The IPPAS Mission will involve a review of the UK's physical protection system for civil licensed nuclear sites against international guidelines and internationally recognised best practice. The IPPAS Mission will also visit the Category I civil licensed nuclear site at Sellafield.

39 OCNS joined officials from DECC and corporate security staff from Sellafield Ltd for the preparatory meeting for the IPPAS Mission. Planning continues for the Mission itself and involves officials from DECC and IAEA, OCNS, Sellafield Ltd and members of the IPPAS Mission.

Transport security

Overview

40 The movement of civil nuclear material by road and rail throughout the UK and worldwide when carried on UK flagged vessels is regulated by OCNS. Within the UK, the majority of these moves comprise consignments of spent nuclear fuel which are transported by road and/or rail in massive transport flasks from the nuclear power stations to the Sellafield civil licensed nuclear site for reprocessing. Nuclear material sent by sea includes cargoes of Category I mixed oxide (MOX) fuel to Japan and vitrified residue returns to their countries of origin.

Movements of civil nuclear material in 2009/10

41 Between April 2009 and March 2010, 1689 separate movements of civil nuclear material were pre-notified to OCNS in accordance with regulations 19 and 20. These notifications included a consignment of Category I MOX fuel to Japan from France which was transported on a UK flagged vessel: the move was notified and cleared during the 2009/10 reporting period but the shipment itself did not commence until early April 2010.

42 1152 notifications were made for the movement of spent nuclear fuel (in comparison to 819 during the previous reporting year). This total comprised 501 notifications for rail transport and 651 notifications of transport by road from the UK's nuclear power stations to the associated railheads or direct to Sellafield. A number of factors subsequently determine whether a notified movement actually occurs and during this reporting period, 504 of these notified movements were cancelled. Amongst the other movements which did occur, 108 were consignments of Category III nuclear material that transited UK ports on foreign-flagged vessels and there were also imports and exports of Category III nuclear material between the UK and Canada, China, France, Germany, Japan, The Netherlands, The Russian Federation, South Korea, Spain, Sweden and the USA.

Movements of civil nuclear material in 2010/11

43 In 2010/11, 2055 separate movements of civil nuclear material were pre-notified to OCNS in accordance with regulations 19 and 20. These included 1496 notifications which were made for the movement of spent nuclear fuel. This total comprised 668 notifications for rail transport and 828 notifications of transport by road from the UK's nuclear power stations to the associated railheads, or direct to Sellafield. 567 of these movements were subsequently cancelled for operational reasons. The increase in activity over 2009/10 reporting period reflects an improvement in transport flask availability.

44 There were 96 movements of Category III nuclear material which transited through UK ports on foreign flagged vessels and there were also imports and exports of Category III nuclear material between the UK and Canada, France, Germany, The Netherlands, The Russian Federation, South Korea, Spain, Sweden and the USA.

45 Movements included the shipment of a consignment of Category I MOX fuel, manufactured in France and transported to Japan in a UK-flagged vessel. The movement was notified in the period 2009/10 but the shipment occurred between April and June 2010. This consignment is also mentioned at paragraph 41 above and paragraph 50 below.

Approved carriers

46 Carriers who wish to transport nuclear material must first be approved by OCNS as either a Class A or a Class B carrier. Those carriers which achieve Class A Approved Carrier status can transport Category I/II/III nuclear material; a Class B carrier can only carry Category III nuclear material. Whether seeking Class A or Class B Approved Carrier status, all carriers must submit a transport security statement (TSS) to OCNS which details the policy and procedures in place to ensure the security of the nuclear material whilst it is in the carrier's custody. The TSS is legally binding. When moving Category I or Category II nuclear material, Class A Approved Carriers must have a transport security plan in place for each move. In practice, moves of Category I and Category II nuclear material require detailed planning involving the consignor and the consignee; other regulators (including the Nuclear Installations Inspectorate, the Environment Agency, the Scottish Environment Protection Agency and the Department for Transport); security organisations including CNC and local Home Office police forces; and, if the movement is abroad, the Foreign Office and Government officials and security authorities from the receiving country. OCNS, as the competent authority, acts in a coordinating role for such movements and is responsible for approving the final movement plan before the move occurs.

47 The number of approved carriers now stands at 23, an increase of one during 2009/10 following the granting of Approved Carrier status to Magnox Hinkley Point.

Reports made under regulation 18

48 Under regulation 18 of the Regulations, an approved carrier is obliged to report to OCNS within 24 hours any attempt at theft or sabotage of nuclear material during transport. For the purpose of this regulation, the means of conveyance of the nuclear material or any premises where such material might be stored temporarily during an approved move are covered, and approved carriers must also report any incident involving an explosive device, firearms or damage which might affect the move. As with regulation 10, regulation 18 also has a 'catch all' clause covering any other event which might affect the security of nuclear material in transit.

49 There were no instances of theft or sabotage of nuclear material in transport in either 2009/10 or 2010/11.

The movement of Category I MOX fuel from France to Japan

50 Contracts exist to enable Japan's policy on recycling its nuclear fuel through reprocessing and making use of the recovered plutonium in MOX for electricity generation. MOX fuel is transported by sea and the most recent of these occurred between April and June 2010. The fuel had been manufactured in France and was transported to Japan on a UK-flagged vessel. This move was subject to extensive planning and preparation and was completed without incident.

51 A shipment of MOX fuel to Japan which had been planned for March 2011 was postponed following the nuclear emergency at Fukushima.

Vitrified residue returns

52 The Sellafield civil licensed nuclear site reprocesses spent nuclear fuel for overseas customers in accordance with UK Government policy and the Nuclear Decommissioning Authority's contractual obligations. The overseas customer retains ownership and responsibility for the highly active waste (HAW) which is one of the products of this reprocessing. The HAW is encapsulated in solid glass and encased in stainless steel and is known as vitrified residue. Returning the vitrified residue is an important part of reducing the volume of legacy wastes stored at Sellafield. UK-flagged vessels have carried cargoes of vitrified residue from France to Japan in the past, but during the period covered by this report, the first returns from Sellafield were achieved and this represents a significant milestone in reducing legacy wastes stored in the UK.

53 Two such shipments were undertaken during the first three months of 2010, one to Japan and the second to The Netherlands. Each involved the transport by rail of a single 113te flask from Sellafield to Barrow where it was loaded on board a vessel dedicated to the transport of nuclear material and then taken by sea to its destination. Both shipments attracted media interest but each was completed without incident and in compliance with national and international regulations and guidance.

54 The Vitrified Residue Returns Programme will involve further shipments to Japan and also to other customers in Europe and is expected to take about ten years to complete.

Inspections

55 Transport security inspectors from OCNS inspect Approved Carriers at sites, railheads and other premises to ensure that the carriers are maintaining robust and appropriate levels of security when transporting nuclear material. These inspections are an important and effective enforcement tool which enables OCNS to confirm that Approved Carriers remain compliant with their approved transport security statements.

56 Twenty-one inspections were carried out in the period 2009/10 and 33 in 2010/11.

Import licensing

57 OCNS is responsible for issuing licences for the import into the UK from outside of the European Union of nuclear materials which are proscribed for import under the Open General Import Licence. As a general assumption and in order to allow the UK to meet its international obligations, Import licences are not usually granted for nuclear materials coming from a state that is not a party to the Convention on the Physical Protection of Nuclear Material.

58 Eleven import licences were granted during the 2009/10 reporting period and eight during the 2010/11 reporting period.

