

Incident Notification and Reporting process

INS/011 - Issue 002

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1. INTRODUCTION

1.1 Under arrangements made to comply with legal and other requirements ONR regularly receives notifications and reports of incidents and events occurring on nuclear sites and other locations from licensees, operators or other duty-holders. In addition to the alerting aspects, notifications also allow ONR to collect and process operating experience (OE) that it needs to assist in its judgement that a nuclear installation or related activity is operated safely and securely and to inform its regulatory programmes. Furthermore, notifications of incidents are used to inform decisions on whether follow-up action by ONR inspectors is necessary.

1.2 The process for handling incident notifications and reports within ONR has been revised following agreement with licensees and other duty-holders. Details of the agreed arrangements can be found in the "Guidance for notifying and reporting incidents and events to ONR" (Ref G/INS/007 Issue 001).

2. PURPOSE AND SCOPE

2.1 The purpose of this document is to outline the ONR arrangements for recording and disseminating initial information related to notifications of incidents occurring on nuclear sites and other facilities and locations where activities are regulated by ONR. This procedure applies to all incident notifications in the areas of nuclear safety, radiological safety, security, safeguards and transport safety. It covers receipt of initial notifications from licensees, operators or other duty-holders and how the information is then recorded and disseminated to appropriate staff within ONR, HSE and other government departments, if necessary.

2.2 This document also includes guidance on the action needed for incidents meeting the Ministerial Reporting Criteria (MRC), which are identical to the HSE/ONR Publication Criteria.

2.3 Guidance is also included to assist inspectors in determining the ONR response to incidents where follow-up action by inspectors may be warranted.

2.4 This document excludes notifications of nuclear emergencies received through calls to the “red telephone”, which are to be dealt with in accordance with instructions contained in the ONR Emergency Procedures Handbook.

3. RESPONSIBILITIES

Operators/Licensees/Duty-holders (OLD)

3.1 G/INS/007 Issue 001 to this instruction clearly outlines the responsibilities for Operators/Licensees/Duty-holders (OLD) to notify ONR of incidents that meet the published ONR criteria, and to provide follow-up reports where relevant.

Programme Business Support Teams (BST)

3.2 When a notification is received from an OLD or ONR inspector then BST are responsible for:-

- Performing a quality check of the incoming ONR Incident Notification form (INF1) to ensure that the required information has been received and a unique record of the incident is produced.
- Promptly alerting the appropriate inspector to review the incoming INF1;
- Ensuring that the details of the incident are recorded and promptly distributed;
- Maintaining accurate, up-to-date distribution lists for incident notifications;
- Reminding Unit Heads where incidents meet MRC that an update is required for Quarterly Statement purposes, and
- Updating part C of the INF1 covering incident follow-up actions both by ONR and the OLD; agreeing part C(1) with the relevant inspector and part C(2) with the OLD.

ONR Inspectors

3.3 On being alerted to receipt of an incident notification, ONR inspectors are responsible for:-

- Dealing with a notification if the relevant Site Inspector is unavailable and requested to do so by BST;
- Reviewing Part A of the submitted INF1, and if necessary contacting the OLD for further information or clarification;
- Providing a statement in relation to ONR’s initial or proposed response to an incident notification and indicating the extent of the circulation of incident related information;
- By agreement with OLD completing an ONR incident notification form (INF1), particularly if an out-of-hours or any telephone notification is made and requesting BST to record and distribute the form;

- Informing the relevant BST of any significant amendments to a previous INF1 notification e.g. change to circulation or update to the rating on the International Nuclear and Radiological Event Scale (INES);
- Completing an ONR Incident Update form (INF2) form on incidents that are deemed to meet MRC for inclusion in the Quarterly Statement of Incidents for Minister, and
- Contacting, as soon as possible, the UK INES National Officer or a designated alternate if an incident notification is rated at INES level 2 or above, see section 4.5.

