

# Health, Safety, Security, Safeguards, Environment and Quality Strategy

November 2015





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# Introduction

Radioactive Waste Management Limited's (RWM's) vision is:

***A safer future by managing radioactive waste effectively, to protect people and the environment.***

Our mission is to:

***Deliver a geological disposal facility and provide radioactive waste management solutions.***

RWM's Corporate Strategy<sup>1</sup> describes the external factors (or strategic drivers) that influence what we need to do and how we need carry that out, and sets our overarching strategy for achieving our vision and mission. Health, safety, security, nuclear material safeguards, environmental protection and quality are of paramount importance to the achievement of our vision and mission, as reflected in our values: professional, responsible, accessible and learning.

All of the strategic drivers in our Corporate Strategy embody health, safety, security, safeguards, environmental protection and quality requirements, however it is worthwhile reiterating one:

- “The development, construction, operation and closure of a geological disposal facility will be regulated by the nuclear regulators and, among other requirements, the developer will need to obtain permits from the environmental regulator and a site licence from the Office for Nuclear Regulation to undertake these activities.

RWM will need to demonstrate to the regulators that it has the necessary capability, organisation, resources and arrangements to undertake these activities safely and securely. To do this, RWM will need to demonstrate that the geological disposal facility will protect people and the environment at the time of disposal and in the future, following closure.”

One of the elements of our Corporate Strategy flows from this strategic driver, i.e. we will:

- “Continue to engage with the regulators to ensure we have the necessary capability, organisation, resources and arrangements in place to apply for and hold environmental permits and a site licence, ahead of the time we need to apply for them.

We currently have arrangements in place for regulatory scrutiny which enable the regulators to provide advice on our organisational development, as well as on our current activities such as the provision of advice on the disposability of proposed waste packages.”

This Health, Safety, Security, Safeguards, Environment and Quality Strategy underpins our Corporate Strategy, and is an essential enabler for the achievement of our vision and mission.

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<sup>1</sup> Radioactive Waste Management Limited, Corporate Strategy 2015-2018.

## Context

As reflected in the European Directive establishing a framework for the responsible and safe management of spent fuel and radioactive waste<sup>2</sup>, geological disposal represents the safest and most sustainable option as the end point of the management of high level waste and spent fuel considered as waste. Where disposal is not available in the short term, radioactive waste should be put into a passively safe state for interim storage pending future disposal or other long-term solution<sup>3</sup>. RWM has a role in both of these outcomes, as the developer of a geological disposal facility<sup>4</sup> and through the provision of advice on the conditioning and packaging of higher activity waste for geological disposal or long-term management<sup>5</sup>. This role covers higher activity waste from both legacy and new build activities.

RWM needs the capability, organisation, resources and arrangements to implement geological disposal safely, securely and to protect the environment. Implementation will take place over many decades and the health, safety, security, safeguards, environmental and quality requirements, and the associated risks and impacts to be managed will evolve as the project progresses. The key phases in the programme can be viewed as:

- The current planning phase, involving a national geological screening exercise, explaining the science and engineering of geological disposal and developing geological disposal concepts;
- Site identification and surface-based investigation activities. During this phase environmental permits and development consent will be required before site investigation activities can commence;

Construction, operation and closure of a geological disposal facility or facilities. This will require a nuclear site licence, further environmental permits and development consent before commencement.

For the current phase, the associated risks and impacts are predominantly associated with 'office-based' activities and are therefore relatively modest. Notwithstanding this, RWM's current activities need to be undertaken taking full account of the fact that they can influence the safety, security and environmental impacts of future phases, when the risk and impact profile increases. The particular challenge presented by the need to assure environmental safety of a geological disposal facility over very long timescales after its closure and removal of institutional controls, also needs to be recognised.

Furthermore, a significant proportion of the waste to be disposed of in a geological disposal facility is being created, treated and packaged now. It is therefore important for RWM, through its work and advice, to help manage the risk that the wastes will not be suitable for, or that they will compromise the safety, security or environmental performance of a geological disposal facility or other long-term solution. RWM should also contribute more generally to the lifecycle management of higher activity wastes through working with industry and regulators to achieve high quality outcomes.

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<sup>2</sup> Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste.

<sup>3</sup> Office for Nuclear Regulation, Management of Radioactive Materials and Radioactive Waste on Nuclear Licensed Sites, NS-TAST-GD-024, May 2013.