Information security

Overview

59 The Regulations place an obligation on the civil nuclear industry to protect sensitive nuclear information against the threats of theft and compromise. Sensitive nuclear information includes any information relating to the security of nuclear material and to nuclear proliferation. The civil nuclear operators and contractors to the industry must apply the Government's protective marking system to all such information and store it, in whatever media in which it is held, to a level of protection commensurate with its protective marking. OCNS is the accreditation authority for IT systems storing protectively marked material and bases its judgements on nationally approved standards for such systems. This involves acting as impartial assessors of the risks that these information systems may be exposed to in the course of meeting the business requirement, and formally accrediting these systems as having appropriately treated and managed those risks.

60 As part of keeping in step with UK standards, OCNS recognises the Government requirement, detailed in the Security Policy Framework, that an accreditor should meet the standards set by the Institute of Information Security Professionals (IISP) for Associate Membership, together with IISP annotation indicating competence in the Government environment (equivalent to the Infosec Training Paths and Competencies Certificate of Infosec Competency). The Band 2 nuclear security inspector currently holds this qualification, and both the Band 3 nuclear security inspectors are working towards it.

The Information Security Branch

61 The Information Security Branch of OCNS has been reorganised during this reporting period and it is now fully staffed with a Band 2 nuclear security inspector and two Band 3 nuclear security inspectors. A third Band 3 information security inspector is currently involved in rewriting TRD as NORMS (paragraph 18 above). As well as assisting the Band 2 nuclear security inspector in routine advisory work, the Band 3 nuclear security inspectors each have responsibility for specific areas of information security. One Band 3 inspector concentrates on approvals and compliance work for existing nuclear operators. The sites subject to regulation have been categorised in order of priority and an inspection programme has been devised to reflect these priorities. Twenty-eight sites are regarded as 'Type A' sites and these include the Category I civil licensed nuclear sites, nuclear power stations, and other locations where significant quantities of Sensitive Nuclear Information (SNI) are held. These sites are formally inspected on a regular basis. There are 78 'Type B' sites and these include decommissioning sites, smaller civil licensed nuclear sites, and locations where smaller quantities of SNI are held. Again, these sites are regularly inspected but at longer intervals than is the case with the Type A sites. Inspections which have been carried out to date have confirmed a high level of compliance and such observations which have been made related to relatively minor corrections in procedures.

62 There is a third area of priority, the 'Type C' sites, which are the responsibility of the second Band 3 inspector who specialises in contract security. There are significant numbers of Type C sites, most of which are contractors holding very small quantities of SNI with a low level of protective marking. These are primarily inspected by the contracting authorities, with the OCNS Information Security Branch providing oversight. Contracts which involve SNI with a protective marking of CONFIDENTIAL and above remain the responsibility of the Information Security Branch. During the period 2010/11, OCNS formed an industry-wide Contract Security Working Group to promote greater cooperation and confidence amongst the contracting authorities which are subject to Regulation. An important output of this Working Group has been 'List N', a civil nuclear security equivalent of List X, which is run by MoD on behalf of the Government. List N contains details of all contractors that have been inspected by the Information Security Branch of OCNS (and deemed to have been compliant with the Regulations) and the contracting authorities in the civil nuclear industry.

Inspections

63 The work of the OCNS Information Security Branch includes advising operators over the security of sensitive nuclear information held on civil licensed nuclear sites, and also advising those operators who hold sensitive nuclear information at offices which are not located on civil licensed nuclear sites. Information security inspectors examine IT systems, paper filing and recording arrangements, handling procedures, and the 'security furniture' in which sensitive nuclear information is kept. They also keep in close touch with OCNS personnel security inspectors to ensure that those with access to SNI are security cleared, or vetted, to a level commensurate with the protective marking carried by such material.

64 The OCNS Information Security Branch has become increasingly involved in activities associated with enabling New Build nuclear power plants. This has included advising Requesting Parties (RPs), Potential Operators (POs) and Technical Support Contractors (TSCs) on all aspects of information security and the inspection of premises and the accreditation of IT systems used by RPs, POs, and TSCs.

65 During the period 2009/10, 30 inspections and accreditations were carried out. In 2010/11, the total was 67. The increase in productivity during this period reflects the fact that the Information Security Branch is now fully staffed, all members have completed their induction training and all are 'warranted'.

Accreditation

66 Both 2009/10 and 2010/11 were busy periods for accreditation. In part, this can be explained by activity associated with New Build, but at the same time, the former large corporations of the United Kingdom Atomic Energy Authority (UKAEA) and British Nuclear Fuels Limited (BNFL) have been broken down into 13 smaller entities that require their own accredited networks. OCNS information security inspectors have worked closely with the operators to ensure that sensitive data has remained secure during the transition period. The third area of activity has been the re-accreditation of NDA and the British Energy Classified Data Networks. The latter is one of the largest in the civil nuclear industry.

67 OCNS has been liaising with regulators responsible for information security in France, Germany and the USA to enable the flow of protectively marked information associated with New Build between regulators, RPs, POs and TSCs. The global nature of the civil nuclear industry and the fact that both current candidate designs for New Build in the UK are foreign have made it essential for these practical information sharing arrangements to be put in place. As part of these arrangements, and in conjunction with the French regulator for security, the Information Security Branch is currently in the process of approving a connection between classified networks in France and the UK. Once in place, this will be a 'first' for the civil nuclear industry.

68 Finally, I want to report that the National Skills Academy achieved interim accreditation for the Nuclear Skills Passport classified data network. The Nuclear Skills Passport will provide all employees and contractors within the nuclear sector with a physical record of their industry-specific training and qualifications that meet the agreed sector standards.

Computer-based systems important to safety

69 Computer-based systems important to safety (CBSIS) are an essential component for the safe operation of nuclear plants and for the last ten years, the OCNS Information Security Branch has ensured that from a security point of view, they have been adequately protected. This remains an interesting area for regulators to recognise each other's competencies and has emphasised the need for both Safety and Security to work closely together. The importance of these systems for the safe operation of nuclear power stations has emphasised the importance of the input from specialists within the safety regulator and this will continue as the CBSIS programme is extended to include other nuclear plants. Since 2006, operators have been obliged to describe in their site security plans the standards, procedures and

arrangements in place to ensure the security of any software used in connection with activities involving nuclear material. This does not in any way create a conflict between safety and security but has helped clarify the position whereby safety regulators will continue to identify and categorise CBSIS, and security regulators will ensure that they are appropriately secured. With the Office of Nuclear Regulation now a reality, sustaining a practical and comprehensive approach to reconciling safety and security considerations will be a priority.

70 During the 2010/11 reporting period, a pilot inspection programme for CBSIS was set up at the Sellafield civil licensed nuclear site. The pilot involves the operator identifying and categorising CBSIS and nuclear safety inspectors validating the operator's work. Safety and Security have agreed a system for aligning safety standards with protective marking categories, and the Information Security Branch will in future inspect CBSIS to confirm that adequate security standards are in place.

Policy

71 Protecting information from disclosure whilst at the same time trying to be as open and as transparent as possible presents particular challenges. In 2005, OCNS published guidance on the internet under the title *Finding a Balance* whose purpose is to assist officials and others involved with the civil nuclear industry manage the risks associated with compliance with the Regulations whilst at the same time meeting the requirements of the Freedom of Information Act. *Finding a Balance* is not protectively marked and is only intended as a guide. It was referred to in a case heard by the Information Commissioner in 2006/08 about the release of sensitive nuclear information relating to plutonium held at the Dounreay Category I civil licensed nuclear site and influenced the decision against release.

72 OCNS publishes protectively marked policy for the civil nuclear industry to indicate those categories of SNI that require protection and the level of protective marking to be applied. During the period covered by this report, the main classification policy has been reviewed and reissued. In particular, it has been simplified, its own protective marking has been reduced to make it more accessible to those with a 'need to know' and it has included guidance on risk management. The revised policy has also taken into account the need to pass some protectively marked material over international borders and advice has been included on information which is already in the public domain.