ONR Unit Heads

3.4 In relation to incident notifications Unit Heads are responsible for:-

- Completing an INF1 following receipt of an out-of-hours telephone notification via the HSE Duty Officer and then submitting it to an ONR incident email account for recording and prompt circulation by BST;
- Contacting, as soon as possible, the UK INES National Officer or a designated alternate if an incident notification is rated at INES level 2 or above.
- Ensuring, for events meeting MRC, that the relevant Site Inspectors complete an ONR Incident Update form (INF2) and that this is cleared with the DCI for inclusion in the Quarterly Statement of Incidents; and
- Ensuring that ONR produces a follow-up report, should the incident's safety significance warrant an investigation and further regulatory action.

Deputy Chief Inspectors (DCIs)

3.5 The DCIs are responsible for:-

- Ensuring consistent application of these arrangements within their Programme or Division;
- Agreeing to the text of updates to incidents that meet MRC on an INF 2 form.
- Maintaining a programme of follow-up work where needed.

OPEX Unit (3C)

3.5 In relation to ONR incident related Operating Experience (OE) information, Unit 3C is responsible for:-

- Coordinating the OE function and incident reporting arrangements within ONR.
- Advising on the distribution for incident notifications.
- Reviewing and revising as necessary the arrangements outlined in this document.
- Providing and maintaining guidance to duty-holders in relation to notifying incidents and events to ONR
- Developing and maintaining an ONR incident notification database.

- Managing the incident screening process to service the Departmental Strategic Objective (DSO) metric and provide insights for regulatory intervention purposes; and
- Compiling the HSE Quarterly Statement of Incidents at Civil Nuclear Installations for approval by the Chief Inspector and distribution to Ministers and others.

UK INES National Officer (UKINO)

3.6 The UKINO is appointed by the Department for Energy and Climate Change (DECC), normally from among ONR's inspectors, and acts independently of ONR in this role. The UKINO is responsible, inter alia, for:-

- Monitoring the consistency of UK users' application of the INES scale through reviewing all relevant incident notifications made to ONR;
- Submitting to IAEA details of any incident rated at level 2 or above within 48 hours of the event; and
- Challenging a licensee's INES rating if considered to be incorrect and ultimately deciding on the final rating of any event.

4. PROCEDURE AND GUIDANCE

Receiving Notifications of Incidents or Events

4.1 Incident notifications can be received by email, telephone or fax through established lines of communication. All notifications should result in Part A of an INF 1 (see Appendix 1) being completed, normally by OLD staff. If an ONR inspector receives a verbal notification whilst on site, and if the incident clearly falls into an ONR reporting category, then they should prompt the licensee/operator to notify ONR through the formally agreed channels.

4.2 For nuclear and radiological related incidents, where immediate notification is necessary in normal office hours the email should be accompanied by a telephone call from the OLD alerting ONR to the notification. Where the notification is made out-of-office-hours then the OLD representative should call the HSE Duty Officer, who in turn should contact the ONR Nominated Inspector with the reporting organisation's contact details. The ONR Nominated Inspector should then contact the OLD by telephone. After agreeing its contents with the OLD, the ONR Nominated Inspector should complete Part A and B of the INF1 form and submit this to the appropriate email account to enable BST to promptly distribute the information.

4.3 For security related incidents or events; initial notifications should be made via telephone to an ONR Civil Nuclear Security (CNS) inspector or through the CNS Duty Officer for out-of-hours notifications. The oral report should be confirmed in writing by the OLD within 48 hours, for this purpose the 48-hour report should be communicated by the OLD using an INF1 form, using an appropriate carrier.

4.4 It is intended to provide a computer database to manage notifications centrally. The ONR incidents email accounts should be checked regularly by BST

staff for incoming notifications from OLD. On receipt of an INF1 form BST staff should ensure all fields have been completed. Until the computer system is available, programme BST staff should undertake these checks as previously. On receiving a notification into the programme incidents email account, BST should contact the appropriate ONR inspector and send them the incoming INF1 form, normally by internal email.

