

DRAFT

19 December 2013

Issue: 1

PEGASUS JOINT REGULATOR / AWE RLI MINUTES

Date of meeting: 15th October 2013

Present: Julie Taylor (Chair)

AWE
AWE
AWE
ONR
ONR
ONR
AWE
AWE
EA
DNSR
AWE
AWE
AWE

1. Chair's Welcome, Introduction & Assurance Moment

- 1.1. Mrs Taylor opened the meeting by welcoming the attendees.
- 1.2. Mrs Taylor added that this meeting was a landmark moment, the outcome of which would be a new model of how AWE will actively participate and work more closely with the regulators taking on board any learning realised.
- 1.3. Mrs Taylor shared a safety moment which emanated from an e-mail received earlier that day where a member of her team had briefed Mrs Taylor on the improvements implemented following the outcome of investigations into abnormal events. Mrs Taylor was proud that positive actions had come out of these investigations improving safety by preventing reoccurrences of similar events.
- 1.4. Mr [REDACTED] raised an incident from his own experience, where he observed a visitor to the EA building carrying a bicycle up the stairs. The individual was also wearing a rucksack. The individual could have been using the lift and by failing to look after visitors to the building others were being put at risk.

2. Agree purpose of meeting

- 2.1. Mrs Taylor explained the purpose of the meeting by setting the scene of the late permissioning of Pegasus PCSR 2 inviting a discussion on the route causes involving all present as part of an RLI activity. The objective would be to improve permissioning going forward with clearly identified accountabilities for specific aspects of the process.
- 2.2. Mr [REDACTED] stated that he wished to apply the lessons learnt from this meeting to wider, future MoD permissioning activities.

3. Review of outcome of individual RLIs

- 3.1. Mr [REDACTED] stated the value of the open sharing of lessons learnt from the independent RLI exercises undertaken by both parties and suggested that the ONR start by sharing actions on themselves arising from their own internal meetings to learn and improve.

a) Regulator View

3.2. Mr [REDACTED] briefed the meeting on the methodology used for their RLI exercise. The meeting involved not only wide representation from ONR but [REDACTED] (DNSR) and [REDACTED] (EA) and focussed on regulator performance. Although the activity revealed no real surprises the value of undertaking the review was recognised by all.

3.3. A list of actions, aimed at improving engagement and delivery for AWE, had been developed (Annex A). These actions were split into three distinct areas;

- o Improvements within ONR
- o Improvements for interactions with AWE
- o Improvements for ONR interventions

Mr [REDACTED] believed most of these were within the gift of his team to deliver; however, a few will need more senior management sanction.

3.4. Following a more detailed explanation from Mr [REDACTED] of the ONR actions and some discussion (Annex A) there were resultant actions for AWE to improve interactions with the ONR.

b) AWE View

3.5. Mr [REDACTED] delivered a verbal presentation on AWE's RLI process which consisted of a meeting of interested parties from various disciplines across the business investigating AWE's contribution to the late permissioning of the project. The discussions were centred around two broad concerns:

- Pegasus permissioning took longer than planned;
- Pegasus permissioning process started later than planned.

The result was a reliability chart highlighting the issues that contributed to the late permissioning of Pegasus.

3.6. The resultant issues could be grouped into the following broad areas:

- o The need to produce a right first time safety case.
- o Documents need to be of better quality. Argument (ALARP) needs to be adequately made and potential specific issues need to be recognised and addressed.
- o Organisation and communications between different disciplines within AWE
- o Work to realistic quality plans
- o Timeliness needs to go hand-in-hand with robust design, operability, etc.
- o Project Management
- o Provision of technical managers – some diverted to broader project management.
- o Changes
- o Project has been subject to a large number of changes from the start.
- o Senior management churn
- o Continuity of senior management.

3.7 [REDACTED]

3.8 The licence instrument request letter was not appropriate. Application for a licence instrument needs to be very clear in what is being requested.

3.9 Interaction would benefit from greater use of more direct discussions rather than e-mail ping-pong.

4. Areas of Commonality/Disagreement

4.1. There was a brief discussion on clearance issues and relative security levels. Assessment expertise sometimes sat with individuals with only SC clearance, contributing to difficulties with sharing information and causing ONR delays. AWE didn't believe that this should be an issue and [REDACTED] agreed to ask security to add guidance to the briefing to be delivered to ONR in November.

