

GENERATION

NUCLEAR SECURITY

WINS Security Investment Workshop

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The Case for Security Expenditure



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UK Context & Current Trends

- Ongoing change to regulatory framework: prescription to self-determination
 - Operator ownership for the risk & the solution.
 - Efficiencies through innovation & increased self-regulation.
 - Closer alignment of safety & security - but under different legislation!
- Established Safety Regime:
 - Delivering year on year a strong safety record.
 - Fully embedded within the business culture & process.
 - Delivering effective hazard management.

..... so don't reinvent the wheel!



UK Context & Current Trends

- Security costs continue to raise beyond the inflationary expectation
 - Within EDF Generation only OPEX cost to have risen since 2016 (+£2M pa to ~ £60M pa*)
 - CAPEX / NRR costs continue to fluctuate upwards against plan (+£1M pa to ~£6M)
 - Limited ability to rebalance security funding.

* This is central funding only and does not include station EDF guarding costs and wider EDF Group cyber security mitigation costs.



Security Risk Assessment & Planning – EDF Approach

- Security...its just another hazard – risk informed decision making:
 - Security risks sit with the full spectrum of hazards the Business to required to mitigate – fully embedded within the wide business risk process & assessment
 - Security risks & performance monitored & assessed like all other risks:
 - Functional oversight / SME assurance from the centre & fleet managers
 - Lagging KPIs & performance reviews linked to established Safety & Performance Delivery Team.
 - Independent assurance (external to the line but internal to the Business)
 - External regulatory feedback
 - Other third party assessment & benchmarking
 - Threat monitoring.
- Leverage of established Safety Case and safety related processes.
 - Alignment of the Safety and Security Change Management Processes.
 - All proposed plant and security modifications have to consider the other function.
 - Bottom-line: talk a common (hazard based) language

Security Risk Assessment & Investment – Impediments

- Probabilistic (Safety hazards) Vs Deterministic (Security risks) - why?
 - Mitigations seek to achieve the same thing i.e. an Unacceptable Radiological Consequence .
 - Need a common assessment of when enough is enough / not enough based on the established (safety) barrier model.
- Self-determination must mean self–determination
 - Non-aligned regulatory principals with legal obligations.
 - Residual elements of prescription: both legal & cultural.