4.5 The ONR inspector should review Part A of the form for completeness and accuracy and, if necessary, should contact the reporting organisation for further information or clarification. Part B of the INF 1 form should then be completed by the ONR inspector and the appropriate circulation option selected, as follows:-

FULL CIRCULATION - Where the incident/event;

- Meets the MRC, which are identical to the HSE's Publication Criteria, or
- Is provisionally rated at Level 1 or above on INES or
- If there is likely to be national media interest under the AN01 criterion.

Note, FULL CIRCULATION includes HSE Press Office, ONR Communications Team and other interested HSE personnel, DECC, Food Standards Agency and, for incidents on sites in Wales and Scotland, respective officials in devolved government.

PROGRAMME CIRCULATION – other incidents/events considered only to be of interest within the particular Programme concerned. Note that these reports are automatically distributed to the Press Office in case of any potential media interest.

4.6 On completion of parts A and B of the INF1 the inspector should submit this to the appropriate BST for distribution to the indicated list.

Disseminating the Incident Notification Report

4.7 On receipt of the INF1 form (Parts A & B completed) into the incident email account BST staff should provide a unique record for the INF1 and promptly distribute it to the indicated circulation list.

4.8 In the case of defence related sites or other premises where security markings may pertain, the INF1 should normally be distributed within the Defence or Security Programme only. If deemed appropriate through consultation with the appropriate Unit Head, others in HSE (e.g. Press Office) may be sent copies of defence site related reports, in this case the report shall be marked 'NOT TO BE CIRCULATED OUTSIDE HSE'. Where information is considered for release outside of HSE then agreement must be sought and obtained from the Ministry of Defence.

INES Ratings and Submission to IAEA

4.9 If the licensee has provisionally rated the event at INES Level 2 or above then the Inspector receiving the notification details should inform the UK INES Officer or one of the alternates as soon as possible to facilitate international dissemination of the event details through IAEA; the target is to submit preliminary details to IAEA within 48 hours of the event.

4.10 In support of the UKINO role (see paragraph 3.6 above) any incidents initially reported with an unknown INES rating should have this information updated when it becomes available. Where applicable, the Site Inspector should obtain the rating from the licensee at the earliest opportunity. Approximately one week following notification the relevant BST should contact the Site Inspector, or on their behalf the OLD, to obtain the rating. The rating shall be provided to Unit 3C to enable the ONR incident log and UKINO to be updated.

Update Reports for Incidents Meeting MRC/HSE/ONR Publication Criteria

4.11 Incidents deemed to have met the MRC (outlined in Annex 1 and identical to the HSE/ONR Publication Criteria) should have an update provided on an INF2 form (see Appendix 2), following the preliminary investigation, if possible. The purpose of the INF2 update is to generate the text which will appear in the Quarterly Statement of Incidents at Nuclear Installations made by the Chief Inspector under section 11 of the HSW Act. Guidance on the information to be included in an INF2 is also provided in Appendix 2. The relevant site inspector should complete an INF 2 form to update the position in relation to the incident and gain agreement to the text from their Unit Head and DCI. The INF2 form should then be forwarded to Unit 3C within one week of the end of the quarter in which the incident occurred.

Producing the Quarterly Statement of Incidents

4.12 Unit 3C shall prompt Programme BST at the end of each quarter to provide any INF2 update reports on incidents that have either been deemed to meet MRC or were previously identified as possible candidates but needed further investigation. Annex 1 provides guidance on when to produce an INF2 and Appendix 2 on what an INF2 should contain. Completed INF 2 reports will be collated and included in the draft Quarterly Statement of Incidents, together with a covering letter to relevant ministers. The Statement is authorised for issue by the Chief Inspector. The distribution of the Statement is undertaken by Unit 3C to a list maintained through consultation with the HSE and ONR Secretariats.

ONR's Response to Incident Notifications

4.13 Relevant Unit Heads, in conjunction with their site inspectors, should decide on the need for further follow-up action based on the significance (nuclear safety / radiological / other) of incidents notified to ONR. Annex 2 outlines criteria to assist Unit Heads and site inspectors in considering what type of ONR follow-up action should be instigated.