73 In July 2010, Issue 2 of the OCNS Security Policy Framework (SPF) was issued. The principal aim of the OCNS SPF is to deal with those aspects of protective security for SNI and personnel security (vetting) where OCNS has legal powers to direct the civil nuclear industry to comply. It follows, as closely as possible, the layout and content of the Government's SPF and is applied by the civil nuclear industry and its contractors including CNPA, CNC, NDA, and all approved carriers. The OCNS SPF represents the standard for the protection of SNI and for personnel security controls necessary in relation to the protection of sites and nuclear material in transit. The OCNS SPF is supported by six Civil Nuclear Security Standards, which contain associated reference documents, detailed technical standards, supplementary policy and guidance. All these are being revised and updated prior to being reissued under the banner of ONR.

Reports made under regulation 22

74 The Regulations place an obligation on operators to report actual or potential breaches of information security within 24 hours of them occurring. As with reports made under regulation 10 (site security) and regulation 18 (transport security), operators are also expected to report a variety of occurrences which do not in themselves constitute a serious breach of security but may be of security interest. As a rule, OCNS information security inspectors investigate all reports and ensure that appropriate follow-up action occurs.

75 There were no reports of serious breaches in information security made under regulation 22 during the reporting period 2009/10.

76 In 2010/11, one operator, following advice from OCNS, introduced a programme to retrain staff in the protection of SNI after a number of procedural errors had occurred at one off-site office complex. No SNI had been reported lost or stolen, but this programme was needed to restore confidence that the correct procedures were being followed by all staff. There were no other significant breaches of information security reported to OCNS under regulation 22. All reports that were made were investigated by OCNS information security inspectors and the appropriate action taken.

Personnel security (vetting)

Overview

77 The Regulations require that all permanent employees in the civil nuclear industry and all contractors must be vetted to a level of clearance commensurate with their access to nuclear material and/or SNI. The OCNS Personnel Security (Vetting) Team is responsible for providing the security vetting service to the civil nuclear industry. In processing applications and granting clearances, OCNS complies with the same nationally agreed standards and procedures that apply to the UK's National Security Vetting (NSV) procedures. Clearances are revalidated at agreed intervals. OCNS has an internal appeals process for applicants whose requests for clearance are denied or withdrawn. If an appeal against a denial or withdrawal of clearance for an NSV level clearance at Developed Vetting (DV), Security Check (SC) or Counterterrorist Check (CTC) is denied by the OCNS internal appeals process, then the appellant can take their appeal to the highest adjudicating authority in NSV, the Security Vetting Appeals Panel, an independent body within the Cabinet Office.

78 OCNS has been at the forefront of the Cabinet Office's Vetting Transformation Programme and was amongst the first of the national vetting authorities to contract out NSV investigative casework to the Defence Vetting Agency (DVA) as one of two single-service providers. OCNS has now established a robust and responsive working relationship with the DVA which delivers an effective service. There is a customer-supplier agreement in place between OCNS and DVA which establishes charges for this vetting service and the level of service in terms of processing times for casework. All vetting costs are recoverable from industry on the basis of demand against DVA's services.

79 During the period covered by this report, the Personnel Security Team has again responded effectively to another high level of demand for security vetting from the civil nuclear industry. A total of 4411 clearances were issued by OCNS in 2009/10 and 3423 in 2010/11. A full breakdown of these figures is included in the tables included in this section below. In 2009/10, one member of the Personnel Security Team at administrative level reduced her hours to become part-time and in 2010/11, a further reduction of one-half full-time equivalent member of staff occurred. These reductions were the result of changing working practices. The smaller team has maintained its high productivity levels, processed a greater number of CTC/SC NSV requests, and carried out a more extensive and broader Personnel Security Inspection Programme.

80 With the increasing globalisation of the civil nuclear industry, there has been a growing trend towards individuals who are not British citizens seeking employment in the UK's nuclear industry. OCNS is unable to carry out the same level of background checks with applicants from overseas as we can with British citizens. Balancing the obligation to respect the UK's employment laws against the need to prevent individuals gaining employment in the industry and using such opportunities to further a malicious agenda, can at times be difficult. Over the past two years, discussions of individual applications for clearance to work in the civil nuclear industry have taken up a greater proportion of my time and decisions to issue clearances are carefully weighed against detailed job descriptions and the actual location where an individual might be employed if a clearance is granted. Increasingly, I have issued clearances with strict caveats which usually reflect denial of access to particular plants, processes or sensitive nuclear information, and an obligation is often placed upon the individual's employer to clear any subsequent redeployment of the individual to another post within the company with OCNS first. This is a burden on the industry and the regulator, but it

is unavoidable if the system is to be fair. In 2009, and in the first case of its sort within OCNS's corporate memory, a decision by me to deny a clearance to a non-British citizen resulted in the decision being challenged at an Employment Tribunal. The Tribunal upheld my decision.

Security clearances 2009/10

81 From 1 April 2009 to 31 March 2010, OCNS issued a total of 4411 clearances; of which 3421 (see Table 1) were new clearances and 990 (see Table 2) were revalidations. A full breakdown of figures, with the previous three years for comparison, is provided in Table 1 and Table 2.

82 Comparison with the figures prior to 2009/10 appears to show a substantial reduction in the numbers of staff and contractors who have been cleared. Although this reduction seems to apply only to the Baseline Personnel Security Standard (BPSS), the picture painted by this table needs to be explained. The BPSS is not a formal security clearance, but a UK Government approved pre-employment check of an individual's identity, nationality, immigration status, employment history and unspent criminal convictions. With the introduction of the means to conduct criminal record checks through 'Disclosure Scotland', I decided to devolve decision making for BPSS applications to the civil nuclear operators where the background of the applicant was straightforward. This devolution of powers was implemented by 31 March 2009 and was underpinned by the issue of strict signing guidelines so that operators were left in no doubt as to the circumstances under which BPSS applications which were not straightforward should be referred back to OCNS for a decision. In 2009/10 operators determined that 15 609 BPSS applications did not need to be referred to OCNS.

83 Table 1 below also shows that the overall number of NSV clearances at CTC and SC level has significantly increased.

Table 1 Security clearances

| Clearance levels | New cases | | | | Reviews |
|---|--------------|---------------|---------------|---------------|------------|
| | 2009/10 | 2008/09 | 2007/08 | 2006/07 | 2009/10 |
| Developed Vetting (DV) | 390 | 385 | 375 | 617 | 474 |
| Security Checks (SC) | 2 302 | 1 565 | 1 081 | 1 434 | 474 |
| Counterterrorist Checks (CTC) | 80 | 37 | 40 | 2 | 12 |
| Baseline Personnel Security Standard (BPSS) | 601* | 9 551 | 12 040 | 14 092 | 30 |
| Foreign clearances | 48 | 49 | 82 | 150 | - |
| Total | 3 421 | 11 587 | 13 618 | 16 295 | 990 |

* BPSS cases which fall outside of the civil nuclear operators' personnel security managers signing guidelines (for example, because of nationality or unspent convictions) or which support an NSV application.

Table 2 Revalidations

| Clearance levels | 2009/10 | 2008/09 | 2007/08 | 2006/07 |
|---|----------------|----------------|----------------|----------------|
| Developed Vetting (DV) | 474 | 395 | 1 065 | 322 |
| Security Checks (SC) | 474 | 326 | 262 | 432 |
| Counterterrorist Checks (CTC) | 12 | 1 | 3 | 0 |
| Baseline Personnel Security Standard (BPSS) | 30* | 2 620 | 2 201 | 570 |
| Total | 990 | 3 342 | 3 531 | 1 324 |

* BPSS cases which fall outside of the civil nuclear operators' personnel security managers signing guidelines (for example, because of nationality or unspent convictions) or which support an NSV application.

