

NUCLEAR SAFETY DIRECTORATE - BUSINESS MANAGEMENT SYSTEM

SITE INSPECTION AND ENFORCEMENT LC9: INSTRUCTIONS TO PERSONS ON SITE

T/INS/009

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 9. 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 9 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 9 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 9.
- 3) Guidance on Inspection of Arrangements.
- 4) Guidance on Inspection of Implementation of Arrangements.

2. Licence Condition

2.1 LICENCE CONDITION 9 - INSTRUCTIONS TO PERSONS ON SITE

The licensee shall ensure that every person authorised to be on the site receives adequate instructions (to the extent that this is necessary having regard to the circumstances of that person being on the site) as regards the risks and hazards

associated with the plant and its operation, the precautions to be observed in connection therewith and the action to be taken in the event of an accident or emergency on the site.

3. Purpose of Licence Condition

3.1 LC 9 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 The purpose of this Condition is to ensure that the licensee provides all people on the site with sufficient information about the risks and hazards associated with the plant and its operation to enable them to take appropriate precautions and to respond adequately and without delay to an incident or emergency situation. The Condition is an additional requirement to s2(2)(c) of HSW Act and Regulation 14(a) of the IRRs. This Condition does not formally require the licensee to make and implement adequate arrangements. However, suitable written procedures should be produced to enable compliance with this Condition to be visible. The procedures should in particular ensure instructions are given to new staff, contractors and visitors. Compliance with these requirements may be verified by consideration of the formal system for instruction and local checks on its implementation by the site inspector.

4. Guidance on arrangements for LC 9

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 9. 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 9.

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 The procedures should note that the requirements of this condition

supplement the requirements of section 2(2) (c) of the Health and Safety at Work etc. Act 1974 and regulation 14(a) of the Ionising Radiation Regulations 1999.

4.6 The procedures should ensure that all persons on the site have been given appropriate instruction on the risks, hazards and responses necessary, during normal operations and potential emergencies. The procedures should address any precautions that need to be observed in the event of any accident or emergency situation.

4.7 The procedures should ensure that instructions are given to new staff, contractors and visitors and that refresher training is also given at appropriate intervals.

4.8 The procedures should ensure that authorised casual visitors who do not meet normal training requirements are accompanied when on the site.

4.9 The procedures should ensure that records of relevant training are made, controlled and kept under the arrangements made for LC6.

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 9 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 ensure all persons on the site receive appropriate instructions during their time on the site. Confirm that they address the differing requirements of new staff, contractors and visitors as well as suitable refresher training where necessary.

5.5 Confirm that the procedures require adequate records of relevant training and instruction and check that there is suitable cross reference to and consistency with the procedures for LC6 and LC10.

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 9 that can be examined during routine inspections.

6.2 Check that a system exists for establishing the necessary instructions for both visitors to the site and employees. Confirm that there is a procedure for ensuring that all persons who enter the site are given appropriate instructions. Cross check with LC10 procedures that the system for providing such basic induction training to persons coming onto the site as required by LC9 exists in a reasonable form and has satisfactory compliance.

6.3 Review the records of instruction given to people on the site and confirm that they are being implemented and also compliant with LC6 requirements. Examine a sample of records to establish that recent appointees, contractors or visitors have completed necessary basic induction training.

6.4 Select an example, such as visitors arriving for a meeting and establish that they are escorted to and from the relevant part of the site in accordance with procedures. Discuss where necessary with the responsible person identified in the procedures any shortcomings or where improvements may be effected.

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).