

**UK ABWR**

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# **UK ABWR Generic Design Assessment**

## **Approach to Optimisation**



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**1. Acronyms**

ABWR	Advanced Boiling Water Reactor
AC	Atmospheric Control System
ALARA	As Low As Reasonably Achievable
BAT	Best Available Technique
BREF	Best Available Technique Reference Notes
BWR	Boiling Water Reactor
C&I	Control and Instrumentation
DECC	Department of Environment and Climate Change
GDA	Generic Design Assessment
GEP	Generic Environmental Permit
ICRP	International Commission on Radiological Protection
ICRP60	The 1990 Recommendations of the International Commission on Radiological Protection
IPPC	Integrated Pollution Prevention and Control
LLW	Low Level Waste
ONR	Office for Nuclear Regulation
OSPAR	Oslo and Paris Convention on Protection of the Marine Environment of the North East Atlantic
P&ID	Process and Information Document for Generic Assessment of Candidate Nuclear Power Plant Designs
PCSR	Pre Construction Safety Report
QMP	Quality Management Plan
REP	Radioactive Substances Regulation – Environmental Principle
RGP	Relevant Good Practice
RSR	Radioactive Substances Regulation
UK	United Kingdom

**2. References**

- [Ref-1] Environment Agency, “Process and Information Document for the Generic Assessment of Candidate Nuclear Power Plant Designs”, version 3, October 2016.
- [Ref-2] Hitachi-GE Nuclear Energy, Ltd., “Quality Management Plan (For UK ABWR GDA Project)”, GA70-1501-0007-00001 (GNQA13-0066), Rev.6, April 2015.
- [Ref-3] Hitachi-GE Nuclear Energy, Ltd., “Demonstration of BAT”, GA91-9901-0023-00001 (XE-GD-0097), Rev.G, August 2017
- [Ref-4] International Atomic Energy Agency, “Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards”, General Safety Requirements Part 3, July 2014.
- [Ref-5] “The 2007 Recommendations of the International Commission on Radiological Protection”, ICRP Publication 103, March 2007.
- [Ref-6] “Directive 2013/59/Euratom - protection against ionising radiation”, Official Journal of the European Union, December 2013.
- [Ref-7] Environment Agency, “Regulatory Guidance Series, No. RSR 2, The regulation of radioactive substances activities on nuclear licensed sites”, Version 2, August 2012.
- [Ref-8] UK Strategy for Radioactive Discharges, Department of Energy and Climate Change, 2009.
- [Ref-9] Department of Energy and Climate Change, “Statutory Guidance to the Environment Agency concerning the regulation of radioactive discharges into the environment”, 2009.
- [Ref-10] Department for the Environment, Transport and Rural Affairs, “Policy for the Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom”, March 2007.
- [Ref-11] Environmental Permitting (England and Wales) Regulations 2016.
- [Ref-12] Environment Agency, “How to comply with your environmental permit for radioactive substances on a nuclear licensed site”, GEHO0812BUSS-E-E, 478\_10, Version 2, 21 August 2012.
- [Ref-13] Environment Agency, “RSR: Principles of optimisation in the management and disposal of radioactive waste”, Issue 2, April 2010.
- [Ref-14] Department for Environment, Food and Rural Affairs, “Environmental Permitting Guidance, Radioactive Substances Regulation, For the Environmental Permitting (England and Wales) Regulations 2010”, Version 2.0, September 2011.
- [Ref-15] Environment Agency, “Criteria for setting limits on the discharge of radioactive waste from nuclear sites”, Issue 1, June 2012.
- [Ref-16] Environment Agency, “Regulatory Guidance Series, No. RSR 1, Radioactive Substances Regulation – Environmental Principles”, version 2, April 2010.
- [Ref-17] “Best Available Techniques (BAT) for the Management of the Generation and Disposal of Radioactive Wastes, A Nuclear Industry Code of Practice”, Issue 1, December 2010, Prepared on Behalf of the Nuclear Industry Safety Directors Forum.
- [Ref-18] Hitachi-GE Nuclear Energy, Ltd., “Alignment with the Radioactive Substances Regulation Environmental Principles (REPs)”, GA91-9901-0028-00001 (XE-GD-0099), Rev.F, August 2017
- [Ref-19] Hitachi-GE Nuclear Energy, Ltd., “Generic Design Development Control”, GA70-1501-0002-00001 (GNQA13-0201), Rev.14, February 2017.
- [Ref-20] Hitachi-GE Nuclear Energy, Ltd., “GDA Safety Case Development Manual”, GA10-0511-0006-00001 (XD-GD-0036), Rev.3, June 2017.

### 3. Introduction

The requirement to optimise radioactive discharges and demonstrate the application of Best Available Techniques (BAT) for the Generic Design Assessment (GDA) submission has been set out by the Environment Agency within their Process and Information Document (P&ID) [Ref-1] and has been captured within Hitachi-GE's Quality Management Plan (QMP) [Ref-2].

This report presents the methodology adopted by Hitachi-GE to demonstrate that the environmental performance associated with the practice of generating electricity from the UK ABWR is optimised, and that impacts from potentially harmful ionising radiation on members of the public and the environment are minimised. In line with Relevant Good Practice (RGP), the Claim, Argument, Evidence model is utilised.

The Claims generated as part of this process, along with their accompanying Arguments, are presented in the 'Demonstration of BAT' report [Ref-3] (also submitted for the Environment Agency's assessment). These two reports should be read in conjunction to give the fullest indication of Hitachi-GE's approach and understanding of the derivation of the Claims and Arguments submitted to the Environment Agency for assessment.

### 4. Regulatory Context

Optimisation is a key element of protecting people from the risks associated with exposure to potentially harmful ionising radiation. Optimisation applies only to radiological risks to people; other living organisms must also be protected from radiological hazards but there is no optimisation requirement.

This section explores the policy, legislative and regulatory context related to optimisation. It also identifies relevant regulatory and industry guidance available to support the development of Hitachi-GE's approach to environmental optimisation and demonstration of BAT.

#### 4.1. Principles of Optimisation

Current legislation and practices associated with radiological protection are based on the 1990 Recommendations of the International Commission on Radiological Protection (ICRP60). ICRP60 states, in the context of optimisation, that:

*In relation to any particular source within a practice, the magnitude of individual doses, the number of people exposed, and the likelihood of incurring exposures where these are not certain to be received should all be kept as low as reasonably achievable, economic and social factors being taken into account. This procedure should be constrained by restrictions to the doses to individuals ('dose constraints'), or the risks to individuals in the case of potential exposures ('risk constraints'), so as to limit the inequity likely to result from the inherent economic and social judgements (the **optimisation** of protection).*

The principles of ICRP60 that relate to optimisation have subsequently formed the basis of principles included in the international standards and directives presented in Table 4.1-1: Principles of Optimisation.