Follow-Up by OLD and ONR

4.14 Programme BST staff should record any follow-up by ONR as outlined in Part C(1). This information should be agreed with the relevant Inspector and recorded in an appropriate system.

4.15 Part C(2) of the form recommends that the OLD provide a follow-up report outlining the results from the OLD investigation into the circumstances surrounding any incident that has been notified to ONR. The expectation is that the report is furnished to ONR within 60 days of the incident. The follow-up report content is defined in G/INS/007 Issue 001 and includes identifying causes, consequences, corrective actions and lessons learnt, where appropriate. Central BST staff will record and process this information for strategic review and stakeholder engagement purposes.

5. References

1. Guidance on notifying or reporting incidents and events to ONR (G/INS/007 Issue 1)

APPENDIX 1 – ONR Incident Notification Form (INF1)

A version of the INF1 form that contains software providing lists and other helpful features is available by request to any of the advertised incident reporting contact points. These should be enabled in MS Word by selecting Tools – Macro – Security and selecting “Medium” from the options displayed.

Clicking [F1] in many fields will display help-text. There is a spell-check button at the top of the form.

APPENDIX 2 - Nuclear Incident Update Form - INF 2

Office for Nuclear Regulation
An agency of HSE

ONR Incident Report No

ONR Incident Update Form

This form provides further information in relation to an initial notification of an incident received by ONR. It is completed when incidents have met HSE/ONR Publication Criteria, which are identical to the Ministerial Reporting Criteria (MRC). Its purpose is to generate the text for inclusion in HSE/ONR Quarterly Statement of Nuclear Incidents at Nuclear Installations. The MRC and HSE/ONR Criteria can be found in ONR instruction INS/011.

Operator/Site:	Date of incident:
MRC/HSE Publication Criterion (a, b, c, d, e or f) has been met in respect of this incident. (Delete as appropriate).	

Text for inclusion in the quarterly statement is as follows:

(The bullet points below provide an aide-memoire on aspects to cover in the update report; overtype as necessary)

- A brief summary of the original incident or event, including personnel affected and any release of radioactive material.
- A comment in relation to why the event was not reported in the previous quarter, if applicable.
- A summary of the findings of the licensee's investigation.
- A summary of the findings from any HSE/ONR's investigation. .
- Commentary on the licensee's response and HSE/ONR involvement in the aftermath including any enforcement action taken.
- Indication of the INES rating and accompanying description, and whether it is a provisional or final rating. Put this statement in the context of the 7 point INES scale.
- Concluding or holding statement on HSE/ONR position e.g. content with licensee's response; investigating further; monitoring licensee's response etc.

Unit Head (SI):	Deputy Chief Inspector (DCI)
(Name in BLOCK CAPS)	(Name in BLOCK CAPS)

ANNEX 1 MINISTERIAL REPORTING CRITERIA (MRC)

MRC/HSE/ONR Publication Criteria	Description of Criteria
a	<p>Dangerous occurrences reportable under the Nuclear Installations (Dangerous Occurrences) Regulations 1965. Summary of occurrences from Regulation No 3 are as follows:-</p> <p>3(a) any occurrence on a licensed site involving the emission of ionising radiations or the release of radioactive or toxic substances, causing or likely to cause death, or serious injury, on or off the site.</p> <p>3(b) any occurrences during transport causing or likely to cause death or serious injury or the breach of containment of a transport package.</p> <p>3(c) any explosion or fire on a licensed site affecting or likely to affect the safe working or safe condition of the nuclear installation.</p> <p>3(d) any uncontrolled criticality excursion.</p>
b	Confirmed exposure to radiation of individuals which exceed or are expected to exceed, the dose limits specified in Schedule 4 to the Ionising Radiation Regulations (IRRs) 1999.
c	Examination, inspection, maintenance, test or operation of any part of the plant revealing that the safe operation or condition of the plant may be significantly affected.
d	A confirmed breach of, or discharge expected to breach quantitative limits of a Certificate of Authorisation for the disposal of radioactive waste issued under the Environmental Permitting Regulations 2010 or Radioactive Substances Act 1993.
e	Abnormal occurrences leading to a confirmed release to atmosphere or spillage of a radioactive substance which exceeds or is expected to exceed, the limits set out in Column 4 of Schedule 8 to the IRRs 1999, except where the release is in a manner specified in an Authorisation under the Environmental Permitting Regulation 2010 or Radioactive Substances Act 1993.
f	Abnormal occurrences leading to a release or suspected release or spread of radioactivity, on or off site, which requires special action or special investigation by the Operator.