84 As at 31 March 2010 there were 522 outstanding initial and review NSV applications with the DVA compared with 628 at the same time last year.

Denials and appeals in 2009/10

85 One NSV clearance at DV level was withdrawn during this reporting period and one application for the BPSS was denied. In both instances the individuals did not appeal against the decision. However, there was one appeal against caveats applied to a BPSS clearance which was unsuccessful.

Security clearances 2010/11

86 From 1 April 2010 to 31 March 2011, OCNS issued a total of 3423 clearances; of which 2728 (see Table 3) were new clearances and 695 (see Table 4) were revalidations. A full breakdown of figures, with the previous three years for comparison, is provided in Table 3 and Table 4.

87 In 2010/11 operators determined that 13 225 BPSS applications did not need to be referred to OCNS.

Table 3 Security clearances

| Clearance levels | New cases | | | | Reviews |
|---|--------------|--------------|---------------|---------------|------------|
| | 2010/11 | 2009/10 | 2008/09 | 2007/08 | 2010/11 |
| Developed Vetting (DV) | 271 | 390 | 385 | 375 | 256 |
| Security Checks (SC) | 1683 | 2 302 | 1 565 | 1 081 | 386 |
| Counterterrorist Checks (CTC) | 77 | 80 | 37 | 40 | 3 |
| Baseline Personnel Security Standard (BPSS) | 660* | 601* | 9 551 | 12 040 | 50 |
| Foreign clearances | 37 | 48 | 49 | 82 | - |
| Total | 2 728 | 3 421 | 11 587 | 13 618 | 695 |

* BPSS cases which fall outside of the civil nuclear operators' personnel security managers signing guidelines (for example, because of nationality or unspent convictions) or which support an NSV application.

Table 4 Revalidations

| Clearance levels | 2010/11 | 2009/10 | 2008/09 | 2007/08 |
|---|----------------|----------------|----------------|----------------|
| Developed Vetting (DV) | 256 | 474 | 395 | 1 065 |
| Security Checks (SC) | 386 | 474 | 326 | 262 |
| Counterterrorist Checks (CTC) | 3 | 12 | 1 | 3 |
| Baseline Personnel Security Standard (BPSS) | 50* | 30* | 2 620 | 2 201 |
| Total | 695 | 990 | 3 342 | 3 531 |

* BPSS cases which fall outside of the civil nuclear operators' personnel security managers signing guidelines (for example, because of nationality or unspent convictions) or which support an NSV application.

88 As at 31 March 2011 there were 505 outstanding initial and review NSV applications with DVA compared with 522 at the same time last year.

Denials and appeals in 2010/11

89 During 2010/11, two DV level clearances were denied and two were withdrawn; four SC level clearances were denied and one was withdrawn; 13 CTC clearances were issued rather than an SC clearance; and OCNS declined to accept two clearances issued by another vetting authority. These denials and withdrawals of clearance resulted in two appeals which were subject to OCNS's internal review process which include an interview of the appellant by me. In one case, I upheld the original decision by the OCNS Head of Vetting and in the second, the appeal has been formally put in abeyance because the appellant is not available for interview.

90 In the same period, OCNS denied three applications for BPSS.

Cabinet Office Vetting Transformation Programme

91 Throughout the period covered by this report, OCNS has consolidated the significant changes introduced by the Cabinet Office's Vetting Transformation Programme and has been preparing for the next stage, which is the introduction of e-vetting, which is known as 'Cerberus'.³ The Personnel Security Team is working with the operators to introduce e-vetting in 2011 and during March 2011, Cerberus awareness briefings events for operators were arranged at Basingstoke, Edinburgh, Gloucester, Leeds and Sellafield. At the time of writing, Cerberus has just gone live.

92 During 2010/11, the Cabinet Office endorsed the extension of the validity period for all initial DV clearances and NSV clearances held by contractors by two years. Although this has resulted in fewer clearances being issued in 2010/11 than in 2009/10, this is a sensible rationalisation which reflects the contribution of the mandatory, annual Security Appraisal Form (SAF) in providing a regular check of a DV holder's continuing suitability to hold a clearance. From 1 April 2011, operators have agreed on a voluntary basis to extend the use

³ More detailed information on Cerberus can be viewed on the DVA website <http://www.mod.uk/DefenceInternet/AboutDefence/WhatWeDo/SecurityandIntelligence/DVA/>.

of the SAF for SC and CTC holders and I have welcomed this additional commitment by the operators to go beyond the Cabinet Office's recommended minimum.

Awareness and aftercare

93 There is always a risk that there may already be individuals who are legitimately employed in the civil nuclear industry who have become disaffected and may wish to cause harm. Such individuals are described as 'insiders' and OCNS devotes considerable time and resource to efforts to mitigate the threat they might pose. In a process known as 'aftercare', OCNS personnel security inspectors conduct regular inspections of office procedures in the operators' vetting offices, providing advice and encouraging best practice. The responsibility of all managers to be aware of the threat from the insider is a major theme during OCNS's biannual Senior Managers (Nuclear) Security Briefings (see paragraphs 28 and 29 above) and is a subject that I have invariably raised with the boards of operators in my regular briefings to them. There is now increasing evidence of anticipatory actions by line managers in response to any incidence of what might appear to be unusual behaviour by employees.

94 During this reporting period, the Head of Vetting has spent considerable time working with the Home Office and Home Office/Scottish Police Forces to ensure that relevant notifications under the Notifiable Occupations Scheme⁴ are passed to OCNS. He will complete a programme to visit all forces local to civil licensed nuclear sites in the reporting period 2011/12. This initiative is proving a success and will be developed further through regular meetings with each Home Office Police Force to ensure that relevant offences are notified. Clearance letters issued to NSV holders have been amended to include a statement confirming that individuals are in a 'notifiable occupation' and holders of BPSS are similarly notified that they are subject to the Notifiable Occupations Scheme.

95 Successful Aftercare management depends upon close liaison between human resources (HR), occupational health and personnel security teams at civil licensed nuclear sites. The Head of Vetting has spent a 'week in business' at one of the Category I civil licensed nuclear sites in order to study working practices between such teams and to consider how this can be made more effective. As a first step, OCNS has agreed that personnel security (vetting) guidance published for the benefit of personnel security teams should be shared with human resources. HR managers are now routinely invited to OCNS Personnel Security (Vetting) Industry Days and feedback from these occasions suggest that including the HR teams is having a positive effect in that they are becoming more aware of potential security implications for HR decisions.

96 The incidence of individuals holding an NSV and requiring to be placed on 'financial aftercare reviews' has increased significantly during the period covered by this report which has coincided with the so-called 'credit crunch'. This was not unexpected and the practical effect of this has been seen in greater numbers of NSV holders than usual being interviewed to ensure that their current financial vulnerabilities do not pose a risk of potential financial inducement. A further consequence of this will be a correspondingly higher number of NSV holders being subject to a further financial review within the next 12 to 36 months. Whilst it is unfortunate that these steps are necessary, I am reassured that many of those NSV holders who are currently vulnerable financially have taken the appropriate, responsible action to prevent their clearances being placed at risk.