Table 4.1-1: Principles of Optimisation

Source	Summary of optimisation principles
IAEA Basic Safety Standards (GSR3 Principle 5) [Ref-4]	Protection must be optimised to provide the highest level of safety that can reasonably be achieved
International Commission on Radiological Protection (ICRP 103, 2007 Recommendations) [Ref-5]	The process of determining what level of protection and safety makes <b>exposures</b> , and the probability and magnitude of potential exposures, <b>as low as reasonably achievable, economic and societal</b> factors being taken into account
European Basic Safety Standards Directive 2013 [Ref-6]	Optimisation: Radiation protection of individuals subject to public or occupational exposure shall be optimised with the aim of keeping the magnitude of individual doses, the likelihood of exposure and the number of individuals exposed as low as reasonably achievable taking into account the current state of technical knowledge and economic and societal factors.

The OSPAR Convention for the Protection of the Marine Environment of the North East Atlantic was agreed in 1992. Countries that have either a North East Atlantic coast or discharge into the OSPAR maritime area via their rivers are Contracting Parties to the Convention. Environment agencies in the UK have a duty to implement the general requirements of the OSPAR Convention. At the 1998 Ministerial meeting of the OSPAR Commission, the Contracting Parties agreed a strategy with regard to radioactive substances with the intention of:

- **Overall objective:** *To prevent pollution of the maritime area, as defined under the Convention, from ionising radiation, through progressive and substantial reductions of discharges, emissions and losses of radioactive substances. The ultimate aim is to achieve concentrations in the environment near background values for naturally occurring radioactive substances and close to zero for artificial radioactive substances. In achieving this objective, the following issues should, inter alia, be taken into account:*
  - *legitimate uses of the sea;*
  - *technical feasibility;*
  - *radiological impacts to man and biota.*
- **Intermediate objective (2020):** *By the year 2020, the OSPAR Commission will ensure that discharges, emissions and losses of radioactive substances are reduced to levels where the additional concentrations in the marine environment above historic levels, resulting from such discharges, emissions and losses, are close to zero.*

Annex A of the strategy agreed during the 1998 Ministerial meeting provides a definition of BAT as applied to reducing discharges, emissions and losses of radioactive substances to the maritime area.

#### 4.1.1. Policy and Regulatory Requirements

The concept of BAT is used in two significant environmental regulatory regimes in England and Wales:

- Schedule 1 of the Environmental Permitting Regulations which enact the requirements of the Industrial Emissions Directive (formally the IPPC Directive), and



- Schedule 23 of the Environmental Permitting Regulations, 2016

Both regimes use the same terminology and have a similar definition for BAT. The differences between the application of BAT under the different regimes reflects the different legal and policy requirements. There is also a wide body of detailed technical standards developed for non-nuclear ('non-RSR') BAT through the European 'BREF Notes'. Such European standards are not available for RSR BAT. In RSR, a principle-based approach which is developed through consideration of the REPs and other supporting guidance [Ref-7] is adopted.

#### 4.2. Statutory Guidance and Government Policy

Government policy has evolved over many years to address the optimisation requirements placed on the UK by international obligations and treaties. Key elements of Government policy that are considered relevant to optimisation are presented in Table 4.2-1: Statutory Guidance and Government Policy relating to Optimisation.

**Table 4.2-1: Statutory Guidance and Government Policy relating to Optimisation**

Source	Summary of requirements
UK Strategy for Radioactive Discharges [Ref-8]	Implements OSPAR requirements. States that UK Government considers the unnecessary introduction of radioactivity into the environment as undesirable even if doses are low and unlikely to cause harm. States that, in setting discharge limits, the regulators will have regard to the application of BAT.
Statutory Guidance to the Environment Agency [Ref-9]	Requires the Environment Agency to pursue the objectives stated in the Strategy for Radioactive Discharges and in particular to apply a number of principles which include: <ul style="list-style-type: none"> <li>- Optimisation of protection</li> <li>- Application of limits and conditions to control discharges</li> <li>- The use of BAT</li> <li>- The use of the 'Precautionary Principle'</li> <li>- The preferred use of 'Concentrate and Contain' over 'Dilute and Disperse'</li> </ul>
Solid Low Level Waste Policy [Ref-10]	Plans required for the management of LLW at all nuclear sites. Consideration of all practicable options for the management of LLW. Use of the waste hierarchy (prevent, re-use, recycle, recover, dispose). Use of a risk-informed approach to ensure that doses to people from disposals are as low as reasonably achievable and to protect the environment.

#### 4.3. Legislation and Regulations

The disposal of radioactive waste from a nuclear licensed site in England and Wales is subject to the provisions of the Environmental Permitting (England and Wales) Regulations 2016 [Ref-11]. In the context of optimisation, Part 4 of Schedule 23 of the Regulations states that:

*In respect of a radioactive substances activity that relates to radioactive waste, the regulator must exercise its relevant function to ensure that:*

- (a) *all exposures to ionising radiation of any member of the public and of the population as a whole resulting from the disposal of radioactive waste are kept as low as reasonably achievable, taking into account economic and social factors; and*

*(b) the sum of the doses resulting from the exposure of any member of the public to ionising radiation should not exceed the dose limits set out in Article 13 of the Basic Standards Directive subject to the exclusions set out in Article 6(4) of that directive.*

These obligations are placed on the regulator who gives effect to these, and other requirements imposed by statutory guidance and Government policy, through permit conditions. The optimisation requirement is achieved by use of the permit conditions presented in Table 4.3-1.

The GDA P&ID document [Ref-1] states the requirement to undertake environmental optimisation and to demonstrate the application of BAT. The P&ID requirements are consistent with those conditions that would be included in a standard permit template that require the application of BAT ([Ref-12]). To ensure compatibility of the GEP application with all future site specific permit applications, and for consistency across the phases of the project, the BAT conditions contained within a standard permit template are used within the GDA Claim, Argument, Evidence approach. The permit conditions that require the application of BAT are therefore used to form the basis of the Claims within the Claim, Argument, Evidence model. For ease of reference, the applicable P&ID requirements are cross-referenced with the relevant BAT condition contained within the standard permit template.

