

Production of Site Visit and Contact Reports

BMS/INS/003 – Issue 4

Target Audience:
All ND Staff

Date issued: 2007-06-26	OG Status: Fully open
Review date: 2010-06-26	Author Unit/Section: R Gray

Purpose & Scope
Policy
Responsibilities
Definitions
Procedure
Associated Documents

1 Purpose & Scope

1.1 This procedure sets down the requirements for the production of site visit and contact reports. It provides ND specific instructions to support the HSE Operational Procedures on Inspection. It applies to all ND inspectors and EIA Project Officers who have regulatory contact, face to face or by other means such as video conference, with ND duty holders at nuclear licensed sites or other operational locations, (e.g. Faslane), or other locations, (e.g. duty holder head offices), or potential licensees, or third party suppliers or contractors.

1.2 Investigations meeting the OPIP, ND "formal" investigation requirements should be written up in a separate investigation report. (ND Guidance is contained in Investigation Stage 2: Decide whether to investigate – Additional Guidance). In due course there will be a common HSE wide investigation report.

2 Policy

2.1 An appropriate, proportionate record of all contacts between inspectors and duty holders, or potential licensees etc., is necessary to account for our regulatory actions including application of HSC's Enforcement Policy Statement (EPS), and ND's three business management principles, (i.e. quality management, knowledge management and continuous improvement).

2.2 All ND inspectors work within the procedures set out in the Operational Procedures on Inspection.

2.3 Visit and other contact reports should provide a transparent account of:

- How we have used resources proportionately in relation to the hazards and appropriately in line with strategies and plans;
- How we have targeted important topics and issues;
- The level of compliance and the strengths and weaknesses of safety performance achieved by the duty holder;
- The regulatory judgements made about the adequacy of compliance and performance and the reasons for them;
- The issues identified for follow up at future interventions and the timing of follow up.

2.4 Visit and contact reports are used:

- By managers to monitor and supervise the work of inspectors and duty holder performance;
- As a source of information for learning about improving duty holder performance;

- As a source of information about the effectiveness of intervention activity.

3 Responsibilities

3.1 Inspectors are responsible for producing reports in accordance with the HSE & ND policies and procedures.

3.2 Superintending Inspectors / Unit Heads are responsible for ensuring that this instruction is being implemented. They should review visit reports for consistency including validity of conclusions, conformance with EPS, and any resultant significant actions. They should also monitor subsequent follow up and closure of those actions.

3.3 Divisional Administrative Support staff are responsible for providing Visit Report (SIR and Contact) numbers from the EDRM system.

4 Definitions

4.1 A **site visit** is defined as any period when inspectors are carrying out their statutory duties at a licensed, other operational site, (e.g. Faslane), or other place, (e.g. duty holder head offices).

4.2 A **contact** is defined as any other formal regulatory exchange or information gathering with licensees, duty holders or potential licensees etc.

Generally two forms of report are envisaged:

4.3 A **Site Inspection Report** is a report of any **visit** to a licensed or other operational site where **an element of compliance inspection** against a Licence Condition or other regulation (i.e. activities under codes C, I, K, N, J, O, E and T), is carried out. The report would usually include a 'score' against the IIS and would be prepared by the inspector making the IIS and/or other regulatory judgements. Other activities which take place during the visit, such as meetings, should be recorded on the site inspection report as appropriate.

4.4 A **Contact Report*** is a report of any contact where formal regulatory exchanges occurs and/or information is gathered to support decisions on safety matters for **permissioning or compliance inspection** purposes, which are not captured by the **site inspection report** definition, and includes:

- A **visit** to any place, duty holder head offices, other official meeting venues, or to licensee suppliers or contractors, or potential licensees, third party suppliers and contractors.
- Other meetings e.g. by video conference. (Where meetings are formally minuted a contact report is not required.)
- Any other form of communication, e.g. telephone where the substance of the communication falls under the definition of contact above.

*In contact reports, if discussions are held on how the licensee is complying with licence conditions, a score may be allocated against IES for the relevant site.

5 Procedures

5.1. When are reports necessary? Reports are necessary for all visits and contacts which fall under the definitions of 4.1 and 4.2. One report should be produced for each visit with the exception that multiple visits to the same site in one week can be aggregated into a single report. Inspectors should **not** produce both a Site Inspection Report and a Contact Report for the same visit.