Note: Further information is provided on the above criteria in the document: Guidance on notifying or reporting incidents and events to ONR (G/INS/007 Issue).

ANNEX 2 - ONR NUCLEAR AND RADIOLOGICAL INCIDENT/EVENT

FOLLOW-UP CRITERIA

The sections below set out criteria aimed at guiding ONR Unit Heads and site inspectors in considering what action to take in response to notification of an incident occurring on the site with nuclear or radiological significance.

A. Incidents periodically notified to ONR inspectors.

Where inspectors receive notifications of incidents NOT falling into the categories B-D below, they should ensure that the licensee has addressed the matters raised in accordance with the arrangements made under LC7, and appropriate action in the interests of safety has been taken.

B. All incidents or events that:

- Are rated on the INES scale at Level 1 or above by the licensee, whether deemed provisional or final; or
- Are deemed to meet the Ministerial Reporting Criteria/HSE Publication Criteria (see Annex 1).

These events should be subject to a preliminary investigation on site by an ONR inspector, with the outcome being recorded in their associated report.

C. Any incident or event; where it is immediately evident or where initial enquiries or a preliminary investigation of the circumstances surrounding the incident reveal that: -

- There appears to be a significant challenge, or potentially significant challenge, to nuclear safety;
- It appears there was, or could have been a significant breach of nuclear site licence conditions or other relevant statutory provisions;
- There has been, or there was potential for, a release of radioactivity above, or that approached, the statutory reporting limits;
- There has been, or there was potential for a dose to an individual or group above, or that approached, the statutory dose limits;
- The licensee had acted knowingly in not taking conservative action; or
- There have been a number of incidents that have the same apparent cause.

These events should be the subject of a more formal investigation by ONR and a specific investigation report should be produced.

D. Incidents that do not fall within the above criteria, but give rise to political or public concern, could be subject to investigation and might also result in production of an investigation report as necessary.

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Office for Nuclear Regulation
An agency of HSE

ONR Incident Report No

ONR Incident Update Form

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Operator/Site:	Date of incident:
MRC/HSE Publication Criterion (a, b, c, d, e or f) has been met in respect of this incident. (Delete as appropriate).	

Text for inclusion in the quarterly statement is as follows:

(The bullet points below provide an aide-memoire on aspects to cover in the update report; overtype as necessary)

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- A summary of the findings of the licensee's investigation.
- A summary of the findings from any HSE/ONR's investigation. .
- Commentary on the licensee's response and HSE/ONR involvement in the aftermath including any enforcement action taken.
- Indication of the INES rating and accompanying description, and whether it is a provisional or final rating. Put this statement in the context of the 7 point INES scale.
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Note: Further information is provided on the above criteria in the document: Guidance on notifying or reporting incidents and events to ONR (G/INS/007 Issue).

ANNEX 2 - ONR NUCLEAR AND RADIOLOGICAL INCIDENT/EVENT FOLLOW-UP CRITERIA

The sections below set out criteria aimed at guiding ONR Unit Heads and site inspectors in considering what action to take in response to notification of an incident occurring on the site with nuclear or radiological significance.

A. Incidents periodically notified to ONR inspectors.

Where inspectors receive notifications of incidents NOT falling into the categories B-D below, they should ensure that the licensee has addressed the matters raised in accordance with the arrangements made under LC7, and appropriate action in the interests of safety has been taken.

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These events should be subject to a preliminary investigation on site by an ONR inspector, with the outcome being recorded in their associated report.

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- There appears to be a significant challenge, or potentially significant challenge, to nuclear safety;
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