**Table 4.3-1: Environmental Permit Conditions and P&ID Requirements relating to Optimisation**

No	Permit Condition	Equivalent P&ID Requirement
2.3.1	The operator shall use the best available techniques to minimise the activity of radioactive waste produced on the premises that will require to be disposed of on or from the premises.	Preventing and minimising (in terms of radioactivity) the creation of radioactive waste.
2.3.2	The operator shall use the best available techniques in respect of the disposal of radioactive waste pursuant to the permit to: (a) Minimise the activity of gaseous and aqueous radioactive waste disposed of by discharge to the environment; (b) Minimise the volume of radioactive waste disposed of by transfer to other premises; (c) Dispose of radioactive waste at times, in a form, and in a manner so as to minimise the radiological effects on the environment and members of the public.	Minimising (in terms of radioactivity) discharges of gaseous and aqueous radioactive wastes. Minimising the impact of those discharges on people, and adequately protecting other species. Minimising (in terms of mass/volume) solid and non- aqueous liquid radioactive wastes and spent fuel. The suitability for disposal of any wastes and spent fuel for which there is no currently available disposal route and how they will be managed in the interim so as not to prejudice their ultimate disposal.
2.3.3	The operator shall use the best available techniques to: (a) Exclude all entrained solids, gases and non-aqueous liquids from radioactive aqueous waste prior to discharge to the environment; (b) Characterise, sort, segregate solid and non-aqueous liquid wastes, to facilitate the disposal by optimised disposal routes	Selecting optimal disposal routes (taking account of the waste hierarchy and the proximity principle) for those wastes.

There is no statutory definition of BAT as it applies to radioactive substances activities. The Environment Agency uses the following definition of BAT [Ref-7] adopted by the Department of Energy and Climate Change (DECC) from the strategy agreed at the 1998 Ministerial meeting of OSPAR contracting parties.

- *The use of the best available techniques shall emphasise the use of non-waste technology, if available.*
- *The term "best available techniques" means the latest stage of development (state of the art) of processes, of facilities or of methods of operation which indicate the practical suitability of a particular measure for limiting discharges, emissions and waste. In determining whether a set of processes, facilities and methods of operation constitute the best available techniques in general or individual cases, special consideration shall be given to:*
  - *comparable processes, facilities or methods of operation which have recently been successfully tried out;*
  - *technological advances and changes in scientific knowledge and understanding;*
  - *the economic feasibility of such techniques;*
  - *time limits for installation in both new and existing plants; and*
  - *the nature and volume of the discharges and emissions concerned.*

- *It therefore follows that what is "best available techniques" for a particular process will change with time in the light of technological advances, economic and social factors, as well as changes in scientific knowledge and understanding.*
- *If the reduction of discharges and emissions resulting from the use of best available techniques does not lead to environmentally acceptable results, additional measures have to be applied.*
- *"Techniques" include both the technology used and the way in which the installation is designed, built, maintained, operated and dismantled.*

#### 4.4. Guidance

##### 4.4.1. Regulatory Guidance

The Environment Agency has produced a number of guidance documents to promote understanding of environmental optimisation and the application of BAT. These documents provide details of the context in which environmental optimisation is to be undertaken and define the Environment Agency's expectations of processes to be adopted to demonstrate BAT. This guidance is summarised in Table 4.4.1-1.

**Table 4.4.1-1: Guidance on Radioactive Substances Regulation and Optimisation**

Guidance Document	Summary of Contents Relevant to Environmental Optimisation
RSR: Principles of optimisation in the management of and disposal of radioactive waste [Ref-13].	Provides a definition of BAT. Defines the legal and policy framework for optimisation. Establishes the basis on which judgments have to be made. Defines principles for optimisation. Require a demonstration that BAT is being applied to achieve an optimised outcome.
Regulatory Guidance Series, No. RSR 2, The regulation of radioactive substances activities on nuclear licensed sites [Ref-7]	Guidance on how the Environment Agency regulates radioactive substances activities. Provides detailed interpretation of the radiation protection principles and comprehensive details on optimisation requirements.
Environmental Permitting Guidance, Radioactive Substances Regulation, For the Environmental Permitting (England and Wales) Regulations 2010 [Ref-14]	Guidance on understanding the permitting and other requirements specific to RSR.
Criteria for setting limits on the discharge of radioactive waste from nuclear sites [Ref-15]	States the requirement for operators to apply BAT. Identifies relevant provisions of the statutory guidance that require limits to be set based on BAT. Explains the relationship between BAT and discharge limits.
Radioactive Substances Regulation – Environmental Principles (REPs) [Ref-16]	Forms a consistent and standardised framework for technical assessments and judgements undertaken by the Environment Agency.

##### 4.4.2. Nuclear Industry Guidance

A Code of Practice and its addendum was prepared on behalf of the Nuclear Industry Safety Directors Forum [Ref-17]. The Code of Practice details the principles, processes and practices that may be used when identifying and implementing BAT for the disposal of radioactive waste under an environmental permit.

## 4.5. Approach to Environmental Optimisation

### 4.5.1. Regulatory Environmental Principles

The BAT methodology presented here is considered to be consistent with industry RGP and takes into account the relevant REPs [Ref-16]. Hitachi-GE's alignment with the REP's report [Ref-18], details the approach undertaken by Hitachi-GE to review and incorporate each of the relevant REPs within the GDA submission. This Approach to Optimisation report principally addresses the following REP:

**Principle RSMDP4** 'The best available techniques should be identified by a methodology that is timely, transparent, inclusive, based on good quality data, and properly documented.'

Through the implementation of this methodology, the following REPs will also be addressed (amongst others):

RSDMDP3, RSDMDP5, RSDMDP6, RSDMDP7, RSDMDP8, RPDP1 and ENDP2.

### 4.5.2. Hitachi-GE BAT Philosophy

The objective of Hitachi-GE's approach to environmental optimisation is to deliver the following objectives:

- Protect members of the public from exposure to potentially harmful ionising radiation and reduce any doses to ALARA;
- Protect the environment within which we operate and live;
- Enable the nuclear power station to operate efficiently;
- Enhance reputation as a 'good neighbour'; and
- Comply with regulations.

Hitachi-GE's approach is guided by the following principles:

- **Evolution of the UK ABWR design:** Boiling water reactors benefit from a long operational history, which has enabled operational feedback to inform the design. Safety, environment and operability have all influenced how the design has evolved at each design iteration. Through the application of this BAT methodology Hitachi-GE will demonstrate how the design has evolved, minimising discharges to the environment and doses to the public.
- **Integration of the BAT methodology into decision making:** There are several considerations that must be borne in mind when making decisions on the design and future operation of a nuclear power station. Some of these are directly attributed to the Office for Nuclear Regulation (ONR) requirements, for example, the reduction of worker dose to ALARA, whereas others are less specific, such as "trouble" (e.g. ease of implementation, operability and decommissioning implications) or "technology maturity". Importantly, the demonstration of BAT needs to be integrated into the project programme and decision making process.
- **Opportunity:** Recognising that the demonstration of BAT should cover the lifecycle of the plant, certain elements will be best addressed during GDA whereas others will be better managed at a site-specific level. In conjunction with future operators, Hitachi-GE has endeavoured to identify the best time to deliver elements of the programme to ensure that opportunities to further optimise the UK ABWR can be realised.

