| NUCLEAR SAFETY DIRECTORATE - BUSINESS MANAGEMENT SYSTEM | | |
|---|---|---|
| **TECHNICAL INSPECTION GUIDE**<br>**GUIDANCE: LC25 OPERATING RECORDS** | | **T/INS/025** |
| | | ISSUE 001 |
| Approved By: *S L Creswell* | S L Creswell | Issue Date: 24/01/05 |
| Open Government Status: Fully Open | | Review Date: 31/12/10 |

## 1. Purpose & Scope

1.1 The purpose of this guidance is to facilitate a consistent approach to LC 25 compliance inspection and to provide assistance to inspectors carrying out their duties in this area. The guidance should not be regarded as either comprehensive or mandatory.

1.2 The guidance provided is split into four main elements:

1) Purpose of the Licence Condition

2) Guidance on arrangements for LC 25.

3) Guidance on inspection of arrangements.

4) Guidance on inspection of implementation of arrangements.

## 2. Licence Condition

## LICENCE CONDITION 25: OPERATIONAL RECORDS.

25 (1). The licensee shall ensure that adequate records are made of the operation, inspection and maintenance of any plant which may affect safety.

25 (2). The aforesaid records shall include records of the amount and location of all radioactive material, including nuclear fuel and radioactive waste, used and processed, stored or accumulated upon the site at any time.

25 (3). The licensee shall record such additional particulars as the Executive may specify.

25 (4). The licensee shall furnish to the Executive such copies of extracts from such records as the Executive may specify.

## 3. Purpose of Licence Condition 25.

3.1 Compliance with LC 25 ensures that the licensee makes records of what happened on the plant, checks on safety related parameters and plant configuration, what was found as a result of inspection and what work was done to repair, service or refurbish equipment. The breadth of the requirement comes from the LC1 definition of operations. These records, which are required to be retained (preserved) by LC 6, can be used by the licensee to demonstrate and by NII to check compliance with licence conditions or other legal requirements The records are also important sources of information in any investigation and could be used in evidence to support (or defend) a prosecution.

3.2 The requirement to keep records of the amount and location of any radioactive material (including fuel and waste) is needed to track and account for such material, so that the nature and location of radioactive material is at all times known. The information may also be required in connection with LC 5 (Consignment of Nuclear Matter)

3.3 LC25 (3) & (4) empower NII to require additional records to be kept, and be provided with copies of any records we require.

## 4. Guidance on procedures for LC 25.

4.1 This licence condition does not formally require the licensee to make and implement adequate procedures, but to effectively comply with this condition we would expect the licensee to have established procedures or procedures to identify the records to be kept, the period of retention and the persons responsible for its implementation. Such arrangements or procedures, which will help demonstrate compliance with the condition, should address all the licence condition requirements

4.2 The procedures should ensure that records cover all 'operations' as defined in LC1 and the quantity and location of any radioactive material, including nuclear fuel and radioactive waste used, processed, stored or accumulated on site.

4.3 The procedures should clearly identify which records are being kept to comply with or demonstrate compliance with this or other licence conditions. This may be conveniently be achieved by producing a schedule of records which should

define, inter alia, retention periods. Retention periods start when a record ceases to be current or live, and are required by LCs 5 & 6 to be at least 30 or 50 years unless a shorter period has been approved by HSE.

4.4 The priocedures should specify the permissible form in which the records may be kept e.g. hard copy, microfiche, electronic etc., together with methods to ensure their integrity and future accessibility.

4.5 The procedures should ensure that the persons responsible for compliance with this condition are identified, and require that those controlling and supervising the making, reviewing and retention of these records are suitably qualified and experienced.

4.6 The procedures should recognise the need for the licensee to respond to any LC25 (3) or (4) Specification from the Executive and identify the person responsible for making any necessary changes to the arrangements.

**5. Guidance on inspection of procedures for LC 25.**

5.1 Confirm that the procedures are "in ticket" with the QMS, adequately reflect the current organisation and define responsibilities for ensuring compliance with the licence condition.

5.2 Check that the scope of the procedures covers all 'operations' as defined in LC1 and the quantity and location of any radioactive material, including nuclear fuel and radioactive waste used, processed, stored or accumulated on site, and that responsibilities for making, managing and retaining records are defined.