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- 4.2. [REDACTED] were discussed. It was felt this was an example of poor engagement. Mr [REDACTED] stated that the decision was based on the safety classification. Accurate classification is imperative as certain standards apply which are not flexible as ONR needs to portray consistent standards across all industries.
- 4.3. It was noted that this matter would be continued in a further discussion held off-line.
- 4.4. Mrs Taylor talked about a reluctance of AWE staff to talk with ONR and relationships between projects, RICC and ONR that may have contributed to poor early engagement and asked how this could be improved going forward.
- 4.5. ONR expressed their concern over the use of [REDACTED] because so much had to be taken on trust and any vagueness caused great difficulties with permissioning. Technically use of [REDACTED] is not in line with the guidance and it is felt that their use is becoming a significant concession.
- 4.6. Areas for AWE improvement related to;
- o Early engagement, with plan
 - o Safety Case on a Page engagement
 - o Restructuring PCSRs to be argument not menu driven
 - o Prevent train of queries – have a discussion
 - o Final submission needs to be better structured
 - o Scrub down programmes – more realistic plans
 - o Provide case in bite size pieces for internal governance
 - o Include regulator notification in project change process
- 5.0 **Summary of commitments**
- 5.1 AWE will;
- o Produce safety cases that are right first time with clear structured arguments based on the “Safety Case on a Page” concept.
 - o Extract key deliverables from safety case delivery plans, enter onto hold point control plans and agree decision “banking” method with regulators.
- 5.2 Regulators will;
- o Promote early engagement and decision “banking” giving clear and unambiguous early warning of issues that might compromise permissioning.
 - o Collate queries/comments from individual assessors to form an overview and decide the most effective way of engaging with AWE on significant and underlying issues.
 - o Plan resources to facilitate early engagement.
- 5.3 It was recognised there was the need for a communications plan to roll this out.

Signed:

Date;

[REDACTED] – Technical Secretary

J Taylor - Chair

Annex A

PEGASUS PCSR2 RLI (23 AUGUST 2013) – KEY OUTCOMES
Annotated with discussions held at the joint RLI

Improvements within ONR

- 1 Early engagement with AWE needs to be identified in resource plans; ONR managers and the PMO need to support the allocation of resource to early engagement.
■ emphasised the importance of early engagement but recognised that this was not seen as a priority in ONR resourcing plans at present. This improvement would therefore need blessing from ONR senior management.
■ also said there was concern over sharing when the design was immature – how much detail is required to make a case. The need for more accurate plans to ensure ONR support at the right time was recognised and there was probably a need to include early engagement in a structured plan. There would also be a need to make sure anything submitted was of a suitable standard.
■ stated the EA also recognised the need for early engagement.
- 2 Add a new element to the Regulatory Effectiveness framework to cover major projects more explicitly.
Projects currently spread across all aspects of the ONR review and needs higher visibility. Regulatory Effectiveness designed as an internal tool. ■ expressed the view that a format more widely shared (within AWE) would be useful.
- 3 Collate queries/comments from individual assessors to form an overview and decide the most effective way of engaging with AWE on significant and underlying issues.
- 4 Use assessments of safety submissions as an 'enhanced inspection' of AWE's arrangements for LC14 and LC23; therefore any significant issues are compliance issues and ONR will write to AWE on these grounds.
This change in approach will probably need sanction from ONR senior management. May be possible to apply this methodology to MENSA PCSR3. In addition to the permissioning letter would receive a separate correspondence identifying areas that are weak or unacceptable.
- 5 Use the AWE ESH culture behaviours for RAG rating of interventions.

Improvements for interactions with AWE

- 6 Improve the wording of assessment queries using more 'open' questions and their targeting (who should receive them in AWE).
Encourage receipt of a comment sheet from ONR initiating a discussion and avoiding 'e-mail tennis'
- 7 Identify the nominated Safety Case Owner for PCSR.
Also see action 8, below. Ensure engage the right individuals and co-ordinate inputs/outputs (hour-glass model for communications).

- 8 Identify the nominated Intelligent Customers in the project.
- 9 ONR should provide briefing to AWE to improve the awareness of the expectations of the Safety Case Owners and Intelligent Customers (based on ONR published guidance).
Also need to improve AWE understanding and identification of Intelligent Customer.
- 10 ONR should receive the Acceptance Review report with formal submissions.
- 11 The project should produce a Safety Case on a Page (SCoaP).
SCoaP may need to be process-based. AWE to look at how effective and practicable this would be.

Improvements for ONR interventions

- 12 Apply a more diverse approach to interventions with the project encompassing technical/engineering level, project managers and senior management.
- 13 ONR should delve more deeply into the supply chain.
ONR objective. All licensees will get enhance scrutiny on supply chain.
- 14 ONR should undertake an intervention within the project on baselines.
Closer look to ensure resourcing on projects is adequate.

Suggested IR expand the scope of their reviews to include consideration of whether the project will deliver an operational facility.