These principles will ensure that design iterations that have been demonstrated to improve performance are included within the UK ABWR design and that the requirements of the environmental permit are an integral part of decision making. Further opportunities to optimise the UK ABWR design can both be identified and subsequently realised subject to the demonstration of BAT (including the consideration of proportionality).

#### 4.6. Basis for Selecting Proposed Approach

The application of BAT to the UK ABWR design will be demonstrated through the Claim, Argument, Evidence approach. The methodology outlined here is already widely used in the nuclear and other high hazard industries in the preparation of safety cases, including that of the UK ABWR (the PCSR). This approach is also being used progressively to demonstrate environmental compliance at a number of UK nuclear industry facilities.

The approach adopted by Hitachi-GE in the application and demonstration of BAT recognises that:

- The UK ABWR design proposed within the GDA submission is an existing design for which operational experience and feedback that demonstrates the performance of waste and environmental systems is available. This experience is expected to make a significant contribution to demonstrating that BAT is being applied to optimise environmental performance and its use is consistent with guidance on environmental optimisation provided by the Environment Agency.
- The introduction of the ABWR to the UK market may require changes or refinements to the design to ensure that it meets the expectations of the regulatory community. For every element of the design that has a bearing on the generation of radioactive waste or the management of radioactive waste disposals and discharges, the question will be asked: *“Is there anything further that can be done?”* The answer will be provided within the Evidence section of the Demonstration of BAT and will consider proportionality (Section 5.8).

The approach set out within this document is considered by Hitachi-GE to reflect RGP within the UK nuclear industry for the delivery of environmental optimisation on large nuclear new build projects. The proposed methodology for demonstrating the application of BAT will enable Hitachi-GE to deliver a ‘Demonstration of BAT’ report that will achieve the following:

- Adoption of operational experience that demonstrates that the existing design has evolved through a number of design iterations, with the reduction of waste generation and discharges at the heart of the evolutionary process.
- Identification of opportunities to further optimise the UK ABWR and demonstration of those options that should be implemented, considering proportionality.
- A robust, defensible and transparent demonstration of compliance with the optimisation requirements of the P&ID and RSR Environmental Permit conditions that require the application of BAT.
- Efficient and effective transfer of knowledge between the GDA submission and future applications by an operator for a site-specific permit.
- Consistent approaches/methodologies for the Demonstration of BAT and the safety case.

### 5. UK ABWR BAT Methodology

Hitachi-GE has developed a methodology for demonstrating the application of BAT which breaks the process down into the main BAT-related permit conditions. Hitachi-GE will therefore be able to demonstrate that it has done everything possible (considering proportionality) to:

- Prevent and minimise (in terms of radioactivity) the creation of radioactive waste;
- Minimise (in terms of radioactivity) discharges of gaseous and aqueous radioactive wastes;
- Minimise the impact of those discharges on people, and adequately protect other species;
- Minimise (in terms of mass and volume) solid and non-aqueous liquid radioactive wastes and spent fuel;

- Select the optimal disposal routes (taking account of the waste hierarchy and the proximity principle) for those wastes; which also includes the suitability of disposal for those wastes where there is currently no available disposal route.

An overview of the BAT methodology employed is outlined in Figure 5-1.

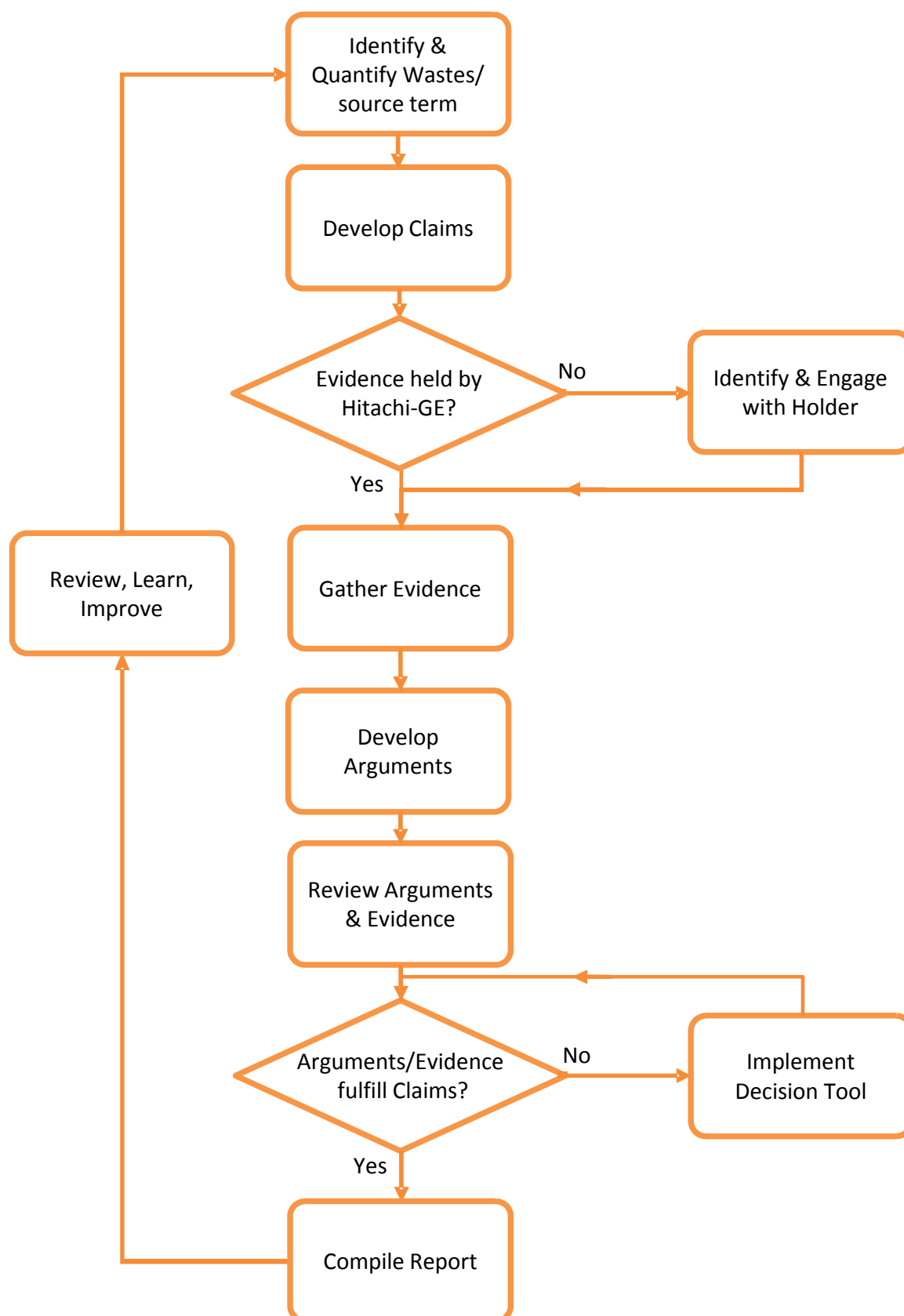


Figure 5-1: Methodology for Demonstrating the Application of BAT



**5.1. Identification and Quantification of Radioactive Waste / Source Term**

The identification and quantification of radioactive wastes / source term stage has three objectives:

- To understand how an activity contributes to the generation of radioactive waste;
- To quantify those radioactive wastes that will be generated; and
- To identify pathways to the environment.

