



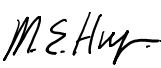
RSR Management Arrangements – Plan for Compliance Arrangements

Report

Document Number: HNP-TEC-DA-REP-00006

Revision:1.0

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Revision History				
Date	Rev No.	Summary of Changes	Ref Section	Purpose of Issue
24/09/18	0.1			Review of 1 st Draft
20/10/18	0.2	Address verification comments		
25/10/18	1.0	Final		Submission to NRW

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1 Introduction

Horizon Nuclear Power Wylfa Limited (Horizon) has submitted an application for an environmental permit for the disposal of radioactive waste (EP-RSR permit) from the proposed new nuclear power station (Power Station) at the Wylfa Newydd site [RD1]. Natural Resources Wales (NRW) is currently in the process of determining this application.

As part of the application [RD1] information was provided about Horizon's management systems and the arrangements that will enable compliance with the EP-RSR permit and provide a high standard of environmental performance. The application noted that many of the arrangements required to help ensure compliance with the EP-RSR permit were not fully developed at the time of submission, as a phased approach was to be adopted for the development of the remaining management arrangements required before commencement of radioactive substance activities at the Power Station.

As part of NRW's determination process, a Schedule 5 request [RD2] has been issued to Horizon asking for more detailed information on how the remaining management arrangements will be delivered.

1.1 Purpose

The purpose of this Report is to provide NRW with a plan for the development and delivery of Horizon's remaining management arrangements for permit compliance up to commencement of radioactive substance activities.

This Report will be provided to NRW in response to the Schedule 5 request.

1.2 Scope

1.2.1 Within Scope

This Report covers the following:

- The development of compliance arrangements required prior to commencement of radioactive substance activities. This Report has considered the main 'generic' permit conditions [RD3]
- Schedule for delivery of compliance arrangements

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2 RSR Compliance Arrangements

As a prospective holder of an EP-RSR permit, Horizon is required to have an effective, written management system in place to achieve compliance with the conditions of the EP-RSR permit. Horizon is currently operating an effective management system that covers many of the areas required to aid compliance with an EP-RSR permit.

The following sub sections provide a summary of the existing arrangements in place for the current phase of the Wylfa Newydd project, and information on when nuclear matter is expected to be brought on to the Power Station site.

Note – Horizon is currently preparing to ‘roll out’ a new management system (HMS2) it is likely that this will have some impact on the naming and hierarchy of the arrangements proposed in this document.

2.1 RSR Arrangements – Overview

Many of the arrangements currently in place within the HMS cover topics across the different departments within Horizon (i.e. not specific to the disposal and management of radioactive waste). These are typically associated with Parts 1 and 4 of the ‘generic’ EP-RSR permit and cover areas such as training, records management, assurance, regulatory affairs, and commercial and project planning. The Permit Compliance Matrix [RD5] lists the current set of arrangements that relate to radioactive substances activities against the permit conditions typically included within a ‘generic’ EP-RSR permit. This compliance matrix [RD5] also covers future arrangements that have been identified by Horizon to assist with compliance prior to commencement of radioactive substance activities at the Power Station. Appendix A of this document provides a list of the arrangements and details whether they are ‘issued’, ‘in production’ or future arrangements described in this document.

The arrangements in place reflect the activities currently being undertaken in the Development Phase¹ of the Wylfa Newydd project. As the project develops in anticipation of radioactive substances activities commencing, the HMS will capture any changes to working practices on the Wylfa Newydd site which will initiate reviews of the existing arrangements by the relevant qualified experts. This will either lead to updates to existing arrangements, or the generation of new documentation.

2.2 Schedule for Nuclear Matter on the Wylfa Newydd site

The works at the Wylfa Newydd site in respect to nuclear matter can be broadly split into 2 clear phases; Pre-Active Commissioning, and Post-Active Commissioning.

¹ RD1 provides further information on the Lifecycle Phases associated with the development of the Wylfa Newydd site. Details of the revised dates associated with the Lifecycle Phases are provided in Appendix B.

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These phases are discussed below, and ultimately dictate the timings for the arrangements currently in place (see Section 3.1), and those proposed prior to the commencement of radioactive substance activities (see Section 3.2)

Pre-Active Commissioning

During this phase the risk of generating radioactive waste for disposal is low and expected to be limited to the potential discovery of radiological contamination [RD6]. Contractors will use radioactive sources during this phase of works, particularly radiography sources in the form of High Activity Sealed Sources (HASS), however, any arrangements for the use and disposal of such sources will be managed by the contractor in compliance with their own Sealed Source Permits.

Post-Active Commissioning

Following commencement of Post-Active Commissioning, there will a significant change in the use of radioactive sources on the Wylfa Newydd site. This will include the use of High-activity Sealed Sources (HASS), and fuel being brought onto the site. Figure 1 below provides an indication of when sources will be brought onto site, and therefore impact the generation of radioactive waste from the site.