5.2. Who should write a report? Usually, the inspector making the visit or making the contact should write the report. If a group of inspectors have been involved on common issues, or if an inspector has visited a site for a limited period when the nominated site inspector was also on site, it can be agreed that only one report will be produced. For site visit or contact reports the inspector making regulatory judgements and producing the IIS scores should author the report for a group of inspectors. All joint reports should include contributions from all of those involved.

5.3. What IT equipment can be used to prepare reports? Official computers and the HSE Network may be used to process and store visit reports carrying the protective marking **RESTRICTED**, provided that the IT security rules, including password procedures detailed in the Intranet Security site are followed. HSE's email system may be used to transmit messages up to **RESTRICTED** within and between HSE and HSL and via the Government Secure Intranet (GSI). Always ensure the recipient mailbox carries 'gsi.gov.uk'. **NB** - No processing or storage of **CONFIDENTIAL**, or higher protectively marked visit reports, is permitted on the HSE network. Anyone wishing to process such material should obtain a PC that can be worked on off-line with an attached slave printer rather than network printer. **ALWAYS** refer to and follow the latest security guidance on the HSE Intranet Security Home Page and associated ND BMS Documents.

5.4. How quickly should reports be produced? Reports should be produced promptly and correctly. Usually they should be distributed within 4 weeks of the completion of the visit or contact. For visits to licensed sites, the period of a visit report is the time at the site of interest between attendance at NII offices, (or home if travelling directly between home and site).

5.5. What should reports contain? All reports should contain: an appropriate **security** marking and/or FOI designation - information contained within the report may be made available to outside bodies;

1. The **number** of the report - inspectors are responsible for obtaining a number suitable to the report type from their administrative team;
2. **Appropriate, proportionate detail** to achieve the policy objectives – see paragraphs 2.3 & 2.4. To ensure consistency across the Inspectorate a common approach to the format and information to be recorded needs to be followed. The proposed structure is described in Annex 1 which should be used appropriately for both site visit and contact reports. Within this general framework Sections 4 and 5 should:
 - Describe the **purpose and significance** of the planned or reactive inspection

visit/contact.

- Record a description of the inspection/contact and report the nature of **compliance with particular legal requirements**, and should give a **balanced picture of performance** recording things that are satisfactory or good practice as well as deficiencies or non-compliance issues.
- Record the findings and **opinion** of the inspector(s) and the **reasons** for those **judgements**.
- Sufficient information to support an argument for pursuing a particular course of action, including the results of using the EMM, where appropriate. Significant actions and proposals for follow up should be recorded in the relevant section of the report.
- Not contain great depth of technical detail* except where necessary to support findings and conclusions. More detailed notes can be placed on file and referenced.

*For **contact reports** the range of topics is, however, potentially very wide. It may encompass the record of a discussion on the validity of all or part of a safety case, evaluation of methodology on which safety cases are based, the proposals for project control or project progress checking, an exchange of views on regulatory practice, a record of discussions with specific staff when expediting action on particular issues, etc, etc. It is not possible to foresee all potential topics so that prescribing a more detailed format for a report is not considered appropriate.

3 An IIS Rating - for site visit reports and when appropriate for contact reports.

When an Inspector is examining the adequacy with which the licensee (or other organisation) is managing specifically identified inspection topics, they should **rate #** conclusions in accordance with the information in G/INS/008 Site Intervention Plans. This rating can also be extended to other sections if desired.

4 Actions. The report should list actions that are considered to require some form of follow-up activity. This follow up may take place on or off the site to which the report refers and therefore may or may not be subject to a subsequent visit report. In order to be able to ensure that follow-up actions are correctly dealt with when appropriate, Inspectors should maintain some form of action tracking system. Whilst full 'close out' is desirable, there will be occasions when it is justifiable not to do this, for example, when lack of resources requires attention to be devoted to higher safety priority items. Such decisions should be recorded.

