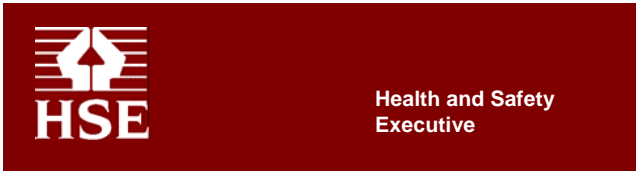


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# **The Development of a Licensable Organisation**

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**Managing for Safety**

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# Scope of Presentation

- Organisational Development
  - Management Prospectus
  - Intelligent customer issues & Design Authority
  - The Organisational “Nuclear Baseline”
  - Development of management arrangements
  - Next steps and early engagement with regulators

<http://www.hse.gov.uk/nuclear/notesforapplicants.pdf>

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## *‘The licensing of nuclear installations’*

- Licence applicant should submit a **Safety Management Prospectus (SMP)** demonstrating that it will have adequate:

- management structure
- safety management arrangements
- resources

Thus the SMP is a fundamental element of the licensing basis

- SMP is akin to *‘Organisational Safety Case’*
  - Guidance developed (T/AST/072)



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# An Integrated Management Prospectus

- EA & security expectations on management arrangements can be met through an:

Integrated Safety, Security & Environment (SSE)  
Management Prospectus

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## The Management Prospectus (1)

- *provide a clear description of the type of activities carried out on the licensed site(s)*
  - SSE management arrangements should be proportionate to the hazards and risks

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## The Management Prospectus (2)

- *describe how the organisational structure meets the nuclear SSE management needs of the business*
  - nuclear SSE policies
  - organisational structure, functions responsibilities

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## The Management Prospectus (3)

- *set out the organisation's approach to the governance of nuclear SSE*
  - high-level descriptions of the systems & processes for directing and controlling activities & maintaining oversight
  - role of Board and Executive
  - role of safety governance committees
  - challenge function
  - strategy for developing and maintaining effective leadership and culture

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## The Management Prospectus (4)

- *provide the strategy for developing and maintaining a licensable organisation with the right structure, resources and competences to deliver effective nuclear SSE*
  - resource strategy & oversight
  - policy & strategy on use of contractors and retention of intelligent customer & design authority capability
  - approach to developing and maintaining “Nuclear Organisational Baseline”

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## The Management Prospectus (5)

- *Show how a ‘learning organisation’ culture is fostered*
  - how the organisation absorbs and responds to lessons both from within and outside the organisation
  - performance monitoring arrangements
  - arrangements to secure and promote open and learning culture
  - challenge culture

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## The Management Prospectus (6)

- *Provide the strategy for managing change and maintaining live and effective management arrangements*
  - strategic approach to review of factors covered within MP
  - arrangements for maintaining these factors and assuring continued adequacy
  - links to arrangements for compliance with Licence Condition 36 [Control of Organisational Change]

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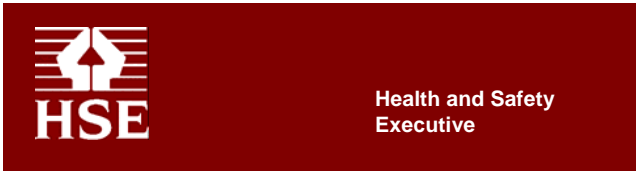
## Specific Issues (1): Intelligent Customer

- **Licensee** must:-
  - Understand the hazards and how to control them
  - Be in control of activities on its site
  - Possess detailed knowledge of the plant safety case
  - Directly employ, or otherwise source, sufficient SQEP'd staff to deliver these activities
  - Have a process to ensure that it retains sufficient in-house capability
  - Demonstrate how it achieves the above
- Guidance under revision – T/AST/049

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## Specific Issues (2): Design Authority

- Expectations set out in INSAG -19
- Key points:
  - NII accepts “ultimate” design knowledge rests with vendor
  - Licensee must acquire sufficient capability to understand the need for, and make, decisions that affect nuclear safety
  - NII expects gradual transfer of this capability from vendor to licensee at appropriate stages through construction and commissioning
  - NII expects plan for this transfer with the end point being establishment of a DA within the licensee’s organisation



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## Specific Issues (3): Nuclear “Baseline”

Purpose:

to ***demonstrate*** that the licensee has suitable and sufficient organisational structures, staffing and competencies to carry out activities which could impact on nuclear safety

Guidance:

[http://hse.gov.uk/foi/internalops/nsd/tech\\_asst\\_guides/tast065.htm](http://hse.gov.uk/foi/internalops/nsd/tech_asst_guides/tast065.htm)

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## What Does the Baseline look Like?

- Up to you !
  - Organisation structure
  - Identification of **all** roles that impact on nuclear safety
  - Identification of numbers of personnel needed **within** licensee
  - Identification of *intelligent customer* roles
  - Reference to management of contractors
  - Identification of vulnerabilities
  - “Route map” to underpinning processes
  - Justification – analysis, performance Indicators etc
  - Reference to Baseline in change proposals

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## Licence Condition Compliance Arrangements

- Adequate arrangements for **Nuclear Site Licence compliance** (from the date of granting the licence)
- 3 elements to adequacy:
  - *make* arrangements
  - *implement* the arrangements
  - *assure effectiveness*
- Arrangements can be proportionate to hazards during build programme
- Where relevant, compliance arrangements should encompass the whole licensee not just the site – this includes the Board and Executive Team
  - e.g. LC12 - Competence

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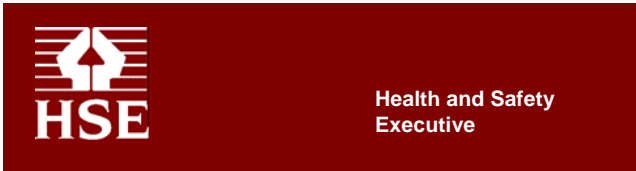
## Development of Organisational Capability (1/2)

- MP, Baseline & management arrangements should provide sufficient confidence in organisational capability to enable HSE to grant a licence & EA a permit
  - initially, to show company has the capability to function as a licensee consistent with current stage of installation
  - plans needed for developing the baseline & arrangements
  - NII will assess arrangements and inspect their implementation prior to granting a licence

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## Development of Organisational Capability (2/2)

- Baseline & arrangements must evolve in line with, and ahead of, the build and commissioning programme
- Licensee should have plans to achieve full Design Authority capability prior to operation
- NII may place regulatory hold points, or expect licensee to set its own, for “organisational build” as well as plant build



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## Next Steps

- Make and maintain contact with HSE/EA
  - (in advance of formal licence application !)
  - Note the interface protocol & role of JPO
- Set out proposals/options for the organisational structures and arrangements – including Board & Executive Team
- Provide confidence in the adequacy of the end point and show how you will get there
  - i.e. include plans and programmes for evolving the smp, baseline and arrangements



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# Early Contact with Regulators

**Talk to us as soon as possible !**

# Indicative Site Licensing Timeline