97 OCNS continues to take a robust line with regard to drug and alcohol misuse not only out of consideration for security but also for safety reasons. The Head of Vetting has worked closely with site occupational health teams to introduce the necessary permissions to allow this interface between security and safety. During 2010, he arranged two Occupational Health Industry Days at which the DVA vetting medical adviser and corporate occupational health managers could discuss health issues that could affect the suitability of an individual to hold a

⁴ 'Notifiable occupations' are those in which the public interest in the disclosure of conviction and other information by the police or other officials generally outweighs the normal duty of confidentiality owed to the individual.

vetting clearance. This is an area which needs a careful approach in order to respect both medical confidentiality and the doctor/patient relationship and further consultation with the appropriate experts is planned.

98 Finally, and as part of OCNS's continuing aftercare education awareness programme, 'Stonewall' has been invited to make a presentation at OCNS's 2011 Personnel Security Industry Day to discuss how companies' employment and welfare practices can be made more aware of lesbian, gay, bisexual, and transgender issues.

Personnel security inspections

99 OCNS's personnel security inspectors have continued to build on the Personnel Security Inspection Programme which was re-introduced during the 2007/08 reporting period. Twenty-two inspections were carried out in 2009/10 and the priority was to focus on full personnel security inspections. Once the initial round of visits had been completed, the Programme could begin to include follow-up inspections and targeted aftercare inspections. During the 2010/11 reporting period, 22 personnel security (vetting) inspections occurred and reflected this changing emphasis: 14 were full personnel security (vetting) inspections, seven were follow-up inspections and one was unannounced. More inspections had been planned for 2010/11, but the Head of Vetting had to divert effort to accommodate the introduction of Cerberus (see paragraph 91 above).

100 This activity allows OCNS personnel security (vetting) inspectors to ensure industry compliance with personnel security (vetting) procedures, to promote consistency across the civil nuclear industry, to provide advice and to allow discussion of individual vetting cases. It is also an important component in the reassurance process to ensure that the industry is exercising its devolved responsibilities with regard to BPSS appropriately. I anticipate that aftercare and its effective management will become the priority for these inspections in the future.

101 As part of the inspection process, OCNS has continued to encourage operators to send staff with personnel security (vetting) and HR responsibilities on appropriate personnel security (vetting) awareness courses. In 2009/10, the Head of Vetting promoted attendance on the CPNI's 'Pre Employment Screening in the National Infrastructure' course and in 2010/11, the focus was on 'personnel security risk assessment'. OCNS will continue to encourage attendance on these and similar briefings.

Generic Design Assessment and support to New Build

102 Throughout this reporting period, OCNS has remained fully involved in the Nuclear Directorate HSE (now ONR) work streams associated with New Build nuclear power stations including both the Generic Design Assessment (GDA) process and engagement with potential operators. This has required close cooperation with nuclear safety specialists within the Nuclear Directorate and with specialists from the Environment Agency. Activity associated with the GDA work stream has gathered momentum as more information to support the development of the Conceptual Security Arrangements for the two technologies has been provided by the two Requesting Parties (EdF Areva and Westinghouse). At the time of writing, OCNS expects to complete the security-related work as planned and will contribute to the reports which will mark the end of the GDA process in 2011.

103 Concurrent with the work associated with GDA, OCNS's interaction with the Potential Operators of New Build nuclear power stations has gradually increased, particularly with regard to the development of the security arrangements for the sites. OCNS has provided the POs with model security standards for New Build whose purpose is to put in place a robust level of security at the New Build nuclear power stations right from the start. These model security standards are protectively marked and are part of OCNS's Technical Requirements

Document (see paragraphs 16 to 18 above). Security is being included in the design of new power plants so that the need to 'retrofit' security during the lifetime of the plant is minimised. In the short term though, the immediate objective is to have an agreed programme for the development of the security infrastructure through the different phases of construction. An important aspect of the security plan during construction will be a clear requirement for the vetting of those involved in the construction of the new plants.

104 At the moment, the Regulations cannot be applied to New Build nuclear power stations until nuclear material and/or other radioactive material is delivered to such sites. Clearly, this would not happen until the construction of the New Build nuclear station was nearing completion and in my view, this is not acceptable. I have welcomed a decision by DECC to agree that the Regulations should now be modified at the earliest opportunity to give OCNS the clear *vires* to regulate New Build sites during the early construction phase and prior to nuclear material and/or other radioactive material being delivered to site. This will ensure that the security infrastructure is installed in a timely way and that all of OCNS's regulatory requirements will be met before nuclear material and/or other radioactive material is delivered to the new site. It is particularly important from a security point of view that all the elements of the security infrastructure to protect this material are in place and have been fully tested before the material is delivered. Notwithstanding the current position with regard to OCNS's *vires* under the current status of the Regulations, I wish to acknowledge the wholly positive, constructive and cooperative approach to security shown by POs on these issues to date.

The effectiveness of security regulation

105 I am satisfied that the Nuclear Industries Security Regulations 2003 provide an effective and proportionate means to regulate security in the civil nuclear industry and that they meet our international obligations and commitments. I look forward to the visit of the International Physical Protection Advisory Service Mission to the UK which will give an independent and impartial view of the effectiveness of the UK's regulatory regime.

International commitments and activities

The International Atomic Energy Agency

106 OCNS has continued to place a high priority on supporting IAEA and promoting best practice in nuclear security globally through the work of IAEA. At the highest level, OCNS represents the UK on the Director General's Advisory Group on Nuclear Security (AdSec). Membership of this group is by personal invitation of the Director General and its members play an important role in shaping the Agency's response to the security challenge for the civil nuclear industry globally. The Deputy Director of OCNS completed his term as a founding member of AdSec in October 2010: his contribution to the work of the Agency received fulsome recognition in Vienna and I wish to record in this report the esteem and respect with which he is held in international circles. In February 2011, the Director General invited me to join AdSec and I attended my first meeting in March 2011.

107 IAEA has devoted considerable effort over the last four years in revising and rewriting the guidance underpinning nuclear security. Details of this work is published on the Agency's website but for the purposes of this report, there is a 'family' of documents beginning with 'Nuclear Security Fundamentals' which set objectives, concepts and principles; 'Recommendations' documents which present best practice in applying the 'Fundamentals'; and 'Implementing Guides' which further elaborate on the 'Recommendations' documents. The UK has strongly supported the development of these documents and OCNS has played a particularly important role in developing Revision 5 of INFCIRC/225 which was published in March 2011 as *Nuclear Security Recommendations on Physical Protection of Nuclear*

Material and Nuclear Facilities. During the period covered by this report, the Deputy Director chaired or attended five working groups which provided the groundwork for a major revision of this key IAEA guidance document. In February 2010 and September 2010, I chaired the Technical Meetings in Vienna, attended by representatives of more than 40 IAEA Member States, which enabled the draft to be approved and recommended for publication.

108 OCNS also provides, on request from IAEA, subject matter experts to support working groups on security matters, and team members for IPPAS Missions to IAEA Member States. The Deputy Director led an IPPAS Mission to Finland in June 2009 and a follow-up IPPAS Mission to Slovenia in 2010. OCNS also contributed IPPAS team members for missions to The Netherlands in July 2009 and to Belarus in September 2009. OCNS also released the Band 2 information security inspector to participate in an IAEA consultancy meeting on Emerging Threats in Cyber Security.

The European Nuclear Security Regulators Association

109 The European Nuclear Security Regulators Association (ENSRA) was formed in 2004 in order to promote a common European view amongst security regulators on the challenges facing the civil nuclear industry in the aftermath of the terrorist attacks in the USA in September 2001, and to provide a forum for the confidential exchanges between regulators in the interests of best practice. ENSRA now comprises a membership of 13 countries, including Belgium, the Czech Republic, Finland, France, Germany, Hungary, The Netherlands, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, and the United Kingdom.