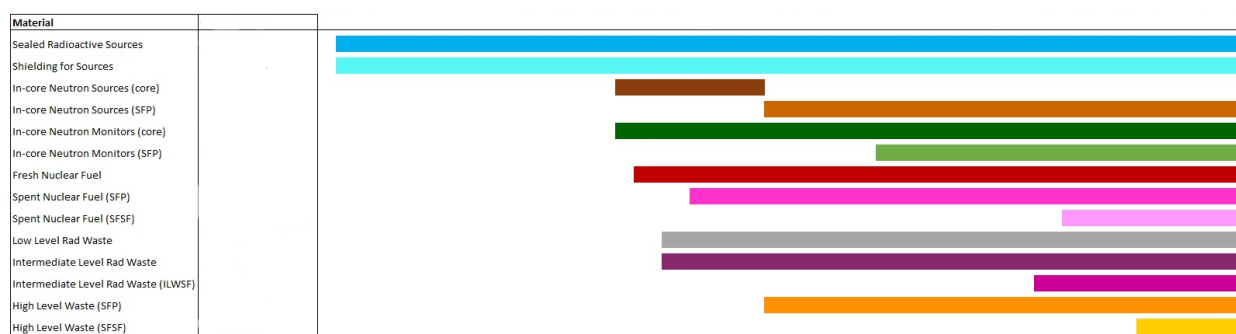


Figure 1: Nuclear Matter Usage on the WN site [Ref. RD4,6]

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3 RSR Compliance – Main Arrangements

Section 2.1 provides a summary of the key documentation being operated within the HMS that is linked to Parts 1 and 4 of the ‘generic’ EP-RSR permit. In addition to these, arrangements are currently in place for the activities being carried out in the Development Phase that are associated with the on-going design of the Power Station. These activities in the main relate to Parts 2 and 3 of the ‘generic’ EP-RSR permit.

The arrangements in place for the current Development Phase will be updated as the design of the Power Station progresses. Section 3.1 provides details on issued PSDs which cover advice on radioactive waste issues and the design of the Power Station.

Further to the PSDs that are already in place to satisfy Parts 2 and 3 of the ‘generic’ EP-RSR permit, additional work is required to produce and implement arrangements required prior to the commencement of radioactive substance activities at the Power Station. Section 3.2 provides a summary of the PSDs that have been identified for production and implementation prior to active commissioning.

In summary, the arrangements discussed in Sections 3.1 and 3.2 have been identified by Horizon as those required to deliver permit compliance before and after commencement of radioactive substance activities at the Power Station. These arrangements will be supported by site based procedures (i.e. operating instructions (OI)) for operation of the plant. An overview of the process in place for the production of the OIs is discussed in Section 3.3.

3.1 RSR Main Compliance Arrangements – Current

As detailed above, a set of arrangements are already in place which are deemed to be proportionate for the activities currently being undertaken in the Development Stage and to manage activities currently underway at the Wylfa Newydd site. Below is a summary of the documentation most relevant to ensuring that activities are appropriately managed in anticipation of radioactive substances activities commencing.

3.1.1 RWA Corporate Arrangements

To support design decisions and design development that has the potential to impact on radioactive waste, Horizon has been required to provide advice from suitably qualified individuals (i.e. Radioactive Waste Advisors (RWA)). Considering this, Corporate RWA Arrangements have been in place since 2015 which included the operation of a shadow Corporate RWA Body.

3.1.1.1 Corporate RWA Arrangements HG-M-05-PSD-02-962

The purpose of this process system description (PSD) document [RD8] and the underpinning procedures is to define Horizon’s Corporate Arrangements, demonstrating that:

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- Individuals appointed to the Corporate RWA Body can collectively demonstrate, in sufficient numbers, competency in all aspects of the *Environment Agencies' RWA Syllabus* [RD9];
- RWAs appointed to the Corporate RWA Body are “suitable” to provide the appropriate level and scope of advice required by the Horizon business; and
- Advice provided by the Corporate RWA Body is technically correct, consistent and formal and compelling advice is traceable to a suitable RWA.

Corporate Arrangements defined within this document have been developed prior to Horizon being granted an EP-RSR Permit. This is primarily for the purpose of ensuring appropriate advice is provided in Best Available Techniques (BAT) assessments and design decision making processes.

3.1.1.2 Corporate RWA Body Membership HG-M-05-PRC-03-963

The purpose of this document [RD10] is to define the process implemented by Horizon for the nomination, assessment and authorisation of individuals in the role of ‘Member of the Corporate Radioactive Waste Adviser Body’ (termed “Member of the Corporate RWA Body”).

This procedure also defines the process for re-authorising an individual in the role of ‘Member of the Corporate RWA Body’, ensuring an individual’s knowledge and experience is maintained and developed through continued professional development.

Finally, this document defines the process for removal of authorisation, if appropriate.

