

Views from an existing licensee

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- > British Energy and its predecessors have operated commercial nuclear plants in UK regulatory environment since 1962 – England & Wales and Scotland
- > Basic principles remain the same – though processes and practices have evolved...
 - > Site licences standardised
 - > Environmental regulators brought under a single umbrella – EA and SEPA
- > ... And industry changes have required substantial re-licensing
 - > 1990 – vesting of nationalised industry > new nuclear site licences / environmental authorisations for Nuclear Electric plc / Scottish Nuclear
 - > 1996 – regrouping for privatisation > new nuclear site licences / environmental authorisations for Nuclear Electric Ltd
 - > 1997 – preparation for integration with BNFL > work on new nuclear site licences / environmental authorisations for Magnox Electric plc
 - > 2005 – integration of British Energy licensees > new nuclear site licences / environmental authorisations for ex Scottish Nuclear stations
 - > 2007 – review of British Energy discharge authorisations > full reformulation
- > We are no strangers to fundamental review

So what is it like to be a licensee?

- > UK regime based on licensee's own arrangements
 - > E.g. single licence – only 36 licence conditions
 - > Not prescriptive – flexible, practicable – and lasts indefinitely
- > But it's all your responsibility!
 - > Regulator is there to make sure you properly discharge this responsibility...
 - > ... and they are there to advise – site inspector / regulator for each site can know plant / people
- > Licensee must have a strong, knowledgeable organisation
 - > Know your plants
 - > Have systems and structures in place to manage plants safely
 - > Demonstrate internal regulation
- > May have an indefinite licence but continuous review is built in
- > Divergence between / within different regulators has sometimes been an issue
- > Matching resources to business needs continuing dialogue

Why is GDA valuable?

- > Understand regulatory status / resolve issues early – important for managing investment risk
- > Model for integrated working between regulators – pattern for future
- > Builds on past experience...
 - > For NII, builds on what (eventually) went well for Sizewell B... but done up front!
- > ... But also innovates
 - > For EA, process breaks new ground – but worth it to secure the benefits
- > But there is much more to being a licensee than having an approved design

What should you expect as prospective licensees?



- > The same high expectations and high-level standards you are used to...
- > ... but the need demonstrate implementation methods that meet UK requirements
- > For GDA, satisfy regulators that:
- > Your chosen design is capable of high standards of safety, security, environmental protection on generic site...
- > ... And you as prospective operator can substantiate this

What should you expect as prospective licensees?

- > Take full account of the regulators' requirements and guidance
 - > Set out in SAPs, TAGs, "good practices" and guidance documents,
 - > ... e.g. EA's Process and Information document for GDA
- > Open communication
- > Deliver what you promise
 - > Regulators like to strive for "best practice" (as do we Operators!)
 - > But subject to ALARP principle
 - > Only promise if you can really do it!

- > It is not easy – needs sustained effort, embedded throughout your organisation