This information is then used as the Claim, Argument, Evidence model develops to determine the extent to which optimisation has already been achieved and what opportunities remain for further optimising the design through the application of BAT. Quantifying the radioactive wastes at the start of the process also supports the 'proportionality principle' and the identification of uncertainties that might impact on the Arguments being developed.

The source term, pathways to the environment, discharges and radioactive wastes will be identified and quantified to support the following:

- Identify where most effort should be expended in further optimising those activities that contribute to the generation of radioactive waste;
- Support the application of the waste hierarchy (prevent, reduce, reuse, recycle and dispose);
- Understand the challenge in terms of management, treatment, potential impact presented by radioactive waste and discharges;
- Determine the potential impacts of radioactive wastes and discharges on members of the public and the environment;
- Correctly design radioactive waste management systems;
- Determine the performance of radioactive waste management systems; and
- Demonstrate control.

The following characteristics of the wastes may be determined:

- Physical;
- Chemical;
- Radiological; and
- Biological.

Where gaps are identified in the Evidence to support the identification and quantification process, these will be identified as uncertainties. These uncertainties, and any associated assumptions, will be assessed to determine their potential impact on Arguments presented within the Claim, Argument, Evidence model and formulate forward actions as required. It is not appropriate to deal with some of these forward actions during GDA and they will be addressed during later phases of the project.

**5.2. Develop Claims**

For the demonstration of BAT in GDA, Hitachi-GE defines a Claim as:

- A clear statement of what will be achieved; and
- A demonstration of compliance with the requirements of the P&ID and those conditions in the RSR Environmental Permit that relate to the application of BAT.

A Claim is developed by:

- Identifying those aspects of a design that contribute to the generation of radioactive waste;

- Establishing waste streams and arisings; and
- Assessing what is required to demonstrate compliance with relevant permit conditions.

Sources of information that support the development of Claims are:

- Identification and quantification of radioactive wastes/source term;
- Environmental Permits;
- Other BAT studies; and
- Technical advisors.

An example of the Claim, Argument, Evidence model has been provided within Appendix A. This illustrates the overall structure that is used to develop the Claim, Argument, Evidence model and how multiple Arguments are used to validate a single Claim. Appendix B provides a specific example of a Claim and Argument and details the type of Evidence that would be required to substantiate the Argument. The Claim illustrates how the specific conditions of the permit and requirements of the P&ID that are being addressed are referenced and how the context of the Claim should be developed.

### **5.3. Gathering Evidence**

Evidence is information available to support the demonstration that BAT is being applied and is required to:

- Underpin Arguments;
- Allow examination and challenge; and
- Identify key gaps (uncertainties).

This methodology addresses the gathering of Evidence prior to developing the BAT Arguments. This ensures that Arguments are Evidence based. It is recognised however, that as the case develops the process of gathering evidence and developing Arguments becomes iterative.

Important considerations when gathering Evidence are:

- Where does it come from?
- How comprehensive is it?
- How applicable is it?
- How reliable is it?

These questions are used to assess the significance of uncertainties identified within the Evidence base and to assess the sensitivity of the Arguments to any assumptions that have been made within the Evidence base.

The Evidence base provided to substantiate the Arguments can include a range of sources of Evidence, including:

- Analytical data;
- Research and Development;
- Trials;
- Modelling;
- Reports;
- Records of experience;
- Engineering judgement;

- Considered opinion; and
- Output from option assessment studies (if conducted in a manner suitable for use).

In determining when more can be done, and exploring the proportionality Argument, the Evidence base can be complimented with the output from a range of tools and techniques. These tools and techniques can contribute to:

- Decision making (including options selection);
- Reducing uncertainty;
- Substantiating Arguments; and
- Demonstrating performance.

A range of tools and techniques are available, whose output will be appropriate to be used as Evidence when demonstrating the application of BAT. Some of the more commonly used tools and techniques have been listed below:

- Options assessment processes that address both BAT and ALARP [Ref-20];
- Multi-attribute decision analysis;
- Cost benefit analysis;
- Trials; and
- Value engineering.

Other tools and techniques are available. As with all tools and techniques these should be assessed to ensure that they meet the requirements of environmental optimisation and the application of BAT prior to implementation.

#### **5.4. Develop Arguments**

Arguments are a series of statements that are required to:

- Demonstrate that the series of Claims are valid;
- Draws the Evidence into a ‘story’; and
- Identify uncertainties and assumptions.

Important considerations for the preparation of Arguments are:

- One or more Argument must be established for each Claim;
- The contribution that each Argument makes to fulfilling the Claim must be determined;
- The Evidence that is important to the Argument must be identified; and
- The impact of uncertainties/assumptions must be described.

Sources of information that can assist in the preparation of Arguments are:

- RGP;
- Reports;
- Discussions and debate;
- Experience; and
- Historical information.

Each Argument shall contain:

- A short description of the context/issue and why it is important to the application of BAT.
- A discussion on how relevant features of the UK ABWR contribute (or not) to delivering environmental performance.
- A statement that clearly articulates what has been achieved.
- Comments on gaps, uncertainties, observations and actions.

An example Argument is provided within Appendix B.

### 5.5. Review, Learn and Improve

The ‘review, learn and improve’ process will monitor the ability of this ‘Approach to Optimisation’ to achieve its intended results, supporting the demonstration that the generic design of the UK ABWR fulfils UK and international expectations with regard to environmental optimisation and the application of BAT. The review process includes self-assessment, independent review and management system review and will enable opportunities for improvement to be identified and implemented where appropriate. The review process has been developed to deliver the following:

- To evaluate the effectiveness of processes (i.e. Approach to Optimisation) in meeting and fulfilling goals, strategies, plans and objectives;
- To determine the adequacy of work performance and leadership;
- To monitor product quality; and
- To identify opportunities for improvement.

The review process incorporates the output from a range of sources including:

- Stakeholder feedback;
- Follow-up actions from previous management reviews;
- Outputs from self-assessments and independent reviews;
- Results delivered and objectives achieved by Hitachi-GE and its processes; and
- Lessons learned from other organisations.