3.1.1.3 Corporate RWA Provision of Advice HG-M-05-PRC-03-1212

This procedure [RD11] defines the process for requesting and providing advice from Horizon’s Corporate RWA Body, including the way in which:

- Advice is requested from the Corporate RWA Body.
- A request for advice is processed by the Corporate RWA Body.
- Advice is distributed from the Corporate RWA Body to the requesting body.
- Advice provided by the Corporate RWA Body is recorded as required.

3.1.1.4 Corporate RWA and RPA Committee Terms of Reference HG-M-02-TOR-02-965

These Terms of Reference (ToR) [RD12] define how the Corporate RWA and RPA Committee shall operate, in accordance with:

- RWA Corporate Arrangements [RD13]
- RPA Corporate Arrangements [RD14]

An application for “corporate RWA status” has been submitted to the RWA Approval Board for consideration. Following confirmation of certification, the RWA Corporate Arrangements will be updated.

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3.1.2 Maintain Design Integrity

Maintain Design Integrity PSD [RD15] is written to provide “sign posting” to the management arrangements set out by Horizon that define how Horizon, as the future Site Licence Company (SLC), will ensure that the “design intent” is established and that “design integrity” will be maintained throughout the life of the plant.

A summary of the main arrangements in place for the design integrity of the Power Station, in relation to the management and disposal of radioactive waste, is provided below.

3.1.2.1 Configuration identification

The *Configuration Identification* [RD16] process describes the steps to be undertaken to identify and structure the WN Power Station’s Configuration Items (CIs) and Facility Configuration Information (FCI). This is carried out to form the basis to systematically review and Accept the design through Configuration Changes.

3.1.2.2 Configuration change

The *Configuration Change (inc. Design Change)* [RD27] process describes the steps to be undertaken to manage configuration changes to the Horizon configuration baselines. This is inclusive of changes for Horizon to Accept deliverables and establish a configuration baseline for the first time, and then to control changes to that Accepted baseline thereafter.

3.1.2.3 Configuration change categorisation

The *Configuration Change Categorisation* [RD28] procedure describes the steps to be undertaken to categorise configuration changes within the *Configuration Change Control (Inc. Design Change)* [RD27] process. It is to be used to assign an appropriate category based on the unmitigated consequences if the change were inadequately conceived or executed.

3.1.2.4 Optioneering

The *Optioneering* [RD18] procedure requires an optioneering study to be carried out when there is a need to inform, underpin and record a decision making process. An optioneering study aims to identify a number of options and comparatively assess them in a manner that is logical, objective, consistent, transparent and robust.

3.1.2.5 BAT Management Arrangements

Horizon has developed management arrangements to direct and instruct the application, demonstration and implementation of BAT. The Management of EP-RSR BAT PSD [RD19] is a management arrangement that sets out the activities that Horizon must undertake to demonstrate EP-RSR BAT. Supporting the PSD are the following three procedures:

- EP-RSR BAT Evidence Management procedure [RD20] – This procedure instructs on the approach to collecting, evaluating and assessing Evidence used to support the development and substantiation of BAT arguments;

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- EP-RSR BAT Case Amendment Management procedure [RD21] – This procedure instructs on the approach for identifying changes impacting upon the Wylfa Newydd BAT Case and the process of amending the Wylfa Newydd BAT Case; and

Horizon's application for an EP-RSR permit was supported by the Wylfa Newydd BAT Case [RD22]. As the design of the Wylfa Newydd plant develops, the above named arrangements will be updated and implemented leading to future revisions of the Wylfa Newydd BAT Case.

The key design parameters included within the EP-RSR application have been configured within the operational permits configuration document [RD17]. The information presented within will form the design reference for the EP applications. As such, the developing design will be routinely assessed against the parameters within the configuration document and EP applications, and any updates to the information contained will be in accordance with the Config change process [RD27].

3.1.2.6 Environmental Structures, Systems and Components (eSSC)

The eSSC Company Practice [RD23] is currently being drafted and when issued will describe the approach for developing Environmental Functional Requirements (EFRs) and managing eSSC at the Power Station. The Manual supports the implementation of Horizon's Categorisation and Classification Strategy [RD24] and the accomplishment of the Strategy's objective to develop an integrated and compatible system for categorising the importance of safety, environmental and security functions identified at the Power Station.

3.1.3 Response to Discovery of Radiological Contamination

The risk of discovering radiological contamination during site works at Wylfa Newydd is considered to be low. However, the risk cannot be excluded and adequate arrangements need to document the set of actions that must be taken by Horizon both in the immediate and long term should this event occur.

The Manage Events & Emergencies at Wylfa Newydd procedure [RD25] supported by the Response to Discovery of Radiological Contamination procedure [RD7] describes the arrangements and the set of actions to ensure that Horizon fulfils its general duties to restrict exposure of workers to ionising radiation under the Ionising Radiation Regulations 2017 (IRR17) and minimise the spread of radiological contamination and control the generation and disposal of waste in compliance with the Environmental Permitting (England and Wales) Regulations 2016 (As amended) (EPR16).