110 ENSRA usually holds an annual meeting and the last occurred in The Netherlands in 2009. There was no formal meeting in 2010, but ENSRA members were present at the Technical Meetings in Vienna in March and September 2010 which finalised INFCIRC/225/Rev5 and acted in concert to carry a number of amendments. No meeting has yet been scheduled for 2011 but in May 2011 the French Institute for Radiological Protection and Nuclear Safety coordinated a two-day 'table top' exercise in France to test the responses to various attack scenarios on nuclear facilities. This was the first exercise of its kind in OCNS's corporate memory and marked a further step forward in learning and sharing best practice. All ENSRA members were invited to take part in the exercise. OCNS attended and played a full part in the exercise.

The World Institute of Nuclear Security

111 OCNS has continued to support the World Institute of Nuclear Security (WINS) which was launched in September 2008 with the endorsement of the Director General of IAEA and with the purpose of promoting the adoption of best practice globally with regard to the security of nuclear materials and nuclear facilities. The OCNS Head of the Approvals and Compliance Unit attended a WINS workshop in November 2009 to study *inter alia* global security challenges to the civil nuclear industry and the development of the Design Basis Threat (known in the UK as the Nuclear Industries Malicious Capabilities (Planning) Assumptions). In June 2010, he joined a WINS 'Security and Guard Force Practitioners' Workshop' in Canada where security at nuclear generating sites in Ontario is generally acknowledged as an example of best practice. This recognition reflects the excellent organisation of the security force, its insistence on high standards of training and fitness and its demanding exercise regime.

Bilateral exchanges

112 Through interactions with organisations such as IAEA, ENSRA and WINS, staff from OCNS routinely meet regulators who are responsible for security in civil nuclear industries abroad. These exchanges provide a valuable opportunity to discuss common regulatory experience and to discuss the development of best practice. In addition to these routine meetings, OCNS hosts formal visits from overseas regulators.

International collaboration on uranium enrichment technology

113 The UK, The Netherlands and Germany ('the Troika') have collaborated on the development of gas centrifuge technology for the enrichment of uranium for several decades and international agreements exist to safeguard this proliferation-sensitive technology. OCNS is the UK's designated National Authority for the purposes of advising the Department of Energy and Climate Change on the development of security policy and then ensuring that the British arm of the Troika complies with such policy after it has been agreed with our international partners.

114 In recent years, the Troika has agreed to the export of Uranium Enrichment technology to both the USA and to France where plants deploying this technology have been built. This activity has led to a number of security committees being formed, each with comparable responsibilities but geared to: the Troika; to the Troika and the USA; or to the Troika and France. This duplication was necessary in the early years but there is now a strong case for rationalisation. During this reporting period therefore, the security regulators of the five member states (the original Troika, the USA and France) have been working towards achieving this rationalisation to ensure greater focus on delivery. Significant progress has been made in this and later in 2011, all expect agreement on further streamlined working to be achieved.

Support to Government

Nuclear Security Summit, Washington DC, April 2010

115 Forty-seven countries attended the Nuclear Security Summit hosted by President Obama in Washington DC in April 2010 whose purpose was to enhance international cooperation to prevent nuclear terrorism. OCNS provided advice to the Cabinet Office in preparation for the Summit and these preparations included participation in two Sherpa meetings, one in Vienna in September 2009 and the other at The Hague in February 2010. Due to the timing of the UK's General Election in May 2010, the Foreign Secretary represented the Prime Minister at the summit itself and the Deputy Director of OCNS was invited to attend the summit as part of the UK delegation. From the UK point of view, an important outcome was the UK's commitment to invite an IPPAS Mission to the UK (see paragraphs 38 and 39 above).

Department of Energy and Climate Change

116 OCNS provides routine support to DECC as part of the development and implementation of policy relating to security in the civil nuclear industry and the promotion of best practice globally for the security of nuclear material. OCNS has routinely provided briefs for DECC officials in preparation for meetings of the Board of Governors at IAEA and then supported DECC at IAEA's General Conference. In both 2009/10 and 2010/11, the latter has included representing the UK at the annual meetings of subscribers to the Plutonium Management Guidelines. We have also advised on the work required to enable the UK to

ratify the International Convention on the Suppression of Acts of Nuclear Terrorism in September 2009, and the Amendment to the Convention on the Physical Protection of Nuclear Material in April 2010. We have also provided assistance to DECC in relation to the handling and processing of protectively marked applications for patents.

117 In addition to the work associated with the GDA process and New Build described at paragraphs 102 to 104 above and as part of the Government's Strategic Siting Assessment for New Build nuclear power stations, OCNS has examined potential sites from the security point of view and provided assessments for each. Following on from this, we have also given security advice to DECC with regard to planning applications made to the Infrastructure Planning Commission.

Foreign and Commonwealth Office

118 In March 2010, the Deputy Director, as part of general OCNS support to work by the Foreign and Commonwealth Office designed to improve the security of nuclear material abroad, made an important contribution to a regulatory workshop for the Pakistan Nuclear Regulatory Authority which had been funded by the Global Threat Reduction Programme.

Administration

The Office for Nuclear Regulation

119 ONR was established as an agency of HSE on 1 April 2011. Where it has not already occurred, ONR will bring together the separate organisations responsible for regulating safety, security, safeguards and transport to allow a more focused delivery of regulation in the future. OCNS has been at the forefront of this initiative since the merger with the safety regulator in April 2007.

120 Although the initiative to form ONR was supported by both the previous and current Governments, the timetable to implement formation was affected by the May 2010 General Election. OCNS has contributed throughout the period covered by this report to the preparations, particularly on the provision of advice with regard to amending nuclear security legislation.

OCNS offices at Harwell

121 In August 2010 HSE announced its intent to exercise the break on the lease of the Harwell offices of OCNS in March 2012, and to redeploy the roles and responsibilities currently located in Harwell to HSE offices elsewhere. This was prompted partly by the need to reduce costs by a sensible rationalisation of HSE's current estate, and in part by recognition of the fact that in the context of ONR, Harwell is no longer ideally placed to provide security regulation for the industry. The Harwell office is expected to close in March 2012.

122 Since OCNS's merger with the safety regulator in April 2007, I have gradually been building up the OCNS presence at Bootle and reducing it at Harwell so that today, the numbers at each location are broadly similar. I regret that closure of Harwell could mean that OCNS may lose some loyal, knowledgeable and professional staff who for perfectly understandable reasons either cannot or will not relocate to other ONR offices. I have been working with HR staff in ONR to respond to this, both from the point of view of looking after staff and of maintaining business continuity between now and closure.

OCNS staffing

123 On 31 March 2011, there were 39 full and part-time members of staff in OCNS. These numbers have remained broadly constant over the period covered by this report with the increases of three since my last report being explained by one additional administrator to support OCNS staff in Bootle, and the transfer of two HSE staff providing the internal HSE personnel security (vetting) function to OCNS as a rationalisation of staffing responsibilities. OCNS has concentrated on consolidating the training of staff recruited in the period 2008/09. All have now achieved the standards required and are fully 'warranted'.

124 An OCNS organisation chart as at 31 March 2011 is shown at Annex A.

OCNS budget and cost recovery 2009/11

125 OCNS is required to recover all its costs for providing a security regulatory service from those whom it regulates or provides support for. The Nuclear Industries Security (Fees) Regulations 2005 (the Fees Regulations) are the authority whereby costs are recovered.

126 In financial year 2009/10, OCNS's expenditure was £4182k of which 93% was recovered from the operators under the Fees Regulations as a charge for OCNS's regulatory services. The balance of £280k, or 7%, was met by DECC in recognition of work that was carried out by OCNS on behalf of Government and could not therefore be recovered from the civil nuclear industry.

