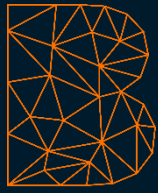


\$4 million off the annual insurance premium



Berwicks

Berwicks turn a failed regulatory inspection to best in class

A global manufacturer of civil nuclear fuel was at risk of losing its licence to operate. Two months later it passed its inspection and the regulator called its emergency arrangements the best it had ever seen.



2 months

Review to trained teams

License

Protected after a failed inspection

Verdict

Best ever seen by the Regulator

Proven

Capability tested in a real site emergency

Why this matters

Regulated operators rarely fail an inspection because the engineering is weak. They fail because the right information does not reach the right people quickly enough, and because the teams that have to decide under pressure were never properly built.

In a licensed nuclear business that gap is not a training issue. It is a threat to the licence itself.

IMPORTANT QUALIFICATION

Client and regulatory comments are reported as they were given to Berwicks following the compliance inspection and the subsequent site emergency. The client is not named at their request. Timescales reflect the actual programme delivered on site.

THE CLIENT

Designs, manufactures and delivers fuel for nuclear power plants serving a global market

SITE	The same 75-hectare industrial site since 1946.
REGULATORY STATUS	Top tier COMAH and a nuclear licensed site.
LICENSE SCOPE	Operations up to 100% U-235 enrichment across fuel fabrication and nuclear materials management.
THE PROBLEM	Emergency response capability fell short of the regulatory standard. The business failed its inspection and its licence to operate was at risk.

What the Berwicks review found

Berwicks put an expert team on the ground, consultants who have spent years designing emergency response processes and training. The first stage was a critical review of the emergency plans and facilities, staff interviews, response processes and role holder training, alongside observation of two live exercises with different teams.

THE REVIEW

A cumbersome process that failed to give decision makers accurate, valid, useful and timely information

INFORMATION DISPLAYS	Did not do the one job they exist for, which is shared situational awareness.
DECISION MAKING	Inconsistent from team to team and from scenario to scenario.
TEAMWORK	Poor teamwork skills across the response organisation.
TRAINING	Individual and team training were both inadequate.

Our Approach

The business needed change quickly, but it could not afford disruption to operations and it did not need its workable arrangements torn up. The solution balanced all three. The entire change process took just over two months.

How the work was sequenced

1	Gap analysis Identify the real issues through review, interviews and observed exercises rather than assumption.
2	Solution design Adopt a process already in common use across the nuclear industry, including by the regulator's own inspectors, then tailor it to the client.
3	Process change Rebuild how incident information is captured, displayed and shared in the Emergency Control Centre.
4	Targeted training Train every team and every role holder on the new process over a few short weeks.
5	Embedding Keep refining the capability and training new responders so it survives beyond the inspection.

Where the value was created

- **Regulatory standing restored.** The client passed its compliance inspection and removed the threat to its licence.
- **Better informed decisions.** Emergency Control Centre (ECC) leaders received relevant, actionable information and could track the progress of a response even in highly complex scenarios.
- **Shared situational awareness.** Hazards and risks were visible to the whole team, not held by individuals.
- **Time and space to think.** The emergency leadership team could engage stakeholders and deliver on its objectives instead of chasing information.
- **Minimal disruption.** Workable parts of the existing arrangements were kept, so the business carried on operating throughout.
- **Capability that stayed.** Skills were embedded in the organisation rather than left with the consultant.

Before and after

MEASURE	BEFORE	AFTER
Regulatory position	Failed inspection, licence at risk	Passed, and set a new benchmark
ECC information management	Cumbersome and unreliable	Industry standard process, tailored
Situational awareness	Fragmented across the team	Shared and current
Decision making	Inconsistent	Consistent and better informed

MEASURE	BEFORE	AFTER
Teamwork and training	Inadequate	Trained teams and trained role holders
Regulator confidence	Under scrutiny	The best they had ever seen
Real world performance	Untested	A live emergency handled without escalation
Organisational outcome	Friction, tension and low morale	Collaboration, shared purpose and stronger capability

The proof came sooner than anyone wanted

Several months after the successful inspection the client suffered a real site emergency, a failure in a filtration system with potentially serious off-site consequences.

The on-duty team responded as they had been trained. They applied the new ECC processes, brought the situation under control, prevented escalation and moved into recovery with minimal impact on the business. Police, regulators, the local authority, suppliers and the parent body were kept informed throughout. The senior leadership later credited Berwicks as the key ingredient in preparing them to manage the emergency successfully.

What the client said

Several months after the successful inspection the client suffered a real site emergency, a failure in a filtration system with potentially serious off-site consequences.

"We have been delighted with the service Berwicks have provided. Berwicks worked with us in the first instance to really understand our business and our issues before producing a gap analysis and delivering a series of training courses in emergency response and process change, specially designed for us."

"For the expertise they bring of emergency management planning and training with other regulated industries, their flexibility, their approach to working with us, and the real value they add, Berwicks have quickly become a trusted partner of ours and I would certainly recommend them to others."

Managing Director, Global Manufacturer of Civil Nuclear Fuel

The nuclear regulator was equally direct. Its inspectors said they were extremely impressed with the transformation in such a short time frame, that the emergency arrangements were now the best they had ever seen, and that they set a new benchmark for excellence in emergency response capability in the UK nuclear industry.

The return on investment question

The relevant question is not what it costs to build emergency response capability. It is what a suspended or withdrawn license would cost a business that has operated the same site since 1946 and supplies fuel to a global market.

In this case the exposure was the whole operation. It was closed out in just over two months, and the capability then paid for itself again the first time a real emergency arrived.

JOIN THE DOTS

Berwicks looks across the whole operation, builds response capability that stands up to independent scrutiny and embeds it with the people who will use it.

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