

NUCLEAR SAFETY DIRECTORATE - BUSINESS MANAGEMENT SYSTEM		
ASSESSMENT GUIDANCE: ASSESSMENT REPORTING		G/AST/003
		ISSUE 002
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1. Purpose & Scope

1.1 This guidance provides supporting information for procedure **AST/003** - "Assessment Reporting", and applies to formal documentation written in response to assessments requested either through the ARF system or under the half-day rule (see AST/002).

2. Guidance

Choice of Document Type

2.1 As stated in AST/003, Task Originators are responsible, in consultation with the Assessor (if practicable), for defining the **document type** required for the formal recording of the outcome of assessment activities. This information should be recorded in an ARF, unless the assessment has been requested under the half day rule (AST/002). AST/003 identifies three tiers of documentation for this purpose:

- Full AR - An AR adopting the standard format and report front sheet as set out in AST/003;
- Short AR - An AR of no prescribed format, but carrying a report front sheet as per AST/003;
- DMS File Note - A document, usually of no prescribed format, filed in DMS.

2.2 A variety of DMS File Note types are supported within the ARF system, including Briefings, File Minutes, Notes for the record etc. and should be utilised within assessment specifications as appropriate.

2.3 The expectation from AST/003 is that Full ARs will constitute stand-alone reports, whereas Short ARs and DMS File Notes will form part of an auditable trail within DMS recording assessment activities and outcomes. Short ARs and DMS File Notes will differ in that the former, in carrying an AR front sheet, will require Line Management acceptance prior to formal issue.

2.4 In determining the form of formal assessment document required, the task specification should take account of the following **Regulatory Considerations**:

- The extent to which the proposals rely on specialist technical arguments;
- The perceived risks and vulnerabilities of the proposals;
- The depth of assessment envisaged / required;
- The time available to carry out and report the required assessment, given the principle that regulation be proportionate;
- Strategic reasons (e.g. past audit findings, known or perceived weaknesses in a Licensee's organisation etc.);
- Historical reasons, i.e. whether similar proposals have led to problems in the past;
- The novelty of the arguments presented;
- The anticipated or likely audience for the document.

2.5 Taking the above considerations into account, NSD policy (AST/003) is that, other than in exceptional circumstances, assessments carried out in support of **Permissioning Activities** should be formally documented using one of the two forms of AR.

2.6 It is recognised that a single ARF will often lead to the production of more than one formal assessment document. However, it is not intended that compliance with AST/003 should require that all these documents be of the type specified in the ARF. Instead, AST/003 should be interpreted as meaning that the lead (headline) formal assessment document be produced as specified in the ARF, while other supporting documents be written to a standard considered appropriate by the Assessor. For example, a Full AR may identify a number of unresolved Issues. It is unlikely that an appropriate form of documentation describing the resolution of these Issues will be a second AR; one or more DMS file notes are likely to suffice. Similarly, the reporting of interim assessment findings will normally be recorded in a file note in advance of a subsequent AR.

2.7 AST/003 describes the procedure and circumstances in which the form of document requested through an ARF may be re-specified. When re-specifying assessment requests, there is no requirement for the Originator to re-issue the ARF unless they believe that this would be of commensurate value with the effort entailed. However, the procedure does require that any downgrading of a specification, and the reason for this downgrading, be recorded in a DMS file note. In addition, it is considered recommended good practice to also record these details in the Comment Field of the ARF database (see AST/002).

Document Content

2.8 Formal assessment documentation should either describe, or point to an auditable trail describing, all relevant **aspects of the assessment** listed in the "Assessment Documentation Content and Format" section of AST/003. The documentation should include both the positive and the negatives of the assessment's findings so that the true balance of the case is visible. Whenever an opinion or claim is set out, it should be made clear whether this is an opinion or claim of the licensee, or of the NSD assessor. Professional opinions should be clearly stated, together with their rationales and should not stray beyond the assessor's area of technical competence without adding appropriate caveats. Any supporting arguments used in support of professional opinions must be capable of substantiation.