5.3 Confirm that there is a schedule or list of records, that it is consistent with LC 5 & 6 arrangements with respect to retention periods, and that the form in which records are kept (eg, hard copy, microfiche, electronic etc. together with methods to ensure legibility and future access) are defined. Confirm that the retention period begins when the record ceases to be "current" or "live", and that any periods shorter than those specified in LC 5 & 6 have been approved by the executive. Check that the procedures clearly identify the person responsible for creating the records defined in the schedule or list.

5.4 Confirm that procedures exist to respond to extant LC25 (3) or (4) specifications or to establish arrangements if required.

**6. Guidance on inspection of implementation of procedures for LC 25.**

6.1 Check that the persons responsible for compliance with this condition are aware of their appointment and the requirements of this condition, and that they are SQEP for those duties.

6.2 Safety related records typically include plant operational logs kept by managers and supervisors and records of checks on safety related parameters and plant configuration. They also include records such as maintenance schedule actions and the results of that work, records associated other maintenance activities and documents such as permits to work which define the means by which safe working conditions are achieved.

Inspectors should satisfy themselves as to the adequacy of the range of records being kept on the site and in doing that may find the following indicative list helpful:

(a) operational logs (e.g. shift managers' / charge engineers' and supervisors' logs, desk logs, refuelling area log, ponds log, radwaste area log and building logs etc depending on site or plant);

(b) records required to demonstrate compliance with Operating Rules or Tech Specs;

(c) records of the state or configuration of the plant including any necessary safety mechanisms, devices or circuits;

(d) records to show the status of any maintenance, inspection, modification, test, or other safety related work in progress;

(e) records required to demonstrate compliance with the maintenance schedule;

(f) clearance, confined space and permit to work certificates, approved schemes of work etc;

(g) records of events, incidents and near misses relevant to safety.

6.3 In addition to the above, inspectors should check that records are being kept of the type, quantity and location of all radioactive material used, processed, stored or accumulated on site, including nuclear fuel and radioactive waste.

6.4 Check that a system is in place that ensures the production, review and storage of the records and that they are readily available for inspection:

6.5 When inspecting records, particular attention should be given to the following

(a) Operational Records.
(i) possible breaches of operating rules or instructions;
(ii) repetitive or standing alarms;
(iii) plant failures, especially to danger;
(iv) plant failures following maintenance;
(v) repetitive or long standing plant failures;
(vi) external events, eg grid problems, services & supplies;
(vii) radiological events;
(viii) operational difficulties;
(ix) staffing problems; and
(x) comments that are unclear.

If problems are identified, or there are entries not easily understood, discuss with relevant managers, engineers or supervisors. Note that any substantial follow up action should be completed as reactive inspection under the relevant licence condition or other legislation;

(b) Maintenance Records:

Focussing on plant or activities linked to nuclear safety or statutory requirements, look for reports of:

(i) failure to danger, unrevealed or repetitive failure, or failure with unexpected or potentially adverse consequences;
(ii) problems with the programming or scheduling of safety related work;
(iii) lack of, or incorrect, spares;
(iv) staffing problems, eg. shortages, training gaps etc;
(v) availability of alternative plant or equipment;
(vi) failure to maintain according to MITS or statutory requirements.

If problems are discovered or exceptions to MITS requirements identified, discuss such entries with the relevant engineers. Plant which cannot be maintained according to the MITS should be declared unavailable unless or until an extension to the maintenance interval has been agreed. This may, depending on the extent of MITS approval, require NII agreement. Note, any substantial follow up action of the above points should be completed as reactive inspection under the relevant licence condition or other legislation.

(c) Incident or Event Records.

Check that events and incidents known to you (eg from discussions with staff or inspection of logs) have been included in the records. Discuss a number of events (selected for potential safety significance or other relevant reason) with the person responsible for keeping these records and check the completion status of the actions. Note, significant follow up action for concerns arising from this inspection should be completed as reactive inspection under LC7.

(d) Records of Current and Prospective Modifications .

Review the register, looking in particular at any new entries since the last inspection, and consider the following:

(i) Does the safety category seem reasonable? Check by sampling the information available to confirm that the detail is sufficient to allow a preliminary categorisation and that the category seems right;

(ii) Does the safety or regulatory significance, or apparent urgency seem such that further inquiries and/or consultation with colleagues is warranted?

Further follow-up action, or more detailed inspection may need to be carried out in accordance with LC 22 guidance.

6.6 Check locally held previous logs or other records and confirm that they are being adequately stored pending archiving or central storage, and that local holdings of records are consistent with the arrangements for LC 25 or LC 6.