

NUCLEAR SAFETY DIRECTORATE - BUSINESS MANAGEMENT SYSTEM

SITE INSPECTION AND ENFORCEMENT LC8: WARNING NOTICES

T/INS/008

ISSUE 001

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1. Purpose and Scope

1.1 This guidance has been prepared as an aid to inspection activities carried out by HM Nuclear Inspectors at Nuclear Installations in judging the Licensees compliance with the requirements of LC 8. This guidance provides a framework for these inspection activities within which the Inspector is expected to exercise his/her discretion. This framework is provided to facilitate a consistent approach to LC 8 compliance inspection.

1.2 The guidance is for use by all Nuclear Inspectors in NSD. The guidance does not indicate when or to what extent LC 8 inspections should be carried out as these matters are covered in individual inspectors inspection programmes.

1.3 The guidance provided is split into four main elements:

- 1) Purpose of the Licence Condition
- 2) Guidance on arrangements for LC 8.
- 3) Guidance on Inspection of Arrangements.
- 4) Guidance on Inspection of Implementation of Arrangements.

2. Licence Condition

2.1 LICENCE CONDITION 8 - WARNING NOTICES

The licensee shall ensure that suitable and sufficient notices are kept on the site for the purposes of informing persons thereon of each of the following matters, that is to say:

(a) the meaning of any warning signal used on the site;

(b) the location of any exit from any place on the site, being an exit provided for use in the event of an emergency;

(c) the measures to be taken by such persons in the event of fire breaking out on the site or in the event of any other emergency;

and that such notices are kept posted in such positions and in such characters as to be conveniently read by those persons.

3. Purpose of Licence Condition

3.1 LC 8 is a standard condition attached to all Nuclear Site Licences. Nuclear site Licensees are required to comply with the LC. How this compliance is achieved is for the Licensees to decide. However, NSD must judge the adequacy of this compliance. It carries out this function by compliance inspection.

3.2 This Condition's purpose is to ensure the safety of all people on the site in respect of their ability to be able to respond appropriately and without delay to an incident or emergency situation. All warning notices and signs should be in appropriate places to advise people what to do or what to avoid in that area in the event of fire or other emergency. Consequently the licensee will need to determine the hazards during potential emergencies for which warning notices are required. In addition, signs should be provided to mark exit routes, emergency equipment and mustering points. Systems for logging the location and for periodic checking of notices should be in place.

3.3 Matters for consideration by inspectors include the system for determining the need for notices and also the system for production, posting and maintenance of notices including those required during periods of disruption such as outages. The main thrust of this Condition will be met if notices are both appropriate to the hazard and the local situation and intelligible to visitors and contractors as well as employees. If the notices refer to warning signals then such signals should be audible or visible and understood by persons likely to be in that area. Signs should conform to the Health and Safety (Safety Signs and Signals) Regulations 1996 (SI 1996, No 341). Licensees arrangements should also take cognisance of British Standard BS 5378 where appropriate.

4. Guidance on arrangements for LC 8

4.1 The following list of elements of arrangements provide NSD's views on what the Licensee's arrangements might be expected to contain to comply with LC 8. The list is neither exclusive nor exhaustive and will be subject to review and revision in light of operational experience. If licensees have generic model(s) for arrangements then it is for the site to justify any deviation from the model(s). **[note: not all licensees use generic models].**

4.2 Procedures should be provided to comply with LC 8.

4.3 Procedures shall address the licence condition requirements.

4.4 Procedures should be readily available and should be reasonably up to date, signed by an appropriate senior manager and controlled under a system compliant with the requirements of LC17.

4.5 Procedures should include where appropriate the specific individuals or posts with responsibility for compliance with the requirements of LC8.

4.6 Procedures should include a requirement for a schedule of warning notices should be kept that identifies position and type of sign.

4.7 Procedures should ensure that systems are in place for review, inspection and maintenance of warning signs.

4.8 Procedures should ensure that the site has a process for identifying the warning signs required as derived from the hazards on that site.

5. Guidance on inspection of Arrangements

5.1 Part 5 of this guidance is to assist inspectors in judging the adequacy of the licensees arrangements. The following list is neither exclusive or exhaustive and will be subject to review and revision in light of operational experience. It does however, provide a hit list of aspects of LC 8 that can be examined during routine inspections.

5.2 Check that arrangements have been made to demonstrate compliance with the LC.

5.3 Examine the compliance procedures layout and check that it is consistent. Review the procedures to establish validity, whether any changes have been made since the last review and whether the identified responsible persons are correct. Note whether instructions, methods and quality assurance rules claimed

in procedures have been followed and whether any changes have been incorporated and validated.

5.4 Check that the procedures require suitable documentation in the form of a schedule of safety signs together with identification of the responsible person or its preparation and regular review. Confirm that they require adequate records of inspection and maintenance (in accordance with LC6 procedures) for warning notices.

5.5 Check that the procedures ensure all safety signs are produced to a relevant and suitable standard. Confirm that they ensure signs and warning notices are produced appropriate to the specific hazards for which they are designated.

5.6 Examine the procedures and check that suitable and sufficient training requirements are identified to cover the requirements of this licence condition.

5.7 Check that the procedures cover adequately and in sufficient detail all matters relevant to the location of safety signs and warning notices. Confirm that this includes provision for specific requirements e.g. during construction where such requirements will change during progress of such work.

6. Guidance on inspection of implementation of Arrangements

6.1 Part 6 of this guidance is to assist inspectors in judging the adequacy of the Licensee's implementation of their arrangements i.e. is the licensee doing what their arrangements say they should be. The following list is neither exclusive or exhaustive and will be subject to review and revision in light of operational experience. It does however, provide a hit list of aspects of LC 8 that can be examined during routine inspections.

6.2 Check that there is a system in place both for producing and displaying the notices required by this licence condition. During plant inspections check that all appropriate places have been identified where warning notices are necessary and that the notices are appropriate for the chosen location. Details of any warning signal specific to the hazard detailed on the warning notice should also be clear. Witness a test of a sample of hazard warning alarms.

6.3 Examine the schedule of safety signs and confirm that it gives details of each sign with written content, sign location and the required frequency of inspection and maintenance. Check the maintenance programme exceptions listing to establish there are none relevant to this licence condition and discuss as necessary with the responsible person identified in the procedures.

6.4 The adequacy of warning notices should be assessed with regard to their intelligibility to the licensee's staff and to visitors e.g. contractor's personnel and their conformance with specific sign legislation. Check that personnel on the site understand warning notices. Confirm by discussing with personnel, that they are aware of any potential hazards in the areas in which they are working as well as general site emergency systems.

6.5 Check on a sample basis a typical escape route by following only the signs posted. Discuss as necessary with the responsible person identified in the procedures. Establish that muster points are identified and check that they are tested on a routine basis.

7. Other Sources of Information

7.1 The inspector should be aware that other Regulations contain requirements for appointment of individuals with similar authorities and responsibilities as DAPS & SQEPs. These include the Ionising Radiations Regulations 1999 requirements for Radiological Protection Advisors (RPAs) and Radiological Protection Supervisors (RPSs).