3.1.4 Control of Radioactive Substances

Under the nuclear matter strategy [RD6], Horizon has developed a suite of arrangements to control the receipt, storage and consignment of nuclear matter. Influenced by the type of nuclear matter expected at Wylfa site, the strategy is divided into a near term and a long term strategy. The near term one is concerned with the control of radioactive sources including any associated shielding material where such material is nuclear matter, eg; depleted uranium. The two key documents that form part of the arrangements are the Control of Nuclear Matter PSD [RD29] and the Control of Radioactive Substances procedure [RD30]. The latter document

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ensures that no radioactive substance is brought to site without adequate arrangements for their control and that appropriate records are made and retained.

3.1.5 Schedule management

The Schedule Management Procedure [RD26] sets out the basis for maintaining the Schedule Performance Measurement Baseline (PMB). The Schedule PMB is the Integrated Schedule that contains all the packages of scope required to deliver the Wylfa Newydd Power Station. The RSR management arrangements delivery schedule included within Appendix B will be incorporated into the Technical programme level 3 schedule and therefore subject to the quality arrangements documented in the schedule management procedure. Inclusion in the Technical programme level 3 schedule level 3 will ensure delivery and that the appropriate resources are identified to deliver the work.

3.2 RSR Main Compliance Arrangements – Future

The remaining management arrangements required by Horizon prior to the commencement of radioactive substance activities will be developed in accordance with the HMS. This will include individual Management System Document Specifications (MSDS) being produced for each of the PSDs identified to help address the remaining compliance arrangements.

Under each PSD there will be a detailed set of arrangements, which in turn will have procedures underneath the arrangements. The MSDS will set the scene for the PSDs associated with the management and disposal of radioactive waste through highlighting key elements that will need to be considered and captured in the associated management arrangements. In addition to the radwaste and disposal PSDs, Operating Instructions (See Section 3.3) and maintenance arrangements [RD31] will also be developed.

During the Development and the Construction Phases, arrangements for the PSDs named below will be proportionate for the activities currently being undertaken in the Development Stage and to manage activities currently underway at the Wylfa Newydd site. In the Commissioning Phase, these arrangements will be further developed and implemented to support active commissioning and operations.

Appendix B details the timings for the production and implementation of the PSDs and their associated Arrangement documents discussed in the sub-sections below.

3.2.1 Management of Radioactive Waste & Spent Fuel

3.2.1.1 PSD

The Management of Radioactive Waste & Spent Fuel PSD will cover a wide range of management arrangements associated with solid and liquid radioactive waste, as well as spent fuel. Solid waste arrangements will cover the storage of waste (raw and packaged), processing (treatment and packaging), characterisation (sampling, analysis, activity assessment, inventory, and disposal). Liquid waste arrangements will cover storage, processing, and sampling.

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3.2.1.2 Arrangements

Following issuing of the Management of Radioactive Waste & Spent Fuel PSD, the arrangements detailed below will be produced:

- Arrangements for Liquid Effluent Management;
- Arrangements for Lower Activity Waste;
- Arrangements for Higher Activity Waste;
- Arrangements for Radwaste Storage;
- Arrangements for Radwaste Characterisation; and
- Radwaste Quality Management System Arrangements.

3.2.1.3 Relevant Permit conditions

The permit conditions that are associated with the Management of Radioactive Waste & Spent Fuel PSD, and the arrangements that sit underneath it, are detailed in Table 1.

Relevant Part of the EP-RSR Permit	Permit Conditions associated with the Management of Radioactive Waste & Spent Fuel PSD
Part 2 – Management	2.3.1, 2.3.2 (a, b, c), 2.3.3 (a, b, c), 2.5.2, 2.6.1, 2.6.2
Part 3 – Disposals of radioactive waste and monitoring	3.1.1, 3.1.2, 3.1.3, 3.1.4 (a & b), 3.1.5, 3.1.6 (a, b, c), 3.1.7 (a & b), 3.1.8, 3.2.1 (a, c, d), 3.2.2, 3.2.3, 3.2.4, 3.2.5 (a & b)
Part 4 – Information	4.1.1 (a, b, c, d), 4.1.2, 4.2.2, 4.3.6 (a & b), 4.3.7 (a, b, c)

Table 1 Management of Radioactive Waste & Spent Fuel PSD – associated EP-RSR permit conditions

3.2.2 Management of Dangerous Goods Transport

3.2.2.1 PSD

Arrangements will be required to ensure that radioactive waste (including spent fuel at the point of disposal) and hazardous materials will be transported in a manner that ensures the safety of personal, plant, and the environment. In addition, such materials will need to be transported in a manner that is acceptable for future treatment and disposal.

The Management of Dangerous Goods Transport PSD will cover on-site and off-site transport arrangements covering the following areas:

- Radwaste – on-site movement for Low Level Waste (LLW) and Intermediate Level Waste (ILW), dispatch of LLW for off-site disposal;
- Radioactive – samples; on-site movement, consignment off-site;
- Clean fuel – receipt and on-site movement;
- Spent fuel – movement on-site;

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- Radioactive sources – receipt, dispatch and on-site movement; and
- Hazardous Material – including waste; receipt, dispatch and on-site movement.