2.9 When writing assessment documents, authors should take due account of the requirements of their likely audience. In addition to the Task Originator, the audience may include some or all of: Line Management; colleague assessors and inspectors (both present day and for future work); NTG members; the general public; courts of law; ministers; other government bodies and the Licensee. It is recognised that the needs of these various audiences will often conflict. For example, a full account of the reasons supporting a recommendation or conclusion may require the presentation of information that is commercially confidential to the Licensee (and likely to have been obtained either directly, or in lieu of, HSWA powers) or information whose disclosure could have security implications. The inclusion of such information is likely to preclude the document from being assigned a "Fully Open" status. Where such conflicts arise, a balance needs to be struck, recognising that the scope and primary aim of the assessment documentation will normally be to inform a regulatory decision. Therefore, in writing assessment documentation, authors should present sufficient information to ensure that the primary aim of

the document is achieved. The decision to include / omit other supplementary information should then be made in order to maximise the utility of the documentation to other potential audiences, provided this is consistent with the primary objective and scope of the documentation. The following paragraphs provide further guidance. In cases where it is unclear where to strike an appropriate balance, authors are advised to consult their Line Managers.

2.10 Even if protectively marked, it must be assumed that anything written in an assessment document is eligible to be read by anyone. Independently of 'openness', the document may also be used as evidence in legal proceedings. The objectives of a reported assessment must therefore be clearly stated, and the content of the report should be focused expressly upon those objectives.

2.11 The tone of assessment documents should be objective, dispassionate and evidently unbiased and open-minded. Assessments should not comment on the licensee's general capability, or performance, unless these are explicitly subjects to be reviewed (e.g. for compliance with IES requirements) or this is relevant to the Assessor's confidence in the case being considered.

2.12 Where a Full AR is produced, the report should be self-standing, i.e. the reader will be able to follow (but not necessarily to substantiate) the key arguments without the need to refer to additional documents.

2.13 It is recommended good practice that Task Originators review ARs completed on their behalf, prior to the submission of these documents for Line Manager acceptance. Reviews of this type improve customer focus and facilitate team working; they need not be formally recorded unless this is believed to add appropriate value. Any such customer review carried out by a Task Originator should consider the fitness for purpose of the assessment documents. Such reviews should avoid consideration of technical issues and should not impinge on the technical independence of the Assessor.

Line Management Acceptance of Assessment Reports

2.14 For the purposes of accepting ARs produced within their Units, references to "Line Manager " here, and in AST/003, should be interpreted to mean either the designated Line Manager, or an individual formally delegated to perform this function in the Line Manager's absence. As noted in AST/003, Line Managers may alternatively, on a case-by-case basis, nominate (in writing) a suitably qualified person within NSD to act on their behalf to accept an AR.

This may be particularly appropriate when the content of the AR falls outside the technical expertise of the Line Manager and the Line Manager believes that understanding the relevant technical issues to be necessary in order to allow formal acceptance of the document to take place. In such cases, this delegation of responsibility should be recorded in an appropriate DMS file. As a second alternative for cases where the lack of relevant technical expertise is a barrier to AR acceptance, Line Managers may retain the authority to accept the document, but request a technical peer review be carried out (see below).

2.15 Acceptance Reviews are carried out to ensure that:

- The assessment sampling has been adequately described and justified;
- All significant areas appear to have been satisfactorily addressed;
- Appropriate standards and criteria have been applied;
- All conclusions and recommendations seem reasonable, flow from the text and are unambiguous;
- A route for closing out each recommendation is identified;
- Unresolved Issues have been (or will be) included in the Issues Database (see AST/004);
- The document is clearly set out and logical;
- All referenced material is on file;
- The proposed distribution list is appropriate

2.16 In carrying out these Reviews, Line Managers are deciding whether or not to accept the AR formally on behalf of NSD. In this context, Line Managers should perform a "challenge function", especially in respect of the first four items in the above list and particularly where the Assessor's recommendation is in favour of the Licensee's proposal. In doing so, Line Managers should avoid performing a verification exercise that repeats the activities of the Assessor; the act of acceptance of an AR should normally be focussed on the overall assessment / regulatory process, rather than on technical issues.