### 5.6. Management of Gaps and Uncertainty

The methodology recognises the iterative nature of design development and acknowledges that there will be gaps and uncertainties associated with Evidence and Arguments. The methodology requires that gaps and uncertainties are identified and their associated impact on the demonstration of BAT is understood. This allows appropriate mitigation and management measures to be put in place to ensure that such measures are delivered at the most appropriate stage of the GDA or site-specific programmes.

#### 5.6.1. Assessing the Quality of Evidence

Environmental optimisation and demonstrating the application of BAT relies on Evidence that is:

- Robust;
- Defensible; and
- Demonstrable.

The Evidence that is gathered needs to be reviewed to establish the presence and size of:

- **Gaps** - Information related to a particular subject or design element is incomplete or not available.
- **Uncertainties** - Confidence in using the information for the UK ABWR is low because it is of uncertain provenance, has not been subject to an appropriate governance process or is not directly applicable to ABWR technology.

Quality of supporting Evidence can be placed in one of three broad groups presented in order of preference:

- **Fact ('I can show')**: Evidence that can be validated and is from a reputable, auditable source.
- **Knowledge ('I know')**: Evidence based on individuals' qualifications, expertise and experience.

### 5.6.2. Determining the Impact of Gaps and Uncertainty on Arguments and Claims

The impact of gaps and uncertainties on Arguments must be determined to ascertain the need for additional work. Key considerations are:

- How important is the Evidence?
- Does the Argument rely on this Evidence?
- Can the other, existing Evidence be used to support the Argument?
- How big is the uncertainty?
- Is information missing?
- Can existing information be interpreted/extrapolated?
- Is expertise missing?

The same approach is adopted for reviewing Claims by considering gaps and uncertainties related to Arguments.

The tool presented in Figure 5.6.2-1 can be used as a simple guide when determining whether additional Evidence is required. 'Check other Evidence' requires that the current Evidence base should be revisited to determine whether there are opportunities to use existing information by direct reference or extrapolation prior to undertaking additional Evidence gathering.

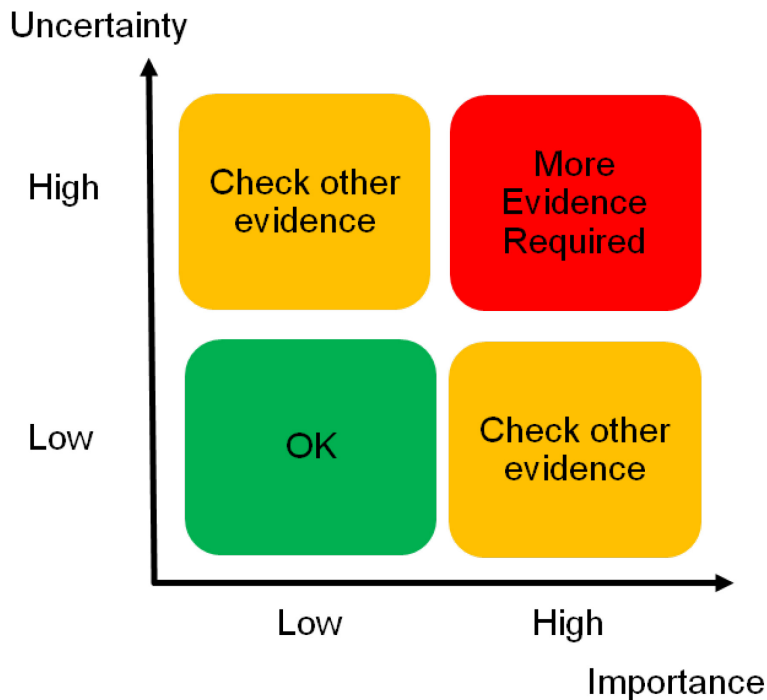


Figure 5.6.2-1: Gap/Uncertainty Tool

### 5.6.3. The Decision Tool

The decision tool is used to define the scope and timing of additional work that is necessary to fill gaps or address uncertainties. It is presented diagrammatically in Figure 5.6.3-1. The decision tool shall be used by suitably qualified experienced persons either individually or collectively. The outcomes from applying the decision tool shall be recorded and scrutinised in accordance with the project governance arrangements.

What additional Evidence is required to fill the gap or address the uncertainty in order to fully substantiate the Argument and Claim?

- Context clearly defined – why we need it
- Clear scope of work – what we need
- Focus on filling gaps or resolving uncertainty – limited to identified issues

When is the additional Evidence required in the project lifetime in order to fill the gap or address the uncertainty?

- Required immediately?
- Is it already on the project programme?
- Site specific issue?

A gap or uncertainty that requires assessment using the decision tool can include those associated with a proposed design change. It is also possible that in order to provide the required Evidence to update an Argument, the decision tool will drive a requirement for a design change.