5.6 How should reports be stored and distributed? Inspectors should pass the original signed copy to their support unit for hard copy distribution, and for the distribution of any electronic copies, either themselves or through their support units, BSS/CAN/003 refers. For those reports which are not covered by security limitations, inspectors are responsible for placing an electronic copy on the EDRM visit report system. In storing an electronic copy of a Site Inspection Reports (**SIR**) or Contact Report (**CR**) for storage on EDRM the File Name should follow the following format:

(SIR) Site Name – Site Inspection Report Number/Year – Visit Type & details – Dates of Visit – Inspector Name

Sizewell B – SIR – 001 – 2007 – Follow up visit – 23 January 20-07 – A N Other
(CR) Contact Report Number – Contact Type and details – Dates of Contact – Inspector Name

CR – 008 – 2007 – Cold debrief meeting for Heysham Level 2 Exercise “Heron 3” that took place 29 November 2006 – 11 January 2007 – A N Other.

6 Associated Documents

6.1 G/INS/008 Site Intervention Plans.

6.2 HSE Intranet Security Home Page.

6.3 BSS/CAN/003 Processing Visit Reports.

Annex 1 – Report format

RESTRICTED

(See section 5.3 for guidance on security marking and handling of documents)

EDRM 2007/XXXXXX

**SITE INSPECTION REPORT No: ABC nnn/yyyy
(or CONTACT REPORT No:)**

(ABC is site or contact prefix, yyyy is the year and nnn is the allocated 3 digit report number)

HEALTH AND SAFETY EXECUTIVE HM NUCLEAR INSTALLATIONS INSPECTORATE

- 1 VISITING OFFICERS** (The names of all NII and other HSE staff participating in the visit, together with any other persons attending the site on HSE's behalf should be listed. Where needed, names of staff should be accompanied by the specific date(s) of their visit.)
- 2 DATE(S) OF VISIT** (The dates of the visit should be stated in date to date / month / year number format, e.g. 3 - 7 September 2007).
- 3 SITE AND LOCATION OF VISIT** (The site, and installation if needed, or location should be named).

Report Content & IIS Rating					
Para	Details (Project, OU, Building)	Plan	IIS Code	LC / Topic	Rating
6.1	Management of change			36	3
6.2	ILW Stores			35	4

6.3					
-----	--	--	--	--	--

4 PRINCIPAL STAFF SEEN: (Names of principal staff including those from licensees, contractors, OGDs (EA) seen during visit.)

(The report must cover enough to allow the informed reader to understand what has taken place. This may be in the summary alone, the summary and report or the summary and file note(s). Inspectors are expected to use their discretion as to the most appropriate way to complete the report. The scoring table **MUST** be completed to inform the IIS and allow decisions on how effort is to be targeted in the future. Guidance can be found below.)

5 SUMMARY

(A **brief** summary of the visit should be provided. If incidents or events are reported, mention this fact in the text and the section of the report where details may be found).

6 REPORT

(GENERAL NOTE - Inspector's work on a site may be recorded under one or a group of "categories" which identify the type of inspection carried out i.e. compliance C, reactive J, planned I, permissioning K, enforcement E. The use of these codes may be prescribed by the annual planning round but the majority of work on site is expected to be the under compliance rating C, with only specific projects identified at the beginning of the year reported under planned I. An inspection may be based on any system or theme which is normally linked to licence condition(s) and or other regulations. Each subject should be briefly covered and include a reference to the principal persons seen, date, matters considered. It should be presented such that it explicitly identifies which systems or themes it relates to and whether the outcome was satisfactory i.e. State of compliance with particular legal requirements met, including the basis for the judgement, and what, if any, follow up action has been initiated. Follow-up to, or continuation of, previous work should be cross referenced to the relevant visit or other report when possible. (E.g. EDRM links to documents). Inspectors are encouraged to place detailed information in referenced notes when appropriate. Contents of this section should be divided into sub-sections with titles. An example of a sub-section is given below.)

6.1 Site Licence Condition 36 Management of Change – IIS Rating 3

(Rating # shown here and in subsequent sub-sections where appropriate represents the rating code number based on the information in G/INS/008. Topics included in these sub sections should be related to a specific legal requirement identified in the planned inspection programme. Material may cover both nuclear and conventional safety (E.g. Fire).)

7 RECOMMENDATION AND ACTIONS IN HAND

7.1 Actions this visit

7.2 Actions from previous visits

(The actions considered necessary to be followed up by NII Inspectors should be listed and uniquely identified e.g. using a combination of the VR Number / Action Number . Where an action is placed on another Inspector, then prior agreement should be obtained and the name of the Inspector identified in the action).