3.2.2.2 Arrangements

Following issuing of the Management of Dangerous Goods Transport PSD, the following arrangements will be produced:

- Arrangements for off-site transport of rad (class7) materials;
- Arrangements for off-site transport of hazardous materials;
- Arrangements for on-site movement of rad (class7) materials; and
- Arrangements for on-site movement of hazardous materials.

3.2.2.3 Relevant Permit conditions

The permit conditions that are associated with the Management of Dangerous Goods Transport PSD, and the arrangements that sit underneath it, are detailed in Table 2.

Relevant Part of the EP-RSR Permit	Permit Conditions associated with the Management of Dangerous Goods Transport PSD
Part 2 – Management	2.3.2 (b & c), 2.3.3 (b), 2.6.1, 2.6.2
Part 3 – Disposals of radioactive waste and monitoring	3.1.3, 3.1.4 (a & b), 3.1.5, 3.1.6 (a, b, c), 3.1.7 (a & b), 3.1.8, 3.2.5 (b)
Part 4 – Information	4.1.1 (a, b, c, d), 4.1.2

Table 2 Management of Dangerous Goods Transport PSD – associated EP-RSR permit conditions

3.2.3 Management of Environmental Discharges

3.2.3.1 PSD

The Management of Environmental Discharges PSD will cover the management arrangements to control both radioactive and non-radioactive, aqueous and gaseous operational discharges. This will include operational control of discharges to the environment, sampling and monitoring techniques, and reporting requirements (including the returning of sampling and monitoring data to NRW). In addition, this PSD will also scope out the relevant information to be included a separate Sampling and Monitoring Techniques document; and arrangements necessary regarding Pollution Inventory and the Statutory Returns.

The arrangements named above will be generated in the Commissioning Phase and will be implemented to support active commissioning and operations.

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In Horizon's application for an EP-RSR permit [RD1], forward actions were made regarding environmental discharges and disposals of solid waste. These have been summarised below:

- FARSR – 3: Prepare a report which demonstrates that equipment and arrangements associated with environmental discharges and disposals from the Power Station are BAT;
- FARSR – 4: Prepare a report evaluating the requirement for in-process radiation monitoring as a means of demonstrating compliance with its EP-RSR permit, and will demonstrate that any in-process monitoring thus identified represents BAT;
- FARSR – 5: Establish radiation threshold levels for the Reactor Building (R/B) stack gaseous discharge monitoring system, above which an alarm will be triggered. In addition, develop response procedures to such an alarm; and
- FARSR – 6: Confirm the monitoring arrangements for the Service Building (S/B) HVAC discharge, as well as all other gaseous discharges outlets not assessed at GDA.

The Management of Environmental Monitoring PSD will detail a plan to address the forward actions named above.

3.2.3.2 Arrangements

Following issuing of the Management of Environment Discharges PSD, the following arrangements will be produced:

- Arrangements for aqueous discharges; and
- Arrangements for gaseous discharges.

3.2.3.3 Relevant Permit conditions

The permit conditions that are associated with the Management of Environment Discharges PSD, and the arrangements that sit underneath it, are detailed in Table 3.

Relevant Part of the EP-RSR Permit	Permit Conditions associated with the Management of Environment Discharges PSD
Part 3 – Disposals of radioactive waste and monitoring	3.1.8, 3.2.1 (a & d), 3.2.2, 3.2.3, 3.2.4, 3.2.5 (b), 3.2.6 (a & b)
Part 4 – Information	4.1.1 (a, b, c, d), 4.1.2, 4.2.2, 4.3.1 (b & c), 4.3.6, 4.3.7 (a, b, c)

Table 3 Management of Environment Discharges PSD – associated EP-RSR permit conditions

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3.2.4 Management of Environmental Monitoring

3.2.4.1 PSD

The Management of Environmental Monitoring PSD will cover arrangements for the environmental monitoring programme (to cover the offsite sampling and monitoring of discharges from the Power Station), and the requirements for statutory monitoring.

In Horizon's application for an EP-RSR permit [RD1], forward actions were made regarding environmental monitoring. These are as follows:

- FARSR – 7: Horizon will establish a radiological environmental baseline for the Power Station site and its surroundings; and
- FARSR – 8: Horizon will determine the BAT with which to monitor the environment and submit its findings to NRW.

The Management of Environmental Monitoring PSD will provide a plan to address the forward actions named above. The outputs of the plan will ultimately dictate the approach that Horizon will adopt with respect to environmental monitoring for the Power Station site and its surroundings.

The PSD will be issued towards the start of the Construction Phase.

3.2.4.2 Relevant Permit conditions

The permit conditions that are associated with the Management of Environmental Monitoring PSD, and the arrangements that sit underneath it, are detailed in Table 4.