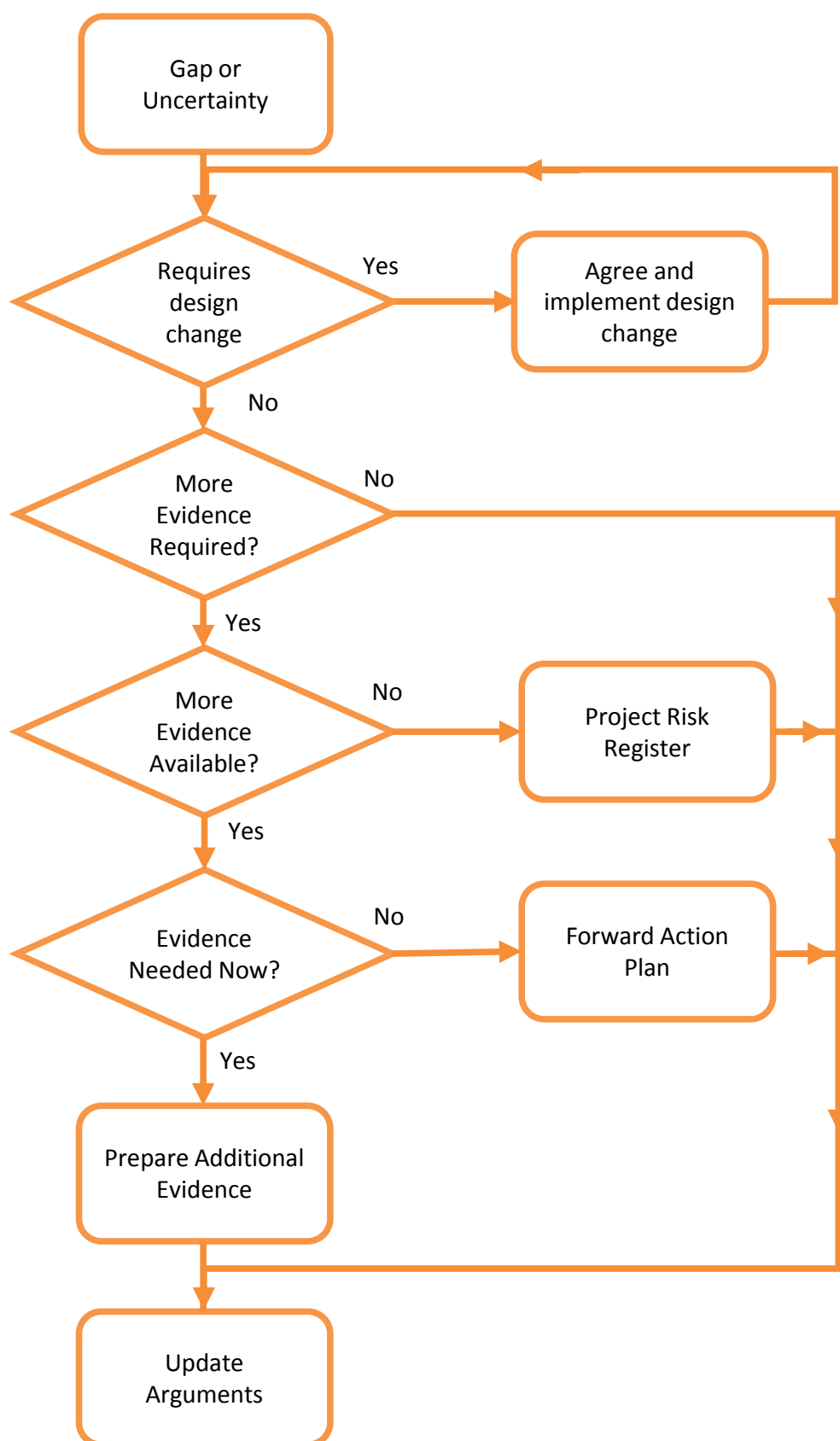


Figure 5.6.3-1: The Decision Tool

### 5.7. Forward Action Plan

The Forward Action Plan defines the scope and timing of additional work that will be delivered after the production of the Claim, Argument, Evidence model. The purpose of the Forward Action Plan is to:

- Identify future tasks that will be delivered at the most appropriate time in the programme;
- Identify the person or function responsible for discharging the action;
- Demonstrate Hitachi-GE's commitment to address identified issues; and
- Aid the definition of Assessment Findings for GDA.

### 5.8. Proportionality

The Environment Agency has indicated that it will take a proportionate approach, both to the degree of assessment that is required by themselves and operators, as well as to the techniques that they require operators to use to optimise environmental performance. In terms of proportionality the Environment Agency's guidance [Ref-13] provides the following:

*'...the point at which detriments [expressed as time, trouble and money] from implementing further techniques becomes grossly disproportionate to the benefits [expressed in reduction in dose to members of the public] gained.'*

Information obtained during the Evidence gathering process must therefore be of the type and level of detail that supports the determination of proportionality. Key considerations are:

- What has been done to date to address the issue under consideration?
- How much time, trouble and money have been invested to date?
- What benefit has been achieved [in terms of reduction in dose to members of the public]?
- What more can be done?
- What additional time, trouble and money would need to be invested to implement further improvement?
- What additional benefits would be achieved?
- How different is the return on investment for the improvement when compared to the original investment?

### 5.9. Reporting

At appropriate stages of a project's lifecycle, such as key steps in the GDA process, the Claim, Argument, Evidence model is formulated into a written account of how an organisation demonstrates the application of BAT at a given time. This written account is the Demonstration of BAT report and it shall capture the decision making process that leads to any conclusions drawn and shall include a robust consideration of the impact of any uncertainties. The iterative nature of environmental optimisation is recognised and addressed within this methodology through the review, learn and improve process. This ensures that opportunities to continue to further optimise environmental performance can be realised throughout the UK ABWR's life cycle. The Claim, Argument, Evidence model and the GDA Demonstration of BAT report shall be used by a future operator to inform the ongoing optimisation of the UK ABWR.

### 5.10. Change Management

The link between the optimised design and the demonstration of BAT presented within the Claim, Argument, Evidence model will be managed through the Generic Design Development Control [Ref-19]. Both the Demonstration of BAT and the Generic Design Development Control process are owned by the Hitachi-GE design authority. This will ensure that BAT Arguments, the techniques that deliver the operational performance demanded by the BAT Arguments, management controls and the management



system are communicated to designers, operators and managers. Any changes to the design are managed through the Generic Design Development Control process to ensure that any impact on the strength of BAT Arguments can be appropriately assessed.

Any proposed change to the generic design will be managed through Hitachi-GE's change management process. The change will need to be assessed to determine the extent it impacts on the BAT Arguments. Each change will be assessed on the following basis:

- **Positive or neutral impact:** Small assessment may be required and recorded as part of the change management process. As part of the periodic review of the Claim, Argument, Evidence model and Demonstration of BAT report this change will be incorporated within the case with the driver (e.g. safety, operability, environment, etc) for the change clearly stated.
- **Negative impact:** Detailed assessment of the change and update of the Claim, Argument, Evidence model required.

Any proposed change (positive, neutral or negative) provides an opportunity to revisit key BAT Arguments and to determine if the requirement for a change provides an opportunity for further environmental optimisation beyond that delivered by the initial approach. Any opportunities that are identified will be formally communicated to the individual/team instigating the proposed change through the Generic Design Development Control process.