OCNS budget and cost recovery 2010/11

127 In financial year 2010/11, OCNS's expenditure was £3882k of which 94% was recovered from the operators under the Fees Regulations as a charge for OCNS's regulatory services. The balance of £216k, or 6%, was met by DECC in recognition of work carried out by OCNS on behalf of Government and could not therefore be recovered from the civil nuclear industry.

128 The charts at Annex B show the percentage of charges by operator recovered during the two financial years covered by this report.

Statement of assurance

129 The purpose of this report is to give the Minister of State for Energy and Climate Change an assurance as to the state of security at civil nuclear sites and the effectiveness of security regulation. I can report that, for the period covered by this report, the industry applied the relevant security regulations in accordance with the standards required of it and that those regulations achieved the purpose for which they were designed.

Change of appointment

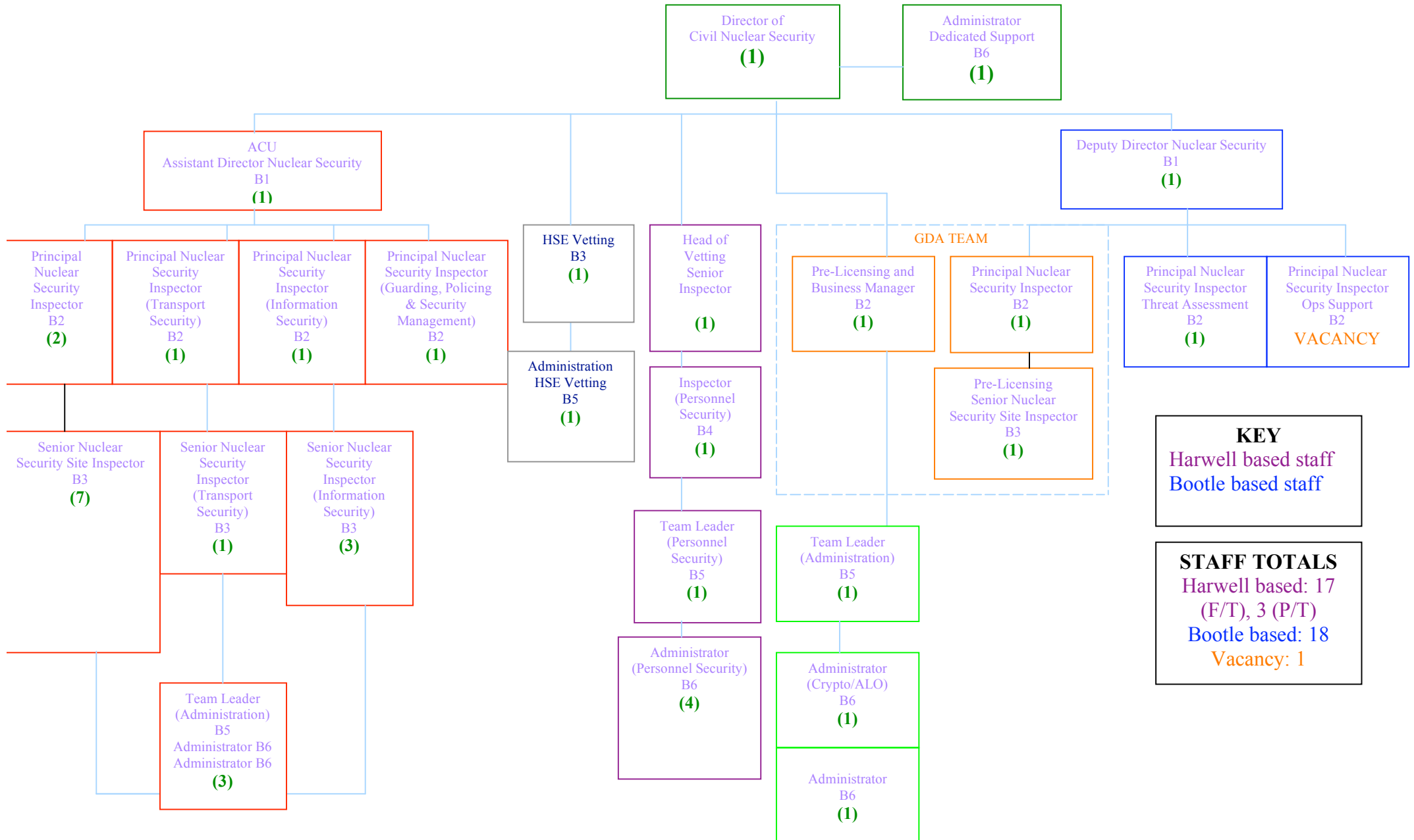
130 On 1 April 2011, and after almost seven years in post as Director of Civil Nuclear Security, I moved to a new appointment within the newly established Office for Nuclear Regulation.

131 I want to use this opportunity to record my gratitude for the support that I have received from all levels within the civil nuclear industry throughout my appointment, and to recognise their undoubted commitment to security. I would also like to thank all staff within OCNS for their professionalism both individually and collectively throughout the last seven years, and to wish them well in the future.

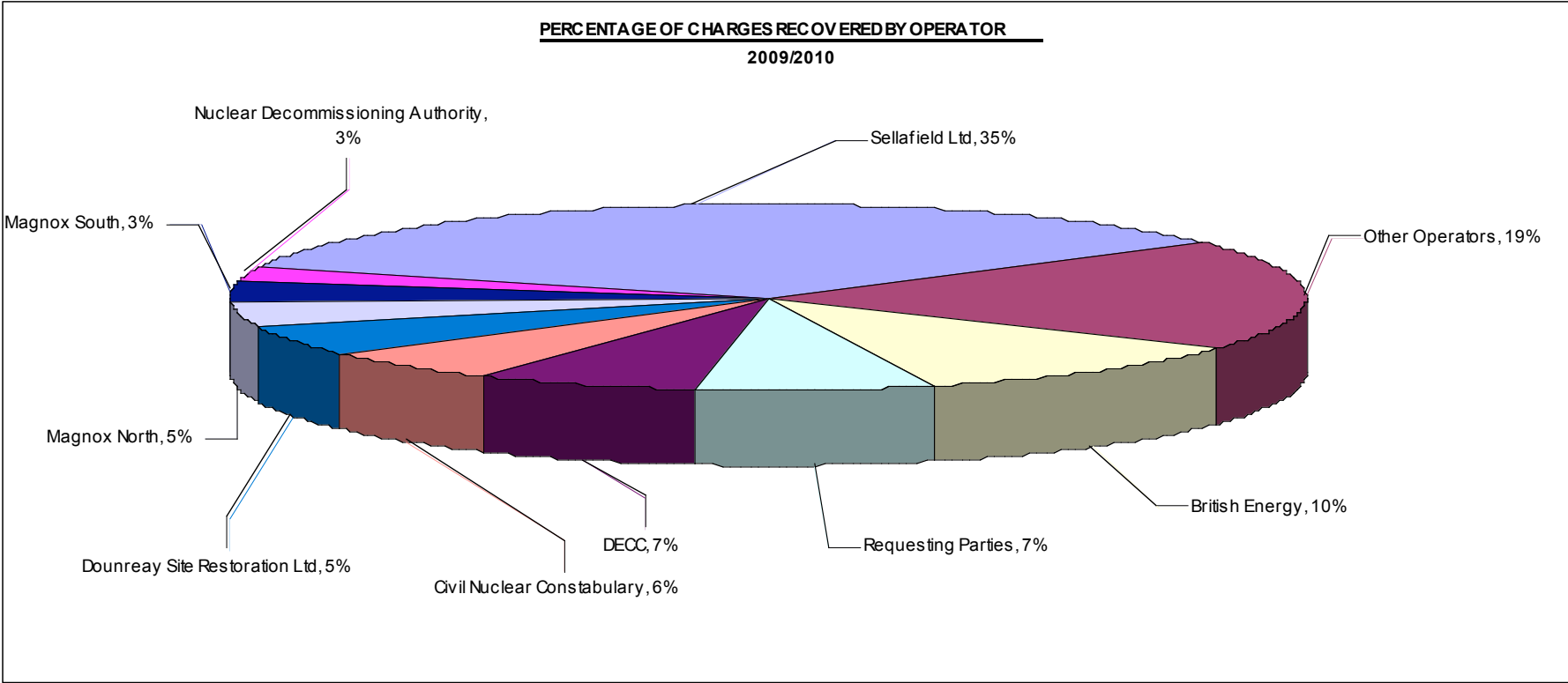
Roger Brunt
Director, Civil Nuclear Security
Bootle

