



Horizon Nuclear Power Services Limited
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Wales Permitting Service,
Natural Resources Wales,
Cambria House,
29 Newport Road,
Cardiff.
CF24 0TP

Date 27th September 2018

FAO: Llinos Owen

Senior Permitting Officer (RSR and Regulated Industry)

DCRM Ref. No: WYN-HZSL-RI-LET-00031

Unique Number: HNP30153

Dear Mr Owen,

Re: Schedule 5 Notice S5N-RSR-003

I acknowledge receipt of NRW letter dated 31st July 2018 covering a Schedule 5 Notice on the application EPR/EB3393NE/A001, this has been recorded as S5N-RSR-003 for Horizon purposes. Horizon has given due consideration to the requests raised and the associated expectations identified in the attachment to your letter. Horizon proposes to respond to the requests by undertaking the work set out in the resolution plan which is attached as Appendix 1 to this letter. We will be tracking progress of completion of the work against the timetable set down at Appendix 1 and will continue to engage with your nominated Inspector through routine Level 4 meetings.

The Director accountable for resolution of these requests is Rabih Hafez, Project Planning Director and the nominated point of contact is Neil Burke, Head of Project Development. Please do not hesitate to contact me if you have any questions or comments.

A handwritten signature in blue ink, appearing to read "Barrie Cran".

Barrie Cran

Head of Nuclear Oversight and Regulatory Affairs

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APPENDIX 1 – RESOLUTION PLAN FOR SCHEDULE 5 NOTICE SSN-RSR-003

Request Number	Topic	NRW			Horizon	
		What is the request?	What is the impact?	What is the solution?	Approach to NRW Request	Responsible Person
1	Management arrangements for permit compliance	Horizon has not submitted a credible plan to deliver the remaining permit compliance arrangements ahead of radioactive substances activities commencing.	NRW are unable to complete the permit application assessment without evidence that Horizon have identified and made plans for the development of the remaining management arrangements necessary to achieve permit compliance. This plan must address the period up to commencement of radioactive substance activities.	HNP shall provide a credible plan for the development and delivery of its remaining management arrangements for permit compliance up to commencement of radioactive substance activities. The plan shall identify the remaining compliance arrangements that need to be developed before radioactive substance activities can commence. Proposed timescales for the delivery of these arrangements shall be included. The plan will be subject to control and governance under Horizon's management system.	1) Review of existing Horizon documentation covering PC compliance and implementation plans, to identify key information to be included in discrete plan as required in request 1. 2) Draft document detailing the anticipated suite of PC compliance arrangements and plan to deliver remaining PC compliance arrangements (by end September 2018). 3) Review and update of document for issue (end October 2018).	Mel Hughes

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NRW				Horizon			
Request Number	Topic	What is the request?	What is the impact?	What is the solution?	Due Date	Approach to NRW Request	Responsible Person
2	Proposed new main steam turbine	HNP have indicated they intend to change the type of steam turbine to be used. The proposed change could alter the volume and nature of radioactive wastes generated from the turbine as described in the EP-RSR permit application. Further information is therefore required.	The materials used in the proposed new steam turbine may result in different arisings of operational and decommissioning solid radioactive wastes. The routes, magnitude, speciation, and impact of gaseous and liquid radioactive wastes arising from the new steam turbine system may be different from those previously modelled for the Generic Design Assessment (GDA) and subsequent EPR-RS permit application. These issues could prejudice: • The volumes, speciation, and radioactivity of wastes requiring disposal under the permit as stated in the application. • The impact assessment and discharge limits applied for in the application. • The Best Available Technique (BAT) case submitted as part of the application.	HNP shall provide: 1. A report substantiating the expected operational and decommissioning solid radioactive wastes arising from the proposed alternate design of steam turbine. 2. A report identifying the paths by which radioactive species, entrained in or part of steam losses, or separately liquid losses from the proposed new steam turbine design may reach the environment. This report shall confirm (or otherwise) that the limits applied for in the EPR-RS application remain valid. 3. A report that demonstrates that the discharges and impacts from the proposed new steam turbine represent BAT.	By 28th February 2019	1) Identify key additional information requirements from GE; communicate these to GE via appropriate commercial channel; receive information. (end September 2018) 2) Identify parts of the configured design affected by turbine design change and develop a plan for updating the design configuration if appropriate. (end sep 2018) 3) Draft documents to present requirements 1-3 in column 5 (End Dec 2018) 4) submit final documents to NRW (End Feb 2019)	Chloe Gamble

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