Signed..... Date: / /200X
A N Other

Distribution:

Mandatory signed paper copies:

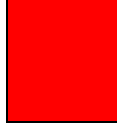
(As appropriate, e.g. if enforcement action is being considered hard copy records may be needed.)

Electronic copies:

- 1 EDRM Folder (Within EDRM the folders for this type of document are listed under 4.5 (Function – Regulatory, Activity – Inspection))
- 2 Superintending Inspector / Unit Head
- 3 Other inspectors involved with this visit or site. (E.g. Site Inspector or Project Assessor if not involved in this visit.)
- 4 Other specified persons. (Especially if items of Generic interest have been identified.)

IIS RATING GUIDE G/INS/008		Inspection Observation	Assessment Observation	Interactions Observation	Expected Action
Purple	Exemplar 1	Meets and exceeds guidance requirements. Practical solutions exist to address intractable problems encountered elsewhere.	Submission of safety case in advance of programme. No regulatory intervention required. Frequent examples of standards being used as a reference at national / international level. Use of innovative methods and cutting edge technology.	Licensee is proactive and positive Licensee brings forward information, proposals and judgments that exceed expectation Licensee argues on the basis of well accepted facts and puts these arguments helpfully	Positive statements on site encouraging continued search for refinement. Commended to colleagues as worth emulating.
Blue	Good Standard 2	Generally exceeds, guidance requirements. Site alert to and actively pursuing, potential improvements. Any suggestions from site inspector considered on merits.	Few minor issues raised. Timely submission of safety case. No regulatory intervention required. Often exceeds current industry sector standards. High technical quality.	Licensee is generally proactive and positive Licensee shows sound judgment most of the time. Licensee avoids spurious arguments and conflict	Positive statement on site. Recognition of improvements.
Green	Adequate 3	Arrangements meet guidance requirements. Some opportunities for improvement under ALARP. Areas for improvement known, but being addressed only slowly. Site inspector able to identify minor points for improvement.	Issues raised for clarification. Safety case submitted on time. Meets relevant national technical standards. Methods are often complex. Some development of standards.	Licensee is largely proactive on most matters. Licensee shows good judgment most of the time. Licensee can be helpful when pressed Licensee argues on irrelevancies infrequently	Identify areas for improvement from inspection at debrief. Encourage steps to improve.
Yellow	Below Standard 4	Fundamental requirements met but some specific procedural weaknesses identified or examples seen of failure to follow procedures. Failure of site to recognise problems may exist.	Several issues raised requiring regulatory follow-up. Submission of safety case late. Improvements required to agreed programme. Methods are mostly routine. Some evidence of meeting current industry sector standards.	Licensee can be proactive but needs to be prompted Licensee can show reasonable judgment but lapses regularly There are spurious or irrelevant arguments.	Weaknesses of procedure or application identified. Specific action required at site debrief. Consider need to put in writing.
Orange	Significantly Below Standard 5	Procedures or practice flawed such that one or more important requirements missed or not delivered. Failure of site to recognise problems may exist. Site willing to adopt a strategy to bring about the required level of improvement.	Many technical issues requiring follow-up Submission of safety case well past agreed deadline. Issue of IN or LI requiring improvement to safety case. Methods generally fall short of current industry good practice. Limited scope and depth of technical content.	Licensee is not proactive and lacks sound judgment. Arguments poorly judged.	Concern should be expressed at debrief, prior to the Site Inspector leaving site, identifying NII concern about the lack of adequate compliance with legal requirements. An action plan should be established to resolve these concerns, to probably fairly short timescales. A follow up inspection will be required.
Red	Unacceptable 6	Seriously deficient arrangements or failed application such that fundamental objectives not achieved or safety prejudiced. Failure of	Multiple issues requiring frequent regulatory contacts. Safety case severely delayed. Safety case inadequacies require prompt regulatory	Licensee needs to be pushed into meeting regulatory expectation. Judgments are made at an emotional level and unjustified.	Licensee advised at debrief to the significant concern that exists. EMM invoked which may result in enforcement action being taken or a letter being issued to specify

**IIS RATING
GUIDE** [G/INS/008](#)

	Inspection Observation	Assessment Observation	Interactions Observation	Expected Action
	site to recognise need for improvement or a very defensive response to NII position adopted.	intervention. Serious shortfalls below accepted industry good practice.		regulatory requirements.