

NUCLEAR SAFETY DIRECTORATE - BUSINESS MANAGEMENT SYSTEM		
<b>ASSESSMENT ASSESSMENT REPORTING</b>		<b>AST/003</b>
		ISSUE 002
Approved By: <i>William Ascroft-Hutton</i>	W Ascroft-Hutton	Issue Date: 13/10/03
Open Government Status: Fully Open		Review Date: 13/10/06

## 1. Purpose & Scope

1.1 This procedure describes the processes involved in the production of formal documentation in response to assessments requested either through the ARF system or under the half-day rule (see AST/002). The procedure sets out NSD policy and the system of work to be adopted when documenting assessment activities. Guidance on the interpretation of this procedure and supporting information is provided in **G/AST/003**.

## 2. Policy

2.1 Assessors are expected to provide an auditable trail within the DMS system recording the basis upon which all recommendations and conclusions arising from their assessments are reached. The formal reporting of assessments is a key part of this recording process.

2.2 Significant assessment activities (i.e. those requiring more than a half day of effort) should be managed via the ARF system (see AST/002). As part of the assessment specification process, the ARF should state the type of formal documentation required. For ARFs generated in support of Permissioning Activities, a request for an Assessment Report (AR) is expected to be the norm.

## 3. Responsibilities

3.1 The **Task Originator** is responsible for specifying the assessment advice required and the type of formal assessment document in which this advice will be recorded.

3.2 The **Assessor** is responsible for performing the assessment and producing an auditable trail, in line with the task specification,

recording the assessment and the basis upon which any conclusions and recommendations are reached.

3.3 The Assessor's **Line Manager** is responsible for managing assessment work, including the acceptance, or otherwise, of ARFs and the allocation of work to Assessors (see AST/001). Line managers are responsible for accepting ARs generated within their Unit. Alternatively, Line Managers may, on a case-by-case basis, nominate (in writing) a suitably qualified person within NSD to act on their behalf to accept an AR. **G/AST/003** provides guidance on the criteria for accepting ARs.

## 4. Definitions

4.1 AR - Assessment Report - A DMS document carrying a unique Assessment Report number, signed by the Assessor and accepted by the Assessor's line manager (or nominee). Two types of Assessment Report, either Short or Full form, are identified in this procedure.

4.2 ARF - Assessment Request Form (see AST/002)

4.3 DMS - NSD's Document Management filing System

4.4 Issue - A finding, concern or point of variance, identified during the regulatory process, which is considered important to either safety or nuclear waste management and which requires action by those we regulate in order to satisfy the tests of adequacy or compliance in relation to a regulatory decision. (See AST/004)

4.5 SAPs - Safety Assessment Principles

## 5. Procedure

### Specification of Formal Documentation Required

5.1 The Task Originator, in consultation with the Assessor (if practicable), or the Assessor's Line Manager, sets out the form of formal assessment documentation required. Any one of three types of formal assessment documentation may be specified:

- A **Full Assessment Report** - an AR conforming to the structure set out below;
- A **Short Assessment Report** - an AR of no prescribed format;

- A **DMS File Note** - a document, usually of no prescribed format, filed via DMS. Types of DMS File Notes that may be specified using the ARF system include Briefings, File Minutes, Notes for the record etc.

For either of the first two options, the AR will utilise the front sheet set out in **Annex 1** and carry a unique report number.

5.2 Where the ARF system is being used to request an assessment be carried out, the form of assessment document required by the Originator should be recorded within the ARF. When choosing to accept an ARF, the Line Manager, acting in the role of intelligent customer on behalf of NSD, may elect (in consultation with the Task Originator) to upgrade the form of assessment documentation requested. The justification for any decision by the Line Manager to agree to a Permissioning ARF that does not request an AR be produced (i.e. contrary to NSD policy) should be recorded in a separate DMS file note and also, ideally, in the Comment Field of the ARF database.

5.3 Example criteria affecting the choice of an appropriate form of formal assessment documentation, including the use of DMS file notes, are set out in **G/AST/003**.

## **Assessment Report Front Sheets**

5.4 Assessment **report numbers** are allocated on a Divisional basis. When requesting report numbers, Assessors should provide administrative staff with details of the ARF number, and also of all DMS files on which the completed report is to be placed.