## Appendix A: Example from the Claim, Argument, Evidence Model

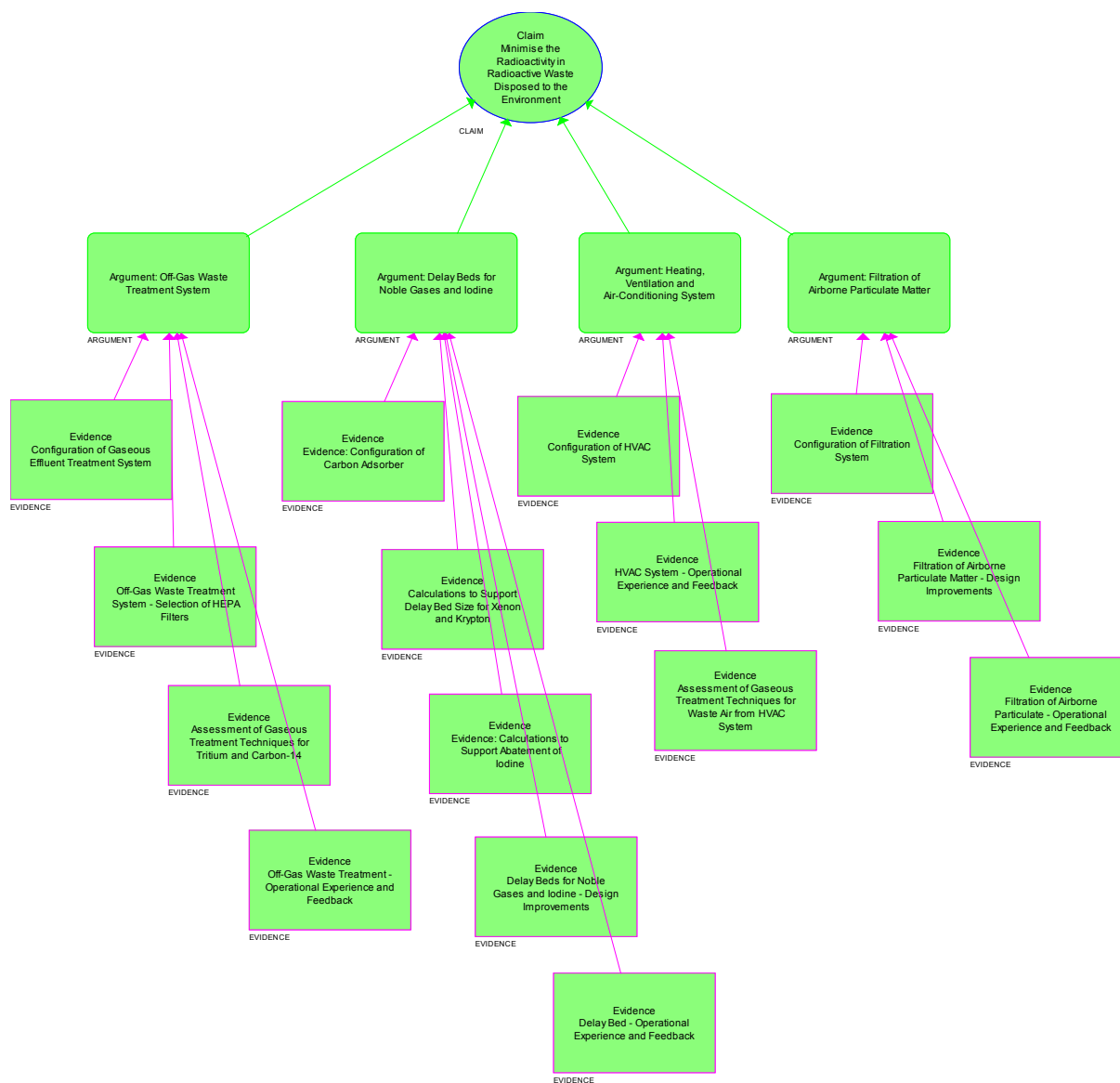


Figure A.1: Example Claim and underpinning Argument and Evidence structure

## Appendix B: Example Claim, Argument, Evidence

### Example Claim: Minimise the Radioactivity in Radioactive Waste Disposed to the Environment

The UK ABWR employs a range of features to reduce the discharge or disposal of radioactivity from those radioactive wastes that are unavoidably created during operations.

The Arguments presented in support of this Claim are considered to demonstrate compliance with the standard BAT conditions ([Ref-12]) and the relevant requirements of the P&ID ([Ref-1]) as provided below:

- Permit Condition 2.3.2(a) 'The operator shall use the best available techniques in respect of the disposal of radioactive waste pursuant to the permit to minimise the activity of gaseous and aqueous radioactive waste disposed of by discharge to the environment.'
- Permit Condition 2.3.3(a) 'The operator shall use the best available techniques to exclude all entrained solids, gases and non-aqueous liquids from radioactive aqueous waste prior to discharge to the environment.'

This is also considered to fulfil the following requirement of the P&ID:

- Minimising (in terms of radioactivity) discharges of gaseous and aqueous radioactive wastes.

The UK ABWR design contains a range of features that contribute to the substantiation of this Claim including:

- Provision of an Off-Gas system which includes processes to reduce radioactivity in the gaseous phase prior to discharge to the environment.
- Provision of a Charcoal Adsorber within the Off-Gas system to abate short-lived fission products.
- An HVAC system that prevents the uncontrolled discharge of gaseous radioactive substances.
- Recirculation systems provided with abatement techniques that minimise the amount of liquid effluent that requires disposal during the operational life of the facility.

In developing the Arguments presented to demonstrate the validity of this Claim, the REPs have been taken into account. The following REPs are considered to be specifically relevant to this Claim:

- **Principle ENDP15** 'BAT should be used to prevent and/or minimise releases of radioactive substances to the environment, either under routine or accident conditions.'
- **Principle ENDP16** 'BAT should be used in the design of ventilation systems.'
- **Principle DEDP4** 'Aerial or liquid radioactive discharges to the environment during decommissioning should be kept to the minimum consistent with the decommissioning strategy for the site.'

### Example Argument: Off-Gas Charcoal Adsorber for Noble Gases

Low concentrations of fission products such as noble gases will be present in the off-gas from the condenser. The concentration of these fission products will increase in the event of a failure in the fuel cladding. The majority of these fission products have relatively short half-lives and undergo rapid decay. Retention of the gaseous fission products in the Off-Gas system for a period prior to discharge reduces the amount of radioactivity that will enter the environment.

The design of the UK ABWR's Off-Gas system includes an Off-Gas Charcoal Adsorber whose purpose is to retain the fission products for a defined period during which they undergo radioactive decay. The chemical properties of the fission products and activated charcoal define the rate at which the fission products are

adsorbed to and de-adsorbed from the surface of the activated charcoal. The Off-Gas Charcoal Adsorber has been designed to retain isotopes of Xenon for a period of approximately 30 days and isotopes of Krypton for approximately 40 hours.

Evolution of the (A)BWR design has introduced a number of improvements to the system for retaining noble gases. These improvements have increased the length of time that noble gases are retained within the Off-Gas system from one day for all gaseous wastes to the current 30 days for isotopes of Xenon and 40 hours for isotopes of Krypton. Further improvements to this system are not considered necessary because analysis has shown that the cost associated with increasing the capacity of the Off-Gas Charcoal Adsorber is significant and the reduction in the amount of noble gases that would be discharged is very small.

#### **Example Evidence**

To substantiate the Argument that has been presented it is expected that a variety of Evidence sources will be used. This Evidence will be summarised and linked directly to the part of the Argument to which it contributes. As an example the substantiation of the delay period within the Off-Gas Charcoal Adsorber will be based on assessment of the release of radioactive noble gases to site environs. Costs associated with increasing the size or number of the charcoal adsorber units would also be provided to support the Argument that it is grossly disproportionate to further increase the delay period.