Technical Peer Review

2.17 The term Peer Review is defined, for the purposes of the present

guidance, in the following section. The definition used relates to completed assessment documents (albeit possibly in draft form); it is not intended to cover informal activities such as the seeking of second opinions by assessors during the course of their assessment activities, or by Line Managers when considering the formal acceptance of completed ARs.

2.18 There is no specific requirement within AST/003 that any technical Peer Review of assessments be carried out beyond that associated with Line Management AR acceptance reviews. It is considered that in many cases, any further technical review of an assessment of proposals that have already passed through a licensee's due process will not usually add value commensurate with the effort expended (or the opportunity cost arising from other displaced work not being undertaken). Nevertheless, it is recognised that there will be instances where further technical review will add commensurate value; this issue needs to be considered on a case-by-case basis weighing the perceived benefits and costs. Three types of Peer Review are considered pertinent to the present guidance:

- Peer Reviews initiated by assessors. Examples of where these are likely to be appropriate include:
 - Where the assessment is linked to other parallel assessments of the same proposals;
 - Where the issues raised by the AR, taking due account of the Regulatory Considerations and the Acceptance Review criteria (both listed above), are judged to warrant a second opinion;
 - Where another assessor has relevant technical experience / knowledge extending beyond that of the nominated Assessor;
 - Where the assessment touches on areas outwith the direct technical expertise of the Assessor;
 - As part of team-working practices (e.g. keeping colleagues informed, acting as mutual "sounding boards", mentoring of new assessors etc.);

Where reviews of this type are undertaken, it is recommended that the outcome be notified to the individual charged with accepting the AR in order to inform their deliberations.

- Peer Reviews initiated by Line Managers. Examples of where

these are likely to be appropriate include:

- When the Line Manager considers that a lack of relevant technical expertise on their part is a barrier to their acceptance review activities;
- Where the issues raised by the AR, taking due account of the Regulatory Considerations and the Acceptance Review criteria (both listed above), are judged by the Line Manager to warrant a second opinion before the report may be formally accepted;
- Where the Line Manager considers that a further review would add supplementary value commensurate with the effort expended;

Where reviews of this type are undertaken, it is recommended that the scope and outcome be recorded in a DMS file note and that the review be cited in the AR. Unless suitable resource lies within their direct managerial control, it is recommended that Line Managers nominating an individual or team to undertake a Peer Review should do so in consultation with the appropriate NTL.

- Peer Reviews initiated by NTLs, i.e. reviews performed to enable NTGs to fulfil their terms of reference (see BMM Annex 6). The scope and outcome of such reviews should be recorded within the DMS. All copies of assessment documentation stored within DMS, upon which the review was based, should be annotated to provide an auditable trail pointing to the review documentation.

2.19 Peer Reviews in the first two of the above categories would normally be carried out under the half-day rule (see AST/002). Peer Reviews in the third category are likely to be more substantial in nature (or form part of a package of reviews) and so would normally be managed via the ARF system.

3. Definitions

3.1 AR - A DMS document carrying a unique Assessment Report number, signed by the Assessor and accepted by the Assessor's Line Manager (or nominee).

3.2 ARF - Assessment Request Form

3.3 DMS - NSD's Document Management filing System

3.4 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.

3.5 NTG - Nuclear Topic Group

3.6 NTL - Nuclear Topic Lead

3.7 Peer Review - a formal evaluation of a completed assessment document performed by an individual or group judged to have suitable and relevant technical experience and knowledge.

4. Associated documents

4.1 AST/002 - Assessment Activities Management

4.2 AST/003 - Assessment Reporting

4.3 AST/004 - Issues Recording Process

4.4 BMM Annex 6 - Nuclear Topic Leads and Groups and Nominated Specialists

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