Relevant Part of the EP-RSR Permit	Permit Conditions associated with the Management of Environment Discharges PSD
Part 3 – Disposals of radioactive waste and monitoring	3.2.1, 3.2.2, 3.2.3, 3.2.5, 3.2.6,
Part 4 – Information	4.1.1 (a, b, c, d), 4.1.2, 4.2.2, 4.3.1 (c)

Table 4 Management of Environmental Monitoring PSD – associated EP-RSR permit conditions

3.3 RSR Arrangements – Operating Instructions

A specific working group has been set up to support the delivery of Operating Instructions and to define how the programmes, processes and procedures in support of the 'Build the Utility' strategy will be achieved for Wylfa Newydd Nuclear Licenced Site, prior to the operational phase. Permit requirements are a significant proportion of this work programme and the arrangements detailed within this Report will be incorporated into the overall delivery strategy.

Radwaste and Environment Subject Matter Experts (SMEs) sit on working group for development of Operational Programmes and Processes and will be responsible for ensuring

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that any instructions are adequate from radioactive waste perspective. It should be noted that the production of the OIs is only for plant-based operations, and as such, is not related to the production of the PSDs discussed earlier in this Report.

4 Delivery of Arrangements

A programme for the delivery of future arrangements discussed in Section 3 is provided in Appendix B. The information provided within the Schedule will be tracked and carried forward into the project planning arrangements for the Wylfa Newydd site. The programme provides an indicative schedule for the delivery of the remaining RSR arrangements and therefore may be subject to change. Should this occur, then Horizon will communicate this to NRW via the appropriate level 4 topic stream meetings.

It should be noted that the timings associated with the Lifecycle Phases have changed from those presented in Horizon's application for an EP-RSR permit [RD1].

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REF. NO.	DOCUMENT NUMBER	TITLE
[RD1]	WN0908-HZCON-PAC-REP-00003.	Wylfa Newydd Project Radioactive Substances Regulation – Environmental Permit Application
[RD2]	EPR/EB3393NE/A001	NRW Schedule 5 Request 31 st July 2018
[RD3]	GEHO0812BUSS-E-E, 478_10	Environment Agency – How to comply with your environmental permit for radioactive substances on a nuclear licensed site
[RD4]	HNP-TEC-WD-REP-00001	Licence Conditions 32, 33, 34 and 35 - Plan for Compliance Arrangements
[RD5]	OD057-S5-NL-REP-00017	RSR Environmental Permit Compliance Matrix
[RD6]	HNP-S3-EWM-STR-00005	Management of Nuclear Matter Strategy and WorkPlan
[RD7]	HG-S-07-PRC-03-1408	Response to Discovery of Radiological Contamination
[RD8]	HG-M-05-PSD-02-962	RWA Corporate Body Arrangements
[RD9]	N/A	https://www.sepa.org.uk/media/36075/rwa-syllabus.pdf accessed 08/10/2018.
[RD10]	HG-M-05-PRC-03-963	Corporate RWA Body Membership
[RD11]	HG-M-05-PRC-03-1212	Corporate RWA Provision of Advice
[RD12]	HG-M-02-TOR-02-965	Corporate RWA and RPA Committee Terms of Reference
[RD13]	HG-M-05-PSD-02-962	RWA Corporate Arrangements
[RD14]	HG-M-05-PSD-02-1217	RPA Corporate Arrangements
[RD15]	HG-D-01-PSD-02-1247	Maintain Design Integrity PSD
[RD16]	HG-D-01-PRO-03-938	Configuration Identification
[RD17]	WN0908-HZCON-ENG-REP-00001	Operational Environmental Permits Configuration document
[RD18]	HG-D-01-PRC-02-795	Optioneering Procedure
[RD19]	HG-D-01-PSD-02-1241	Management of EP-RSR Best Available Techniques(BAT)
[RD20]	HG-D-01-PRC-03-1244	EP-RSR Best Available Techniques (BAT) Evidence Management

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[RD21]	HG-D-01-PRC-03-1242	EP-RSR Best Available Techniques (BAT) Case Amendment Management
[RD22]	HNP-S3-DA-REP-00013	Wylfa Newydd EP-RSR Best Available Techniques (BAT) Case
[RD23]	HG-D-01-CYP-02-1706	Environmental Structures, Systems, and Components (SSC) Company Practice [DRAFT]
[RD24]	HNW-S3-DAP-STR-00001	Strategy for Categorisation and Classification
[RD25]	HS-S-09-PRC-03-759	Manage Events & Emergencies at Wylfa Newydd procedure
[RD26]	HG-M-04-PRC-03-1442	Schedule management
[RD27]	HG-D-01-PRO-03-940	Configuration Change Control (inc. Design Change)
[RD28]	HG-D-01-PRC-03-1196	Configuration Change Categorisation
[RD29]	HG-D-03-PSD-02-1419	Control of nuclear matter PSD
[RD30]	HG-S-07-PRC-03-1554	Control of radioactive substances
[RD31]	HNP-HZOPS-OPS-STR-00003	EMIT Condition Compliance Strategy:

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Appendix A – RSR Arrangements

The tables below list the Horizon arrangements proposed against each part of the permit. Status of the arrangements are identified as either, 'Issued', 'In progress', or are future arrangements and reference is made the section of this document in which they are discussed.