<sup>4</sup> Department of Energy & Climate Change, Implementing Geological Disposal, A Framework for the long-term management of higher activity radioactive waste, July 2014; and Welsh Government, Welsh Government Policy on the Management and Disposal of Higher Activity Radioactive Waste, 2015.

<sup>5</sup> Office for Nuclear regulation, Natural Resources Wales, Scottish Environment Protection Agency, Environment Agency, The management of higher activity waste on nuclear licensed sites, February 2015.

# Health, Safety, Security, Safeguards, Environment and Quality Strategy

In order to achieve our vision and mission, and in a manner consistent with our values, we have adopted the following Health, Safety, Security, Safeguards, Environment and Quality Strategy, which will be applied in a risk-based and proportionate manner.

We will establish the health, safety, security, safeguards, environmental and quality standards and requirements associated with our current and future activities. We will engage with Government, regulators and industry to contribute to the development of standards and requirements where appropriate, in order to enable the effective delivery of our mission.

We will engender a culture within all employees in our organisation and supply chain that: promotes high standards of performance in health, safety, security, safeguards, quality and environmental protection; and encourages openness, a questioning attitude, a right first time approach, learning and continuous improvement.

We will ensure RWM develops so that it has the capability, organisation, resources and arrangements to effectively carry out our activities and meet high standards of health, safety, security, safeguards, environmental protection and quality. To ensure this and build confidence we will prepare in good time for future phases of our programme, demonstrate conformance with current standards and requirements and demonstrate how we intend to, or expect to, meet standards and requirements for future phases.

Our work will be underpinned by the development of a generic safety, security, safeguards and environmental case for the geological disposal system that is complete, objective, realistic and clearly sets out uncertainties and their significance. Recognising the challenge presented by the need to assure environmental safety over very long timescales, defence in depth will be provided by a disposal system that incorporates engineered and natural barriers with multiple safety functions. Substantiation of the performance of the disposal system will be provided by both qualitative and quantitative arguments, supported by the application of sound science and good engineering practice, learning from others and peer review.

To manage the risk that wastes in production will not be suitable for, or may compromise the implementation of geological disposal or other long-term solution, and also support optimised management, we will provide waste management and disposability advice that is of high quality, proportionate and clearly sets out any risks to disposal and the uncertainties. We will make clear the key role waste packages play in the safety of the geological disposal system.

RWM will ensure high standards of corporate governance and incorporate an independent oversight function to monitor and provide assurance that appropriate health, safety, security, safeguards, environmental and quality performance is achieved.

To provide confidence in our current activities and ensure we prepare in good time for future phases, we will subject our work and development as a prospective permit and licence holder, to scrutiny and peer review by the regulators and other external and international bodies. The organisation will respond to this scrutiny in a timely manner to improve performance.

## Governance

Among other responsibilities, the members of the RWM Board have both collective and individual responsibility for health and safety. The Board needs to ensure RWM complies with statutory requirements and meets appropriate health, safety, security, safeguards, environmental protection and quality standards.

The measures taken to ensure this, and support fulfilment of this Strategy, include establishment of:

- Health, Safety, Security, Safeguards, Environment and Quality Sub-committee of the Board:
  - to advise the Board with respect to ensuring RWM meets its responsibilities and accountabilities as specified in law, and in RWM's strategies, plans and management system;
- External specialist advice:
  - to provide the Board with external authoritative advice on health, safety, security, safeguards, environment and quality matters as required;
- Nuclear Safety and Environment Committee:
  - to provide authoritative advice on nuclear and radiological safety and environmental protection matters;
- Health and Safety Committee:
  - to, among other matters, discuss health and safety matters with employee representatives; and
- Health, Safety, Security, Environment and Quality Department to:
  - provide advice to RWM on health, safety, security, safeguards, environment, quality and other regulatory requirements related to the implementation of geological disposal;
  - coordinate interactions, and maintain and develop the relationship with, health, safety, security, safeguards and environmental regulators;
  - support the development a programme of scrutiny by regulators of RWM, pursuant to RWM's operation as a prospective permit and licence holder;
  - develop, promote and where appropriate, operate an integrated health, safety, security, safeguards, environment and quality management system;
  - undertake independent oversight to provide assessment and assurance of, and report on, health, safety, security, safeguards, environment and quality performance, against the appropriate standards and requirements.





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