5.5 ARs should be assigned an **Open Government** Status Category (either Fully Open, Partially Open or Fully Closed) in line with HSE policy, as set out in GAP 1 and GAP 3 Annex G. Applying this guidance, ARs describing the assessment of documents obtained under HSWA powers, or in lieu of these powers, will normally be categorised as Fully Closed. Nevertheless, ARs should be written in a manner that would allow their release to the public should either the document owners give consent to their release, or if future changes to the law permit retrospective disclosure (e.g. the coming into force of the Freedom of Information Act). In particular, the use of commercially confidential or security restricted information should be avoided unless this is pertinent to the assessment being undertaken and the reasoning behind conclusions reached should be set out in full.

5.6 The HSE Staff Handbook (Chapter 4 Conduct, Appendix 3 - 'Information Security in HSE') provides guidance on assigning **protective markings** to documents. Wherever possible the inclusion of sensitive information, necessitating a protective marking, should be avoided.

5.7 The identities of the AR author and Line Manager (or nominee) accepting the AR should be printed clearly, either alongside or below their signatures.

## **Assessment Documentation Content and Format**

5.8 Full ARs should be written in Arial font (size 12), utilise one-inch margins and have numbered paragraphs. These formatting requirements are also recommended for other formal assessment documents.

5.9 The **document content** should be sufficient to allow the reader to understand what has been assessed and the basis for any conclusions or recommendations contained therein, or point to an auditable trail of DMS file entries that provide the same information. Irrespective of whether the assessment is to be documented in a single stand-alone report, or a series of DMS file entries, the following aspects of the assessment should be recorded (where appropriate):

- The assessment advice required, i.e. the objectives of the work;
- The work carried out to meet these objectives;
- Any work not undertaken that could have had a bearing on the assessment, together with a justification for why this work was not carried out;
- Any relevant background material, including legal position if appropriate;
- An overview of relevant portions of the arguments being assessed;
- A list of any standards and criteria used in the assessment;
- Any conclusions or recommendations arising from the assessment. These should include a clear statement concerning the adequacy of the proposal being assessed, and whether or not it is judged acceptable for the proposal to proceed (subject to the resolution of outstanding Issues). Any recommendations should provide unambiguous advice for future NSD action,

together with an identified route for closing out these recommendations;

- The basis for arriving at any conclusions and recommendations.
- Any Issues identified during the course of the assessment, together with details of how these Issues were resolved. Unresolved Issues should be clearly set out in the assessment document conclusions / recommendations, along with an identified route for their resolution. Unresolved Issues should also be recorded in the Issues Database in a manner that takes due regard of security matters (AST/004);

5.10 For stand-alone Full ARs, the above information should be set out within the following **standard format** for NSD assessment reports, i.e. using section headings as per, or similar to, the following:

- Introduction;
- NSD Assessment; with sub-sections entitled:
  - Licensee's Case;
  - Standards and Criteria;
  - NSD Assessment;
- Conclusions and Recommendations;
- References.

5.11 Further sections and sub-sections may be created as necessary. For assessments where the standard AR format is not appropriate, other suitable document structures may be adopted following consultation with the Task Originator.

5.12 Full ARs should also include a summary that, at a minimum, should set out any conclusions and recommendations identified in the report, together with a route for closing out these recommendations and contain sufficient background information to provide a management overview.

5.13 It is not appropriate to specify any particular format for Short ARs, DMS file notes or other formal assessment documents, provided the information identified above is recorded in a suitable manner.

## **Changes of Document Specification and Fast-Tracking**

5.14 It is recognised that the specific requirements of assessment activities may change as the work progresses. This may result in a need to change the type of formal assessment documentation required (to either a higher or lower tier document). In particular, a delay to a regulatory decision arising from the production of a Full or Short AR documenting an already completed assessment may impose a financial penalty on a Licensee that would be inconsistent with HSE's principle of proportionate regulation. Under such circumstances, Task Originators may wish to consider either re-specifying the form of assessment documentation they require, or requesting an interim lower tier document pending the production of the originally envisaged AR at a later date (**Fast Track** Assessment route).