Document Title	Document No	Status
Management System Manual	HG-M-02-MAN-01-02	Issued
Company Manual	HG-M-02-MAN-01-04	Issued
Management Prospectus	WD03.01.03-S5-NL-REP-00002	Issued
Competency Assessment	HG-S-02-PRC-03-946	Issued
Defining the Organisation	HG-S-02-PRC-03-1337	Issued
Nuclear Baseline	HG-S-02-PRC-03-1193	Issued
Management of Nuclear Baseline Change	HG-S-02-PRC-03-1165	Issued
Corporate RWA Body Membership	HG-M-05-PRC-03-963	Issued
Corporate RWA Arrangements	HG-M-05-PSD-02-962	Issued
Corporate RWA Provision of Advice	HG-M-05-PRC-03-1212	Issued
Corporate RWA and RPA Committee ToR	HG-M-02-TOR-02-965	Issued
Systematic Approach to Training	HG-S-02-PSD-02-274	Issued
Management of Records	HG-S-04-PSD-02-850	Issued
Document Control	HG-S-04-PSD-02-335	Issued
Health & Safety Management	HG-S-06-PSD-02-176	Issued
Environmental Management Manual	HG-S-07-MAN-02-1374	Issued
Handling Safety Health & Environmental Communications	HG-S-RC-03-314	Issued

Table A6 Horizon Arrangements for EP-RSR Permit Part 1

Document Title	Document No	Status
Corporate RWA Provision of Advice	HG-M-05-PRC-03-1212	Issued
Competency Assessment	HG-S-02-PRC-03-946	Issued
Control of Nuclear Matter PSD	HG-D-03-PSD-02-1419	Issued
Hold Point Control Process	HG-M-04-PSD-02-1216	Issued
Operating Instructions	-	See Section 3.3
Marking of the Site Boundary Procedure	HG-D-06-PRC-03-1416	In production
Wylfa Newydd EP-RSR Site Boundary Map	-	Issued
Management of EP-RSR Best Available Techniques	HG-D-01-PSD-02-1241	Issued
Optioneering	HG-D-01-PRC-03-795	Issued
Management of Radioactive Waste and Spent Fuel	HG-S-07-PSD-02-1420	See Section 3.2.1
Management of Environmental Discharges	-	See Section 3.2.3

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Response to the discovery of Radiological Contamination Procedure	HG-S-07-PRC-03-1408	Issued
Transport Process System Description	-	See Section 3.2.2
Management of Environmental Functions and eSSC	HG-D-01-PSD-02-1303	In production
Examination Inspection Maintenance and Testing	-	In production [RD31]
Commissioning Procedure	HG-D-07-PSD-02-395	Issued
Hold Point Control Process	HG-M-04-PSD-02-121	Issued
Health and Safety Management	HG-S-06-PSD-02-176	Issued
Environmental Management within Horizon	-	Issued
Handling Safety Health & Environmental Communications	HG-S-06-PSD-03-314	Issued
Management of GDA Assessment Findings Process	HG-D-01-PRC-03-1354	Issued
Management of Records Process System Description	HG-S-04-PSD-02-850	Issued

Table A2 Horizon Arrangements for EP-RSR Permit Part 2

Document Title	Document No	Status
Management of Environmental Monitoring	-	See Section 3.2.4
Management of Radioactive Waste and Spent Fuel	HG-S-07-PSD-02-1420	See Section 3.2.1
Management of Environmental Discharges	-	See Section 3.2.3
Response to the discovery of Radiological Contamination Procedure	HG-S-07-PRC-03-1408	Issued
Management of EP-RSR Best Available Techniques	HG-D-01-PSD-02-1241	Issued
Transport Process System Description	-	See Section 3.2.2
Management of Records	HG-S-04-PSD-02-850	Issued
Operating Instructions	-	See Section 3.3
Document Control	HG-S-04-PSD-02-335	Issued
Optioneering	HG-D-01-PRC-03-795	Issued
Regulatory Interface	HG-D-02-PSD-02-310	Issued
Basis of Design (BOD) Chapter 2.2 Plant Performance and Operations	WN001-S3-DA-SPE-00003	Issued
Basis of Design (BOD) Chapter 2.1 Safety Requirements (Nuclear, Conventional and Environmental)	WN001-S3-DA-SPE-00002	Issued
GDA Adoption Procedures	HG-D-01-PSD-02-1175	Issued
Examination Inspection Maintenance and Testing	HG-S-07-PSD-02-1382	In production [RD31]
Management of Environmental Functions and eSSC	HG-D-01-PSD-02-1303	In production

Table A3 Horizon Arrangements for EP-RSR Permit Part 3

Document Title	Document No	Status
Management of Records	HG-S-04-PSD-02-850	Issued

