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NIA response to the Department for Business, Energy & Industrial Strategy inquiry on Civil Nuclear Constabulary: service expansion and diversification

1. The Nuclear Industry Association (NIA) welcomes the chance to respond to the Department for Business, Energy & Industrial Strategy inquiry into the service expansion and diversification of the Civil Nuclear Constabulary.
2. The NIA is the trade association and representative body for the civil nuclear industry in the UK. We represent more than 200 companies operating across all aspects of the nuclear fuel cycle. This includes the current and prospective operators of nuclear power stations, the international designers, and vendors of nuclear power stations, and those engaged in decommissioning, waste management and nuclear liabilities management.
3. Some of our members may choose to make their own detailed submissions so therefore our response is a high-level overview of the nuclear sector's thoughts on this issue.

Overview

4. The NIA is broadly supportive of the Government's proposals to change the remit of the Civil Nuclear Constabulary (CNC), including the recommendation to choose '*Option 4 – Service Expansion and Assistance*'.
5. However, we must emphasise that all changes to the CNC should not negatively affect its first priority - the effective protection of UK nuclear sites. Therefore, the Government must look to develop robust frameworks and accountability procedures to ensure that expansion plans are not favoured by the CNC when distributing work.
6. Key to this will be maintaining close relationships with relevant nuclear site holders covered by the CNC and the Office for Nuclear Regulation going forward, and the ability for these stakeholders to continue to input into the CNC's future work and strategy. We see their support as essential to expansion plans due to the potential severity of issues caused by improper staffing at these sites.
7. The NIA appreciates that high attrition rates could affect the ability of the CNC to fulfil role as experience and consistency in numbers on the workforce is key to ensuring the safety of the sites. As a sector that prides itself on providing stable and highly

skilled jobs, we support the CNC's ambitions to provide a better environment for its workforce.

8. As well as an update to the CNC's remit, the NIA would like the Government to consider the CNC's role as the shape of the UK nuclear sector evolves. In the next decade, the UK will likely see Advanced Nuclear Technologies as a widespread feature of the nuclear landscape.
9. This poses two important questions:
 - With a shorter construction period, the CNC must be able to adapt to increase in responsibilities at a quicker pace – has this been thought about and will this affect the proposed or future plans?
 - Nuclear clusters will become more physically widespread across the UK – is this perceived positively or negatively by the Government and CNC? Impact assessments must be done in time for these changes.
10. We would welcome the opportunity to feedback into further development of these plans and reiterate the need more continued collaboration with the nuclear industry going forward.