5.15 A decision by a Task Originator to re-specify the type of formal assessment document they require, or to utilise the Fast Track Assessment route, should be taken following due consideration of the criteria affecting the choice of documentation types listed in **G/AST/003** and requires the agreement of the Assessor's Line Manager. Where a lower tier document is now required, the change and the reasons for the change of specification should be recorded in a DMS file note. Furthermore, if the original request was in response to a Permissioning ARF and the revised specification now requires that only a DMS file note be produced (and not an AR, in contravention of NSD policy), the written agreement of the Assessor's Line Manager needs to be obtained and recorded in DMS. This applies equally to Fast Track Assessments, even if it is intended to produce an AR in the longer term.

5.16 When utilising the Fast Track route, the requirement is that an appropriate assessment has been completed but that there is insufficient time to produce the accompanying documentation. Line Manager Acceptance Reviews of such assessments should still be undertaken, adopting the guidance in **G/AST/003** and applying the same degree of scrutiny as would have been employed if the originally envisaged AR had been produced. As such, the content of a Fast Track Assessment, produced in lieu of an AR, still requires the written agreement of the Assessor's Line Manager. For simplicity, it is recommended that Fast Track Assessments be recorded in a single DMS file note outlining the assessment and the justification for use of the Fast Track route, and then annotated with the Line Manager's written comments and signature denoting their acceptance of the content and process.

## **Document Storage**

5.17 **Paper copies** of issued ARs should be kept in the Division AR file and the relevant station / site file, as indicated in the distribution list in **Annex 1**. Alternatively, in order to minimise long-term storage requirements, these files may instead contain copies of signed AR front sheets, provided these point to the location of the complete document held elsewhere within DMS. In other respects the **distribution list** in Annex 1 is not intended to be mandatory, but has been provided as a checklist. Distribution of assessment documentation should conform to local (i.e. Division or Unit) policy wherever such a policy has been defined and be carried out electronically unless this is considered to be inappropriate.

5.18 Assessment documents **protectively marked** at CONFIDENTIAL or above, that are in progress or completed, should not be stored electronically on fixed computer or electronic media. For storage on removable computer or electronic media, security furniture with a security lock should be used. Any electronic copies (in progress or completed) that are RESTRICTED should be password protected. Passwords should be obtained from Divisional administrative support when the AR number / DMS identifier is taken out.

5.19 **Electronic copies** of ARs should be stored in an appropriate computer directory controlled by Divisional Administration staff. The name of the electronic file should follow the convention NSD DIVx ARyyy-zz, where x refers to the NSD Division and yyy-zz relates to the report number and year. For example NSD DIV1 AR003-00 refers to assessment report number 3 of calendar year 2000 produced in Division 1. Optionally, the name of the particular site to which the AR applies can be tagged on to the end of the electronic file name.

## **6. Associated documents**

6.1 AST/FWD - Assessment Foreword

6.2 AST/001 - Assessment Process

6.3 AST/002 - Assessment Activity Management

6.4 AST/004 - Issues Recording Process

6.5 G/AST/003 - Guidance: Assessment Reporting

6.6 GAP 1 - Open Government: Disclosure of Information to the Public

6.7 GAP 3, Annex G - Assigning an Open Government Classification

6.8 HSWA - Health and Safety at Work etc. Act 1974

6.9 HSE Staff Handbook (Chapter 4 Conduct, Appendix 3 'Information Security in HSE')

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## **ANNEX 1**

### **(STANDARD LAYOUT FOR FRONT SHEET OF NSD ASSESSMENT REPORTS)**

NSD Div. x AR No. yyy/zz  
Open Government Status: Fully Open/Closed

**HEALTH & SAFETY EXECUTIVE  
NUCLEAR SAFETY DIRECTORATE  
ASSESSMENT REPORT**

Site :

Project :

Title :

Licence Number :

Licence Condition Numbers :

ARF No :

Author: ..... Signed .....

Date .....

(Assessor)

Accepted: ..... Signed .....

Date .....

(Unit \*\* SI)

#### **Distribution:**

DCI (Cover page & summary only)

Unit SI Site Inspector

Project Inspector  
Relevant NTL  
Relevant Assessors Station / Site File, part \*\*, enc \*\*  
Assessment Report File. part \*\*, enc \*\*  
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