May 2011

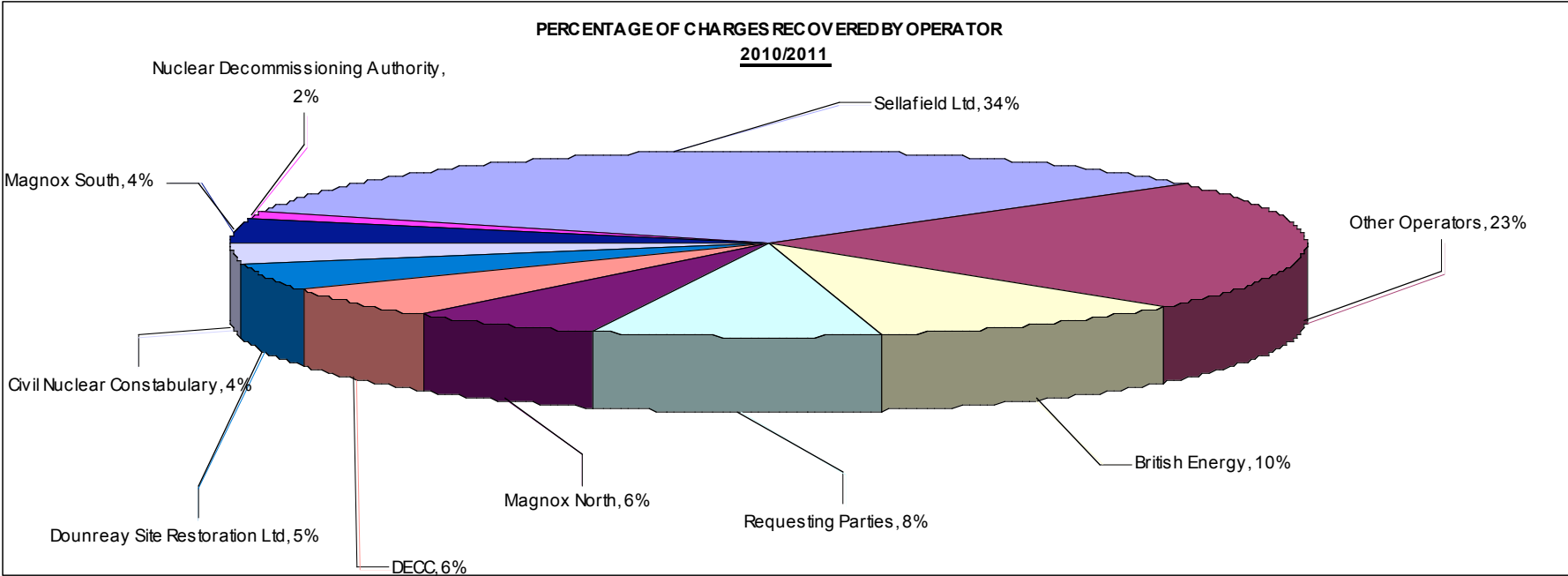
Annex A: OCNS organisation as at 31 March 2011



Annex B: Recovery of charges



Annex B: Recovery of charges



References

The following documents are referred to in this report:

- 1 *The Nuclear Industries Security Regulations 2003*
<http://www.legislation.gov.uk/uksi/2003/403/contents/made>
- 2 *Convention on the Physical Protection of Nuclear Material*
<http://www.iaea.org/Publications/Documents/Infcircs/Others/inf274r1.shtml>
- 3 *The Physical Protection of Nuclear Material and Nuclear Facilities (INFCIRC/225/Rev5)*
http://www-pub.iaea.org/MTCD/publications/PDF/Pub1481_web.pdf
- 4 *Nuclear Industries Security Regulations 2003*
<http://www.legislation.gov.uk/uksi/2003/403/contents/made>
- 5 *The Uranium Enrichment Technology (Prohibition of Disclosure) Regulations 2004*
<http://www.legislation.gov.uk/uksi/2004/1818/contents/made>
- 6 *The Nuclear Industries Security (Fees) Regulations 2005*
<http://www.legislation.gov.uk/uksi/2005/1654/contents/made>
- 7 *Finding a Balance OCNS*
<http://www.hse.gov.uk/nuclear/ocns/balance.pdf>
- 8 *High-activity Sealed Radioactive Sources and Orphan Sources Regulations 2005*
<http://www.legislation.gov.uk/uksi/2005/2686/contents/made>

Abbreviations

ACU Approvals and Compliance Unit
AdSec Advisory Group on Nuclear Security
AFO authorised firearms officer

BNFL British Nuclear Fuels Limited
BPSS Baseline Personnel Security Standard

CBSIS computer-based systems important to safety
CNC Civil Nuclear Constabulary
CNPA Civil Nuclear Police Authority
CPNI Centre for the Protection of National Infrastructure
CPPNM Convention on the Physical Protection of Nuclear Material
CTC Counterterrorist Check

DECC Department of Energy and Climate Change
DCNS Director of Civil Nuclear Security
DV Developed Vetting
DVA Defence Vetting Agency

ENSRA European Nuclear Security Regulators Association

GDA Generic Design Assessment

HASS High-activity Sealed Radioactive Sources and Orphan Sources Regulations 2005
HAW highly active waste
HSE Health and Safety Executive
HSL Health and Safety Laboratory

IAEA International Atomic Energy Agency
IISP Institute of Information Security Professionals
IPPAS International Physical Protection Advisory Service

JTAC Joint Terrorism Analysis Centre

MOX mixed oxide (fuel)

NDA Nuclear Decommissioning Authority
NIMCA Nuclear Industries Malicious Capabilities (Planning) Assumptions
NORMS National Objectives, Requirements and Model Standards for the Protective Security of Civil Licensed Nuclear Sites, other Nuclear Premises and Nuclear Material in Transit
NSV National Security Vetting

OCNS Office for Civil Nuclear Security
ONR Office for Nuclear Regulation

PO Potential Operator

RP Requesting Party

SAF Security Appraisal Form
SC Security Check
SNI Sensitive Nuclear Information
SPF Security Policy Framework
SSP site security plan
SRLG Security Regulators' Liaison Group

TSC Technical Support Contractor
TSP temporary security plan
TSS transport security statement
TRD Technical Requirements Document

UKAEAC United Kingdom Atomic Energy Authority Constabulary
UKAEA United Kingdom Atomic Energy Authority

WINS World Institute of Nuclear Security

© *Crown copyright* If you wish to reuse this information visit www.hse.gov.uk/copyright.htm for details. First published 10/11.