
	NUCLEAR SAFETY DIRECTORATE - BUSINESS MANAGEMENT SYSTEM	
	SITE INSPECTION AND ENFORCEMENT GUIDANCE: NSD's FAST STREAM REPORTING PROCESS	
	G/INS/003	
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1. Purpose and scope

- 1.1 This guidance underpins BMS Procedure INS/011 covering NSD's Fast Stream Reporting Process. It covers guidance aspects of the of the Ministerial Reporting and HSE Publication Criteria that are currently identical.
- 1.2 The guidance informs Inspectors of the criteria and facilitates their interpretation when completing the FAST 1  reporting form covered in the aforementioned top tier procedure.

2. Policy

- 2.1 NSD's full policy is covered in procedure INS/011, but para 2.2 below summarises that relevant to full circulation reports that meet Ministerial Reporting Criteria.
- 2.2 NII uses a "fast stream" reporting system to alert senior staff and also to ensure that Other Government Departments (OGDs) receive advance notice of incidents that may include those that meet the Ministerial Reporting Criteria and are therefore consistent with the HSE Publication Criteria.


3. Responsibilities


- 3.1 These are as listed in section 3 of the procedure INS/011

4. Definitions

- 4.1 As listed in section 4 of procedure INS/011

5. Guidance

- 5.1 The Ministerial Reporting Criteria are listed in Annex 1. They are currently identical with HSE's Publication Criteria which determines whether incidents reported appear in the Quarterly Statement of Incidents at Nuclear Installations made by HSE under Section 11 of the HSW Act.
- 5.2 To assist interpretation and NSD decision making when completing the FAST 1 form, Annex 2 provides guidance listed against the same numerical sequence as the Criteria given in Annex 1. Line management and / or Unit colleagues should be consulted in any areas of difficulty where possible, as long as consistent with rapid completion and distribution of the FAST 1  form, see BSS/CAN/010.

- 5.3 It should be noted that these criteria do not yet apply to Defence sites.
- 5.4 Follow-up / final reports (FAST 2s ) are raised in relation to events that meet Ministerial Reporting / HSE Publication Criteria. Instruction and advice on completing the FAST 2 form is given in procedure BSS/CAN/011.

6. Associated Documents

- 6.1 INS/011 - NSD's Fast Stream Reporting Process
- 6.2 BSS/CAN/010 - Fast Stream Incident report (Fast 1) Numbering and Issue
- 6.3 BSS/CAN/011 - Processing Follow up Incident Reports (Fast 2s)
- 6.4 Health and Safety at Work Act.

ANNEX 1

MINISTERIAL REPORTING AND HSE PUBLICATION CRITERIA

- a. Dangerous occurrences reportable under the Nuclear Installations (Dangerous Occurrences) Regulations 1965.
- b. Confirmed exposure to radiation of individuals which exceed, or which are expected to exceed, the dose limits specified in Schedule 4 to the Ionising Radiations Regulations 1999.
- c. Examination, inspection, maintenance, test or operation of any part of the plant revealing that the safe operation or condition of the plant may be significantly affected.
- d. A confirmed breach of, or discharge expected to breach quantitative limits of a Certificate of Authorisation for the disposal of radioactive waste issued under the Radioactive Substances Act 1993.
- e. Abnormal occurrences leading to a confirmed release to atmosphere or spillage of a radioactive substance which exceeds or is expected to exceed, the limits set out in Column 7 of Schedule 2 of the Ionising Radiations Regulations, 1985, except where the release is in a manner specified in an Authorisation under Radioactive Substances Act 1993.
- f. Abnormal occurrences leading to a release or suspected release or spread of radioactivity, on or off site, which requires special action or special investigation by the Operator.

*Being the summation of external dose and that committed from intake.

NB: These criteria do not apply to Defence sites.

If the incident is so serious that the nuclear site's emergency plan has to be invoked, the procedures in those plans are to be followed.

ANNEX 2

GUIDANCE FOR INTERPRETATION OF MINISTERIAL REPORTING AND HSE PUBLICATION CRITERIA

(for the purpose of NSD decision making)

1. No further judgement is involved in interpretation of this criterion.
2.
 - (a) Incidents, where exposure of individuals are **expected** to (but not confirmed at time of form entry) exceed dose limits specified in Schedule 1 to the IRRs should be recorded on a FAST 1 with a “Not Known” against the question “Does the incident meet HSE’s publication criteria?” When **confirmed** by subsequent investigation, a Fast 2 then be prepared in the normal manner.
 - (b) For safe operation or condition of plant to be “significantly affected” it is likely that safety margins would have been eroded. This is a judgement to be made by the Inspector, based on a knowledge of the site and the operation/procedures involved.
3. Incidents involving a discharge which is **expected** to (but not confirmed at time of form entry) breach quantitative limits of a Certificate of Authorisation should be recorded on a FAST 1 with a “Not Known” against the question “Does the incident meet HSE’s publication criteria?” When **confirmed** by subsequent investigation, a Fast 2 should then be prepared in the normal manner.
4.
 - (a) Interpretation provided in the ACOP (Ref 1), in respect of release or spillage of a radioactive substance in excess of limits set out in IRRs '85, may be used.
 - (b) Incidents involving a release which is **expected** to (but not confirmed at time of form entry) result in an estimated effective dose equivalent to a member of the public in excess of 0.5 mSv, should be recorded on a FAST 1 with a “Not Known” against the question “Does the incident meet HSE’s publication criteria?” When **confirmed** by subsequent investigation, a Fast 2 should then be prepared in the normal manner.
5. Incidents which require “special” action or “special” investigation by the operator are a matter for the Inspector’s judgement, based on a knowledge of the site and the operation/procedures involved.

References

- a. - Approval Code of Practice
- b. - The protection of persons against ionising radiation arising from any work activity.
- c. - The Ionising Radiations Regulations 1985.