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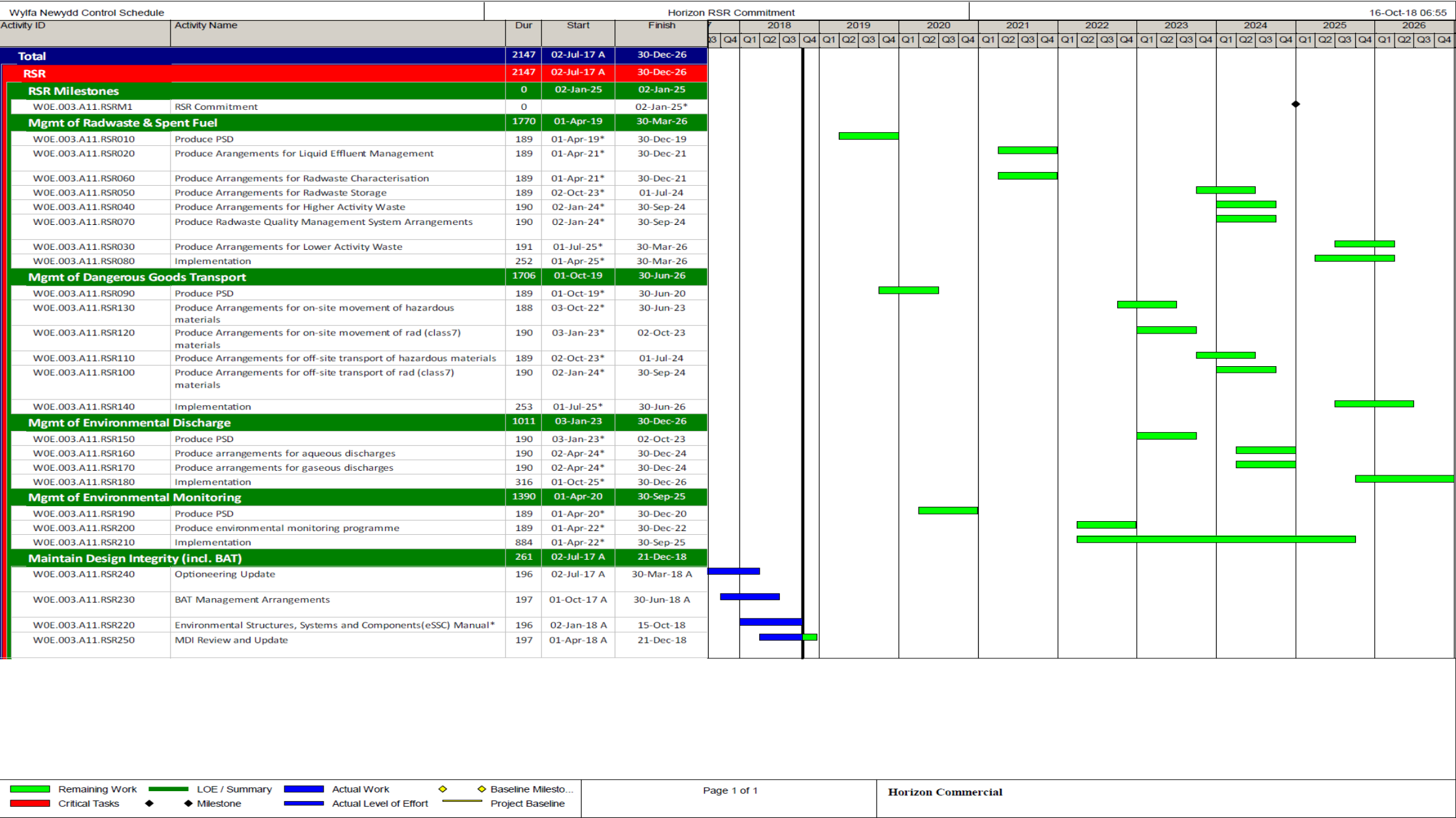
Document Control	HG-S-04-PSD-02-335	Issued
Management of Radioactive Waste and Spent Fuel	HG-S-07-PSD-02-1420	See Section 3.2.1
Management of Environmental Discharges	-	See Section 3.2.3
Records Retention Schedule	HNP-S2-DCRM-SCH-00012	Issued
Regulatory Interface	HG-D-02-PSD-02-310	Issued
Initial Notification	HG-M-05-PRC-03-1261	Issued
Management of Environmental Monitoring	-	See Section 3.2.4
Management of ONR Regulatory Issues and NRW Schedule 5 Notices	HG-D-02-PRC-03-1395	Issued
Management System Manual	HG-M-02-MAN-01-02	Issued
Development of Business Processes	HG-M-02-PRO-02-01	Issued
Management of Nuclear Baseline Change	HG-S-02-PRC-03-1165	Issued
Nuclear Baseline	HG-S-02-PRC-03-1193	Issued

Table A4 Horizon Arrangements for EP-RSR Permit Part 4

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Appendix B– RSR Main Arrangements Schedule



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